



KIRKLEES COLLEGE

Modern Slavery Statement

Document Control Page

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MODERN SLAVERY STATEMENT

1. Introduction

- 1.1 Modern slavery is a hidden crime that affects millions of people worldwide. It includes forced labour, exploitation, and human trafficking - all forms of abuse that deny individuals their freedom and dignity.
- 1.2 At Kirklees College, we are committed to taking a stand against modern slavery in all its forms. As a values-based organisation, we believe that everyone has the right to live and work free from exploitation. Our commitment to kindness, unity and excellence means we take ethical working practices seriously, expect the same from others, and act where we see risk or harm.
- 1.3 This statement explains the steps we are taking to prevent modern slavery within our organisation and through the people and companies we work with. It covers the financial year ending 31 March 2025 and is published in line with the Modern Slavery Act 2015.
- 1.4 Kirklees College is one of the largest further education providers in Yorkshire. We have around 973 staff and support approximately 12,724 learners each year across seven specialist centres in the Kirklees region. With an annual turnover of £55 million, including around £13.4 million spent on goods and services, we recognise the importance of using our influence to help protect human rights and promote ethical working practices.

2. Due diligence processes

- 2.1 We are committed to being open and responsible in how we work, and this includes taking clear steps to reduce the risk of modern slavery in our college and in the services and supplies we rely on.
- 2.2 We expect everyone we work with - including suppliers, contractors and other partners - to share this commitment. All suppliers are expected to follow our policies and sign up to our framework agreement, which sets out the standards we require.
- 2.3 As part of our approach, we carry out proportionate checks based on the level of risk. Where there is a higher risk of exploitation, we take extra steps to

understand and reduce that risk. This may include requesting more information, asking further questions, or choosing not to work with certain suppliers.

2.4 Most of our goods and services are sourced from within the United Kingdom, where the risk of modern slavery is lower. However, we remain alert to the possibility of harm wherever it may occur. We also have a whistleblowing policy in place to support anyone - inside or outside the college - who raises a concern about exploitation or unethical practices.

3. Supply Chains

3.1 Our college works with a wide range of suppliers to help us deliver high-quality education and services. 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 Moving forward, the college will continue to review the effectiveness of our modern slavery efforts, including our due diligence and procurement processes, and will implement improvements where enhancements are identified.

4. Risk Assessment

- 4.1 Responsibility for identifying and managing risks related to modern slavery within the College's operations and supply chain is shared between the College's leadership team and our external procurement support. We are current developing our monitoring process, including tracking responses to due diligence questions and reviewing any relevant whistleblowing concerns where they arise.

5. Responsibility for the Statement

- 5.1 Responsibility for the 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 complies with our legal and ethical obligations. Management at all levels are responsible for ensuring those reporting to them understand and comply with this statement and all relevant policies.

6. Recruitment practices

- 6.1 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.
- 6.2 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.

7. Organisational policies

7.1 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:

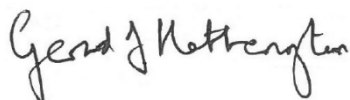
- **Resolution and Whistleblowing policies** – these policies allow employees, students and others to raise concerns, which would include circumstances giving rise to a risk of modern slavery, without fear of retaliation.
- **Employee Code of Conduct** – this code sets out the actions and behaviour expected of staff 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.

8. Communication and awareness of this Statement

8.1 This policy is displayed on the College website and on the College’s intranet. In addition, training on modern slavery awareness is available to all staff on the LMS system.

9. Review

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



Signed: -----

Chair of the Corporation

Date: 10 July 2025