The Harpur Trust

Modern Slavery Statement

This statement applies to all activities of The Harpur Trust (referred to in this statement as 'The Trust'), including all schools within its legal entity (Bedford School, Bedford Modern School, Bedford Girls' School, Pilgrims Pre-Preparatory School).

1. ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

The Harpur Trust is a charity which was set up more than 450 years ago to help improve the lives of people in Bedford. The Harpur Trust supports families from all backgrounds by providing grants to community projects, sponsoring the HEART Academies Trust, working with local primary schools to improve education outcomes, sponsoring a diverse range of community events and offering a generous bursary programme for places at our independent schools.



Our schools. We own, manage, and support the four independent Harpur Trust Schools, which between them educate over 3,000 pupils per year:

- Bedford Girls' School – a day school for girls aged 7-18
- Bedford Modern School – a day school for boys and girls aged 7-18
- Bedford School – a boarding and day school for boys aged 7-18
- Pilgrims Preparatory School – a nursery and prep school for boys and girls aged 3 months to 7 years



Our employees. Over 1,100 people work for The Harpur Trust, either at one of our four schools or in the main office. The Trust has centralised HR policies to cover the recruitment and management of employee relations.



Our grant making. Supporting our community by giving grants to local projects is core to what we do. Over the past 10 years, we have given over £11 million in grants to projects based in and around Bedford. This money helped local organisations and individuals to make a difference to their own lives or those of others in the local area.



Procurement. Our schools and Trust office are responsible for the procurement of supplies required in the organisation. Our internal procedures set out the processes to ensure fair procurement and prompt payment of suppliers.



Supply Chains. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We expect all those in our supply chain and contractors to comply with our values.

2. DEFINITIONS

The Trust considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement.

3. OUR COMMITMENT

The Trust acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Trust does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to the Trust in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Trust strictly adheres to the standards required in relation to its responsibilities under the relevant employment legislation.

4. POLICIES

The Trust recognises that policies are crucial for developing anti-slavery and anti-trafficking standards across the organisation. These policies can influence employees' decision-making on a day-to-day basis and so they should promote anti-slavery behaviour. The Trust has the following policies that set out our expectations:

- Recruitment, Selection and Disclosure & Barring Service Policy and Procedure
- Financial Regulations and supporting procurement policies
- Whistleblowing Policy and procedures
- Safeguarding Policy
- Employee Code of Conduct
- Equality and Diversity Policy
- Harassment and Bullying Policy
- Disciplinary Policy
- Anti-Bribery and Corruption Policy
- Learning and Development Policy (including staff training modules)

These policies are signed off by our Executive team or Committees and are available to all employees.

5. RISK ASSESSMENT AND MANAGEMENT

In general, the Trust considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it. In particular, the following paragraphs set out three potential risk areas for the Trust and how they are addressed:

- **Sub-contracting**. The majority of suppliers deliver their services to us directly, primarily because we have to ensure all workers have the appropriate checks done before working in a school environment. On the occasion where this is not the case (primarily for a large capital project), we ensure additional risk assessments are carried out, which include an assessment for modern slavery aspects.
- **Employee behaviour**. Through training and regular feedback to our employees, we ensure that they behave in accordance with our policies and there are also mechanisms

in place for employees to raise concerns either directly to management or anonymously through a whistleblowing report.

- **International Pupils**. To ensure that we do not become a target for those looking to exploit the student visa route by trafficking children to the UK, the Trust has the following in place to mitigate the risk:
    - We use The Boarding Schools' Association (BSA) and the British Boarding Schools Network (BBSN) to recruit pupils from overseas. If the Trust were to be approached by another agent it would always seek references.
    - As part of the visa application process, as laid out by the Home Office, we seek financial records from parents of pupils proving their ability to pay the first year of fees. We also interview the pupils.
    - Our guardian checks and safeguarding procedures meet the needs of the UK Visa Immigration.

6. DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

The Trust has not, to its knowledge, conducted any business with another organisation, which has been found to have involved itself with modern slavery. In accordance with section 54(4) of the Modern Slavery Act 2015, the Trust has taken the following steps to ensure that modern slavery is not taking place:

- With regards to national or international supply chains, we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We undertake due diligence on new suppliers about them and their supply chains.
- We have systems in place to encourage the reporting of concerns and the protection of whistleblowers.

7. MEASURES OF EFFECTIVENESS

We use the following measures to check how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Right to work checks completed at recruitment stage.
- Ensure minimum employment age adhered to, in line with the relevant legislation.
- Always apply national minimum wage thresholds, in line with the relevant legislation.
- Regular contact with material suppliers including their understanding of, and compliance with, our expectations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2010 in connection with the financial year ending 30 June 2024.

8. TRAINING AND AWARENESS RAISING ON MODERN SLAVERY AND HUMAN TRAFFICKING

Training on modern slavery is available to all our employees on our existing training platforms. The Trust has rolled out the appropriate sessions to particular groups of employees to raise awareness.

The Trust has provided a range of posters to its schools for display on notice boards to help raise awareness not only amongst it staff but with its pupils too.

9. REPORTING MODERN SLAVERY

All staff are aware of the Trust's Whistleblowing Hotline where they can report any issues in confidence and anonymously. The Whistleblowing policy also refers to the Modern Slavery Helpline (0800 0121 700) which is available for staff who do not feel they can raise concerns internally.

Modern Slavery can also be reported by other means, either via Crimestoppers on 0800 555 111 or on the Government website – “Report modern slavery – GOV.UK”. Staff should be aware that if there is a crime in action or an immediate loss to life they should call 999.

10. FURTHER ADVICE AND SUPPORT

Modern Slavery Helpline
Information and advice on modern slavery.

The Salvation Army
Immediate and intensive support to ensure victims of trafficking are given the best possible chance of recovery.

Migrant Help
Support services for adult victims of human trafficking.

Kalayaan
Advice, advocacy and support services for migrant domestic workers.

Medaille Trust
Helps women, young men and children who have been freed from human trafficking.

Barnardo's
Provides direct, specialist support to trafficked children.

Anti-slavery
Human-rights organisation working to eliminate slavery throughout the world.



Rhain Castell
Chair of the Trust **6 December 2024**