

i2eConsulting Limited

MODERN SLAVERY POLICY

Committed to preventing modern slavery, forced labour and human trafficking through ethical business practices, responsible governance and a culture of integrity.

Document Reference: I2E-MSP-001

Version: 1.0

Effective Date: April 2026

Review Date: April 2027

Approved By: Director

Organisation Details

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Document Classification

Status: Approved

Document Owner: Director

Applies To: All employees, associates, contractors, consultants, volunteers, suppliers and any individual acting on behalf of i2eConsulting Limited.

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1. Introduction

i2eConsulting Limited is committed to conducting all aspects of its business with honesty, integrity and respect for human rights. We have a zero-tolerance approach to modern slavery, forced labour, human trafficking, servitude and all forms of exploitation. We recognise our responsibility to ensure that these practices do not occur within our organisation or throughout our supply chains.

As a provider of education, skills development and employability services, we are committed to promoting ethical business practices and maintaining high standards of corporate governance. We expect the same standards from our employees, associates, contractors, suppliers, partners and all organisations with whom we conduct business.

This Modern Slavery Policy sets out the principles and measures adopted by i2eConsulting Limited to prevent modern slavery and human trafficking, ensure compliance with applicable legislation, and promote a culture of transparency, accountability and responsible business conduct.

The policy supports the organisation's commitment to safeguarding the welfare, dignity and rights of all individuals and reinforces our expectation that everyone associated with i2eConsulting Limited acts ethically and reports any concerns relating to modern slavery or human trafficking. It will be reviewed regularly to ensure it remains effective, relevant and aligned with current legislation and recognised best practice.

2. Policy Statement

i2eConsulting Limited is committed to preventing modern slavery, forced labour, human trafficking, servitude and all forms of exploitation within its organisation and supply chains. We operate a zero-tolerance approach to modern slavery and are committed to conducting all business activities ethically, transparently and in compliance with the Modern Slavery Act 2015 and all other applicable legislation.

We are committed to promoting and protecting the rights, dignity and freedom of every individual. We expect the highest standards of integrity and ethical conduct from our employees, associates, contractors, suppliers, partners and all organisations with whom we work.

To fulfil this commitment, i2eConsulting Limited will:

- Comply with all applicable legislation relating to modern slavery, human trafficking and labour rights.
- Conduct business in a manner that promotes fairness, equality and respect for human rights.
- Take reasonable steps to identify, assess and mitigate the risk of modern slavery within our operations and supply chains.
- Work with suppliers, contractors and partners who demonstrate ethical business practices and a commitment to preventing modern slavery.
- Encourage the reporting of any suspected incidents of modern slavery or unethical labour practices without fear of retaliation.

- Investigate reported concerns promptly and take appropriate corrective action where necessary.
- Promote awareness of modern slavery through communication, guidance and training where appropriate.
- Continually review and improve our policies, procedures and controls to strengthen our approach to preventing modern slavery.

Everyone associated with i2eConsulting Limited shares responsibility for upholding this policy and contributing to a working environment that promotes ethical conduct, respect for human rights and compliance with legal obligations.

3. Purpose

The purpose of this Modern Slavery Policy is to establish i2eConsulting Limited's commitment to preventing modern slavery, forced labour, human trafficking and all forms of exploitation within its operations and supply chains. The policy provides a framework for promoting ethical business practices, protecting human rights and ensuring compliance with the **Modern Slavery Act 2015** and other relevant legislation.

This policy aims to:

- Prevent modern slavery, forced labour and human trafficking in all aspects of the organisation's activities.
- Promote a culture of integrity, transparency and ethical business conduct.
- Protect the rights, dignity and wellbeing of employees, associates, learners, contractors, suppliers and other stakeholders.
- Ensure that appropriate measures are in place to identify, assess and manage the risk of modern slavery within the organisation and its supply chains.
- Provide clear guidance on the responsibilities of employees, managers, suppliers and partners in preventing modern slavery.
- Encourage the prompt reporting and investigation of any suspected incidents or concerns relating to modern slavery or human trafficking.
- Support continuous improvement through regular monitoring, review and enhancement of the organisation's policies, procedures and due diligence processes.

By implementing this policy, i2eConsulting Limited demonstrates its commitment to conducting business responsibly, upholding fundamental human rights and fostering a safe, fair and ethical working environment for everyone associated with the organisation.

