

## **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 1,930 pupils and employ approximately 650 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 Safer Recruitment Policy refers to the role of recruiting managers and the HR department in remaining mindful of the potential indicators of modern slavery throughout the recruitment process. The Safer Recruitment Policy also makes reference to the expectation on recruitment agencies working with the School to share the same commitment on preventing modern slavery and human trafficking.

Our Whistleblowing Policy offers guidance on how all individuals working at the School (both employees and agency workers) can raise concerns and the safeguards that are offered to individuals prepared to 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**

The Finance department continues to undertake risk assessments and request completion of the anti-slavery questionnaire with our circa 1,000 suppliers on our supplier list. Of the 1,000 suppliers we have 119 active i.e. suppliers Highgate have used in the past 12 months which includes 10 new suppliers. All active suppliers have gone through the modern slavery questionnaire, with

priority having been given to those operating within “high risk” industries and those with the highest value of spend. With any new supplier, the finance team ensure the anti-slavery questionnaire is completed as part of the business-as-usual process.

The risk assessment process for suppliers includes:

- (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.

The HR Teams are continuing learning in this area and are developing a solid understanding of their responsibilities around preventing modern slavery in their recruitment and people management practices.

The Finance department are continuing to complete checks of new suppliers and checks of our existing suppliers.

### **Further steps**

Given the large volume of companies within the School’s supply chain, the Finance department will continue to review the anti-slavery practices of the School’s existing suppliers to ensure risk is managed appropriately and any concerns are raised immediately.

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

### **Board approval**

Highgate has made this Statement for its financial year ending July 2022.

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 29th November 2022