

DN Colleges Group (DNCG)

Modern Slavery and Human Trafficking Statement 2026

1. Introduction

Modern slavery is defined as the exploitation of people through slavery, servitude, or forced labour, where a person cannot leave due to coercion, deception or abuse of vulnerability,

Human trafficking involves the recruitment, movement or harbouring 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 reflects the UK Government's updated statutory guidance published in March-April 2025, where there is an increasing expectation for transparency, detail and evidence-based reporting. It constitutes DNCG's (and its subsidiaries), slavery and human trafficking statement for the financial year ending **31 July 2025**. 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 (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 Stainforth and the Humber Energy Skills Training Academy. DNCG's (and its subsidiaries) core business is education and training.

DNCG (and its subsidiaries), has circa 18,000 students/apprentices and approx. 1,200 staff. A dedicated procurement and contracting function with transactional purchasing devolved to individual departments is in place across the organisation and aligned to the 2025 guidance. Our core organisational values have equality, diversity, inclusion and opportunity at their heart.

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. This could include roles such as cleaning, catering, ICT or contractor services.

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, The Equality Act (Amendments) Regulations 2023, Working Together to Safeguard Children 2023 and the Prevent Duty Guidance 2023:

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

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

All policies are aligned to the 2025 guidance expectations for stronger transparency, outcomes-led reporting and continuous improvement.

4. Due Diligence Processes

When procuring any type of goods or services, DNCG (and its subsidiaries), endeavours to ensure that any third-party supplier operates 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) undertakes due diligence to identify and address risks of modern slavery within its supply chains. In line with the 2025 updated statutory guidance, our approach reflects the two levels of expected practice:

- **Level 1 expectations:** We maintain clear due-diligence processes that assess risk, review supplier compliance and ensure our procedures align with recognised good-practice frameworks. This includes conducting impact assessments and putting appropriate plans in place to manage identified risks.
- **Level 2 expectations:** As we develop our approach further, we increasingly focus on demonstrating measurable progress, including strengthened monitoring of suppliers, clearer visibility of risk areas and evidence of improvements resulting from our due-diligence activity.

These processes help ensure suppliers meet required standards and allow us to take corrective action where risks or non-compliance are identified.

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

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

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

Procurement adheres to the Public Contracts Regulations 2015 and, for procurements commenced from 24 February 2025, the Procurement Act 2023 and associated Regulations. Under these procurement regulations, certain offences relating to modern slavery, human

trafficking and child labour are grounds for the mandatory exclusion of suppliers from participating in public procurement processes.

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 and sustainable procurement practices, including measures to address slavery and human trafficking within supply chains.

Tendering and contracting processes, which are essential components of our procurement strategy, include appropriate due diligence checks. Prior to entering into new contracts, suppliers are required to complete relevant supplier selection documentation (such as a Supplier Information Questionnaire or equivalent declaration) which includes confirmation of compliance with applicable legislation, including the Modern Slavery Act 2015.

Where relevant and proportionate, procurement processes may also include selection and evaluation criteria relating to ethical practices, supply chain transparency, and compliance with employment and labour standards.

DNCG (and its subsidiaries) include clauses within their standard terms and conditions requiring suppliers to comply with the Modern Slavery Act 2015 and to ensure that slavery and human trafficking are not taking place within their organisation or supply chains. Suppliers are required to take reasonable steps to ensure their own subcontractors and supply chains comply with these obligations.

Work placement processes for students and apprentices include 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.

These processes are subject to ongoing monitoring and periodic review by the Procurement Team to ensure that procurement practices remain compliant with current legislation and continue to support ethical and responsible sourcing.

5. Recruitment Practices

All recruitment and selection processes are conducted by managers/staff who are appropriately trained in Safer Recruitment & Selection, and Safeguarding practices, with increased oversight of recruitment agencies in line with 2025 strengthened expectations regarding labour-sourcing risks.

Temporary staff recruited indirectly by DNCG (and its subsidiaries), are recruited through agreed recruitment agencies. To further mitigate the risk of any potential occurrences of modern slavery, DNCG (and its subsidiaries), has developed 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.

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.

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. Training will include a range of resources such as scenarios, case-studies and risk-spotting exercises as required under the updated 2025 guidance. Awareness of the risks will also be raised with students and apprentices, for example, as part of the Personal Development Scheme of Learning.

7. Commitment

DNCG and its subsidiaries are committed to strengthening understanding of their supply chains and increasing transparency and accountability to protect the rights and wellbeing of everyone working within them. As part of this statement and the policies outlined above, DNCG works to minimise the risk of modern slavery or human trafficking across its supply chains and services. The Group also commits to progressing toward Level 2 disclosures, evidence-based reporting, measurable KPIs, and annual publication through the UK Government Registry.

This statement has been approved by DNCG's governing body and will be reviewed at least once annually.

This statement will be submitted to the UK Modern Slavery Statement Registry. This statement will also be made available to all staff members, stakeholders, and the general public, by publication on the intranet and websites.

Daniel Fenwick
Principal & Acting Chief Executive Officer
March 2026

