

# Prevention of Modern Slavery and Human Trafficking Statement

November 2025

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## 1. Introduction

Highgate takes the issue of modern slavery, as defined in the Modern Slavery Act 2015, seriously.

## 2. Organisational Structure

The School is a British independent co-educational day school operating in London. We educate around 1,950 pupils and employ approximately 650 staff (including those on casual contracts of employment). The School was founded in 1565 and registered under charity number 312765. Highgate owns one trading subsidiary, Highgate International Schools Limited. The Governors, who act as the Charity's Trustees, are responsible for governance of the School.

## 3. Highgate’s Supply Chains

The School’s supply chain includes suppliers of educational materials, school uniforms, catering, maintenance, security, transport and travel services, medical supplies, cleaning, furniture, equipment, stationery, ICT hardware and software, construction, recruitment and employment agencies.

## 4. Our Policies and Procedures

Highgate is committed to conducting all activities with fairness, honesty, and the highest standards of integrity, in full compliance with applicable laws. We uphold the principles of the Modern Slavery Act and actively work to prevent slavery and human trafficking within our operations and supply chains.

We strive to minimise the risk of these practices wherever possible and remain vigilant in monitoring and improving our processes. To date, Highgate has not identified any concerns related to modern slavery or human trafficking, but we continue to review and strengthen our approach.

This commitment aligns with our broader governance framework, including Whistleblowing, Equality, Recruitment, Health & Safety, and Anti-Bribery and Corruption policies.

The School's Safer Recruitment Policy requires recruiting managers and the HR department to remain mindful of potential indicators of modern slavery throughout the recruitment process. Recruitment agencies working with the School are expected to share this commitment. All prospective staff members, including contract workers, undergo appropriate checks such as Right to Work and identity verification.

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. Concerns about modern slavery can be confidentially reported to the Deputy Bursar in the first instance.

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.

## 5. Due Diligence and Supply Chains

Before engaging new suppliers or partners, the School undertakes proportionate due diligence as set out in the School's Financial Handbook.

Highgate complies fully with all regulatory and legal requirements in the procurement of goods and services. Where appropriate, the School undertakes a formal tender process to ensure fairness and transparency. We aim to establish long-term relationships with reputable suppliers who demonstrate excellence and integrity, and we make our expectations regarding ethical business practices clear from the outset.

With any new supplier, the finance team ensure the anti-slavery questionnaire is completed as part of the business-as-usual process.

## 6. Progress

The Finance department continues to undertake risk assessments and request completion of the anti-slavery questionnaire with our suppliers. The priority has been given to those operating within "high risk" industries and those with the highest value of spend.

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 Team continues to strengthen practices that promote transparency, accountability, and ethical standards across all areas of work. The team have enhanced monitoring of casual and temporary employment arrangements to ensure thorough vetting and compliance with ethical standards. This is an area that they continue to prioritise their focus.

## 7. Further Steps

Highgate will continue to strengthen its approach to preventing modern slavery and human trafficking. Consideration will be given to reviewing supplier risk profiles and introducing clear anti-slavery clauses in all future contracts. We also aim to improve communication of expectations to suppliers and explore partnerships with specialist organisations to ensure best practice. In addition, Highgate plans to introduce targeted training for core business Managers and Directors, who have primary responsibility for procurement, to enhance their ability to identify and mitigate risks effectively.

## 8. Board Approval

Highgate has made this Statement for its financial year ending July 2025. 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 25 November 2025