



Anti-Slavery and Human Trafficking Statement (Financial year ended 31 July 2024)

Introduction

This Statement is made pursuant to section 54 part 6 of the Modern Slavery Act 2015 and sets out the steps that Dulwich College is taking to ensure that slavery and human trafficking are not taking place in any part of our organisation or our supply chains.

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of human rights.

The College is committed to understanding potential modern slavery risks within its operations and thereby ensuring that there is no slavery or human trafficking taking place in its business and its supply chains. This commitment extends to all persons working for the College or on our behalf in any capacity, including employees at all levels, governors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

Dulwich College makes this Statement pursuant to section 54 of the Modern Slavery Act 2015 for its financial year ended **31 July 2024**.

Structure, Employees and Supply Chains

Dulwich College is an independent boys' school in London. It is a charitable company limited by guarantee with two trading subsidiaries, Dulwich College Enterprises Limited and Dulwich College Enterprises Overseas Limited.

We are committed to respecting the human rights of our employees through our employment policies and practices. We are committed to providing competitive remuneration and benefits for our employees such as training & development and we are also a London Living Wage employer.

Supply chains used by the College currently include the following goods and services:

- Boarding house supplies (including bedding and linen)
- Catering equipment, clothing, supplies and services
- Classroom equipment and supplies
- Cleaning equipment, supplies and services
- Facilities and security services and supplies

- Construction
- Mechanical and Electrical equipment and associated items, services and supplies
- Furniture and fittings
- Grounds maintenance equipment and supplies
- ICT equipment and services (including software licences)
- Kindergarten equipment and supplies
- Laboratory equipment and supplies
- Maintenance equipment, supplies and services
- Medical equipment, supplies and services
- Sports equipment, clothing and supplies
- Paper, stationery, books, newspapers, magazines and subscriptions
- Printing and design services
- Professional, contractor and consultancy services
- Recruitment and employment agencies
- Transport and travel services (including coach services, flights, tour operator and taxi services)
- Uniform (staff and pupil) and other items to be sold in or supplied by the Commissariat.

The College has considered which of its supply chains could be at a risk of slavery or human trafficking. Regard was given to supply chains which are at high risk, those which originate outside the UK and guidance from ISBA (the Independent Schools' Bursars Association) which highlights three particular areas for schools to consider, i.e. catering, stationery and uniform. In our review of supply chains, we are cognisant that, unlike most schools, we do not outsource our main operational activities, and we have added to the ISBA list of areas requiring particular focus those agencies that provide labour to support the College's operational activities, i.e. cleaning, catering, maintenance, security, events and hospitality, and construction.

Due Diligence and Risk Assessment Processes

As part of the College's initiative to identify and mitigate the risk of slavery and human trafficking in supply chains we uphold the following measures:

- we take a risk-based approach to our contracting processes and keep them under review;

- we assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery in our contracts with third parties;
- if the College assesses any element of risk, we ask employment and recruitment agencies and other third parties supplying workers or contractors to the College to confirm their compliance with the Modern Slavery Act; and
- before entering into significant value contracts with new suppliers we: (i) obtain general information on them and an understanding of their corporate structure; and (ii) assess their financial stability by reviewing company accounts..

Further Steps

Dulwich College is committed to improving its practices to ensure that its supply chains are free from modern slavery and human trafficking. The College is in the process of consolidating its material purchasing activities across all activities and creating additional roles whose remit includes responsibility to improve visibility and introduce a consistent approach to supplier due diligence. Some additional steps that the College will consider implementing (adopting a risk-based approach taking into account factors such as turnover or the country in which the supplier is based etc.) in the future are:

- a standard questionnaire to be completed by suppliers requiring a statement of compliance, similar to safeguarding requirements;
- enhanced due diligence, specific to modern slavery and human trafficking on both existing and new suppliers, including, where necessary, further investigation and enquiry;
- staff training to raise awareness of modern slavery and human trafficking from a procurement perspective, recognising that procurement is carried out by many departments within the College;
- increased search for and use of ethical suppliers, particularly suppliers of food which has been identified by the College as a supply chain of concern; and
- clauses in contracts seeking supplier compliance with and assurances of commitment to the Modern Slavery Act 2015.

Signed on behalf of the Board of Governors
by Katy Jones, Clerk to Governors, January 2025

Katy Jones