



## **POLICY DOCUMENTS**

<b>Citation</b>	This document shall be cited as: <b>KHS Anti-slavery Statement</b>
<b>Person responsible</b>	Bursar
<b>Comments to</b>	Bursar
<b>Last reviewed/updated</b>	March 2021
<b>To be reviewed/updated</b>	March 2022
<b>Reason for review/update</b>	Annual update
<b>Person reviewing/updating document</b>	Bursar
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## **KHS Anti-slavery Statement**

### **1. Introduction**

- This statement is made pursuant to Section 54 part 6 of the Modern Slavery Act 2015 and sets out the steps that Kingham Hill School is taking to ensure that slavery and human trafficking are not taking place in our supply chains<sup>1</sup> or in any part of our organisation.

### **2. Our policy on slavery and human trafficking**

- The School is committed to acquiring goods and services for its use without causing harm to others. In doing so, the School is committed to supporting the UK Government's approach to implementing the UN Guiding Principles on Business and Human Rights.
- In implementing this approach the School supports the Base Code of the Ethical Trading Initiative:
  - Employment is freely chosen
  - Freedom of association is respected
  - Working conditions are safe and hygienic
  - Child labour shall not be used
  - Living wages are paid
  - Working hours are not excessive
  - No discrimination is practised
  - Regular employment is provided
  - No harsh or inhumane treatment is allowed.

### **3. Our Supply Chains**

- As the Kingham Hill Trust is a charity, procurement of quality goods and services has always been an important part of ensuring charitable funds are spent appropriately. Supply chains utilised by the School currently include uniform, catering, caretaking and grounds maintenance, cleaning, furniture and equipment, ICT hardware and construction.
- The School has considered which of its supply chains could be at a high risk of slavery or human trafficking.

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<sup>1</sup> The term "supply chain" is not defined but Home Office guidance states that it has its everyday meaning, see 'Transparency in Supply Chains' <https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide>

Regard was given to supply chains which are high risk, originate outside the UK, and guidance from ISBA (The Independent Schools' Bursars Association) which identifies high risk supply chains for schools as catering, stationery and uniform.

#### **4. Due Diligence**

- The School carries out stringent due diligence on new suppliers. This includes:
  - Obtaining general information on supplier companies and understanding their corporate structure
  - Assessing supplier financial stability by reviewing recent and previous company accounts
  - Ensuring suppliers are able to provide adequate assurances of their own commitment to preventing modern slavery and human trafficking
  - Ensuring suppliers are able to provide relevant health and safety checks
  - Ensuring suppliers on School contracts are ISO 9001 compliant, and provide details of their quality assurance systems and policies across a number of areas, ensuring high standards particularly in relation to working conditions and people
  - Obtaining details of supplier policies for the purchase for consumables.

#### **5. Our Policies on Slavery and Human Trafficking**

- We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. An Anti-Slavery and Human Trafficking Policy is being drafted which will reflect our commitment to acting ethically and with integrity in all our business relationships, and the source document for the enforcement of effective systems and controls to ensure slavery and human trafficking is not taking place in our supply chains.

#### **6. Current practices**

- The School's procurements follow one of two pathways:
  - Collaborative (through independent school purchasing consortia)
  - In-house tendering and contracting.
- The School will engage with the purchasing consortia to request the inclusion of ethical sustainability, including addressing slavery and human trafficking, in their procurement programmes.
- The School's in-house tendering and contracting processes will in future include some pre-qualification clauses which address the National Living Wage and the standard terms and conditions will include enhanced clauses covering modern slavery and human trafficking.

## **7. Further steps**

- The School commits to better understand its supply chains and work towards even greater transparency and responsibility towards people working in them.
- The School is committed to improving its practices to ensure that its business and supply chains are free from slavery and human trafficking and that it demonstrates even greater transparency and responsibility towards people working in them.
- Some of the additional steps that the School will consider implementing in future are:
  - Enhanced due diligence, specific to slavery and human trafficking
  - Enhanced due diligence on existing suppliers, rather than on new suppliers only
  - Regular risk assessments on supply chains
  - Staff training to raise awareness of slavery and human trafficking
  - Proactive engagement with high risk suppliers to obtain more detail on the entire supply chain
  - Increased use of ethical suppliers
  - Clauses in contracts ensuring supplier compliance with the Modern Slavery Act 2015.

**Last reviewed: March 2021**

**To be reviewed: March 2022**

**Catriona Thompson**