

# The Careers and Enterprise – Modern Slavery Statement

## Introduction

The Careers and Enterprise Company's ("CEC") commitment to tackling modern slavery and human trafficking is part of our broader resolve to protect human rights.

This is our first Modern Slavery Statement. It has been prepared for CEC in accordance with section 54(1) of the Modern Slavery Act 2015 (the "Act") in respect of our fiscal year from April 2022 - March 2023 and sets out the steps we take to prevent modern slavery occurring within our business or our supply chains.

## 1. Organisational Structure and Supply Chains

We are the national body for careers education in England, supporting schools and colleges to deliver modern, 21<sup>st</sup> century careers education.

Our mission is to help **every** young person find their best next step.

We do this by working with both primary and secondary schools, colleges, and employers to improve careers education and secure better outcomes for young people.

Our work is at national scale and delivered through our network of Careers Hubs that bring together schools, colleges, employers, and apprenticeship providers in local areas across England, working in partnership with Mayoral and local authorities to connect with local skills needs.

We are driving a system of support for young people that has:

- A well understood and near universally adopted framework at its heart – [the Gatsby Benchmarks](#)
- Careers Leaders professionally trained who can use data and student feedback to run dynamic and impactful programmes.
- Education leaders who see the importance of careers education and champion the work
- Teachers and parents who are often the first port of call for young people, included in careers conversations and equipped to help with confidence.
- Targeted, intensive support for those young people who face the most barriers.
- Local networks connecting schools and colleges to businesses and apprenticeship providers, offering meaningful experiences to students and teachers alike.
- Careers education in the mainstream of school and college life and an important part of the local skills and economic agenda.

Our operational delivery and governance of all procurement activities is managed through our teams based in our head office in London and our field-based teams across England.

All teams report into the Senior Leadership Team, which is headed up by our CEO and with oversight from the CEC Board and its committees. Our Audit Committee has oversight of compliance with all relevant legislation including the Modern Slavery Act 2015 (the Act) and our Board sign off our modern slavery statement.

The Procurement Team conducts all CEC procurement activities, to ensure compliance with legislation

and to achieve value for money on bought-in goods and services. The majority of supplier expenditure that takes place on an annual basis is with local (Network) partners, via Grants, who have registered addresses in the UK. These grants with Network Partners came to £14.7m in the financial year 2022. In total, The CEC spent c£16m with more than fifty suppliers.

## **2. Our Supply Chains**

CEC uses a number of suppliers to support our operations and activities. These are mainly UK based and are therefore required to be compliant with UK legislation. The majority of overseas suppliers are large multinationals who are already issuing Modern Slavery Statements, leaving very few suppliers where we do not already have transparency in their controls.

Most of our suppliers provide services to support the operations of the company, ranging from marketing, logistics, recruitment, events, IT support, offices, training providers, consultants, travel and professional services. We also procure a limited amount of goods in the form of office supplies, IT hardware and other materials used in our day-to-day operations.

CEC is a consumer of services, and not products or raw materials. When compared with other industry sectors the risks associated with modern slavery in our supply chain are low. Despite this, we are committed to taking action to reduce any risks and ensure we are preventing modern slavery in our supply chains.

## **3. Policies in relation to slavery and human trafficking**

CEC's commitment to protecting human rights is embodied in a number of its policies, including, but not limited to:

- Modern Slavery Policy
- Fraud, Anti-Bribery and Gifts and Hospitality policy
- Pay Policy
- Procurement Policy
- Contract Management SOP
- Raising Concerns (Whistleblowing) Policy
- Dignity at Work Policy
- Equity, Diversity & Inclusion Policy
- Recruitment and Selection Policy
- Safeguarding policy

The CEC Modern Slavery Policy is designed to specify CEC's formal policy positions on modern slavery and determine the appropriate controls to mitigate its effects on our supply chain and business operations.

## **4. Procurement and Contractual Due Diligence**

We are updating all our procurement templates, including the Selection Questionnaire and tendering documentation to ensure these are in line with regulatory requirements around modern slavery.

The CEC works with several procurement consortia including the Crown Commercial Services and is

reassured that they are applying similar measures to their procurements and framework agreements.

We will be amending our standard terms and conditions for purchasing goods, works and services, to include an obligation to comply with the Modern Slavery Act and to pass this down to any supply chain.

It is a condition of our tendering and contracting process that all key partners and suppliers can demonstrate full adherence to key employment legislation. This aims to ensure that the welfare and well-being of all employees working or participating on our projects and programs are fully protected.