4. Scope

This Modern Slavery Policy applies to all individuals and organisations associated with i2eConsulting Limited, regardless of their role or contractual relationship with the organisation. It sets out the standards of conduct expected to prevent modern slavery, forced labour, human trafficking and other forms of exploitation across our operations and supply chains.

This policy applies to:

- All employees, whether permanent, temporary, full-time or part-time.

- Directors and senior management.
- Associates, consultants and agency workers.
- Volunteers, interns and work experience participants.
- Contractors and subcontractors.
- Suppliers, service providers and business partners.
- Any individual or organisation acting on behalf of i2eConsulting Limited.

The policy covers all business activities undertaken by i2eConsulting Limited, including the delivery of education, training, employability and consultancy services, procurement processes, recruitment activities and supplier engagement.

All individuals and organisations within the scope of this policy are expected to comply with its requirements, uphold the highest standards of ethical conduct and report any concerns relating to modern slavery or human trafficking promptly. Failure to comply with this policy may result in appropriate disciplinary, contractual or legal action, depending on the nature and seriousness of the breach.

i2eConsulting Limited expects its suppliers, contractors and partners to adopt similar standards and to take reasonable steps to prevent modern slavery and human trafficking within their own organisations and supply chains.

5. Our Commitment

i2eConsulting Limited is committed to upholding the highest standards of integrity, fairness and respect for human rights in all aspects of its operations. We believe that every individual has the right to work in an environment free from exploitation, forced labour, servitude and human trafficking.

Our commitment is to ensure that modern slavery has no place within our organisation or our supply chains. We will take reasonable and proportionate steps to prevent, identify and address any risks associated with modern slavery while promoting ethical business practices and responsible procurement.

To demonstrate this commitment, i2eConsulting Limited will:

- Maintain a zero-tolerance approach to modern slavery, forced labour and human trafficking.
- Conduct business ethically and in compliance with the Modern Slavery Act 2015 and all other applicable legislation.
- Promote respect for human rights, equality and dignity in all business relationships.
- Carry out appropriate due diligence when engaging suppliers, contractors and business partners to reduce the risk of modern slavery within our supply chains.
- Encourage employees, associates, suppliers and partners to report any concerns relating to modern slavery without fear of retaliation.
- Investigate all reported concerns promptly, fairly and confidentially, taking appropriate action where necessary.
- Provide information and awareness to employees and relevant stakeholders to help them recognise and respond to the risks of modern slavery.
- Continuously review and strengthen our policies, procedures and controls to ensure they remain effective and aligned with recognised best practice.

i2eConsulting Limited expects everyone working for, with or on behalf of the organisation to share this commitment and to actively contribute to maintaining a culture of ethical conduct, transparency and accountability. Together, we are committed to protecting vulnerable individuals and ensuring that our business is conducted in a lawful, responsible and socially responsible manner.

6. Risk Assessment and Due Diligence

i2eConsulting Limited recognises that the risk of modern slavery may exist within business operations, recruitment activities and supply chains. Although we consider the overall risk to our organisation to be low due to the nature of our services, we are committed to taking appropriate and proportionate measures to identify, assess and mitigate any potential risks.

The organisation will adopt a risk-based approach to due diligence, focusing on areas where there is a greater likelihood of modern slavery occurring. Risk assessments will be reviewed periodically and updated where there are significant changes to business operations, suppliers or legislative requirements.

To manage these risks, i2eConsulting Limited will:

- Assess potential modern slavery risks when engaging new suppliers, contractors and business partners.
- Undertake appropriate due diligence before entering into significant commercial relationships.
- Encourage suppliers and contractors to operate in compliance with the Modern Slavery Act 2015 and other applicable employment and human rights legislation.
- Seek assurance, where appropriate, that suppliers maintain ethical labour practices and do not engage in forced labour, human trafficking or other forms of exploitation.
- Monitor supplier relationships and address any concerns regarding unethical or unlawful practices promptly.
- Review procurement and recruitment processes to minimise the risk of exploitation within the organisation and its supply chain.
- Maintain records of due diligence activities where appropriate and take corrective action where risks are identified.

Where evidence or reasonable suspicion of modern slavery is identified, i2eConsulting Limited will investigate the matter promptly and take appropriate action, which may include terminating business relationships, reporting concerns to the relevant authorities and implementing additional safeguards to prevent recurrence.

