



# Modern slavery and human trafficking statement

For year ending 31 December 2025

# Contents

1	Introduction .....	3
2	Organisation structure .....	3
3	Policy and approach.....	4
4	Operations .....	5
5	Employee vetting.....	5
6	Training .....	6
7	Procurement and supply chain .....	6
8	Key performance indicators.....	7
9	Strategy 2026.....	7
10	Attestation .....	7

# 1 Introduction

This 'Modern Slavery & Human Trafficking' statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the "Act") for the financial year ending 31 December 2025. It outlines Management & Training Corporation (UK) Ltd's (including its subsidiary companies) commitment across its business and supply chain to combat modern slavery, trafficking and human exploitation; protecting the rights of the individuals we employ and serve in the community.

During the year ending 31 December 2025, our business centred on providing residential and escorting services to service users (including detained people) within Manston Processing Centre ("PC"). Our operations at Manston PC ceased on 30 September 2025, therefore during the year ending 31 December 2025 we also focused on bidding for new Government Immigration and Escorting opportunities. We are committed to delivering robust and professional immigration services in accordance with the principles of the Act and we remain focused on continuously strengthening compliance and service improvement in support of it.

We recognise our responsibility to uphold and protect the human rights of our employees, service users, victims and wider individuals in the communities we serve. Our strategic and operational plans and processes aim to promote awareness amongst our employees and partners in a way which encourages a culture of respect for, and promotion of, human rights in everything we do and stand for.

We believe that everyone has the chance to change their lives for themselves, and those around them, for the better and to become a valued citizen in the community. As such, we acknowledge our obligations and commitment to comply with the Act and in preventing modern slavery in all its forms, including human trafficking, within our business, our supply chain and the communities we serve.

Our position is clear, we respect the human rights of all employees, service users and those within our supply chain and we have a zero-tolerance approach to modern slavery, human trafficking or forced labour in any part of our business or supply chain.

## 2 Organisation structure

Management & Training Corporation (UK) Ltd's ("MTC") parent company is Management & Training Corporation, based in the United States of America.

Since June 2022, MTC has provided residential and escorting services at Manston PC on the Kent coast. Manston is the main PC set up to process asylum seekers who arrive on small boats across the channel. MTC's contract at Manston PC ceased on 30 September 2025.

MTC manages its businesses through its Group Managing Director, supported by the corporate directors who collectively constitute the MTC Senior Leadership Team (SLT). The SLT reports into the parent company's Board.

During the year ended 31 December 2025, much of our frontline services were provided through our employees although we also contracted with a small number of significant key supply chain partners within our supply chain to deliver frontline services. We also used a wider

supply chain for corporate support services. Following the 30 September 2025 cessation of our services at Manston PC, all relevant operational employees transferred to another provider under TUPE (Transfer of Undertakings (Protection of Employment) Regulations).

We did not operate outside of the UK and our supply chain was also fully based within the UK. While we believe this lowers our risk exposure to modern slavery and human trafficking, we do recognise the growing issue within the UK, particularly the potential links with the service users and communities we serve. As such, we remain committed to monitoring our business approach and operational delivery with regards to this.

### 3 Policy and approach

We are fully committed to ensuring there is no modern slavery or human trafficking in any part of our business or supply chain, adopting a zero-tolerance approach to non-compliance.

We utilise a wide array of policies and processes to promote ethical behaviour and integrity across our business relationships. We have well-established policies and procedures that ensure we operate responsibly and ethically and that we respect and protect human rights.. Such policies and processes include:

- Sustainable procurement policy
- Security and vetting policy
- Diversity, equity and inclusion policy
- Fraud, bribery and corruption policy
- Whistleblowing policy
- Employee Wellbeing Ambassador Committee and associated welfare initiatives to give employees a clear, safe channel to voice concerns
- Anonymised quarterly employee surveys, giving employees a safe channel to raise concerns
- Attendance at the Business Services Association (BSA) modern slavery council steering committee
- Employee annual mandatory training which includes a module on modern slavery

Our policies are promoted through a mix of: employment starter packs, mandatory and voluntary training / refresher training, corporate inductions and being readily available to employees through our intranet. Our legal register is owned by the commercial department, who engage our lawyers as required and act as custodian for legislative amendments – any changes are cascaded through to our policy makers and employees, as necessary.

Our key supply chain partners are required to provide assurance that their business approach is in line with our commitment to the Act through their values, policies and processes. They are expected to demonstrate their competence throughout the contract lifecycle (section 7) and we continue to develop our management approach in such regard.

Our key policies and expectations are complemented by mandatory annual training (section 6).

Our aim is to create a supportive and open environment where anyone can easily raise concerns about risks or issues related to our operations. These can be discussed directly with line managers and Human Resource teams, or raised through formal channels (our whistleblowing process).

Our whistleblowing policy encourages our people, customers and suppliers to report any concerns about unlawful conduct that they suspect is taking place at work. This includes the risk of slavery or human trafficking.

A Whistleblowing update is provided to the Senior Leadership Team quarterly (and more frequently if required).