As part of our high value/risk tender processes, all key partners and suppliers are required to warrant to CEC that they are fully compliant with all employment, equality, and environmental legislation and that, where applicable, they are compliant with the annual reporting requirements contained within section 54 of the Modern Slavery Act.

## **5. Risk assessment and management**

Any breach of the Modern Slavery Act by a supplier to CEC would be a material breach of its contracts. CEC has not identified any instance of a breach of the Modern Slavery Act in its supply chain to date.

In a scenario were the CEC to have identified any instance of modern slavery in its supply chain, it would act in accordance with due process. Actions would include informing the police and terminating a contract.

In addition to existing controls, CEC's Modern Slavery Policy requires modern slavery to be considered as part of a risk-based approach during the entire contract lifecycle, including the pre-procurement and category plan development, tendering, selection, award, and post-award stages.

### **5.1 Raising Concerns**

Our Modern Slavery Policy and Safeguarding Policy contain guidance on how to raise any questions or concerns that our people may have about modern slavery in our business or supply chain. This can be done via an appropriate manager, our Human Resource function or via our whistleblowing policy and procedure.

### **5.2 Recruitment and people management**

The CEC recruitment and people management processes are designed to ensure that all prospective employees and agency staff are legally entitled to work in the UK and to safeguard employees from any abuse or coercion once in their employment.

To mitigate against this, as part of our recruitment process for employees and agency staff, we conduct checks prior to any person joining CEC. Our recruitment team looks for potential red flags for modern slavery and follows up on any irregularities which may indicate that there is an issue. The pre-screening of individuals includes identity checks (in person verification of passports and right to work documents), reference checks, right to work checks, criminal record checks (for relevant posts), and where applicable education and professional qualification checks. Employee salaries will only be paid into a bank account which is held in their name. Any concerns around modern slavery are identified, reported and appropriate action taken.

CEC is committed to ensuring that all our people are paid fairly, and we are accredited by the Living Wage

Foundation as a Living Wage employer. We ensure that all our employees in the UK are paid at least the real Living Wage. We also ensure that all staff of our suppliers who provide on-site services in our UK offices are paid the real Living Wage, including those in cleaning and maintenance services, which we have identified as areas of our supply chain that are at a higher risk of modern slavery.

## **6. Key performance indicators to measure effectiveness of steps being taken**

### **6.1 Key Performance Indicators (KPIs)**

CEC's Modern Slavery Policy specifies a number of modern-slavery-related KPIs. CEC shall monitor the following KPIs yearly:

- Percentage of all staff having completed specific modern slavery training, where the post has been identified as requiring such training to be in place.
- Percentage of all new starters having completed mandatory modern slavery training within six months of starting.
- Percentage of in-scope supplier spend for new contracts awarded with compliant / non-compliant modern slavery statements in place.

### **6.2 Monitoring and auditing**

Due to our size and complex supply, we are only able to audit in detail our supply chain to the first tier. Therefore, we intend to collaborate with others in the CCS and Central Government (e.g., DFE) to look deeper into the second and third tiers.

An assessment of existing suppliers by our Commercial team will be conducted to categorise them according to the level of modern slavery risk they represent. As our supplier base changes year on year, this categorisation will form part of the on-boarding process for all future potential suppliers.

## **7. Training on modern slavery and trafficking**

CEC has mandatory training on Modern Slavery in place for all staff as part of our compliance work. Additionally, Procurement and Contracts staff are also required to have mandatory training that specifically addresses countering modern slavery in supply chains; a course that looks at the issue of human trafficking/ethical procurement. Our Safeguarding policy further reinforces our commitment to modern slavery and trafficking and provides additional guidance for staff. It is important to note that none of our employees carry out any regulated activity with young people as part of their jobs at CEC, however we do carry out DBS checks for certain roles where appropriate, as further measures of best practice.

## **8. Future Steps**

To ensure its compliance with the Modern Slavery Act and to embed zero-tolerance policies related to human trafficking and slavery into its daily operations, The CEC is committed to developing its policies, processes, and procedures.

To facilitate effective risk management and ongoing monitoring of potential areas of higher risk, The CEC will maintain its Modern Slavery Act training programmes as well as utilize systems that facilitate ongoing monitoring of supply chains.

This document represents CEC's slavery and human trafficking statement under s. 54(1) Modern Slavery Act 2015 for the fiscal year ending on 31 March 2023 and was approved by the CEC Board in 2023.