

# SEVENOAKS SCHOOL

## MODERN SLAVERY STATEMENT

### Statement from the Board of Governors and the Chair

The Governors of Sevenoaks School (the "School"), are committed to preventing modern slavery and human trafficking within the School's activities, by taking steps to ensure that the School and, as far as we are able, its supply chains are free from slavery and human trafficking.

This financial year is the first year the School has been in a position to publish a modern slavery statement. This statement therefore signifies the start of the journey for the School and sets out our intention and commitment to identify and understand all potential modern slavery risks relating to the School and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in our organisation and supply chains.

The Board of Governors of Sevenoaks School makes this statement pursuant to Section 54 of the Modern Slavery Act (2015), for its financial year ending 31st July 2023. This statement has been approved by the Board who will review and update it annually.



**Alison Beckett**

Chair of the Board of Governors, Sevenoaks School

Approved on 30th November 2023

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## 1. Structure

- 1.1. Sevenoaks School (the “School”) is a charity registered in England and Wales (11013) and a company limited by guarantee (4908949). The School is an independent, co-educational day and boarding school for both local and international students aged 11 – 18, based in Sevenoaks, Kent. We have around 540 staff and 1200 pupils. The School was founded in 1432. The School derives most of its income from tuition fees. The members of the Board of Governors, as the charity trustees, are legally responsible for the overall management and control of the School. The School operates only in the UK.
- 1.2. Sevenoaks School, including the entities – Sennocke Services Limited (which is a wholly owned, commercial subsidiary of the School) and Sevenoaks School Foundation (a separate registered charity (307923) with charitable objects to support the School), operate from the School campus, in the heart of Sevenoaks town.
- 1.3. The Board of Governors are responsible for the strategic direction of the School, oversight of its operation and control of its assets. The Board delegates management of the School to the Head and Bursar, who also serves as Clerk to the Governors. The Board and each of its three sub-committees (Education, Finance & Property, and Governance) meet termly.
- 1.4. The School operates a Risk Framework that is reviewed and updated on a regular and ongoing basis. The Risk Framework is shared with the Governance Committee each term to provide independent challenge and assurance that risk management arrangements are effective. The full Risk Framework is reviewed annually by the Governance Committee and the Board of Governors.
- 1.5. A new strategy, *Sevenoaks 600* was recently approved by the Board. This highlights our commitment to ensuring the School’s community and campus is inclusive, responsible and sustainable, and that we provide an environment where all staff and students are able to flourish. To that end, we further recognise our responsibility to address the risk of modern slavery and human trafficking in our own operations and supply chain. In 2022-2023, Sevenoaks School received a total income of c. £42 million. Income is generated through the following income streams: tuition fees, grants and donations, and ancillary trading income.

## 2. Supply Chains and Risk Assessment

We believe the two primary ways the School can be exposed to modern slavery is through: our workforce and supply chains.

### 2.1. Workforce:

- 2.1.1. We use a variety of consultants, agencies and third parties for workforce recruitment, in particular for roles which may be difficult to fill and/or tend to be highly specialised or senior roles. We recognise this can pose a level of risk of modern slavery regarding our workforce. We mitigate this risk by also carrying out our own internal recruitment where we can.
- 2.1.2. We also manage this risk by checking the terms and conditions applied to consultants and agency workers are fair and promote the living wage. All of our contractors and agency staff are paid in line with our own staff. Our rigorous safeguarding checks require us to see original documents. We are also required to confirm that all staff have the right to work in the UK.

### 2.2. Supply Chains:

- 2.2.1. We have identified key supply chains applicable to the School. These include: catering, cleaning<sup>1</sup>, grounds maintenance, furniture, equipment, IT software and hardware, construction, clothing, agencies for the recruitment of staff and students and educational supplies.
- 2.2.2. In this statement we have begun to identify high-risk supply chains. Regard has been given to any supply chains which originate from outside the UK and the guidance from ISBA (the Independent Schools’ Bursars Association) which identifies high risk supply chains for schools as: catering, stationery and uniform.
- 2.2.3. Other sectors which tend to be identified as high risk include: facilities maintenance (commercial

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<sup>1</sup> The School has recently brought cleaning in-house, which mitigates against this risk.

