Modern Slavery and Human Trafficking Policy

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.

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.

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 Middlesbrough College'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 Further Education Sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

Middlesbrough College 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 Middlesbrough College, a General Further Education College operating in the North East of England, providing education and training and has seven subsidiary companies namely: Northern Skills Group Business Services Limited, TTE Technical (UK) Limited, TTE International Limited, Northern Apprenticeship Company Limited *(Dormant)*, TTE Apprenticeships Limited

(Dormant), Middlesbrough College Management Services Limited *(Dormant)* and University Centre Middlesbrough Limited *(Dormant)*.

Middlesbrough College has a diverse supply chain covering staffing resources and operational activities including but not limited to estates management, catering, cleaning education / training and transport.

Middlesbrough College operates predominantly in the United Kingdom and has a group turnover of approximately £71 million in 2025/2026. Around £0.3m of annual turnover is generated from overseas customers through the College's subsidiary TTE International Limited

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

Relevant Policies

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

- **Whistleblowing Policy (MC22)**
  Middlesbrough College 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 (MC36)**
  Middlesbrough College's Code of Conduct makes it clear to employees the actions and behaviour expected of them when representing the organisation.

- **Supplier Terms and Conditions**
  Middlesbrough College is committed to ensuring that its suppliers adhere to the highest standards of ethics and will continually strive to ensure that existing and new suppliers are aware of their obligations under the Act and comply where necessary.

- **Safer Recruitment Policy (MC37)**

  Middlesbrough College 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
Middlesbrough College undertakes appropriate financial and due diligence checks

when considering taking on new suppliers and regularly reviews their existing suppliers to ensure they meet their regulatory obligations.

The College has undertaken an initial assessment of current suppliers to identify those who meet the turnover criteria. For these organisations, the College is using the Government Modern Slavery Assessment Tool to gain assurance that suppliers are compliant with the Act or are working towards compliance. This tool links supplier completed questionnaires providing assurance that the college's supply chain is fully compliant with the Act. Additionally, the tool provides supplier policy documents to verify alignment to the college's policy.

Additionally, through the College's procurement activities, tender documents include a supplier Suitability Assessment Questionnaire to seek assurance before entering new contracts.

Training
Middlesbrough College will ensure that key staff will undertake training on modern slavery, where deemed necessary, and will engage with external training providers, as appropriate.

Awareness Raising Programme
Middlesbrough College will continue to raise 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.

This statement was approved by Middlesbrough College's Governing Body on Wednesday 21st October 2026 and will be reviewed and updated annually as part of the review of the Financial Statements.

Zoe Lewis
Principal / Chief Executive

Laura Woods
Chair of Governors
21 October 2026