

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

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.