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cleaning services, waste and recycling disposal, pest control services and building maintenance), ICT equipment and financial institutions. These sectors are classed as high risk for labour exploitation based on their use of subcontracting and third-party recruitment agencies, the high proportion of migrant workers in these sectors, and the often-isolated working conditions that workers face. The use of subcontracting and third-party recruitment agencies in high-risk sectors creates complex supply chains, making it hard to identify who is responsible for worker protection, leaving workers vulnerable to abuse.

2.2.4. Over the next few years the School will adopt a risk-based approach to due diligence on suppliers, with a focus on those identified as carrying the greatest exposure to risk whether due to geographic area, industry sector, or supply chain complexity. Having completed this risk mapping, we will be able to identify our high-risk suppliers and implement due diligence procedures accordingly.

### 3. Policies:

The School has a number of policies in place which help to ensure there is no modern slavery or human trafficking in our supply chains or organisation. All School employees have access to these policies, available in English, via the internal online portal. However the School is currently carrying out a policy review across its key policies. As and when School policies and procedures are reviewed, there shall be a requirement for the policy owner to consider modern slavery and human trafficking. This will form part of the review process before a policy is formally approved.

#### 3.1. Employee Code of Conduct

This policy outlines the responsibilities and expectations of all staff (employees, volunteers, agency workers, directly engaged contractors) to work within professional boundaries at the School. This Code of Conduct is supported by several individual policies, such as the Equity, Diversity and Inclusion Policy that outline employees' obligations to be inclusive and non-discriminatory towards each other and where they can access support. All employees are required to read the Code of Conduct before joining the School

#### 3.2. Recruitment Procedure

As a School, we are required to follow rigorous safeguarding checks on all staff. This includes: identification checks; right to work checks; Enhanced DBS with BCL Prohibition checks, Section 128 checks; overseas checks; Prohibition from Management List for appropriate senior staff.

The School employs both UK and non-UK nationals. The School will not employ people who do not meet the legal requirements for employment in the UK, to build resilience to criminal activity such as human trafficking. Employees from overseas, who do not have a right to work in the UK are only engaged on a sponsorship VISA basis.

#### 3.3. Grievance Procedure

This procedure supports the EDI Policy as it outlines the moral and legal responsibilities of the School, providing a supportive and accessible framework for staff to raise concerns. This procedure applies to all staff.

#### 3.4. Equity, Diversity and Inclusion

Sevenoaks School is committed to ensuring that equity, diversity and inclusion are at the very heart of our culture and community. We are proud of the fact that we are a British school with a global, progressive outlook. A culture of inclusion is central to the School's beliefs. We will work tirelessly to eradicate all forms of discrimination both in school and in the wider community. We are dedicated to eliminating discrimination against any person or group protected by the 2010 Equality Act and ensuring that every member of the Sevenoaks community feels respected, valued and supported.

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Everyone in the community (staff, governors, contractors, students, parents and visitors) has responsibility for ensuring that the school environment fully supports equity, diversity and inclusion. The Senior Leadership Team is responsible for overseeing implementation of the policy and for ensuring that all staff are aware of their responsibilities and are supported in taking appropriate action against prejudice and discrimination.

The School's Equity Diversity and Inclusion Steering Group, has overall responsibility for developing and embedding the school's strategic commitment in this area. The School embraces our duties under the Equality Act 2010 to foster respectful and dignified relationships amongst the school community, and in particular to ensure that there is no discrimination against members of the community on grounds of the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity (including paternity)
- Race (colour, ethnic or national background)
- Religion or belief (including lack of belief)
- Sex
- Sexual Orientation

### 3.5. Whistleblowing Policy

This policy encourages and supports employees, volunteers, temporary, casual and agency staff to internally report and raise concerns, regardless of their position in the organisation. A clear mechanism is established for all staff to raise concerns.

