



SHERBORNE

SCHOOLS GROUP

Anti-Slavery Policy

Approving body: Finance Committee

Owner: Chief Operating Officer

Author: Chief Operating Officer

Executive Summary

In accordance with the UK Modern Slavery Act 2015, this policy outlines the Sherborne Schools Group's commitment to preventing slavery and human trafficking in any aspect of its activities and supply chains.

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¹ Approved by the document owner pending ratification by the Finance Committee.

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Modern Slavery Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our statement for the financial year ending 30 June 2025. It covers the activities of the Sherborne Schools Group (Registered Company 04002527, Registered Charity 1081228) and its wholly owned trading subsidiaries. This statement is published on our [website](#).

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes many forms, including slavery, servitude, forced and compulsory labour, and human trafficking, all of which involve the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Sherborne Schools Group² (the Group) is committed to preventing slavery and human trafficking in all its activities and supply chains. The Group upholds the highest standards of integrity and ethical conduct in our operations.

Scope

This policy applies to all staff, volunteers, students, contractors, suppliers, and business partners associated with Sherborne Schools Group.

Our Commitment

The Sherborne Schools Group is committed to conducting our business 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 activities and are committed to ensuring that it does not take place in our supply chains.

² The Sherborne Schools Group includes Sherborne Boys, Sherborne Girls, Sherborne Prep, Hanford Prep, and their trading subsidiaries.

We are dedicated to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business. Our commitment includes:

- **Compliance with Legislation** - Adhering to the UK Modern Slavery Act 2015 and other relevant laws.
- **Ethical Standards** - Promoting ethical practices and human rights in all our operations.

Responsibilities

The **Governing Body** has ultimate responsibility for ensuring this policy conforms with our legal and ethical obligations.

The **Chief Operating Officer** has responsibility for implementing this policy on a daily basis, monitoring its usage and effectiveness, dealing with any questions about it and reviewing internal control systems and processes to ensure that the Group is successful in combating modern slavery.

Heads, Senior Leadership Teams and the Managers of the trading subsidiaries within the Group are responsible for ensuring that staff reporting to them understand and comply with this policy and receive appropriate and ongoing training on it and on modern slavery risks in supply chains.

All staff, volunteers, students and business partners are responsible for reporting any concerns related to modern slavery and human trafficking using the mechanisms outlined [below](#).

Due Diligence Processes

The Group implements due diligence processes to identify and mitigate risks of modern slavery, including:

The Group adopts a risk-based approach to assessing modern slavery risks within its operations and supply chains, focusing particular attention on higher-risk sectors, services and geographic regions.

- **Supplier Assessments** - Evaluating potential suppliers for compliance with anti-slavery policies.
- **Contract Clauses** - Including anti-slavery clauses in contracts with suppliers and partners.
- **Audits and Inspections** - Conducting regular audits and inspections of supply chains.

The Group may request evidence of suppliers' policies, procedures and controls relating to modern slavery and reserves the right to review compliance where concerns arise.

Training and Awareness

Training on this policy, as well as the threat the Group faces from modern slavery in its supply chains, is part of the induction process for all new employees, and updates will be offered through established channels of communication.

Our zero-tolerance stance to modern slavery must be conveyed to all suppliers, contractors and business partners from the beginning of our commercial engagement with them and reinforced as needed subsequently.

We provide training to ensure that staff, volunteers and students understand the risks of modern slavery and human trafficking. Training will include recognising indicators of modern slavery, understanding reporting obligations and awareness of safeguarding responsibilities where children or vulnerable adults may be affected. This includes:

- **Induction Programmes:** Incorporating anti-slavery training into induction programmes for relevant staff and volunteers.
- **Ongoing Education:** Regular updates and training sessions for staff, volunteers and students, as appropriate.

Reporting Mechanisms

The prevention, identification and reporting of modern slavery in any element of the Group or its supply chains is the duty of all staff and all those under the Group's authority. If anyone has reason to believe that a breach of this policy has occurred, is happening or may occur in the future, they should contact their line manager or a senior leader as soon as possible in accordance with the Group's Whistleblowing Policy.

We are dedicated to ensuring that no one experiences any adverse treatment as a result of reporting in good faith their concern that modern slavery in any form is or may be occurring in any part of our own business or in any of our supplier networks.

We have established clear reporting mechanisms for concerns related to modern slavery:

- **Confidential Reporting** - Providing confidential channels for reporting concerns.
- **Whistleblowing Policy** - Ensuring protection for those who report in good faith.
- **Safeguarding Policy** - Ensuring a commitment to safeguarding and child protection and appropriate channels for reporting concerns.
- **Anti-bribery policy** - Ensuring a commitment to integrity in all our business dealings.
- **Staff disciplinary procedures** - Ensuring appropriate consequences for any behaviour conflicting with the policies of the Group.

Monitoring and Review

The Group will monitor the effectiveness of this policy through supplier due diligence activity, contract management processes, whistleblowing reports, safeguarding concerns and training completion records.

The Group is committed to improving its practices to ensure that its supply chains are free from modern slavery and human trafficking. This policy will be reviewed regularly and updated as required to ensure its effectiveness. Feedback and suggestions for the improvement of this policy are welcome and should be directed to the Chief Operating Officer.

Appendix 1: Summary of Changes in Issue 2

- Updated following review to correct drafting, clarify governance responsibilities, strengthen risk-based supply-chain due diligence and supplier monitoring, expand training and reporting expectations, and introduce effectiveness measures.