Through ongoing risk assessment and due diligence, i2eConsulting Limited aims to strengthen its governance, protect vulnerable individuals and ensure that its operations and supply chains remain ethical, responsible and compliant with applicable legislation.

7. Responsibilities

Preventing modern slavery is a shared responsibility. i2eConsulting Limited expects everyone working for, with or on behalf of the organisation to uphold the principles set out in this policy and to contribute to maintaining ethical business practices throughout our operations and supply chains.

Directors and Senior Management

The Directors and Senior Management are responsible for:

- Providing leadership and oversight for the implementation of this Modern Slavery Policy.
- Promoting a culture of ethical conduct and respect for human rights.
- Ensuring appropriate systems and procedures are in place to prevent modern slavery.
- Reviewing the effectiveness of this policy and approving any necessary updates.
- Taking appropriate action where instances of modern slavery or non-compliance are identified.

Managers

Managers are responsible for:

- Ensuring employees understand and comply with this policy.
- Promoting awareness of modern slavery risks within their areas of responsibility.
- Monitoring working practices and reporting any concerns promptly.
- Supporting investigations into suspected incidents of modern slavery where required.

Employees, Associates and Contractors

Employees, associates and contractors are responsible for:

- Complying with this Modern Slavery Policy and acting with integrity at all times.
- Remaining vigilant to the signs of modern slavery, forced labour and human trafficking.
- Reporting any concerns or suspicions promptly through the appropriate reporting channels.
- Cooperating fully with any investigations relating to suspected modern slavery.

Suppliers and Business Partners

Suppliers, contractors and business partners are expected to:

- Operate in compliance with the Modern Slavery Act 2015 and all applicable employment legislation.
- Maintain ethical labour practices throughout their own operations and supply chains.
- Cooperate with i2eConsulting Limited's due diligence processes where requested.
- Notify i2eConsulting Limited of any actual or suspected incidents of modern slavery that may affect their business relationship with the organisation.

By fulfilling these responsibilities, everyone associated with i2eConsulting Limited contributes to protecting human rights, maintaining ethical standards and ensuring that modern slavery has no place within our organisation or our supply chains.

8. Reporting Concerns

i2eConsulting Limited encourages all employees, associates, contractors, suppliers and business partners to report any concerns or suspicions relating to modern slavery, forced labour, human trafficking or other forms of exploitation. Prompt reporting enables the organisation to investigate concerns, protect individuals who may be at risk and take appropriate corrective action.

Individuals are not expected to investigate suspected cases themselves. Instead, they should report any concerns as soon as possible through the appropriate internal reporting channels.

Concerns may relate to, but are not limited to:

- Suspected forced or compulsory labour.
- Human trafficking or exploitation.
- Unlawful restrictions on an individual's freedom of movement.
- Poor or unsafe working conditions that may indicate exploitation.
- Withholding of wages, identity documents or employment rights.
- Any supplier, contractor or business partner suspected of engaging in unethical labour practices.

Reports should be made to the Director or another designated member of senior management. Where appropriate, concerns may also be reported through the organisation's whistleblowing procedures or directly to the relevant statutory or regulatory authorities.

i2eConsulting Limited is committed to ensuring that all reports are treated seriously, handled confidentially where possible and investigated promptly, fairly and without prejudice. No individual will suffer retaliation, victimisation or adverse treatment for raising a genuine concern in good faith, even if the concern is not ultimately substantiated.

Where an investigation confirms that modern slavery or human trafficking has occurred, the organisation will take appropriate action, which may include notifying the relevant authorities, terminating contractual relationships, implementing corrective measures and strengthening internal controls to prevent future occurrences.

9. Training and Awareness

i2eConsulting Limited recognises that training and awareness are essential in preventing modern slavery and promoting ethical business practices. We are committed to ensuring that employees, associates and individuals acting on behalf of the organisation understand the risks associated with modern slavery and are aware of their responsibilities under this policy.

The organisation will promote awareness of modern slavery by providing appropriate information, guidance and resources to help individuals recognise the indicators of exploitation and understand the procedures for reporting concerns.

To support this commitment, i2eConsulting Limited will:

- Promote awareness of modern slavery, forced labour and human trafficking across the organisation.

