



# DERBY COLLEGE GROUP STATEMENT

## Modern Slavery Statement

Reference: GOV-002  
Year: 2019  
Designated Owning Department: Corporate Affairs

Date: December 2019  
Executive Owner: Deputy CEO - Strategy & Corporate Services  
Lead Reviewer: Clerk to the Governors  
Reviewers:

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**POLICY - PROCEDURES - GUIDELINES - RELATED DOCUMENTS**

## **Modern Slavery Statement, December 2019**

DCG is committed to tackling modern slavery and aims to do this by raising awareness and understanding of modern slavery and human trafficking amongst its employees and students, ensuring there is no modern slavery in the Group's own business and the Group's supply chains. The Group considers modern slavery prevention as part of a broader human rights agenda and as such engages with the wider community to promote individuals' protection.

### **Organisational Structure and Supply Chains**

#### Organisational Structure

DCG primary business is the provision of education and skills training to individual students, employers and their employees and school pupils. In addition, the Group provides nursery care for children up to the age of **four**. Other activities include the leasing of premises for conference and events through a Group subsidiary – MBS Limited and the provision of cleaning services through DCG Services Limited. The Group is based in Derbyshire and operates from four main campuses – two within the City of Derby and two within the County of Derbyshire. The Group also provides community education in an outreach centre in the City of Derby and works directly on employer premises in the East and West Midlands.

#### Employees and Supply Chain

The Group and its subsidiaries employs a range of suppliers, including seasonal and sessional employees. A breakdown for 2018/19 is provided below:

- An average of 937 people, 732 were teaching/teaching support employees;
- 109 sessional staff assigned to DCG for its main business of education and skills training;
- 33 temporary/seasonal employees of MBS Limited
- 37 employees of DCG Services Limited
- Around 4,000 suppliers and sub-contractors
- In 2018/19 the Group's turnover was around £51m, £7.1m was spent on goods and services.

### **Responsibility for Anti-Slavery Initiatives**

The Group's Deputy Chief Executive takes overall responsibility for supporting and overseeing anti-slavery initiatives, and focussed responsibility is assigned as follows:

Student Support – Director of Services for Students  
Student Engagement – Head of Behaviour for Learning  
Employee Engagement – Executive Director of Human Resources  
Supplier Engagement – Procurement Manager

### **Policies**

The Group has a review cycle for all policies and plans to incorporate expectations of Group employees, suppliers and others, as appropriate, at review stages. Policies currently in place that incorporate elements aimed at supporting the abolition of modern slavery are: Code of Conduct for Employees, Recruitment and Selection Policy, Health and Safety and Welfare at Work, Public Interest and Disclosure Policy, Safeguarding Policy and Financial Regulations. In addition, where a tender process takes place to appoint a new supplier, alongside standard questions, questions and requirements around social responsibility, sourcing and modern slavery are included.

The Suppliers' Handbook includes a statement to reflect the expectations contained within the Modern Slavery Act.

### **Due Diligence**

Given the nature of its core business, the Group does not deem modern slavery and human trafficking as high risk. However, the Group engages in activities aimed at tackling modern slavery and human trafficking and places a priority on raising awareness amongst its largest cohort of students, as part of positive citizenship, and those employer partners who support the Group's students. In addition, the

Group pays regard to its own staffing and supply chain and policies have been revised to incorporate expectations associated with tackling modern slavery and human trafficking.

The Group has moved to categorised suppliers by industry and added a risk rating in order to identify those industries associated with high risk in terms of modern slavery (for example, agriculture, farming and domestic services) and whose turnover is in excess of £36 million (this being the indicator to comply with the Act). Questions relating to the Modern Slavery Act and how organisations comply with this have been included in tender processes for new suppliers, including how suppliers ensure modern slavery is not present in their supply chain.

A review has been undertaken of existing suppliers who the Group did business with in 2018/19 in order to identify if the Group deemed this supplier high risk. For those operating in a high risk industry the Group will issue the revised Suppliers' Handbook along with relevant questionnaire for completion, upon receipt of which assessment will be undertaken.

In the academic year 2018/19, the Group did not terminate any business as a result of suppliers not meeting expectations.

The Group's largest cohort of students, and those supporting them, will continue to be engaged in awareness raising initiatives as part of the positive citizen programme. The statement will be issued annually to all employees in order to ensure continued awareness and vigilance.

Students, employees and contractors are encouraged to identify and report any potential breaches of Modern Slavery.

**Approved by the DCG Corporation on 16 December 2019.**

Signed: Janet Morgan, Chair of Governors