

# SLAVERY AND HUMAN TRAFFICKING STATEMENT

July 2019



## THE KEEPERS AND GOVERNORS OF THE POSSESSIONS AND GOODS OF THE FREE GRAMMAR SCHOOL OF JOHN LYON<sup>1</sup> (HEREAFTER REFERRED TO AS 'THE CORPORATION') SLAVERY AND HUMAN TRAFFICKING STATEMENT

### INTRODUCTION

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This statement is made pursuant to Section 54 part 6 of the Modern Slavery Act 2015 and sets out the steps that the Corporation is taking to ensure that slavery and human trafficking are not taking place in our supply chains<sup>2</sup> or in any part of our organisation.

### OUR POLICY ON SLAVERY AND HUMAN TRAFFICKING

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The Corporation is committed to acquiring goods and services for its use without causing harm to others. In doing so, the Corporation 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 Corporation 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

### OUR SUPPLY CHAINS

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Our assessment at this time is that the principal areas of the Corporation's operations which could potentially carry material <sup>2</sup>supply chain risks are office supplies, laboratory consumables, ICT and AV equipment, and some facilities management services, such as cleaning, catering and security services.

<sup>1</sup>This comprises Harrow School, John Lyon School, Harrow School Enterprises Limited and Harrow International Schools Limited.

<sup>2</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>.

To manage this potential problem the Corporation's supply chains will thus be managed under four 'super-categories':

- Laboratory and workshop consumables and equipment
- ICT equipment and services
- Facilities Management goods and services
- Professional services

## **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

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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 has been issued to 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.

## **WHAT WE ARE DOING NOW**

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The Corporation's procurements follow one of two pathways: collaborative, through the Independent Schools purchasing consortia, or in-house tendering and contracting. The Corporation will actively engage with its purchasing consortia to support the inclusion of ethical sustainability, including addressing slavery and human trafficking, in their procurement programmes.

The Corporation's in-house tendering and contracting processes will in future include some pre-qualification clauses which address the National Living Wage, although our major soft service contracts already include this requirement. Our standard terms and conditions have clauses covering modern slavery and human trafficking.

We are now also using the DEFRA Prioritisation tool and the Responsible Procurement Code as tools to assess the risks and to monitor progress with mitigation.

## **WHAT WE ARE GOING TO DO IN THE FUTURE**

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In this and the coming years, the Corporation commits to better understand its supply chains and work towards even greater transparency and responsibility towards people working in them.

For contracts that we award we will identify those supply chains which represent a medium to high risk of modern slavery, human trafficking, forced and bonded labour, and labour rights violations. We will record this assessment of risk using the DEFRA Prioritisation tool and the Responsible Procurement Code, and, working with our suppliers will more closely monitor the supply chains that have been identified as a potential risk and take appropriate action as necessary. We envisage identifying such action in collaboration with our purchasing consortium partners and with appropriate NGOs.

Ralph Arundell  
**Director of Operations**  
**Harrow School**