- Ensure that employees are informed of the organisation's zero-tolerance approach to modern slavery.
- Provide guidance on recognising the signs and indicators of modern slavery and human trafficking.
- Inform employees and relevant stakeholders of the procedures for reporting concerns or suspected incidents.
- Encourage suppliers, contractors and business partners to adopt similar standards of awareness and ethical practice within their own organisations.
- Review training and awareness activities periodically to ensure they remain effective and reflect current legislation and recognised best practice.

Modern slavery awareness will form part of the organisation's wider commitment to ethical conduct, safeguarding, equality and responsible business practices. By promoting a culture of openness and accountability, i2eConsulting Limited aims to ensure that everyone associated with the organisation understands their role in preventing exploitation and protecting human rights.

10. Monitoring, Compliance and Review

i2eConsulting Limited is committed to ensuring that this Modern Slavery Policy is effectively implemented, monitored and regularly reviewed to maintain compliance with the Modern Slavery Act 2015, other applicable legislation and recognised best practice.

The organisation will monitor the effectiveness of this policy and associated procedures to ensure that appropriate measures remain in place to prevent modern slavery, forced labour and human trafficking across its operations and supply chains.

To support effective monitoring and compliance, i2eConsulting Limited will:

- Monitor compliance with this policy across all areas of the organisation.
- Review due diligence processes and supplier relationships to identify and manage potential modern slavery risks.
- Investigate reported concerns promptly and implement appropriate corrective actions where necessary.
- Maintain appropriate records of reported concerns, investigations and actions taken.
- Periodically assess the effectiveness of this policy and related procedures to identify opportunities for improvement.
- Monitor changes in legislation, regulatory requirements and recognised best practice to ensure continued compliance.
- Report significant issues or policy breaches to senior management for appropriate action.

This Modern Slavery Policy will be formally reviewed at least annually, or sooner where there are significant changes to legislation, organisational structure, business activities or identified risks. Any revisions will be approved by senior management and communicated to employees and other relevant stakeholders.

Through regular monitoring, compliance checks and continuous review, i2eConsulting Limited aims to strengthen its commitment to ethical business practices, protect human rights and ensure that modern slavery has no place within the organisation or its supply chains.

11. Breach of the Policy

i2eConsulting Limited takes any breach of this Modern Slavery Policy seriously. Any act or omission that is inconsistent with the principles set out in this policy may damage the organisation's reputation, compromise its legal obligations and undermine its commitment to ethical business practices and the protection of human rights.

Employees, associates, contractors, suppliers or business partners who fail to comply with this policy may be subject to appropriate action, depending on the nature and seriousness of the breach.

Where a breach is identified, i2eConsulting Limited may take one or more of the following actions:

- Conduct a prompt and appropriate investigation into the alleged breach.
- Implement corrective actions to address identified weaknesses or areas of non-compliance.
- Take disciplinary action against employees in accordance with the organisation's disciplinary procedures, which may include dismissal where appropriate.
- Suspend or terminate contracts with suppliers, contractors or business partners who fail to meet the required ethical standards.
- Report suspected criminal activity, including modern slavery or human trafficking offences, to the relevant law enforcement or regulatory authorities where appropriate.
- Review and strengthen internal policies, procedures and due diligence processes to reduce the risk of future breaches.

No employee or individual acting on behalf of i2eConsulting Limited will be subjected to retaliation, discrimination or victimisation for reporting a genuine concern in good faith. However, deliberately making false or malicious allegations may result in disciplinary or contractual action.

i2eConsulting Limited is committed to addressing any breach of this policy promptly, fairly and consistently while taking all reasonable steps to prevent modern slavery and uphold the highest standards of ethical conduct throughout its operations and supply chains.

12. Declaration and Approval

i2eConsulting Limited is committed to preventing modern slavery, forced labour, human trafficking and all forms of exploitation within its operations and supply chains. This Modern Slavery Policy demonstrates the organisation's commitment to conducting business ethically, protecting human rights and complying with the requirements of the **Modern Slavery Act 2015** and other applicable legislation.

This policy has been approved by senior management and reflects i2eConsulting Limited's commitment to maintaining the highest standards of integrity, transparency and responsible business conduct. The organisation will continue to review its policies, procedures and due diligence processes to ensure they remain effective in preventing modern slavery and promoting ethical practices.

