

## North Kent College

### Modern Slavery Act Statement 2025/26

This statement is made pursuant to Section 54, of the Modern Slavery Act 2015 and sets out the steps that North Kent College has taken to identify, mitigate and prevent slavery or slavery-like practices, forced labour and human trafficking from taking place in our supply chains or in any parts of North Kent College's business.

#### 1. North Kent College Organisational Structure

North Kent College was incorporated under the Further and Higher Education Act 1992 and has charitable status and so is subject to the requirements of the Charities Act. Further Education (FE) corporations are classified as 'exempt' charities. This means that they are not regulated by the Charity Commissioners but by a separate regulator - the Department for Education (DfE). The Head Office of North Kent College is Oakfield Lane, Dartford, Kent, DA1 2JT and the College Chief Executive Officer/Executive Principal as appointed by the North Kent College Corporation Board is Mr David Glead.

The College during the 2024/25 financial statement period employed on average 625 members of staff. (615 in 2023/24).

The College annual turnover for the financial period ending 31 July 2025 was £48.868m and the approximate figure that the College spent on goods and services was £13.690m.

North Kent College portfolio consists of three unique campuses, Dartford, Gravesend, Tonbridge providing further and higher education to its local Kent communities and our Hadlow College being the only land-based college in the Kent region provides a curriculum primarily covering land-based subjects including Agriculture, Horticulture, Conservation and Wildlife Management, Animal Management, Fisheries Management, Equine Studies and Floristry. All our campuses serve their local communities and together we offer a broad range of programmes, enrichment and progression opportunities.

#### 2. North Kent College Commitment

North Kent College (the College) is committed towards taking steps to identify, prevent and mitigate the risks of modern slavery, human trafficking, forced and bonded labour and labour rights violations in its supply chains. We are committed to ensuring that our activities, partnerships, our contractors and sub-contractors and all those in our supply chains comply with the Modern Slavery Act 2015.

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.

### **3. Purpose**

This statement sets out the 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.

The information shown below sets out practices, most of which are already in place at the College and continue as an on-going process through 2025/26 and beyond, in response to the introduction of the Modern Slavery Act in 2015.

### **4. 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. This statement and associated documentation will be reviewed annually, and no later than 6 months after 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:

- a. Recruitment Policy.
- b. Equality and Diversity Policy.
- c. Disclosure and Barring Scheme Policy; and
- d. Anti Bribery Policy
- e. NKC Whistle Blowing Policy
- f. Safeguarding Policy

### **5. Reporting Concerns**

The College takes all allegations of slavery and human trafficking seriously. All members of the College community including but not limited to staff, students and members of the Corporation Board, are expected to report any concerns relating to slavery or human trafficking and encourage the disclosure of information about malpractice/wrongdoing in the College. Staff and Students of the College are signposted to our advice and

policies on seeking advice and reporting concerns. <https://www.northkent.ac.uk/search?q=policies>

a. Reporting modern slavery within the College or its suppliers

The College's Whistleblowing Policy & Procedures (Public Information Disclosure Act) 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.

## **6. Steps and awareness of this policy**

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

## **7. Steps taken to identify and mitigate Modern Slavery Risks in up to 2025**

The Modern Slavery risks the College is exposed to are not unique to it and are shared across the Further and Higher Education sector.

The College has zero tolerance to slavery and human trafficking.

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

- Recruitment;
- Security Services;
- Cleaning;

- Outsourced Catering Services
- Subcontracting (Only applicable if/when the College enter into subcontracting arrangements 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).

## 8. 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.

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

- A. 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.
- B. Enhance reference to modern slavery in training for staff who are purchasing or liaising with suppliers can be aware of this issue.
- C. Ensure staff and students are aware of the risks associated with part time employment and those in high-risk categories such as agriculture, construction, personal and social health care, catering, tourism, factory work and events.