### 3.6. Safeguarding Policy

This policy outlines the responsibility of anyone who works or volunteers at the School to promote and safeguard the mental, emotional, and physical welfare of children. Schools and their staff form part of the wider safeguarding system for children, to protect children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. This Policy includes the procedure to be followed:

- For the management of safeguarding
- If a staff member suspects a child is being neglected/abused or at risk of being drawn into extremism, or a student makes a disclosure
- If allegations are made of misconduct by staff or volunteer.
- For appointing new staff or volunteers, and arranging for visits by non-staff.

The policy has been developed in accordance with Working Together to Safeguard Children (July 2018) (WTSC), Keeping Children Safe in Education (September 2023) (KCSIE), Boarding Schools' National Minimum Standards (2015), Prevent Duty Guidance (April 2021) and FGM Guidelines. The policy is reviewed annually in line with KCSIE

All staff are required to complete an online safeguarding module prior to commencing their employment and receive comprehensive safeguarding and child protection training as part of their induction. Staff are also required to read the relevant sections of KCSIE each year; Annex B (KCSIE) includes sections on Modern Slavery and Child Exploitation.

## 3.7. Anti-Money Laundering Policy

Human trafficking is considered one of the most profitable criminal enterprises in the world, with the potential to generate significant money for its perpetrators. As victims are forced into work, the money that they generate must be disguised before it can be introduced into the legitimate financial system. Human trafficking and modern slavery therefore often necessitates money laundering, which is a subsequent, connected criminal offence.

The School is potentially vulnerable to being used as a vehicle through which a criminal may seek to launder the proceeds of crime (Illicit Funds). Additionally, the School, or a member of staff, is at risk of committing a money laundering offence if they accept Illicit Funds in circumstances where they have knowledge or a reasonable suspicion that the payment is from Illicit Funds. Members of staff have a role to play in being vigilant to the risk of accepting Illicit Funds and in assisting law enforcement agencies in combatting money laundering. The School's Anti-Money Laundering Policy assists staff with identifying *red flags* that may be indicative of money laundering activities and reduces the risk of the School being used as a vehicle through which criminals can launder Illicit Funds; ensuring that School staff are aware of and comply with the requirements of UK anti-money laundering legislation.

## 3.8. Anti-Corruption and Bribery Policy

It is the policy of the School to conduct all activities in an honest and ethical manner. The School takes a zero tolerance approach to bribery and corruption and is committed to ensuring staff act professionally, fairly and with integrity, as well as implementing and enforcing effective systems to counter bribery. The Anti-Corruption and Bribery Policy applies to all staff, governors, trustees, volunteers, agents and any other person associated with the School and includes standards to be followed in relation to potential risk areas such as purchasing, gifts and hospitality. Staff are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.

## 4. Policy Review

The School intends to produce additional policies which will further support the School's commitment to prevent all forms of modern slavery with our operations. These include:

- Procurement Policy
- Dignity at Work Policy
- Pay Policy
- Recruitment Policy

## 5. Supplier Onboarding

The School is currently reviewing a new Procurement Policy which aims to ensure all suppliers are thoroughly vetted before entering into a commercial relationship with them.

## 6. Training

We recognise the importance of staff receiving modern slavery awareness and other training as part of our individual responsibility to prevent modern slavery and human trafficking in our operations and supply chains. During financial year 2023-2024 the School shall plan for staff training to raise awareness of slavery and human trafficking.

## 7. Internal Reporting Procedure

Any member of staff who wishes to report a concern about modern slavery or human trafficking should report their concern directly to the Senior Deputy Head, Deputy Head Staff, or the Director of HR.

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