This Modern Slavery Policy will be reviewed **annually**, or sooner where significant legislative, operational or organisational changes occur, to ensure its continued suitability and effectiveness.

This document is approved for implementation and applies to all employees, associates, contractors, suppliers, business partners and individuals acting on behalf of i2eConsulting Limited.

Approved by:
Damilola Tomisin Adeyemo
Director
i2eConsulting Limited

Date of Approval: 15th April 2026

Review Date: 15th April 2027

Version: 1.0

Document Owner: Director, i2eConsulting Limited

Appendix A – Indicators of Modern Slavery

The following indicators may suggest that an individual is a victim of modern slavery, forced labour or human trafficking. While the presence of one indicator does not necessarily confirm exploitation, multiple indicators may warrant further attention and appropriate reporting.

Employment Indicators

- Individuals appear unable to leave their employment freely.
- Employees are required to work excessive hours without appropriate rest breaks.
- Wages are withheld, reduced without explanation or paid directly to another individual.
- Workers do not possess or have access to their own identity documents, passports or work permits.
- Individuals appear fearful, anxious or reluctant to speak openly about their working conditions.
- Employees have little or no control over their working arrangements or living conditions.

Behavioural Indicators

- Individuals avoid eye contact or appear intimidated when speaking.
- Someone else speaks on behalf of the individual or controls their movements.
- Individuals show signs of fear, distress, intimidation or unusual submissive behaviour.
- Workers appear isolated or have limited contact with family or friends.
- Individuals are unable to provide basic information about their employment or accommodation.

Living Conditions

- Individuals appear to be living in overcrowded or unsuitable accommodation.
- Several workers share the same residential address under suspicious circumstances.
- Living conditions appear unsafe, unsanitary or below acceptable standards.
- Workers are transported to and from work by the same individual under controlled conditions.

Recruitment and Employment Practices

- Recruitment fees have been charged to workers unlawfully.
- Workers have been deceived about the nature of their employment.
- Contracts or employment terms are withheld or not explained.
- Individuals are threatened with dismissal, deportation or violence if they refuse to work.

What to Do

If any employee, associate, contractor or partner suspects that modern slavery or human trafficking may be occurring, they should:

- Remain calm and avoid placing themselves or others at risk.
- Record any relevant information or observations where appropriate.
- Report concerns immediately in accordance with the organisation's Reporting Concerns procedure.
- Maintain confidentiality and avoid discussing the matter with unauthorised individuals.
- Cooperate fully with any investigation conducted by i2eConsulting Limited or the relevant authorities.

i2eConsulting Limited is committed to ensuring that all concerns are taken seriously, investigated appropriately and handled with sensitivity, confidentiality and respect for the rights of all individuals involved.

Appendix B – Reporting Procedure

Purpose

This procedure outlines the process for reporting suspected incidents of modern slavery, forced labour, human trafficking or other forms of exploitation. i2eConsulting Limited encourages the prompt reporting of concerns and is committed to ensuring that all reports are handled fairly, confidentially and without retaliation.

Step 1 – Recognise the Concern

If you observe or suspect that an individual may be a victim of modern slavery or human trafficking, do not ignore the situation. Be alert to the indicators outlined in Appendix A – Indicators of Modern Slavery.

Step 2 – Report the Concern

Report the concern as soon as possible to:

- The Director; or
- Your Line Manager (where applicable); or
- Another designated member of senior management.

If the concern relates to a member of management, the matter should be reported directly to the Director or the appropriate external authority where necessary.

Step 3 – Provide Relevant Information

Where possible, include the following information:

- The nature of the concern.
- The date, time and location of the incident or observation.
- The names of individuals involved (if known).
- Any evidence or observations supporting the concern.
- Any immediate risks to the safety or wellbeing of the individual concerned.

Individuals are not expected to investigate suspected incidents themselves.

Step 4 – Investigation

i2eConsulting Limited will:

- Acknowledge receipt of the concern where appropriate.
- Assess the information provided.
- Conduct a prompt, fair and confidential investigation.
- Take appropriate action based on the findings.
- Report suspected criminal activity to the relevant authorities where required.

Step 5 – Confidentiality and Protection

All reports will be handled as confidentially as reasonably possible. Individuals who report concerns in good faith will be protected from victimisation, retaliation or any detrimental treatment.

