



Modern Slavery and Human Trafficking Statement

1. Purpose

This statement sets out North Kent College's ("the College") 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.

The College is committed to driving out acts of modern slavery and human trafficking from within its own business and supply chains.

The College acknowledges its responsibility under the Modern Slavery Act 2015 ("the Act") and will ensure transparency is achieved within the organisation, so the objectives of the Act are achieved on a consistent basis.

The information shown below sets out practices, some of which are already in place at the College and any committed actions set for 2020/2021 in response to the introduction of the Modern Slavery Act in 2015.

2. North Kent College

North Kent College is an educational, training and employability organisation in the UK. The College has its head office in the UK has an annual turnover of over £35m (starting from August 2020).

3. Policy on Slavery and Human Trafficking

The College is committed to acquiring goods and services for its use without causing harm to others. It will make reasonable endeavours to ensure all employees and agents within its supply chains are not subject to any form of forced, compulsory/bonded labour or human trafficking and that they are paid in line with the national minimum wage.

All colleagues have a personal responsibility for the successful prevention of slavery and human trafficking with the Finance Department taking responsibility for overall compliance of College's suppliers. The Deputy Chief Executive will report annually to the College's Corporation on compliance with the Act from a procurement perspective. This statement and associated documentation will be reviewed annually, prior to North Kent College publishing its annual audit Financial Statements (incorporating the Modern Slavery Act 2015 requirements).

The following College Policies and Procedures support the organisation's compliance with the Act:

- 3.1. Recruitment Policy;
- 3.2. Equality and Diversity Policy;
- 3.3. Disclosure and Barring Scheme Policy;
- 3.4. Anti Bribery Policy; and
- 3.5. NKC Whistle Blowing Policy

4. Reporting modern slavery within the College or its suppliers

The College's whistleblowing and safeguarding and PREVENT policies are intended to provide guidance on how concerns can be communicated to the organisation. Concerns about suspected modern slavery associated with the College or its suppliers may be reported by employees in this manner. The aforementioned policies apply to employees and may be found on the College Website.

To surmise, any suspected instance of modern slavery or human trafficking within the College or its suppliers must be reported to one of the College's designated Safeguarding Officers, who will investigate and advise the appropriate people of any further actions.

The details of Safeguarding Officers are widely available to all staff members and are displayed on the back of staff ID badges, in the display stands at all campuses, and on the College website.

Communication and awareness of this policy

This policy is displayed on the College website and on the College's intranet, the policy location is conveyed to all staff members at their induction.

5. Supply Chains

The College has zero tolerance to slavery and human trafficking. It expects all those in the supply chain and its contractors to comply with these values.

To date the College has reviewed its supply chain and identified general potential areas of risk including:

- 5.1. Recruitment;
- 5.2. Security Services;
- 5.3. Food and Catering Services;

- 5.4. Construction;
- 5.5. Cleaning;
- 5.6. Stationery and Office Equipment;
- 5.7. Clothing (work wear); and
- 5.8. General Course Materials, software and equipment procured from international manufacturers.

When procuring goods, works and services in the higher risk categories, the College ensures that suppliers are required to prove a high level of corporate social responsibility during the tendering and selection process as set out within in the College Financial Regulations.).

6. Plans for the Future

The College expresses its commitment to better understand its supply chains and working towards greater transparency and responsibility towards people working on them.

Adequate resources will be made available to ensure slavery and human trafficking is not taking place within the College's organisation or within its supply chains to the best of its knowledge.

The College continuously strives to improve its programmes of education to enable social mobility and economic prosperity to the community which it serves.

North Kent College's Senior Leadership Team takes responsibility and accountability for implementing this statement and its next steps are:

- 6.1. For higher risk areas such as high volume spend with one supplier who may procure overseas to continue to ask suppliers approach to Modern Slavery within company and the supply chain;
- 6.2. Continue to review and consolidate suppliers onto public frameworks or into single suppliers via North Kent College tenders to have greater control on suppliers and review approach annually;
- 6.3. Discourage purchases from online suppliers where the source of the item is unclear as although prices may be cheap, it does not provide adequate protect against modern slavery e.g. ebay;
- 6.4. Apply due diligence to ensure business supply chains are slavery free to protect against child labour, forced labour and human trafficking, gross human rights violations, or other health and safety risks to workers; and
- 6.5. Enhance reference to modern slavery in training for staff who are purchasing or liaising with suppliers can be aware of this issue.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

Approved by Corporation Board 6th October, 2020

Signed by the Chief Executive

A handwritten signature in black ink, consisting of a stylized 'D' followed by a long, sweeping flourish that loops back to the left.