

MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Version: 4

Effective date: June 2026

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Summary of Changes

Ser	Issue	Date	Summary of changes
1	1	25/05/2021	Initial policy development
2	2	12/09/2024	Updated to new policy template
3	3	24/11/2025	Updated in line with review dates
4	4	08/06/2026	Alignment to internal processes and policies

Overview

The Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 came into effect on 29 October 2015 and require commercial organisations in any sector with a turnover greater than £36m per annum to produce a 'Slavery and Human Trafficking Statement' for each financial year.

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A 'commercial organisation' is 'an organisation which supplies goods and services'. Turnover is calculated including subsidiaries, but subsidiaries with turnover below £36m per annum or which are not 'commercial organisations' do not need to publish a 'Slavery and Human Trafficking Statement' in their own name. MKC Training has opted to produce a statement voluntarily in its own name although not currently meeting this threshold.

If an organisation has taken no steps to ensure that modern slavery is not taking place in its business and supply chains, its Slavery and Human Trafficking Statement must state this.

If an organisation to which the requirement applies fails to produce a Slavery and

Human Trafficking Statement for a particular financial year, the Secretary of State may bring proceedings in the High Court requiring the organisation to do so.

Introduction

This statement sets out MKC Training’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.

This statement relates to actions and activities during the financial year 1 August 2025 to 31 July 2026.

As part of Defence and the Further Education Sector, the

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organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

MKC Training is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of MKC Training, a wholly owned subsidiary of MidKent College operating in the South East of England and providing training to a wide range of students, and providing services to both defence and non-defence customers.

MKC Training operates in the United Kingdom and has a diverse supply chain covering staffing resources and operational activities including but not limited to estates management, ICT, cleaning and transport.

MKC Training is aware of its responsibility under the Act and has developed its framework to ensure its supply chain complies with the Act, and this will include policies, risk assessment, due diligence and training requirements.

Risk Assessment, high-risk suppliers and KPIs

MKC Training has undertaken a mapping exercise across its supply chain to identify areas of potential modern slavery risk. In line with the Anti-Slavery Risk Tiering Tool (ARTT) guidance, this exercise is reviewed and refreshed on an annual basis to ensure it remains

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current and reflective of changes within our operations and supply base.

Through this process, we identify and categorise higher-risk suppliers and apply enhanced scrutiny where appropriate. We have established key performance indicators (KPIs) to monitor our progress in addressing modern slavery risks within these higher-risk areas, and we regularly review performance against these KPIs to drive continuous improvement.

MKC Training considers modern slavery risks throughout the end-to-end procurement lifecycle, from initial needs identification and supplier selection through to contract management and end-of-contract review. This ensures that risks are actively managed at each stage and that lessons learned are incorporated into future procurement activity.

Relevant Policies

MKC Training has several policies that assist in preventing slavery and human trafficking in its operations, including:

Public Interest Disclosure Procedure (Whistleblowing Procedure) MKC Training encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. The Whistleblowing Procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

Code of Conduct MKC Training’s Code of Conduct makes it clear to employees and suppliers the actions and behaviour expected of them when representing and/or working with the organisation.

Supplier Terms & Conditions MKC Training is committed to ensuring that

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its suppliers adhere to the highest standards of ethics by ensuring suppliers are aware of their obligations under the Act and comply where necessary.

Staffing and Recruitment Appointment Policy and Guidelines MKC

Training uses reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due Diligence MKC Training undertakes appropriate financial and due diligence checks when considering taking on new suppliers, and regularly reviews its existing suppliers to ensure they meet their regulatory obligations.

MKC Training recognises that a range of internal policies support the prevention of modern slavery and human trafficking. Any additional policies relevant to safeguarding ethical practices and labour standards are publicly available on request.

Our Approach to Supply Chain Compliance

We are committed to preventing modern slavery and human trafficking in our operations and supply chain. To achieve this, we require all suppliers to complete a compliance questionnaire covering anti-slavery policies and ethical practices. We review responses and supporting evidence before approval and conduct periodic audits to validate compliance. Suppliers may be asked to reconfirm their commitments annually, ensuring continuous oversight and improvement. This process reflects our dedication to transparency, accountability, and ethical business standards.

Fair Working Practices and Worker Voice

MKC Training supports fair working practices within its supply chain by setting clear expectations regarding compliance with UK employment law, the Modern Slavery Act 2015, and the provision of

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effective worker voice mechanisms.

We require suppliers to demonstrate that workers have access to appropriate representation, whether through recognised trade unions or alternative employee

forums, alongside clear grievance and whistleblowing processes.

Our approach aligns with established ethical procurement standards to promote transparency, fair treatment, and responsible employment practices across our supply chain.

Debt Bondage and Due Diligence

MKC Training undertakes due diligence to reduce the risk of workers within its supply chains being subjected to debt bondage. This includes:

- Raising awareness among staff to understand the risks and indicators of debt bondage through mandatory training;
- Screening and evaluating key recruitment agencies to ensure ethical practices are followed; and
- Taking appropriate corrective action where any risk or instance of debt bondage is identified.

Training

MKC Training delivers training on modern slavery to all staff and engages with external bodies, as appropriate.

In addition to internal training, MKC Training is working towards

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providing targeted awareness and training to higher-risk suppliers to strengthen their understanding of modern slavery risks and expectations. We anticipate this additional process to be embedded into our procurement processes by Q2 2027.

Awareness Raising Programme

MKC Training will continue to raise the awareness of the basic principles of the Modern Slavery Act 2015, including but not limited to:

- How employers can identify and prevent slavery and human trafficking.
- What employees can do to flag up potential slavery or human trafficking issues.
- What external help is available, for example through the Modern Slavery Helpline.

Michael Fry
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