

# Modern Slavery & Human Trafficking Statement

## Introduction

E-Qual Recruitment Ltd (“E-Qual”) recognises that all businesses, including ours, have an obligation to prevent slavery and human trafficking and will do all in its power to prevent slavery and human trafficking within its business and within the supply chains through which it operates. This is necessary to comply with the provisions of the Modern Slavery Act 2015.

Modern slavery can take many forms including the trafficking of people, forced labour, servitude and slavery. As a leading provider of recruitment services in Wales, we take our responsibility for supplying staff extremely seriously and are aware of the potential for being targeted by traffickers and unlicensed gang-masters. Our own processes around candidate engagement ensure our employees are alert to the signs of exploitation, in order that we may take the necessary action promptly and effectively should it be identified.

This statement focuses specifically on E-Qual’s compliance with the Modern Slavery Act 2015 (the Act) and highlights the steps we take to ensure there is no slavery or human trafficking occurring within our organisations or within organisations we supply staff into insofar as we can ensure this. One of our Company’s most valuable assets has always been its reputation for integrity and fairness. Maintaining this reputation within our market is an essential pre-requisite to our continued success.

## Organisation

E-Qual Recruitment Ltd, a private limited company registered in England & Wales company number 07611972, is a leading provider of temporary recruitment services to the education sector, employing over 200 people in our offices and within educational institutions (including but not limited to schools and further education colleges) across Wales. We have offices in Llanelli (6 Dragon 24, North Dock, Llanelli, Carmarthenshire, SA15 2LF) and Cardiff (Sophia House, 28 Cathedral Road, Cardiff, CF11 9LJ).

## **Our Labour Force & Supply Chain**

Complying with the Modern Slavery Act 2015 requires an ongoing review of our internal practices in relation to our labour force and our supply chains. Our core business activity is to source candidates for client schools and other education institutions. We adhere to high ethical standards and to operate in an ethical, legally-compliant and professional manner by adhering to both the REC's Code of Professional Practice, as well as the REC's Audited Education gold standard accreditation requirements. These include the requirements to adhere to all current UK legislation governing recruitment. We expect any suppliers we might engage with to promote similar standards in their own supply chain. E-Qual does not enter into any business with any other organisation, in the UK or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsive labour. Nonetheless, we do not rely on this and carry out our Recruitment, Selection and Vetting processes and procedures independently for every candidate we assess. No labour provided to the organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. E-Qual strictly adheres to the minimum standards required in relation to our responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees as part of our effort to attract, recruit and retain high quality candidates and employees.

Our supply chain includes, but is not limited to, the following types of organisations:

- Technology services
- Financial administration
- Legal administration
- Marketing and advertising services
- Payroll administration
- Education Workforce Council (EWC)
- Premises management

We consider our main exposure to the risk of slavery and human trafficking to exist indirectly with our material suppliers because some products may involve the provision of labour in a country where protection against breaches of human rights may be limited. We engage large established UK based companies for the provision of material supplies e.g. stationery and so expect that they have robust policies and procedures in place to ensure compliance with the Modern Slavery Act 2015. Periodically we undertake an exercise to ensure that all suppliers are aware of and are displaying their adherence and compliance with the Modern Slavery Act 2015. In general, we consider our exposure to risk of slavery and human trafficking to be limited.

# Our policies on Modern Slavery & Human Trafficking

E-Equal Recruitment Ltd considers modern slavery to encompass:

- human trafficking
- coerced work via mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being sold as property
- being physically constrained or having restrictions placed on freedom of movement
- being denied the right to resign following a reasonable notice period
- being paid below the national minimum wage for the workers's age

We expect all of our suppliers to adhere to the requirements of the Modern Slavery Act 2015, and to have in place a policy recognising, respecting and protecting the human rights of their employees, those of their suppliers and business partners and the communities affected by their operations. All of our employees must be free to choose to work for their employer and to leave the company upon reasonable notice. All employees must be provided with a clear contract of employment, which complies with local legislation. All employees must be treated in a fair, equal manner and with dignity and respect. Any form of discrimination, victimisation or harassment on the grounds of marital or civil partnership status, sex (inc. assignment), race (including colour, ethnic and national origin, nationality), disability, sexual orientation, having or not having dependants, religious belief or political opinion, age, trade union activity and offending background must be prohibited.

All applicable laws and industry standards on employee wages, benefits, working hours and minimum age should be adhered to, without any unauthorised deductions. Suppliers should observe the provisions of the International Labour Organization such that any young persons under the age of 18 should not be employed to work at night or for any hazardous work and their employment should not harm the young person's education, health or physical, mental, moral or social development. No young persons may be employed below the age of 16. All slavery and human trafficking laws must be complied with including, but not limited to, the UK Modern Slavery Act 2015. We and our suppliers must ensure that our operations are free from slavery and human trafficking, internally, within our supply chains & other external business relationships.

In accordance with section 54(4) of the Modern Slavery Act 2015, E-Equal has undertaken the following steps to ensure that modern slavery is not taking place:

- Training all staff to embed a zero tolerance policy towards modern slavery
- Right to work checks completed at the recruitment stage for all candidates
- No candidate can be supplied without meeting all compliance requirements which include checks to avoid the risks of modern slavery and human trafficking
- Ensures that minimum employment age is adhered to in line with the relevant legislation
- Applies the national minimum wage (NMW) thresholds in line with the relevant legislation
- Maintains regular contact with material suppliers including their understanding of, and compliance with, our expectations
- We limit the geographical scope of our operations to the UK
- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour
- We expect all companies we engage with to have suitable anti-slavery and human trafficking policies and processes
- We have systems in place to encourage the reporting of concerns and the protection of whistleblowers

## Due Diligence for Modern Slavery & Human Trafficking

E-Qual ensures strict compliance checks are carried for all candidates we supply. We verify the identity of each worker and their right to work before supply commences. We also conduct a series of vetting and compliance checks and procedures including obtaining enhanced DBS checks, checking Education Workforce Council (EWC) registrations, obtaining two written professional references, completing registration forms and carrying out in-person interviews.

All E-Qual employees have access to dedicated channels through which they may voice concerns, either through local reporting mechanisms or through the whistleblowing procedure. E-Qual is committed to protecting employees when disclosing malpractice and will ensure that all disclosures made in good faith will be treated confidentially and without fear of retaliation.

## Training

All staff within E-Qual are expected to comply with all laws and act in accordance with local guidelines and regulations and act with integrity and honesty. We have undertaken to review our policies and procedures to ensure our colleagues have access to any additional information and support they may require with regard to human trafficking, forced labour, servitude and slavery. A training module on modern slavery and human trafficking is also available to all employees.

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This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes E-Qual's slavery and human trafficking statement for the current financial year.

Date of approval: 17<sup>th</sup> May 2018

Signed:



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*Liam Rahman*

*Co-Director, E-Qual Recruitment Ltd.*