

# Modern Slavery statement

## Our commitment to preventing modern slavery

Kings is an international education organisation. As such a commitment to human empowerment, global mobility and opportunity through education defines our core values. It is in this context that we recognise the major global human rights issues caused by modern slavery and human trafficking.

Kings is therefore committed to ensuring that we do everything in our power to prevent modern slavery and human trafficking across all aspects of our operations or supply chains.

This is our first Modern Slavery Statement. It outlines our drive to understand and react to potential modern slavery risks within our operations through awareness, training, policies and procedures.

### 1. Our organisational structure

Kings has teaching operations in both the UK and US. In the UK, we operate year-round schools at our own premises and junior summer camps at third party premises.

#### i. Year-round schools

Our own UK schools are located in Bournemouth, Brighton, London and Oxford. Each is recognised as a boarding school by the Department for Education and therefore subject to regular Ofsted inspection. The schools provide both English language training and pre-university academic programmes primarily to international students, although with a growing cohort of local UK students.

#### ii. Summer Schools

Our junior summer camps are located at third party school locations in London, Bath, Southend, Cheltenham and Shropshire.

#### iii. Management structure

The Kings operation in the UK is overseen by a Board comprising three UK-based Directors. Reporting to the Board is a Senior Management Team comprising the Operations Director, Director of College Services, Director of Admissions, Director of Administration, Finance Director and four school Principals.

## 2. Our supply chains

We define our operation within two broad categories insofar as they relate to our policies and procedures to prevent modern slavery and human trafficking:

### i. Student recruitment

Kings recruits students from all over the world. They are recruited mainly through partner agents but also through government sponsorship programmes, corporate clients and direct applications.

### ii. Goods and service supply chains

We have a number of supply chains for goods and services used within our school operations and marketing activities.

## 3. Modern slavery risk assessment

We have undertaken a review of potential risks within our operations.

Within international student recruitment and admissions there is the potential risk of human trafficking under the guise of admission onto one of our educational programmes.

(See below for our actions in relation to recent incidence).

Within our supply chains, we have identified the main areas of potential risk as:

- External cleaning services
- External taxi services
- Catering services
- Provision of branded merchandise
- Provision of printing and distribution services
- External services at our summer camp locations
- Provision of resources and materials – including stationery and teaching resources
- Supply staff and contracted workers

We acknowledge that we are the start of a long-term process. As such, we have not at this stage identified risks beyond the first tier of our supply chains, and are committed to broadening the scope of our remit over time.

The steps we are currently taking to mitigate against these risks are outlined below.

## 4. Our modern slavery policies

We have developed a [Kings Modern Slavery Policy](#) and a [Supplier Code of Conduct](#).

These policies are part of a wider group of policies which define our commitment to an ethical approach to business operations. These include policies around student safeguarding and welfare as well as rights protection for our staff.

Policies which support our commitment to non-engagement with modern slavery and human trafficking

include:

- Kings Safeguarding and Child Protection Policy
- Kings Safer Recruitment and DBS Checking Policy
- Kings HR Policy Manual – including Whistleblowing Policy
- Kings Admissions and Attendance Registers Policy
- Kings Equality Policy

[View all Kings policies and procedures.](#)

Kings policies are reviewed annually and updated where necessary.

## 5. Due Diligence processes

As a school with a UKVI (UK Visas and Immigration) Tier 4 license, we are required to adhere to strict guidelines when sponsoring students for visas to study with us. The UKVI conduct regular audits to ensure this is done correctly. This includes verifying that all admissions to our schools are genuine, that staff have the right to work in the UK and that relevant checks have been conducted prior to and on arrival.

Our contractual agreements with overseas agents and our admissions processes are subject to on-going scrutiny and improvement. We ensure that our partner agents provide adequate references to us and sign a contractual agreement to demonstrate their legitimacy and dedication to exceptional service.

Students from countries viewed as high risk as identified in our Modern Slavery policy are required to provide applications in person, receive a face to face interview, provide ID on application and at interview, and must complete a Secure IELTS Test. These measures are designed to provide greater protection against exam coaching and forgery.

We have also strengthened our staffing overseas to allow for a member of Kings staff to interview prospective students in person, or at least to meet with educational agents to ensure their procedures for checking ID and language level are robust.

All four of our UK schools are registered with the Department for Education as Independent Boarding Schools. As a result our schools are regularly inspected by Ofsted – including a thorough audit of all welfare and safeguarding provision. Our schools are also inspected by the British Council, a specialist in accrediting international education institutions.

All of our schools maintain close contact with their Local Authority, including the MASH (Multi-Agency Safeguarding Hub including Social Services, Police and Health Services). Any information relating to potential modern slavery or trafficking is shared with this team as a matter of course.

As part of their contracted services to us we also require all suppliers of goods and services within the categories identified to provide us with their own Modern Slavery statement where applicable.

Where suppliers are not legally required to publish a Modern Slavery statement, we require instead all suppliers to sign a formal agreement with Kings confirming their commitment not to engage in any aspects of modern slavery within their business activities.

## **6. Training processes in relation to modern slavery**

Training relating specifically to modern slavery and human trafficking was delivered to all of our school staff in December 2018/January 2019. This training used case studies based on actual events, in order to highlight issues specific to our sector and settings.

All staff receive a safeguarding training update annually. Where new information needs to be communicated to staff on issues relating to modern slavery, this will be communicated via the annual safeguarding training update.

## **7. Effective action taken to address modern slavery**

Kings has unfortunately uncovered isolated incidents of modern slavery and has taken all necessary steps to deal with this. As such, robust policies are in place which have been honed from direct, practical experience.

Specifically we have dealt with a small number of cases involving the trafficking of young people from Vietnam under the guise of attending our courses. Staff training ensured that distinctive signs of trafficking were quickly picked up. Kings immediately involved the MASH team and the UKVI.

Our work on identifying and addressing these isolated incidences was praised by both the Local Authority and Ofsted as an example of very good practice. As a result we were asked to deliver staff training at other local schools on our findings and actions. We aim to maintain cross-school contact to continue working toward best practice.

## **8. Measuring our effectiveness in preventing modern slavery**

We will regularly review our actions and performance in relation to preventing modern slavery. This will include KPIs for relevant managers and colleagues as well as a regular modern slavery agenda item at monthly operations meetings and biannual Senior Management Team meetings.

We will deem our actions effective if no reports of modern slavery practice have been reported or identified by colleagues, external suppliers, government departments or law enforcement agencies. Alternatively, we will define positive progress in this area through timely and effective action having been taken to address any modern slavery issue, and in any learning we can acquire from such instances.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It constitutes Kings slavery and human trafficking statement for the financial year ending December 31, 2020.

It is approved by the UK Board of Directors.

Nigel Pamplin

Andrew Hutchinson

Andrew Green

April, 2021