The Girls' Day School Trust – Anti-Slavery Statement

1. Introduction

The Girls' Day School Trust (GDST) continues to be committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. This statement has been updated to reflect the progress made by the GDST during the financial year 1 September 2021 to 31 August 2022. It sets out the steps the GDST is taking to understand potential modern slavery risks within its business, and to endeavour to ensure that there is no slavery or human trafficking taking place in its business or its supply chains.

2. Organisational structure and supply chains

The GDST is the UK's leading network of independent girls' schools, with 23 schools and 2 academies throughout England and Wales. It was founded in 1872 and currently educates over 18,000 pupils whilst employing over 4,000 staff.

As the GDST is a charity, procurement of quality goods and services has always been an important part of ensuring charitable funds are carefully spent. Supply chains utilised by the GDST currently include uniform, catering, caretaking and grounds maintenance, cleaning, furniture and equipment, ICT hardware, agencies for the recruitment of international students, construction and educational supplies.

The GDST has considered which of its supply chains could be at a high risk of slavery or human trafficking. Regard was given to supply chains which originate outside the UK and previous guidance from ISBA (The Independent Schools' Bursars Association) which identifies high risk supply chains for schools as catering, stationery and uniform.

3. Due diligence

As part of the GDST's initiative to identify and mitigate the risk of slavery and human trafficking in supply chains, the GDST adopts a risk-based approach to due diligence on new suppliers, with a focus on those identified as carrying the greatest exposure to risk whether due to geographic area, industry sector or value of spend. The steps taken are tailored to the individual supplier and can include:

- Obtaining general information on supplier companies and understanding their corporate structure.
- Assessing supplier financial stability by reviewing recent and previous company accounts.
- Ensuring suppliers are able to provide adequate assurances of their own commitment to preventing modern slavery and human trafficking.
- Ensuring suppliers are able to provide relevant health and safety checks.

- Ensuring suppliers on GDST framework contracts provide details of their quality assurance systems and policies across a number of areas – this is to ensure high standards particularly in relation to working conditions and people.
- Obtaining details of supplier policies for the purchase of consumables.
- Requiring suppliers to pay their staff, who are working on GDST sites, the Living wage, as defined by the Living Wage Foundation.

4. Relevant policies

The GDST has appropriate policies in place to help ensure that there is no modern slavery or human trafficking in its supply chain or business. These policies are regularly reviewed and updated.

The key policy is the GDST's internal Anti-Modern Slavery and Human Trafficking policy, which was comprehensively reviewed and updated in the course of the 2021/22 financial year, and which demonstrates the organisation's commitment to act ethically and with integrity in business relationships. The policy also demonstrates the GDST's commitment to having effective systems in place to endeavour to ensure slavery and human trafficking are not taking place within its business and its supply chains.

The GDST's Anti-Slavery policy makes reference to other relevant and longstanding GDST policies, including its Whistle-blowing policy, Procurement policy, Dignity at Work policy, Pay policy, Anti-money laundering policy and Safeguarding policy. In turn, these policies are carefully monitored and regularly updated, and the Whistle-blowing policy and Fraud policy are reviewed by our external auditors.

The GDST is confident that, together, these policies mitigate the risk of slavery and human trafficking taking place within its business or supply chains and provide support to staff should they have any concerns.

5. Progress this financial year

In its Anti-Slavery Statement for the 2020/21 financial year, the GDST identified a number of steps that it would consider implementing in future. Good progress has been made and a number of steps have been implemented. These include:

- More regular risk assessments on existing and new supply chains across the organisation.
- Proactive engagement with high-risk suppliers to obtain more detail on the entire supply chain.
- Planning for staff training to raise awareness of slavery and human trafficking.
- The commencement of a review of the arrangements that the Trust has in place with agencies for the recruitment of overseas students to ensure these address modern slavery risk.

- A review of the Trust's safeguarding practices to ensure that they adequately address any modern-slavery risks with regard to the recruitment of international students.

6. Future steps and objectives

The GDST is committed to continually improving its practices to ensure that its business and supply chains are free from slavery and human trafficking. Some of the additional steps that the GDST would like to progress towards implementing in future are:

- Working with GDST schools to consider how the consideration of anti-slavery can be embedded into their educational provision.
- Implementing additional controls that will ensure GDST schools fully consider anti-modern slavery risk when appointing suppliers. These checks can then be audited as part of the GDST's process of internal school audits.
- Continuing to progress the actions detailed in section 5 above.
- Raising awareness of modern slavery across the organisation more broadly.

7.Board approval

The Girls' Day School Trust makes this statement pursuant to section 54(1) of the Modern Slavery Act 2015, for its financial year ending 31 August 2022. This statement has been approved by The Girls' Day School Trust's board of directors who will review and update it annually.

Juliet Humphries, Director (review date September 2023)