



## Anti-Modern Slavery Statement

### Organisational structure and supply chains

The Girls' Day School Trust (GDST) is a UK-registered charitable company (company number 6400; charity number 306983) that owns and operates 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.

The GDST has a wholly-owned trading subsidiary, GDST (Enterprises) Limited (company number 2971891), and is the sole member of the GDST Academy Trust (company number 6000347).

As the GDST is a charity, procurement of quality goods and services has always been an important part of its operation, given the need to ensure that charitable funds are carefully spent.

Our key suppliers include those that supply goods and services relating to:

- Clothing (uniform);
- Catering;
- Cleaning;
- Caretaking and grounds maintenance;
- Furniture and equipment;
- IT hardware and software;
- Recruitment agencies;
- Advertising agencies;
- Construction;
- Educational supplies;
- Professional fundraising;
- Vehicles and drivers; and
- Law firms and other professional service providers.

There have been no major changes to our key supplier types since our last published statement.

## 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 Policy is scheduled to be reviewed in the course of the 2024/25 financial year.

In addition to the GDST's Anti-Modern Slavery and Human Trafficking Policy, the GDST has a number of other relevant policies and procedures, including those relating to:

- Safeguarding;
- Whistleblowing;
- Procurement;
- Anti-Fraud;
- Dignity at Work;
- Pay; and
- Anti-Money Laundering.

In turn, these policies are carefully monitored and regularly updated, and the Whistleblowing policy and Anti-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.

## Due diligence and risk-assessment

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

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; and
- Requiring suppliers to pay their staff, who are working on GDST sites, the Living wage, as defined by the Living Wage Foundation.

### Commitment to continuous improvement

The 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.

Actions taken include:

- Updating the Procurement Procedure in November 2023 which highlights modern slavery as a key contractual risk;
- Engaging with high-risk suppliers to obtain more detail on their labour practices, as well as the entire supply chain (where applicable);
- Requesting and receiving modern slavery statements and/or policies from our key catering and cleaning suppliers in the Spring term 2024, with a plan to request an update on such statements and/or policies in the Spring term 2025;
- Making anti-modern slavery training available to all staff through the GDST's e-learning offering, GDST Learn;
- Providing staff training on procurement activities in January 2024, that covered modern slavery and human trafficking, in particular, the need for the GDST to include modern slavery as a key consideration when carrying out due diligence on new suppliers;
- Having an immigration compliance officer in post who is responsible for overseeing engagement with agencies for the recruitment of overseas students, ensuring these address modern slavery risk. Actions include:
  - Updating agent contracts to include clauses on mitigating risk of child trafficking and/or exploitation;
  - Reviewing the GDST's criteria and engaging with guardianship agencies to ensure that all homestay placements meet safeguarding requirements and protect children from risk of exploitation;
- Adding a new section to the GDST Safeguarding Procedures to minimise the risk of child trafficking and/or exploitation, including checking parent identities of sponsored students;
- Reviewing the GDST's safeguarding practices on an ongoing basis, to ensure that they adequately address any modern slavery risks with regard to the recruitment of international students. This includes the arrangements for overseas pupils being incorporated into the GDST's

safeguarding audit of individual GDST schools commissioned by the GDST; and

- Requiring all key catering and cleaning suppliers to sign up to a new GDST safeguarding and child protection schedule, and equipping GDST schools with the necessary tools to carry out due diligence on those suppliers, which will continue into the academic year 2024/25;
- Continuing to work with GDST schools to consider how the understanding of modern slavery can be embedded into their educational provision.

#### 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 2024.

This statement has been approved by the Council of the GDST, being the GDST's board of directors, and who review and update it (as necessary) annually.



Vicky Tuck, Chair of Trustees and Company Director (review date September 2025)