



# Modern Slavery and Human Trafficking Policy

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Effective Date	August 2019
Reviewed	
SMT Approval	
Full Review Date	June 2020



## INTRODUCTION

This document contains Harrow Beijing's policy on modern slavery and human trafficking. This is in alignment with best practice as detailed in Chinese labour laws and under section 54 of the UK's Modern Slavery Act 2015.

Forced or compulsory labour, human trafficking and other kinds of slavery represent some of the gravest forms of human rights abuse in any society. At Harrow Beijing we are alert to the risks both internally and through our relationships with external contractors.

Harrow Beijing is committed to conducting all aspects of its business in an ethical and transparent manner. Harrow Beijing values require that all workers are treated with dignity and respect. Harrow Beijing is fundamentally opposed to slavery, human trafficking, forced labour, debt bondage, the sale or exploitation of children and all exploitative practices in the workplace.

Harrow Beijing works with a wide array of suppliers and contractors from within Mainland China and internationally. Harrow Beijing requires that all contractors and suppliers do not engage in any such practices, and do not knowingly themselves contract with third parties which do.

Harrow Beijing values require that it terminates business relations with any contractor or supplier found to be in breach of anti-slavery and human trafficking obligations.

This statement is an expression of our commitment to improving our practices to combat modern slavery and human trafficking both within the school and our supply chains to ensure that the organization is fully compliant with Chinese and international legislation and guidelines.

## RISK ASSESSMENT

The School has assessed the risks of modern slavery and human trafficking as follows:

### i) High risk activities

- The school does not believe there to be any high risk operations within the school or within our supply chains and contractor relationships with regards to modern slavery and human trafficking.

### ii) Medium risk activities

- Supply chains linked to the catering and cleaning provisions as a consequence of the School's use of external contractors.
- Supply chains linked to the manufacture of ICT equipment and school uniforms, as a consequence of the School's use of external suppliers to provide items and the likelihood that supplies are manufactured overseas.

### iii) Low risk activities

- Provision of staff predominantly through external contractors involved in the delivery of catering, cleaning, security and facilities management and services.



## **POSITION ON MODERN SLAVERY**

The whole school policies we have in place and our anti-slavery statement, reflect our commitment to:

- Paying people fairly and properly for their work;
- Acting ethically and with integrity in all our business relationships, and;
- Enforcing effective systems and controls to ensure slavery and human trafficking is not taking place internally or through our external supply chains.

All policies are reviewed by senior managers and signed off by the Board, following (where appropriate) thorough consultation with all relevant stakeholders. Policies are reviewed on a rolling basis in response to longevity, statutory or regulatory change and school feedback.

## **DUE DILIGENCE PROCESSES**

The Head Master, with assistance from Government Affairs and/or Human Resources Team are responsible for investigating any suspected instances of modern slavery and human trafficking.

## **RECRUITMENT AND TRAINING FOR STAFF**

The School operates a comprehensive and transparent recruitment and selection process, incorporating the provisions of the *Keeping Children Safe in Education* (2018) guidelines.

The majority of the school's staff are employed directly on a permanent or fixed term basis. Those successfully appointed are sourced from multiple recruitment services which utilize a range of direct advertising, social media, databases and existing staff referrals, or via approved third party agencies.

In line with our commitments to safeguarding, all employees who join Harrow Beijing are subject to rigorous pre-employment checks to ensure they are genuine applicants operating as free agents with the required level of propriety. These will include verification of identity, references, evidence of qualifications, criminal record disclosure and right to work checks.

For roles covered by external contractors, the School will ensure that similar checks to those for employees are carried out. This is done by obtaining written verification from the contractor that the checks have been conducted and the outcomes are satisfactory.

## **WHISTLEBLOWING**

The Federation encourages all its employees, contractors and other business partners to report any concerns related to their direct activities or supply chains. This includes any circumstances that may give rise to increased risk of slavery or human trafficking. Our 'whistle-blowing policy' is designed to make it easy for workers to make disclosures, without fear of retaliation.



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## **MEASURING EFFECTIVENESS**

The school strives to maintain the highest standards of employee conduct and ethical behaviour, and the 'staff handbook' which includes our 'code of conduct' makes clear to employees the actions and behaviours expected of them when representing the school.

Being aware of the contents of the 'staff handbook' is one of our mandatory policies which we expect all employees to observe; every employee signs an annual declaration confirming their familiarity with our mandatory policies.

## **PROCUREMENT PRACTICE**

The school is committed to ensuring that its key suppliers adhere to the highest standards of ethics. We recognize that modern slavery is a complex supply chain issues and suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour.

The School will work with its key suppliers to ensure that they meet these standards, and any serious violation of the School's standards will lead to a review and possible termination of the business relationship.

All major supply contracts, notably those identified as presenting a medium or high risk, are reviewed regularly with the results reported to the Board of Governors to ensure that they are complying with expectations of the School.