



KIRKLEES COLLEGE

ANTI SLAVERY AND HUMAN TRAFFICKING STATEMENT

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ANTI SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the college's slavery and human trafficking statement for the financial year ending 31st July 2021.

- 1.1 *Kirklees College* is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its services. This statement sets out the preventative steps that the college is taking (and intends to take) to avoid the risk of modern slavery occurring within college services.
- 1.3 The college is a *further education college* that employs approximately 900 staff, operating in the United Kingdom. Its core business is teaching a learner population of approximately 14,000.
- 1.4 The college has an annual turnover of £41 million of which approximately £10.4million is spent on goods and services to support the running of the college.

2. Due diligence processes

- 2.1 As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of college services, the college will adopt due diligence processes that are proportionate to any risk areas identified (dependent on the severity of the risk and other relevant factors).

3. Supply Chains

- 3.1 In its supply chains, the college has identified the following business areas as carrying material risks of modern slavery occurring:
 - Capital construction projects.
 - ICT equipment and services (including software licences)
 - Paper, stationery, books, newspapers, magazines and subscriptions
 - Professional, contractor and consultancy services
 - Recruitment and employment agencies
 - Transport and travel services (including taxi services)
 - Clothing and uniforms.
- 3.2 When tendering any types of goods or services, the college requires any potential third party suppliers to evidence that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015 during any tendering and selection processes, including through contracting with suppliers from approved procurement frameworks.

- 3.3 When procuring any types of goods or services identified as carrying material risks of modern slavery occurring in 3.1 above the college requires any supplier to evidence that they operate a high level of corporate social responsibility and comply with the Modern Slavery Act 2015.
- 3.4 Any supplier or potential supplier, identified in 3.1, wishing to supply to or partner with the college that does not comply with the Modern Slavery Act 2015, or the college's own policies and procedures, will be removed from the college's list of suppliers and will not be considered for future supply to the college unless they can demonstrate that these compliance requirements are met.
- 3.5 In terms of future steps, the college will review the viability of introducing other due diligence processes for monitoring and managing identified risks, including risks associated with particular countries and products.

4. Recruitment practices

- 4.1 Since 1st August 2020 all temporary staff and staff recruited indirectly by the college are recruited through our Master Vendor arrangement with Eden Brown. To mitigate the risk of any potential occurrences of modern slavery, the college conducts checks on such agencies before they are approved.
- 4.2 Through its recruitment processes, the college ensures that Eden Brown conduct all relevant pre-recruitment checks and provide evidence that all such checks have been conducted.

5. Organisational policies

- 5.1 The college already implements the following policies, which embed good practice and provide remedies for individuals concerned about any potential instances of modern slavery in any part of college business. The college operates the following policies:

Grievance and Whistleblowing policies – these policies allow employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.

Employee Code of Conduct – this code sets out the actions and behaviour expected of them whilst employed by the college. The college strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.

Anti-bribery and corruption policy – the college is committed to the highest standards of ethical conduct and integrity in its business activities. The college will not tolerate any form of bribery or corruption by its employees or any person or body acting on its behalf.

Recruitment policy – this policy ensures that the college follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.

This statement has been approved by the college Corporation and will be reviewed at least once annually.



Signed: -----

Gerard Hetherington

Chair of the Corporation

Date: 13th December 2021