As part the College's ongoing work an the existing implementation is in place, as the college supply chain is continually evolving

### 1. Procurement & Supplier Engagement

North Kent College does not have a designated Procurement Team and as such we follow and comply with the College Financial Regulations as approved by the Corporation Board. We make our expectations clear in our Information for Suppliers. Tender processes for identified risk areas will seek compliance, where the business meets the policy requirements.

### 2. Training Providers/Subcontracting

The College will take steps to ensure that they meet the requirements as set out in the Department for Education Agreements.

### 3. Due Diligence

The College recognises that there is a level of risk associated with the supply chains of goods and services that we procure, although the risks that the College are exposed to are not unique and are shared across the wider FE and HE Sector.

#### 4. Recruitment

The College ensures all legally compliant right to work checks are undertaken and that there is robust visa and immigration related advice/assistance information provided. The College already have a robust Recruitment Policy in place which covers the following key areas:

Recruitment Policy and Procedure which specifically covers these areas:

Agency Workers  
Pre and Post Appointment Checks

#### 5. Training & Awareness

In 2022/23 a new online module was identified on this subject. For 2023/24 the training module for Modern Slavery was made a mandatory training module for all staff. This has helped improve awareness cross college, not just in the Finance team that administer and oversee most purchases for the College but wider as Procurement is locally driven by departments.

This statement was approved by the North Kent College Corporation Board on 26/03/2026

Date

Signed by:



David Gleed – Chief Executive Officer/Executive Principal for North Kent College

Action Plan including proposed new policies for implementation and due diligence checks.

Action	Notes	Deadline	Lead responsible
<p><b>Governance</b></p> <p>1. Board paper on Modern Slavery Act and compliance implications, including action plan and Draft 2025/26 Statement to be signed by Chair and CEO for Board meeting 26/03/2026</p>	<p>The Board must approve the update Modern Slavery Statement and proposed action plan within 6 months of the approval of the NKC Financial Statements for the year ended 31.7.2025</p>	<p>26/03/2026</p> <p>Done previous statement published</p>	<p>Lawrence Jenkins Yolanda Hughes David Gleed David Martin</p>
<p>1.1 Subject to Board approval, publish the Modern Slavery Act Statement</p>	<p>The Act requires the link to the Statement to be in a prominent place on the home page itself - either directly visible on the homepage or part of an obvious drop-down menu on the homepage</p>	<p>26/03/22026</p> <p>Done previous statement published</p>	<p>Yolanda Hughes</p>
<p><b>Policy &amp; Procedures</b></p> <p>2.1 Ensure that all College Staff are made aware of the Modern Slavery Statement Other stakeholders can find this on the College's website.</p>	<p>Modern Slavery Statement and related policies to be shared electronically with all staff..</p>	<p>February 2023</p> <p>Implemented as a mandatory course for all staff</p>	<p>SLT</p>
<p>2.2 Amend existing policies to include references to modern slavery</p>	<p>Recruitment Policy.- updated January 2024 Equality and Diversity Policy. updated February 2025</p>	<p>July 2023 as per policy</p>	<p>Yolanda Hughes Rhiannon</p>

		<p>Disclosure and Barring Scheme Policy; updated October 2023</p> <p>Anti-Bribery Policy –updated March 2026</p> <p>NKC Whistle Blowing Policy PIDA updated December 2024</p> <p>College Financial Regulations – in absence of Procurement Policy updated March 2026</p> <p>Staff Code of Conduct updated March 2026</p>		Hughes Lawrence Jenkins
	<b>Procurement &amp; Supplier Engagement</b>			
3.1	Identifying and managing risks in new procurements	- Design new procurements to take account of modern slavery risks eg. Cleaning Contracts.	July 2023 As and when	
3.2	Taking action when victims of modern slavery is identified	Work openly and proactively with your suppliers to resolve issues and change working practices - Consider terminating contract only as a last resort	On-Going	
	<b>Training &amp; Awareness</b>			
4.	Provide targeted training for relevant staff	Explore online training modules that are to be made readily available to staff via Safety Media	Implemented and all existing and new staff undertake from 2024	

