

Modern Slavery and Human Trafficking Policy and Statement

1. Introduction

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

2. Our business

We are a British independent school and registered charity operating from premises in Brighton, Sussex. We have over 450 staff and 1600 pupils.

We comply with stringent procedures for recruitment to ensure compliance with UK legislation and safeguarding obligations and our salaries are set with regard to the living wage (and not just the national minimum and national living wages).

To provide educational and boarding services to our pupils, we use third party service providers for some aspects of our operations (eg catering, building contractors) and ordinarily 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, we have two other schools in the UK that adopt the same principles that the College does and we provide services to a number of schools overseas bearing the Brighton College brand under contracts with their owners.

3. Our policy in relation to slavery and human trafficking

We are committed to conducting our activities fairly, honestly and with the highest standards of integrity, in accordance with applicable law. We do not tolerate slavery or human trafficking in any part of our business and are committed to ensuring that it does not take place in our supply chains.

This policy sits alongside our existing Whistleblowing, Equality, Recruitment, Health & Safety and Anti-Bribery and Corruption Policies.

4. Our due diligence processes in relation to our business

Considering chains that carry risk

The College continues to evaluate which of its supply chains could be at a higher risk of slavery or human trafficking. Particular regard is given to supply chains that originate outside the UK and to those areas identified as higher risk by The Independent Schools' Bursars Association, including catering, stationery and uniform. We are not aware of any instances of or indicators of modern slavery in our business or our supply chains.

Appropriate supplier arrangements

We comply with our regulatory and legal obligations with respect to procurement of goods and services. Where appropriate, we conduct a tender. We aim to build longstanding relationships with trusted suppliers with a reputation for excellence; we make clear our expectations of business behaviour.

Communicating expectations and seeking commitments

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

Due diligence on key suppliers or partners

At present, due diligence is carried out on certain new suppliers or partners, dependent on the nature of the supplier and supply. This can include some or all of: i) obtaining general information on supplier companies and understanding their corporate structure; ii) assessing supplier financial stability by reviewing recent and previous company accounts; iii) ensuring suppliers are able to provide relevant health and safety checks; iv) obtaining details of supplier policies for the purchase of consumables; v) holding discussions with owners and/or senior management; vi) referencing; and vii) carrying out third party checks using accredited agencies.

Further steps

The College is committed to improving its practices to ensure that its business and supply chains are free from slavery and human trafficking. Some of the additional steps the College is considering are:

- Enhanced due diligence, specific to slavery and human trafficking
- Enhanced due diligence on existing suppliers, rather than on new suppliers only
- Risk assessments on supply chains
- Staff training to raise awareness of slavery and human trafficking, especially from the perspectives of procurement and employment
- 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

Key performance Indicators and measuring effectiveness

The College is seeking to identify appropriate sector KPIs for measuring adherence to this policy. When there is more clarity in this area, the College will consider these and either adopt them or adopt them with modification relevant to the College's circumstances.

5. Training for our staff

Those members of staff closely involved in the procurement process for suppliers, staff recruitment and international operations are being trained on this Policy.

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

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 2018 and was approved in the Board of Governors meeting of 15 March 2019.

Paul Westbrook

Group Chief Operating Officer

Approved with effect 15 March 2019