



MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

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Title	Modern Slavery & Human Trafficking			Ref. No	
Approved by	SLT	Date	12/09/2024	Issue	2

Contents

Overview.....	2
Introduction.....	3
Organisational structure and supply chains	3
Relevant Policies.....	3
Training.....	4
Awareness Raising Programme	4

Summary of Changes

Ser	Issue	Date	Summary of changes
1	1	25/05/2021	Initial policy development
2	2	12/09/2024	Updated to new policy template

Overview

The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 came into effect on 29 October 2015 and require commercial organisations in any sector with a turnover greater than £36m per annum to produce a 'Slavery and Human Trafficking Statement' for each financial year.

A 'commercial organisation' is 'an organisation which supplies goods and services'. Turnover is calculated including subsidiaries, but subsidiaries with turnover below £36m per annum or which are not 'commercial organisations' do not need to publish a 'Slavery and Human Trafficking Statement' in their own name. MKC Training has opted to produce a statement voluntarily in its own name although not currently meeting this threshold.

If an organisation has taken no steps to ensure that modern slavery is not taking place in its business and supply chains, its Slavery and Human Trafficking Statement must state this.

If an organisation to which the requirement applies fails to produce a Slavery and Human Trafficking Statement for a particular financial year, the Secretary of State may bring proceedings in the High Court requiring the organisation to do so.

Title	Modern Slavery & Human Trafficking			Ref. No	
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Introduction

This statement sets out MKC Training's actions to understand all potential modern slavery risks related to its business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

This statement relates to actions and activities during the financial year 1 August 2024 to 31 July 2025.

As part of Further Education Sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

MKC Training is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of MKC Training, a wholly owned subsidiary of MidKent College operating in the South East of England and providing training to a wide range of students.

MKC Training operates in the United Kingdom and has a diverse supply chain covering staffing resources and operational activities including but not limited to estates management, ICT, cleaning and transport.

MKC Training is aware of its responsibility under the Act and is developing its framework to ensure its supply chain complies with the Act, and this will include policies, risk assessment, due diligence and training requirements.

Relevant Policies

MKC Training has several policies that assist in preventing slavery and human trafficking in its operations, including:

- **Public Interest Disclosure Procedure (Whistleblowing Procedure)** MKC Training encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. The Whistleblowing Procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.
- **Code of Conduct** MKC Training's Code of Conduct makes it clear to employees the actions and behaviour expected of them when representing the organisation.
- **Supplier Terms & Conditions** MKC Training is committed to ensuring that its suppliers adhere to the highest standards of ethics, and a review of its Terms & Conditions will be undertaken to ensure that suppliers are aware of their obligations under the Act and comply where necessary.
- **Staffing and Recruitment Appointment Policy and Guidelines** MKC Training uses reputable employment agencies to source labour and always

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verifies the practices of any new agency it is using before accepting workers from that agency.

- **Due Diligence** MKC Training undertakes appropriate financial and due diligence checks when considering taking on new suppliers, and regularly reviews its existing suppliers to ensure they meet their regulatory obligations.

Where applicable ie. for suppliers that meet the turnover criteria, a Supplier Assessment form is sent to our suppliers to confirm that they have policies and procedures in place to cover Modern Day Slavery, Sustainability, Equality Diversity & Inclusion, GDPR and Health & Safety. This will provide us with assurance that our supply chain is working to the required standards and compliance.

We continue to review and update the new supplier process to request suppliers to provide evidence that the organisation complies with the Act, and thereby MKC Training can seek assurance.

Additionally, an analysis is underway of our current suppliers who meet the turnover criteria, and for these organisations, a system is being implemented to gain assurance that the organisation complies with the Act or is working towards compliance.

Further ongoing work through MKC Training's procurement activities and future tender documents will include a supplier Suitability Assessment Questionnaire to seek assurance before entering new contracts.

Training

MKC Training will ensure that key staff will undertake training on modern slavery, where deemed necessary, and will engage with external training providers, as appropriate.

Awareness Raising Programme

MKC Training will continue to raise the awareness of the basic principles of the Modern Slavery Act 2015, including but not limited to:

- How employers can identify and prevent slavery and human trafficking.
- What employees can do to flag up potential slavery or human trafficking issues.
- What external help is available, for example through the Modern Slavery Helpline.