

David Game College

Modern Slavery and Human Trafficking Statement 2025–26

This statement is issued pursuant to Section 54, Part 6 of the UK Modern Slavery Act 2015 and sets out the steps taken by **David Game College** during the 2025–26 reporting period to prevent modern slavery and human trafficking across our operations, admissions processes, employment practices, and supply chains.

David Game College is committed to the highest standards of ethical conduct and to ensuring that vulnerable individuals—including children, young adults, and international students—are protected from exploitation. We recognise that educational institutions can be targeted by traffickers and criminal networks, and we therefore adopt a strong, proactive, and continually improving approach to risk management.

1. Organisational Overview

David Game College is an independent education provider based in the United Kingdom, offering GCSE, A level, university foundation, and specialist programmes. We employ academic and professional services staff and engage a wide range of suppliers including estate and facilities services, security, ICT, student support services, and educational resources.

We acknowledge our duty to identify, prevent, and respond to risks of:

- Modern slavery
- Human trafficking
- Forced labour
- Child exploitation
- Criminal exploitation (including financial, labour or immigration-related)
- Risks related to international student recruitment and admissions

2. Our Commitment

We commit to:

- **Zero tolerance** of modern slavery in any form.
- **Ethical, transparent, and lawful conduct** across all operations.
- **Embedding safeguarding and risk controls** throughout the admissions process.
- **Scrutiny of suppliers**, contractors, and partner organisations.
- **Ongoing engagement** with government standards and sector best practice.
- **Mandatory registration and use of the Crown Commercial Service Modern Slavery Assessment Tool (MSAT)** beginning 2025–26.

3. Governance and Accountability

Oversight and responsibility are structured as follows:

Board of Directors

- Holds ultimate accountability for compliance with the Modern Slavery Act 2015.
- Reviews and signs off the annual Modern Slavery Statement.
- Ensures adequate resources are allocated.

Executive Leadership Team (ELT)

- Implements the policy across the organisation.
- Leads risk assessments, monitoring, and escalation.
- Oversees supplier vetting and MSAT compliance.

Admissions and Safeguarding Committee

- Conducts enhanced risk assessments for all student applications.
- Identifies potential trafficking concerns.
- Reports serious concerns to external agencies (e.g., local safeguarding partners, Home Office).

Procurement, Facilities, and ICT Managers

- Responsible for applying due diligence and supplier checks.
- Ensures all suppliers meet modern slavery compliance standards.

All Employees

- Have a duty to report concerns via safeguarding or whistleblowing channels.
- Receive training appropriate to their role.

4. Admissions: Preventing Child and Student Trafficking

David Game College recognises that some international students—especially minors—may be vulnerable to trafficking, coercion, or criminal exploitation.

We have implemented **multi-layered controls**:

4.1 Screening and Verification

- Compulsory interviews (in person or via secure video call).
- Validation of identity documents and education history.
- Verification of parental consent and guardianship arrangements.
- Cross-checking agent information to prevent fraudulent recruitment.

4.2 Behavioural and Safeguarding Indicators

Admissions staff are trained to identify red flags such as:

- Scripted responses or coaching
- Signs of coercion, distress, or external control
- Adults answering on behalf of the applicant
- Unexplained inconsistencies in educational or personal history
- Applications coming from known high-risk regions
- Questions relating to employment or financial arrangements inconsistent with student intentions

4.3 Escalation Protocol

Where concerns are identified:

1. The application is halted.
2. A safeguarding risk assessment is undertaken.
3. The matter is escalated to the Safeguarding Lead or Risk Committee.
4. Where required, referrals are made to the police, the Home Office, or safeguarding agencies.

5. Employment Practices

We ensure that our staff and contracted workers are protected from exploitation through:

- Right-to-work and identity checks
- Fair recruitment practices
- Compliance with UK employment law
- Payment of at least the Real Living Wage for directly employed staff
- Prohibition of recruitment fees
- Clear reporting mechanisms for concerns
- Access to pastoral and HR support

6. Supply Chain Management and Due Diligence

David Game College's supply chain includes:

- Estates, security, and facilities management
- ICT hardware, software, and AV equipment
- Recruitment and marketing services
- Professional and consultancy services
- Catering and cleaning services
- Laboratory and educational equipment

6.1 Supplier Vetting

All existing and new suppliers are assessed for:

- Compliance with Section 54 of the Modern Slavery Act
- Policies and statements on modern slavery

- Ethical trading and labour practices
- Use of subcontractors and overseas labour
- Transparency in supply chains

6.2 Crown Commercial Service MSAT Integration

Beginning 2025–26:

- All high-risk suppliers **must complete the CCS Modern Slavery Assessment Tool**.
- Medium-risk suppliers will be encouraged or required to complete MSAT depending on contract value.
- Findings will inform supplier approvals, contract renewals, and risk mitigation.

6.3 Contractual Controls

Supplier contracts now include:

- Zero tolerance clauses for modern slavery
- Requirements to report incidents or suspected breaches
- Obligations to provide evidence of good labour practices
- Rights for the College to audit or terminate contracts where non-compliance is identified

7. Training and Awareness

We provide role-specific training covering:

- Recognising signs of trafficking and exploitation
- Identifying risks within admissions processes
- Safe interviewing practices for minors and international applicants
- Supplier assessment and procurement due diligence
- Whistleblowing and reporting mechanisms
- Updates on legislation and government guidance

Annual refreshers are mandatory for staff in:

- Admissions
- Safeguarding
- Procurement and Finance
- Facilities and ICT
- HR and Recruitment

8. Reporting Mechanisms

We maintain multiple confidential reporting routes:

- Safeguarding Team direct reporting

- Designated Safeguarding Lead and Deputies
- Whistleblowing Policy and anonymous reporting
- HR reporting mechanisms
- Clear communication channels for suppliers and contractors

All reports are investigated and logged. Where criminal activity is suspected, the College will report concerns to the appropriate authorities immediately.

9. Measuring Effectiveness (KPIs)

To evaluate progress, we monitor:

- Number of staff trained and retrained
- Percentage of suppliers assessed through MSAT
- Number of safeguarding flags raised during admissions
- Time taken to investigate reported concerns
- Reduction in high-risk supplier categories
- Findings from internal audits and policy reviews

10. Continuous Improvement

During 2025–26 we commit to:

- Embedding MSAT fully into procurement workflows
- Increasing supplier scrutiny for ICT and facilities services (high-risk sectors)
- Enhancing staff training on fraud and coercion in student recruitment
- Strengthening collaboration with safeguarding partners
- Publishing clearer guidance for agents, guardians, and external partners
- Expanding risk-mapping to cover labour rights in overseas supply chains

This statement has been approved by the **Board of Directors of David Game College** and will be reviewed annually.

John Dalton

For and on behalf of the Board

David Game College

To be reviewed: 2027