

KIRKLEES COLLEGE

ANTI SLAVERY AND HUMAN TRAFFICKING STATEMENT

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ANTI SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. Introduction

This statement is made on behalf of Kirklees College with regards to the Modern Slavery Act 2015 which requires large employers to be transparent about their efforts to eradicate slavery and human trafficking within their organisation and supply chains. This statement is to be reviewed each financial year in accordance with clause 6 of the Modern Slavery Act 2015. This statement constitutes Kirklees College's slavery and human trafficking statement for financial year ending 31st July 2022.

- 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. Each year we work with around 14,000 learners.
- 1.4 The college has an annual turnover of £45 million of which approximately £11.4million is spent on goods and services to support the running of the college.

2. Due diligence processes

- 2.1 The College is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our suppliers, contractors and business partners, and this is inferred through their agreement to follow College policies.
- 2.2 where framework agreements are in place. The college works with the framework agreement operators who are undertaking these enquiries on behalf of the education sector.
- 2.3 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).
- 2.4 The vast majority of the College's sources are from inside the United Kingdom and as such are less at risk of slavery and human trafficking issues. The College also has a policy for the protection of whistleblowers, to protect those raising the issue of slavery and human trafficking within the organisation or its suppliers.

3. Supply Chains

- 3.1 The College has a number of suppliers for various parts of the organisation. These include:
 - Agency staff including teaching and business support

- Business partners
- Apprentice employers
- External contractors including advisors, cleaners, builders, caterers and consultants
- Guest speakers and lecturers
- Printing of College promotional materials
- Sponsorship and charity
- Capital construction projects.
- ICT equipment and services (including software licences)
- Paper, stationery, books, newspapers, magazines and subscriptions
- Professional, contractor and consultancy services
- Transport and travel services (including taxi services)

- 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. Responsibility for the Statement

Ultimate responsibility for the prevention and prevention of modern slavery within the College rests with the College's leadership team. Kirklees College's Corporation has overall responsibility for ensuring that this policy and its implementations comply with our legal and ethical obligations. Managers and Team leaders at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

5. Recruitment practices

- 5.1 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.

- 5.2 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.

6. Organisational policies

- 6.1 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.

7. Communication and awareness of this Statement

This policy is displayed on the College website and on the College's intranet, and is conveyed to all staff members at their induction. Awareness sessions will be delivered for staff and it will be included in the PAD sessions for students.

8. Review

The Modern Slavery Statement will be reviewed annually in accordance with clause 6 of the Modern Slavery Act 2015.

Signed: -----

Gerard Hetherington

Chair of the Corporation

Date: