

MODERN SLAVERY STATEMENT

1. Introduction & Scope

- 1.1. EKC Group (the Group) is committed to ensuring that there is no modern slavery in its supply chains or in any part of its services. We have a zero-tolerance approach to modern slavery and are committed to ensuring there is transparency in our business and our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.
- 1.2. Modern slavery, also called slavery, child labour and/or human-trafficking, is a crime and a violation of fundamental human rights. It can take various forms, all of which involve the withdrawal of a person's freedom by another to exploit them for personal or commercial gain. We will never engage in, or condone, such activities.
- 1.3. This Statement sets out the preventative steps that the Group is taking (and intends to take) to avoid the risk of modern slavery occurring within its supply chains or services. It applies to all persons working for us or on our behalf in any capacity (including employees, agency workers, volunteers, contractors, external consultants, and third-party representatives).

2. Organisational Structure

- 2.1. The Group is a Further Education Provider that employs approximately 1500 staff, operating in the United Kingdom. Its core business is teaching a learner population of young people and adults of approximately 15,000.
- 2.2. The Group has an annual turnover of approximately £80m.

3. Supply Chains

- 3.1. In its supply chains, the Group has identified the following business areas as carrying material risks of modern slavery occurring:
 - Procurement
 - IT and office equipment
 - Estates
 - Cleaning
- 3.2. When procuring any type of goods or services, the Group requires potential third-party suppliers to evidence that they operate a high level of Corporate Social Responsibility during tendering and selection processes.
 - 3.2.1. Any supplier or potential supplier that does not comply with the Modern Slavery Act 2015, or the Group's own policies and procedures, will be removed from our list of suppliers and will not be considered for future supply unless they can demonstrate that these compliance requirements are met.

- 3.2.2. We will take action to terminate existing contracts with, and to pursue appropriate legal remedies against, any suppliers who we subsequently discover to have been operating in breach of this statement.
- 3.3. Through its recruitment processes, the Group ensures that all approved agencies conduct relevant pre-recruitment checks and provide evidence that all such checks have been carried out.
 - 3.3.1. Temporary workers are only engaged through approved reputable recruitment agencies.
 - 3.3.2. To mitigate the risk of potential occurrences of modern slavery, the Group conducts checks on such agencies before they are approved.

4. EKC Group Policies

- 4.1. The Group already implements the following [policies](#), which embed good practice and provide resolution for individuals concerned about any potential instances of modern slavery in any part of our business:
 - 4.1.1. **Staff Code of Conduct** – sets out the actions and behaviour expected of staff whilst employed by the Group.
 - 4.1.2. **Recruitment Policy** – ensures that the Group follows transparent recruitment processes, including measures to prevent illegal working and compliance with other relevant statutory requirements.
 - 4.1.3. **Grievance and Whistleblowing policies** – allow employees, students and others to raise concerns, which includes circumstances giving rise to a risk of modern slavery, without fear of retaliation.
 - 4.1.4. **Anti-bribery and Fraud Policy** – we are committed to the highest standards of ethical conduct and integrity in business activities and will not tolerate any form of bribery or fraud by its employees or any person or body acting on its behalf.
 - 4.1.5. **Corporate and Social Responsibility Policy** – sets out what we do to ensure that our business operates ethically and with integrity.
 - 4.1.6. **Procurement Policy** – reflects the Group's commitment to acting ethically and with integrity in business relationships, as well as implementing and enforcing effective and proportionate safeguards and controls such as Due Diligence Procedures for suppliers to ensure that they meet key ethical and legislative requirements.
 - 4.1.7. **Financial Regulations** – provide the practical and ethical standards by which the Group manages its financial operations.

- 4.1.8. **Bullying and Harassment policies** - designed to help ensure that our staff and students are treated with both dignity and respect.
- 4.1.9. **Safeguarding and Preventing Extremism Policy** – sets out our approach to dealing with instances of child exploitation and human trafficking and the partnerships which we rely on to help us do this.
- 4.1.10. **Risk Management Policy** – keeps our activities in line with all applicable laws, regulations and codes of governance (including in relation to modern slavery).

5. Assessing and Managing Risk

- 5.1. The Group identifies the following as the principal areas of potential risk:
- supply chains
 - outsourced activities
 - recruitment practices and recruitment agencies

6. Due Diligence Processes

- 6.1. As part of our initiative to identify and mitigate the risks of modern slavery occurring in any part of our services, we adopt due diligence processes that are proportionate to any risk areas identified.
- 6.2. These processes are subject to on-going assessment and review.

7. Staff Awareness – Training

- 7.1. To ensure that there is an understanding of the risks of modern slavery in our supply chains and our business, we provide an annual update to our staff (via start of year / information day activities).
- 7.2. We also require our business partners to provide awareness to their staff and suppliers and providers.

8. Performance Indicators Monitoring and evaluation

- 8.1. Where the Group identifies risks of modern slavery occurring in any part of its services, it will consider setting and reviewing KPIs in the following contexts:
- use of grievance and whistleblowing procedures by staff to raise concerns about instances of modern slavery
 - awareness-raising amongst staff including risk management; appropriate decision-making and timely remedial action
 - oversight of third-party suppliers of relevant goods and services supply chains
- 8.2. This Statement will be made available to all by publication on our website.
- 8.3. We will also seek to raise awareness of the risks of modern slavery amongst staff by other measures, including discussion of this statement during the induction process for new employees.

8.4. This Statement is made pursuant to Section 54(1) of the [Modern Slavery Act 2015](#) and constitutes East Kent Colleges Group's Modern Slavery Statement for the financial year ending 31 July 2027. It has been approved by the Group's Full Governing Body on 13 July 2026 and will be reviewed annually.

Signed – 

Name – Lucy McLeod | CEO and Accounting Officer

Date – 13.7.26.