

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT-SEPTEMBER 2026

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps we have taken during the financial year ended 31 August 2025, and continue to take, to identify and address the risks of modern slavery and human trafficking within our operations and supply chains.

INTRODUCTION

The Keepers and Governors of the Possessions, Revenues and Goods of the Free Grammar School of John Lyon (the "Corporation", "we", "us" or "or") is an educational charity. The Corporation operates Harrow School and John Lyon School, together with our wholly owned subsidiaries and associated entities that support our charitable activities. We educate approximately 1,600 pupils in the United Kingdom, employ nearly 1,000 staff directly and operate within a wider group that supports more than 2,700 staff globally. During 2024/25, our consolidated income was approximately £91 million. [See here.](#)

Our charitable purpose is to transform the lives of children and young people through education. We are committed to conducting all aspects of our work with integrity, fairness and respect for human rights. We have zero tolerance for slavery, servitude, forced or compulsory labour and human trafficking in any form.

OUR ORGANISATION AND SUPPLY CHAINS

We provide educational, boarding, pastoral and community services through Harrow School and John Lyon School, supported by activities undertaken through our trading subsidiaries and charitable entities. Our operations require us to procure a wide range of goods and services, including:

- Construction and facilities management services;
- Catering, hospitality and cleaning services;
- Educational resources and technology;
- Uniforms, sporting equipment and other consumables;
- Professional services;
- Recruitment and temporary staffing services; and
- Maintenance, transport and estate-related services.

We recognise that certain sectors present a higher inherent risk of modern slavery, particularly where labour-intensive services or international supply chains are involved. We therefore adopt a risk-based approach to procurement and supplier management.

OUR COMMITMENT

We are committed to ensuring that slavery and human trafficking do not take place within our organisation or our supply chains. We expect the same commitment from all suppliers, contractors, consultants, agents and business partners.

We support the principles contained within the Modern Slavery Act 2015 and broader international human rights standards. We seek to work with suppliers who demonstrate lawful, ethical and responsible employment practices and who treat workers with dignity and respect.

DUE DILIGENCE AND RISK MANAGEMENT

We incorporate modern slavery considerations into our procurement, recruitment and risk management processes.

Our approach includes:

- Undertaking due diligence on significant suppliers and contractors, particularly where services are procured in higher-risk sectors;
- Assessing suppliers' policies, governance arrangements and compliance with relevant employment legislation;
- Seeking appropriate contractual commitments from suppliers regarding compliance with the Modern Slavery Act 2015;
- Reviewing supplier relationships where concerns arise and taking appropriate action where standards are not met;
- Considering modern slavery risks within wider organisational risk management processes; and
- Maintaining oversight of procurement activity through established financial and governance controls.

Where concerns are identified, we seek first to understand the circumstances and work constructively with suppliers to improve standards. However, where there is evidence of serious non-compliance or a failure to address concerns, we reserve the right to terminate contractual relationships.

EMPLOYMENT PRACTICES

We are committed to maintaining fair and transparent employment practices throughout our organisation. We operate recruitment and employment procedures designed to ensure compliance with UK employment law and safeguarding requirements. These procedures include:

- Verification of identity and right-to-work documentation;
- Appropriate reference and background checks;
- Written contracts of employment;
- Compliance with national minimum wage and employment legislation requirements; and
- Safeguarding checks where roles involve working with children and young people.

We are committed to providing a workplace where employees are treated fairly, are free to raise concerns and are protected from discrimination, intimidation or exploitation.

POLICIES AND GOVERNANCE

Our commitment to preventing modern slavery is supported by a wider framework of policies and procedures, including:

- Whistleblowing arrangements;
- Safer recruitment procedures;
- Safeguarding policies;
- Anti-bribery and corruption controls;

- Procurement and financial regulations;
- Equality, diversity and inclusion policies; and
- Staff codes of conduct and related governance arrangements.

These policies help us identify, prevent and address risks associated with modern slavery and unethical employment practices.

TRAINING AND AWARENESS

We seek to ensure that staff involved in procurement, recruitment, safeguarding and supplier management understand the risks associated with modern slavery and human trafficking.

Relevant employees are expected to recognise indicators of exploitation, understand escalation procedures and apply appropriate due diligence when procuring goods and services or engaging with third parties.

We will continue to promote awareness across the organisation and strengthen understanding of modern slavery risks where appropriate.

LOOKING FORWARD

We recognise that the risk of modern slavery continues to evolve and that organisations must remain vigilant. During the coming year we will continue to:

- Review and strengthen our supplier due diligence procedures;
- Maintain oversight of higher-risk supply chains;
- Promote awareness amongst relevant staff;
- Consider opportunities to enhance contractual protections and supplier engagement; and
- Keep our policies and practices under review to ensure they remain effective and proportionate.

We remain committed to taking reasonable and practical steps to prevent modern slavery and human trafficking and to ensuring that our operations reflect our values as an educational charity.

Signature:



Name: David Curley

Title: Chief Financial and Commercial Officer

Date: 8 September 2026