Step 6 – Record Keeping

Appropriate records of reported concerns, investigations and actions taken will be maintained in accordance with the organisation's record management and data protection procedures.

Emergency Situations

Where there is an immediate risk to the safety or welfare of an individual, the matter should be reported to the relevant emergency services or statutory authority without delay before following the organisation's internal reporting procedure.

i2eConsulting Limited is committed to ensuring that every reported concern is treated seriously, investigated appropriately and managed in accordance with legal requirements and the organisation's commitment to protecting human rights and preventing modern slavery.

Appendix C – Relevant Legislation and Guidance

Purpose

This appendix identifies the principal legislation and guidance that support i2eConsulting Limited's commitment to preventing modern slavery, protecting human rights and promoting ethical business practices.

Relevant Legislation

Modern Slavery Act 2015

The **Modern Slavery Act 2015** is the primary legislation addressing modern slavery, forced labour, servitude and human trafficking within the United Kingdom. It places responsibilities on organisations to prevent modern slavery and promotes transparency within supply chains.

Human Rights Act 1998

The **Human Rights Act 1998** incorporates the rights contained in the European Convention on Human Rights into UK law and provides legal protection for the fundamental rights and freedoms of individuals.

Employment Rights Act 1996

The **Employment Rights Act 1996** establishes key employment protections relating to fair treatment, employment rights and working conditions.

Equality Act 2010

The **Equality Act 2010** protects individuals from discrimination, harassment and victimisation and promotes equality of opportunity in the workplace.

Health and Safety at Work etc. Act 1974

This Act places a duty on employers to ensure, so far as is reasonably practicable, the health, safety and welfare of employees and others affected by their activities.

Data Protection Act 2018 and UK GDPR

These provide the legal framework for the secure and lawful processing of personal information, including information relating to investigations and safeguarding concerns.

Relevant Guidance

i2eConsulting Limited will have regard to recognised guidance and best practice, including:

- UK Government Guidance on the Modern Slavery Act 2015.
- Home Office guidance on identifying and reporting modern slavery.
- Gangmasters and Labour Abuse Authority (GLAA) guidance.
- UK Government procurement guidance relating to modern slavery and ethical supply chains.
- Relevant safeguarding and whistleblowing guidance where concerns involve vulnerable individuals.

Organisational Commitment

i2eConsulting Limited will monitor changes to relevant legislation and official guidance to ensure this policy remains legally compliant and reflects current best practice. Where legislative or regulatory changes occur, this policy will be reviewed and updated accordingly.

Appendix D – Definitions and Abbreviations

Term / Abbreviation	Definition
Modern Slavery	A collective term covering slavery, servitude, forced or compulsory labour and human trafficking, where individuals are exploited and deprived of their freedom for personal or commercial gain.
Forced Labour	Any work or service that a person is compelled to perform against their will through threats, coercion, intimidation or deception.
Human Trafficking	The recruitment, transportation, transfer, harbouring or receipt of individuals through force, coercion, fraud or deception for the purpose of exploitation.
Servitude	A situation in which an individual is required to live and work for another person and is unable to change their circumstances due to coercion or abuse of power.
Exploitation	The act of taking unfair advantage of an individual for personal, financial or commercial benefit, including labour exploitation, sexual exploitation, domestic servitude and criminal exploitation.
Supply Chain	The network of suppliers, contractors, service providers and other organisations involved in providing goods or services to i2eConsulting Limited.
Due Diligence	The process of assessing and managing risks by gathering information, conducting checks and monitoring suppliers, contractors and business partners to ensure ethical and lawful practices.
Whistleblowing	The reporting of suspected wrongdoing, unethical conduct or unlawful activities within an organisation without fear of retaliation.
Modern Slavery Act 2015	UK legislation designed to combat modern slavery, forced labour and human trafficking, while promoting transparency and accountability within organisations and their supply chains.
Human Rights	The fundamental rights and freedoms to which every individual is entitled, regardless of nationality, race, gender, religion or any other characteristic.
GLAA	Gangmasters and Labour Abuse Authority – the UK authority responsible for investigating labour exploitation and preventing worker abuse in certain sectors.
Home Office	The UK Government department responsible for immigration, security, policing and the implementation of legislation relating to modern slavery and human trafficking.
i2eConsulting	Refers to i2eConsulting Limited , a private limited company registered in England and Wales, providing employability, STEM education, skills development and career progression services.