



EDUC8 TRAINING GROUP

Ethical Employment Policy

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1. INTRODUCTION

Educ8 Training Group (“ETG”) is one of the largest independent training providers in England and Wales. All companies within the ETG group uphold the same company Vision, Mission and Core Values and follow our group policies and procedures.

At the date of this policy these companies are:

- Educ8 Training Group Limited, registered number 10865705.
- Haddon Training Limited, registered number 04773490.
- Aspire and Learn Ltd, registered number 08784755.
- Educ8 Ltd, registered number 05059754.

Any reference to “ETG” throughout this policy includes all the companies named above.

For the purpose of this policy the reference to “Funding Bodies” includes, but is not restricted to, the Welsh Government, DfE, and local authorities.

2. Policy Statement

ETG is committed to ensuring that all workers within its organisation and throughout its supply chains are employed ethically, fairly, and in compliance with the letter and spirit of UK employment law, supported by proportionate due diligence and governance arrangements appropriate to the nature and scale of the organisation and its supply chains.

This Policy demonstrates ETG’s commitment to the Welsh Government Code of Practice – Ethical Employment in Supply Chains and supports the wider obligations under the Modern Slavery Act 2015, employment legislation, safeguarding requirements, and public sector funding conditions.

ETG recognises its responsibility as an organisation delivering publicly funded education and training to uphold the highest standards of ethical employment and to take proportionate action to prevent modern slavery, human trafficking, exploitation, and other unethical employment practices.

3. Scope

This Policy applies to:

- All employees and apprentices
- All contractors, consultants, freelancers and associates, where engaged directly or indirectly to deliver services on behalf of ETG
- All suppliers and organisations within ETG’s supply chains, including those providing goods or services directly or indirectly to ETG.

4. Key Principles

ETG is committed to ensuring that:

- All work is freely chosen, and no worker is subject to forced, bonded or involuntary labour
- Employment practices are fair, transparent, and lawful
- Workers are treated with dignity and respect, free from exploitation, discrimination or abuse
- Pay, working hours and conditions meet or exceed legal minimum standards

- Supply chain arrangements do not encourage or contribute to unethical employment practices

5. Modern Slavery and Human Rights

ETG has a zero-tolerance approach to modern slavery, human trafficking and human rights abuses.

We will:

- Take steps to identify and assess risks of modern slavery within the organisation and supply chains
- Act promptly where concerns are identified
- Work with suppliers to address and remediate issues where possible
- Report concerns to appropriate authorities where required

6. False Self-Employment and Insecure Work

ETG is committed to ensuring that individuals are engaged under the correct employment status, with employment status assessed on a case-by-case basis and reviewed where roles, working arrangements or contractual terms change.

We will:

- Not engage individuals on a self-employed or freelance basis where the reality of the relationship indicates worker or employee status, and to take corrective action where misclassification risks are identified
- Take steps to prevent false self-employment within the organisation and supply chains
- Not make unfair use of umbrella arrangements or zero-hours contracts to avoid employment rights, tax obligations, or health and safety responsibilities

Where flexible or fixed-term arrangements are used, these will be lawful, transparent, proportionate, and appropriate to the role.

7. Pay and the Living Wage

ETG is committed to fair pay practices.

We will:

- Ensure all employees are paid at least the Real Living Wage
- Encourage suppliers to adopt fair pay practices and, where relevant, to pay the Living Wage

8. Trade Union Rights and Blacklisting

ETG respects the right of all workers to:

- Join a Trade Union or collective organisation of their choice
- Engage in lawful trade union activities without fear of discrimination or detriment

ETG will:

- Not make use of blacklists or prohibited lists
- Not knowingly contract with suppliers who use blacklisting and fail to take corrective action
- Expect suppliers to respect trade union rights and freedom of association

9. Whistleblowing and Raising Concerns

ETG encourages the reporting of concerns relating to unethical or unlawful employment practices.

We will:

- Maintain a Whistleblowing Policy that enables staff to raise concerns confidentially and without fear of retaliation
- Provide a mechanism for external parties, including suppliers and workers in their supply chains, to raise concerns about unethical employment practices
- Investigate concerns promptly and take appropriate action

10. Procurement and Supply Chain Management

ETG will integrate ethical employment considerations into procurement and supplier management.

We will:

- Assess employment practices as part of procurement and tender processes
- Include ethical employment expectations within procurement documentation where appropriate
- Challenge abnormally low bids where there is a risk that low cost may result in unethical treatment of workers
- Ensure suppliers are paid promptly and within agreed terms
- Expect suppliers to sign up to the Welsh Government Code of Practice or demonstrate equivalent standards, where relevant to the nature of the goods or services provided

We will take a risk-based and proportionate approach to supply chain monitoring, focusing on areas where there is a higher risk of labour exploitation.

10. Training and Awareness

ETG will ensure that:

- Staff involved in recruitment receive appropriate training on ethical employment and modern slavery
- Training records are maintained and reviewed

11. Roles and Responsibilities

Board and Senior Leadership

The Board and Senior Leadership Team are responsible for:

- Oversight of ethical employment risks, including risks relating to employment status, insecure work, and supply chain labour practices
- Approval of the annual Modern Slavery and Ethical Employment Statement
- Ensuring appropriate resources are in place to implement this Policy

12. Monitoring and Review

This Policy will:

- Be communicated to all staff and relevant stakeholders
- Be made available to suppliers and third parties where appropriate
- Be reviewed annually to ensure continued effectiveness and compliance with legal and policy requirements