## 4 Operations

Since June 2022, MTC has provided residential and escorting services at Manston PC on the Kent coast. Manston is the main PC set up to process asylum seekers who arrive on small boats across the channel.

For our Home Office business, we conduct our security services with a trauma-informed, welfare-centric approach, where direct engagement with the service user population is promoted extensively. We work closely with the Home Office and local authorities to ensure we provide the best possible support for individuals we come into contact with. This includes dedicated training for behavioural interpretation / management, with a specific module on identifying and addressing suspected Modern Slavery issues. In Communal areas, we also provide Home Office approved, multi-lingual modern slavery / human trafficking-related support materials for Service Users under our care. The Senior Management Team receives thorough daily briefings any welfare concerns identified by our operational employees with a recognised escalation path to the Home Office where appropriate.

During our operations at Manston PC (which ceased on 30 September 2025), residents were screened for modern slavery risks, with safeguarding care plans implemented and cases escalated to the Home Office as required. We tracked and reported modern slavery cases daily to the Home Office, alongside monthly governance meetings, and quarterly safeguarding forums with all stakeholders/providers on site.

Operational audit tools tested identification, end-to-end communication and safeguarding processes. The operational risk register was reviewed monthly by the on-site Senior Management Team and captured safeguarding risks identified through audits, with actions tracked to drive continuous improvement. This was supported by monthly internal business performance meetings, where safeguarding data was reviewed and actions agreed, and weekly governance meetings with our medical key supply chain partner where safeguarding data and issues were a standing agenda item.

## 5 Employee vetting

All employees, whether temporary or permanent, are required to be vetted. The entry vetting for all employees is Disclosure & Barring Service (DBS) vetting, with frontline employees required to have Enhanced Disclosure & Barring Service clearance and Counter Terrorism Check (CTC) vetting.

All employees, when recruited, are required to provide documented evidence including personal ID and proof of address. As part of recruitment, we conduct immigration status/right to work checks of all our employees. This includes confirmation the individual is a British Citizen (e.g. passport) or, for third nationals, checking their residence permit. In all instances, we inspect

original documents rather than copies. If we were to be unsure about a person's status, we would see professional advice, including using the Government's online right to work tool.

Some specialist employees, such as Information Security and ICT, are also required to have Security Clearance (SC).

We pay salaries into bank accounts in the name of the member of the employee unless there is an auditable, credible reason to do otherwise.

## 6 Training

Our human resources team enables employees to develop the skills, knowledge, qualifications and understanding they need to deliver high quality services.

Learning and development plans form part of our employee annual personal development plans, consisting of a mix of mandatory annual and ad hoc voluntary training.

During the year ended 31 December 2025, training was provided through our on-line training portal, and included a blend of mandatory training modules and complementary 'bite size' learning through podcasts/videos on modern slavery and corruption.

## 7 Procurement and supply chain

During the year ended 31 December 2025, our supply chain consisted of two types of suppliers – 'tier one' who largely deliver frontline services to our service users and 'tier two' who typically provide support services.

Our commercial department managed the strategic development, leadership and oversight of procurement and contract management activity across our business. Procurement policies and practice promote our standards and expectations, complemented by robust standard forms of contract to establish and manage expectations of our supply chain with regards to the Act.

Our evaluation and due diligence process considers the suitability of suppliers through evaluation processes including, but not limited to, their commitment to inclusion, service delivery and quality, risk management, reputation and code of ethics/conduct. Key suppliers participate in regular contract management meetings which utilise our 'contract management plan' tool.

We include modern slavery risks of our business and supply chain as part of our overall corporate risk assessment process. From this, we consider our uniforms supply chain to be the highest risk because the clothing industry is traditionally lower paid and the products may be manufactured overseas. As part of our due diligence, we have ensured we use a local uniform supplier based in Kent, this supplier was selected to both support the local economy and due to their commitment to ensure all work is completed in-house and not out-sourced which enables better control of a high-risk sector.

## 8 Key performance indicators

100% of our current employees have completed their annual mandatory modern slavery training.

Our operational audit programme completed scheduled audits on end-to-end safeguarding processes and ensured any findings raised were fully addressed.

Completion for quarterly whistleblowing reporting to the senior leadership team.

## 9 Strategy 2026

We recognise that our policies, systems and processes need to evolve further to deliver against our commitment to the Act and, during the coming year 2026, we will have a particular focus on:

- Implement the use of Government toolkits for supplementing our assessment of modern slavery risks and management. Key UK government-linked tools include the **Modern Slavery Assessment Tool (MSAT)**, the **Anti-slavery Risk Tiering Tool (ARTT)**,
- Enhance our supplier code of conduct in respect of expectations around human rights and anti-slavery practices.
- Enhance our Supplier Health checks and audits in respect of modern slavery.

## 10 Attestation

This statement is a fair representation of the business for the financial year ending 31 December 2025 and will be fully supported and promoted in 2026.

Approved by Management & Training Corporation (UK) Ltd's Board of Directors.

Signed on behalf of MTC:



**Ian Mulholland, MTC Managing Director**

Date: 20 March 2026