

# Modern Slavery and Human Trafficking Policy and Statement



This policy applies to (delete as appropriate):

- I. Both BC senior school and BCNPPS

If this is an employee policy, please indicate if this applies to (delete as appropriate):

- I. All staff / employees

Policy owner:	Emma Dobson
Frequency of review:	Annually
Dates of previous review:	November 2021
<b>Date of current review:</b>	<b>November 2022</b>
Date of next formal review:	November 2023
BC Policy reference:	
ISI reference code (where applicable):	
Linked policies/documents:	Whistleblowing Policy
Comments (changes vs previous version date):	There have been no major changes to the previous version. Annual high level review of key suppliers undertaken.

	<b>Name (role):</b>	<b>Signature:</b>	<b>Date:</b>
Policy owner:	Emma Dobson (Bursar)	E C Dobson	November 2022
SMT owner (if different):	As above		

Legal Counsel:	N/A		
Ratified (Governor)	Board of Governors		Board meeting 18 <sup>th</sup> November 2022

# Modern Slavery and Human Trafficking Policy and Statement

## 1. Introduction

Brighton College (the “College”) takes the issue of modern slavery, as defined in the Modern Slavery Act 2015, seriously.

## 2. The College’s business

The College is a British independent school and registered charity operating from premises in Brighton, Sussex with over 450 staff and 1700 pupils.

The College complies with stringent procedures for recruitment to ensure compliance with UK legislation and safeguarding obligations and sets its salaries with regard to the living wage.

To provide educational and boarding services to pupils, the College uses third party service providers for some aspects of its operations (e.g. catering, building contractors) and can have contracts in place for the provision of other services and supplies, including: legal advice, pensions advice, office supplies, laboratory supplies, IT equipment, uniform and other consumables.

In addition, the College’s Group has two other schools in the UK and the College provides services to a number of schools overseas bearing the Brighton College brand under contracts with their owners.

## 3. The College’s policy in relation to slavery and human trafficking

The College is committed to conducting its activities fairly, honestly and with the highest standards of integrity, in accordance with applicable law. The College does not tolerate slavery or human trafficking in any part of its business. This policy sits alongside the College’s Whistleblowing, Equality, Recruitment, Health & Safety and Anti-Bribery and Corruption Policies.

## 4. The College’s due diligence processes in relation to its business

### ***Considering supply chains that carry risk***

The College annually evaluates which of its supply chains may be at higher risk of slavery or human trafficking. Regard is given to supply chains originating outside the UK and to areas identified as higher risk by The Independent Schools’ Bursars Association, including catering and uniform. The College is not aware of any instances or indicators of modern slavery in its business or supply chains.

### ***Appropriate supplier arrangements***

The College complies with regulatory and legal obligations with respect to procurement of goods and services. Where the College deems it appropriate, it conducts a tender. The College aims to build longstanding relationships with trusted suppliers with a reputation for excellence and seeks to make clear its expectations of business behaviour to suppliers.

### ***Communicating expectations and seeking commitments***

For owners and operators of schools overseas that bear the Brighton College brand, the College seeks their commitment that they comply with the same fundamental principles of not tolerating slavery or human trafficking in any part of their business as well as complying with the College’s anti-bribery and corruption policy.

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### ***Due diligence on key suppliers or partners***

At present, due diligence is carried out on certain new suppliers or partners. This can include some or all of: i) obtaining general information on companies and understanding their corporate structure; ii) assessing financial stability by reviewing company accounts; iii) ensuring the main catering supplier is able to provide relevant health and safety checks; iv) determining which suppliers have slavery and human trafficking policies; v) discussions with owners and/or senior management; vi) referencing; and vii) carrying out third party checks using accredited agencies.

### ***Further steps***

The College seeks to ensure that its business is free from slavery and human trafficking. The College has a Slavery and Human Trafficking Committee that has considered: i) identification of suppliers at greater risk of slavery and human trafficking; ii) the viability of a code of conduct for some suppliers; and iii) how best to communicate expectations and seek commitments from relevant suppliers. Additional steps the Committee is considering include: i) liaison with groups and charities with expertise in the field of slavery and human trafficking to further improve the College's approach; and ii) introducing suitable clauses in future contracts seeking to ensure supplier compliance with the Modern Slavery Act 2015.

### ***Key performance Indicators and measuring effectiveness***

The College's principal KPIs are:

- No staff to be paid below minimum wage
- Staff training delivered annually by September for teachers and October for support staff
- Annual supply line evaluation to determine which suppliers are higher risk
- Anti-slavery statement agreed by the Board at its annual Michaelmas Term meeting
- All new contracts with suppliers in high risk sectors and all new contracts relating to overseas schools to contain specific commitment to comply with relevant slavery and human trafficking legislation
- Reporting to the necessary authorities any and all identified breaches of slavery and human trafficking legislation

## **5. Training for the College's staff**

Those members of staff closely involved in the procurement process for suppliers, staff recruitment and international operations have been trained on this policy.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Brighton College's slavery and human trafficking statement for the financial year ending 31 July 2022 and was approved by the Board of Governors, who met on 18<sup>th</sup> November 2022.

**Emma Dobson**

**Bursar**

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