



MidKent College

Slavery and Human Trafficking Statement 2021/22

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.

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.

Introduction

This statement sets out MidKent College'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 2021 to 31 July 2022.

As part of Further Education Sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking. MidKent College 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 MidKent College, a General Further Education and Higher Education College operates in the South East of England, providing education and training and has one subsidiary company named MKC Training Services Ltd.

MidKent College has a diverse supply chain covering staffing resources and operational activities including but not limited to estates management, cleaning and transport.

MidKent College only operates in the United Kingdom and has a group turnover of £46 million in 2019 / 2020.

MidKent College 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

MidKent College has a number of policies that assist in preventing slavery and human trafficking in its operations, including:

- **Public Interest Disclosure Procedure (*Whistleblowing Procedure*)**

MidKent College 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**

MidKent College's Code of Conduct makes it clear to employees the actions and behaviour expected of them when representing the organisation.

- **Supplier Terms & Conditions**

MidKent College 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**

MidKent College uses reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due Diligence

MidKent College 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.

We will be looking into the new supplier process to request suppliers to provide evidence that the organisation complies with the Act, and thereby the College can seek assurance.

Further work will also include an analysis of the current suppliers who meet the turnover criteria, and for these organisations, a system will be put in place to gain assurance that the organisation complies with the Act or is working toward compliance, and thereby the College can seek assurance.

Additionally, through the Colleges procurement activities, future tender documents will include a supplier Suitability Assessment Questionnaire to seek assurance before entering into new contracts.

Training

MidKent College 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

MidKent College 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.

Chair Martin Cook

