

2020

HIGHGATE

PREVENTION OF MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

Highgate is committed to improving our practices to help prevent modern slavery and human trafficking within our activities, by taking steps to ensure, as far as we are able, that our supply chains are free from slavery and human trafficking.

This statement identifies the actions the School is taking to understand potential modern slavery risks within the business structure, and our supply chain, and to identify any steps that the School could take to reduce these risks, wherever possible.

Organisational structure

The School is a British independent co-educational day school operating in London. We educate around 1,850 pupils and employ approximately 600 staff (including those on casual contracts of employment).

The School was founded in 1565 and is a charity; the Governors, who act as the Charity's Trustees, are responsible for governance of the School.

Highgate's supply chains

The School's supply chain includes suppliers of educational materials, school uniforms, catering, maintenance, cleaning, furniture, equipment, stationery, ICT hardware and software, and construction.

Relevant policies

The School's Recruitment Policy has always included the requirement for Right to Work and ID checks of all staff including agency workers/contractors (ensuring, inter alia, that the employer has not retained the worker's ID documents which is a common indicator of slavery). The Recruitment Policy refers to the School's commitment towards preventing modern slavery and human trafficking in terms of the engagement of agency workers which has been identified as a higher risk area.

Our Whistleblowing Policy offers guidance on how all individuals working at the School (both employees and agency workers) can raise concerns.

The School's Financial Handbook sets out that any individual wishing to engage a new supplier speak to the Finance Team regarding anti-slavery measures within procurement processes.

Progress this financial year

Recognising that the engagement of agency workers is deemed to be a high-risk area, the HR department have engaged companies who supply staff to discuss the School's expectations of business behaviour and to undertake a risk assessment in this area. The Finance department have completed the same actions with 7% of our circa 1,000 suppliers; priority was given to those deemed to operate within high risk industries and the companies with the highest value of spend.

The risk assessment process which is being developed when engaging new suppliers will include:

- (i) Completing a Risk Assessment to identify whether a company could be at a higher risk of slavery or human trafficking, in line with information on high-risk territories published by the Global Slavery Index, and in line with the Independent School Bursars' Association guidance on high-risk industries;
- (ii) Reviewing the supplier's Anti-Slavery Statement, if they are required to publish such a document in the public domain. In the absence of such a Statement, new suppliers are requested to complete a 'Prevention of Modern Slavery and Human Trafficking Questionnaire' which establishes (amongst other points) whether they have anti-modern slavery policies in place and their approach to checking if their own suppliers/sub-contractors have measures in place.

Further steps

Work to review the anti-slavery practices of the School's existing suppliers is an ongoing exercise given the large volume of companies within our supply chain.

Regular communication of the expectations around engaging new suppliers and procurement practices, as articulated within the Financial Handbook, also remains an ongoing exercise.

The School is also developing additional clauses relating to anti-slavery to include as part of its tender process for construction contracts.

Board approval

Highgate has made this Statement for its financial year ending July 2020.

The Statement has been reviewed by the Finance, Audit and Risk Committee and approved by the School's Governing Body.

John Pheasant
Secretary and Clerk to the Governing Body

Approved with effect 24 November 2020

2019

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We are also in the process of reviewing our Whistleblowing Policy to expressly mention the School's commitment towards preventing modern slavery and human trafficking, including guidance on how individuals are able to raise concerns.

A key element of the measures taken by the School relates to our procurement processes; to that end, the Financial Handbook has been updated accordingly.

Progress this financial year

The School has conducted an initial evaluation to identify which of its supply chains could be at a higher risk of slavery or human trafficking, for example companies operating in high-risk territories identified in the Global Slavery Index and industries such as catering and uniform which The Independent Schools' Bursars Association have identified as higher risk. This involves a Risk Assessment of suppliers.

The School has reviewed our due diligence undertaken on suppliers. A 'Prevention of Modern Slavery and Human Trafficking Questionnaire' has been produced and is being introduced as part of the process for engaging new suppliers. In addition, current suppliers deemed as a higher-risk as part of the Risk Assessment of suppliers will be asked to complete the questionnaire.

This questionnaire helps make clear our expectations of business behaviour. It focuses on factors such as whether the organisation has been convicted of breaching The Modern Slavery Act 2015, whether they have related policies in place and their approach to checking whether their own sub-contractors/suppliers have appropriate measures in place. It will support other due diligence undertaken such as (a) obtaining general information on supplier companies and their corporate structure, (b) assessing supplier financial stability and (c) obtaining details of relevant supplier policies.

Further steps

The School will continue to roll-out the questionnaire to a greater number of existing suppliers.

The School will consider our tender processes, particularly within the construction sector, to review whether additional clauses relating to anti-slavery need embedding within standard contractual terms and conditions.

The School will review the requirement for wider staff training to continue to raise awareness of the School's commitment to preventing modern slavery and human trafficking.

Board approval

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The Statement has been reviewed by the Finance, Audit and Risk Committee and approved by the School's Governing Body.

John Pheasant
Secretary and Clerk to the Governing Body

Approved with effect 26 November 2019