

## DN Colleges Group (DNCG)

### Modern Slavery and Human Trafficking Statement 2022

#### 1. Introduction

Modern slavery is defined as the recruitment, movement, harbouring or receiving of people through the use of force, coercion, abuse or vulnerability, deception, or other means for the purpose of exploitation.

Human trafficking involves the recruitment or movement of people for exploitation by the use of threat, force, fraud, or the abuse of vulnerability.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes DNCG's (and its subsidiaries), slavery and human trafficking statement for the financial year ending **31 July 2022**. It sets out the preventative steps that DNCG (and its subsidiaries), is taking (and intends to take) to avoid the risk of modern slavery occurring within its supply chain or services.

Further information is available at [www.legislation.gov.uk](http://www.legislation.gov.uk) (Modern Slavery Act 2015).

#### 2. Organisational Structure

DNCG (and its subsidiaries) is a major education provider in South Yorkshire, Greater Lincolnshire, and the Humber Region. DNCG is primarily based in Doncaster (Doncaster College and University Centre) and Scunthorpe (North Lindsey College and University Campus North Lincolnshire). DNCG also has a number of off-site centres situated at British Steel and the Humber Energy Skills Training Academy. DNCG's (and its subsidiaries) core business is education and training.

DNCG (and its subsidiaries), has over 16,000 students/apprentices and circa 1,200 staff. A dedicated procurement and contracting function with transactional purchasing devolved to individual departments is in place across the organisation.

#### 3. Policies

DNCG (and its subsidiaries), is committed to procuring goods and services for its use without causing harm to others. DNCG (and its subsidiaries), will endeavour to ensure all employees and agents within its supply chains are not subject to any form of forced, compulsory/bonded labour or human tracking and that they are paid in line with the National Minimum Wage.

The following Policies and Procedures support DNCG's compliance with the Modern Slavery Act 2015, The Children Act 1989, The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017, Working Together to Safeguard Children 2018, The Prevent Duty 2021:

- Safeguarding, Child Protection & Prevent Policy
- Equality, Diversity & Inclusion Policy
- Safer Recruitment & Selection Policy

- Procurement Policy
- Financial Regulations
- Grievance Policy
- Whistleblowing Policy & Procedure

#### 4. Due Diligence Processes

When procuring any type of goods or services, DNCG (and its subsidiaries), endeavours to ensure that any third-party suppliers operate at a high level of corporate social responsibility during any tendering and selection process.

Any supplier or potential supplier identified as not complying with the Modern Slavery Act 2015 or any Policies and Procedures, will be removed as a supplier unless corrective actions can be agreed to ensure compliance to the Modern Slavery Act 2015.

DNCG (and its subsidiaries), has in place systems to:

- Identify and assess the potential risk areas in its supply chains through its due diligence processes.
- Mitigate the risk of slavery and human trafficking occurring in its supply chains.
- Protect whistle blowers.

DNCG (and its subsidiaries), supply chains are managed under the following categories:

- Administration / Finance
- Curriculum
- Estates/Facilities Management
- Digital Technologies
- Marketing
- Recruitment
- Travel & Transport

Following review of its supply chains, the principal areas identified which carry material risks are office supplies, consumables, digital equipment, clothing and uniforms, and some Estates & Facilities services, such as cleaning, catering, and security services, especially when outsourced. In particular for these spend categories where risk of modern slavery and human trafficking are more common, due diligence will be undertaken to assess how suppliers minimise the risk of modern slavery and human trafficking occurring in the supply networks. Procurement adheres to the Public Contracts Regulations 2015. Under these procurement regulations certain modern slavery offences, such as child labour and human trafficking are grounds for the mandatory exclusion of bidders from public procurements.

Procurements follow one of two pathways: collaborative, through regional purchasing consortia, or in-house tendering and contracting. DNCG (and its subsidiaries), actively engages with its purchasing consortia to support the inclusion of ethical sustainability, including addressing slavery and human trafficking, in their procurement programmes.

Tendering and contracting processes includes due diligence checks through a Supplier Questionnaire/Declaration to gain assurance before entering into new contracts.

Work placement processes for students/apprentices includes due diligence checks and onsite assessment through the satisfactory completion of an Employer

Assessment/Declaration Form before a placement can commence. This process is undertaken in conjunction with the Health & Safety team.

DNCG (and its subsidiaries), contract terms and conditions of Supply have clauses covering modern slavery and human trafficking. In performing their obligations under these contracts, Contractors agree to comply fully with the Modern Slavery Act 2015.

These processes outlined above will be subject to on-going assessment and review (at least annually) by the Procurement Team.

## **5. Recruitment Practices**

All recruitment and selection processes are conducted by managers/staff who are appropriately trained in Safer Recruitment & Selection, and Safeguarding practices.

Temporary staff recruited indirectly by DNCG (and its subsidiaries), are recruited through agreed, reputable recruitment agencies. Through its recruitment processes, DNCG (and its subsidiaries), ensures that all recruitment agencies conduct all relevant pre-recruitment checks (including enhanced Disclosure & Barring Service checks) and provide evidence that all such checks have been conducted prior to commencement of placement.

To further mitigate the risk of any potential occurrences of modern slavery, DNCG (and its subsidiaries), are currently in the process of developing a preferred supplier list of agencies, strengthening the checks in place, and reducing the number of agencies with which DNCG (and its subsidiaries), works in partnership.

## **6. Training**

To ensure all staff understand the risks of modern slavery and human trafficking, DNCG (and its subsidiaries), will continue to develop awareness training as part of the essential training programme. Awareness of the risks will also be raised with students and apprentices, for example, as part of the tutorial Scheme of Learning.

## **7. Commitment**

As part of this statement which includes the extensive policies and procedures outlined above, DNCG (and its subsidiaries), expresses its commitment to better understand its supply chains and work towards greater transparency and responsibility towards people working on them, to minimise the risk of modern slavery or human trafficking in its supply chain or in any part of its services.

This statement has been approved by the Governance structure and will be reviewed at least once annually.

This statement will also made available to all staff members, stakeholders, and the general public by publication on the intranet and websites.

**John Rees**  
**Chief Executive Officer**  
**December 2022**