



Anti-Modern Slavery Statement

Introduction

At The Girls' Day School Trust (GDST), we are united in a mission to help girls learn without limits, so that they can lead lives without limits.

How we operate is vital in achieving this mission, and we understand that we have a responsibility to consider the consequences of our actions on others. We are therefore committed to tackling the risks of modern slavery and strive to operate to high ethical standards in our operations, business relationships, and supply chains.

This statement sets out the measures we have taken and the measures we continue to build on, to minimise the risk of modern slavery and increase the ethical standards of our organisation.

Organisational structure

The GDST is a UK charity registered with the Charity Commission (charity number 306983) and a UK company limited by shares registered with Companies House (company number 6400). The GDST owns and operates the UK's leading network of independent girls' schools, with 24 schools and 2 academies throughout England and Wales. It was founded in 1872 and currently educates nearly 19,500 pupils whilst employing over 5,000 staff and workers. 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).

Governance

The organisation is governed by the Council of the GDST, who are also directors of the GDST. The Council oversees our operations and is responsible for the strategic direction and oversight of the organisation. Day-to-day decisions and management of the GDST are delegated to the Chief Executive Officer, and the Executive Directors, who make up the Executive Leadership Team. The Council is supported by sub-committees, which meet at least termly and report to the Council of the GDST.

The Procurement Department and Legal and Risk Assurance Department (which includes Legal, Immigration, Internal Audit, and Governance), are responsible for

identifying, assessing, and responding to modern slavery. Any concerns about any issue or suspicion of modern slavery in any parts of the GDST's business or supply chains of any supplier tier are dealt with in line with the Whistleblowing Policy.

The Legal Department is responsible for drafting our annual modern slavery statement with support from other departments, including Procurement, People and Culture, Immigration, Internal Audit, and Governance.

The GDST's Audit Committee endorsed our modern slavery statement as a first level review ahead of the Council's meeting for approval and signature by the Chair of the Council.

Our business

At the GDST, we are committed to understanding and tackling the risks of modern slavery and aim to maintain high ethical standards in our activities and operations. We require those who work with and for us to adhere to these standards.

As part of the recruitment process, candidates invited to an in-person interview at a GDST school or at Trust Office must bring original documents to verify their Right to Work in the UK and complete an identity check prior to a DBS Disclosure application. These checks ensure that individuals hold possession of their own passports and identity documents.

Our People and Culture Department monitor remuneration of all staff to ensure staff are paid fairly and competitively. While some of our support staff, such as cleaning and catering staff, are seen to be in an industry at high risk of modern slavery occurring, all employed staff aged 18 and over are paid at the level of at least the Living Wage (the London or Regional rate as appropriate) and apprentices, and staff aged under 18, receive the rates of pay aligned to the national minimum wage rates for their category or age-group. GDST's employment contracts stipulate that salaries must be paid directly into the employee's personal bank or building society account.

Supply chains

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 operate in the UK, and 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.

Our suppliers operating outside the UK include foreign tour operators, and some UK-based suppliers, such as those providing clothing and/or food services, may have manufacturing facilities outside of the UK.

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 reviewed in the 2024/25 financial year by the Procurement Department, and which demonstrates the organisation's commitment to act ethically and with integrity in business relationships. The policy demonstrates the GDST's commitment to having effective systems and controls in place to endeavour to ensure slavery and human trafficking are not taking place within its business and its supply chains. We will consider whether it is appropriate to update this policy in 2025/26 financial year, taking account of the revised statutory guidance "Transparency in Supply Chains", published by the Home Office in March 2025.

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 and Child Protection;
- Whistleblowing;
- Procurement;
- Anti-Fraud;
- Dignity at Work;
- Pay;
- Recruitment; and
- Anti-Money Laundering.

In turn, these policies are carefully monitored and regularly updated. In the 2024/25 financial year:

- The Dignity at Work Policy was reviewed and updated to reflect The Worker Protection (Amendment of Equality Act 2010) Act 2023 introducing a new mandatory legal duty on employers to proactively prevent sexual harassment of staff while they are at work by taking reasonable preventative actions;
- The Safeguarding and Child Protection Policy and Procedures were reviewed and updated in line with Keeping Children Safe in Education 2025, which references modern slavery as a category of abuse; and
- The Whistleblowing policy and Anti-Fraud policy were reviewed by our external auditors in the Summer of 2025. Following an external review, the policies were then reviewed and approved by the GDST's Audit Committee.

The above-named policies are available to GDST staff on the GDST intranet. 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. If GDST staff do have any concerns, they are entitled to raise these under the Dignity at Work Policy and/or Whistleblowing Policy.

While Whistleblowing legislation only applies to 'workers', the Whistleblowing Policy encourages other stakeholders, including volunteers, contractors and agency staff to raise concerns using this policy.

Due diligence and risk-assessment

In the 2024/25 financial year, the GDST's Procurement Department 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, assess, and mitigate the risk of modern slavery and human trafficking in supply chains, the GDST conducts annual due diligence on key framework suppliers. In addition, 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 risk-level of 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.

Disclosure of Instances of Modern Slavery

There have been no recorded instances of modern slavery in the GDST's business, corporate activities, or its supply chains.

Training

The GDST provides e-learning anti-modern slavery training through IHASCO, which is available to all staff through the GDST's e-learning offering, GDST Learn. The training course is designed to increase awareness of the various forms of modern slavery present today and outlines proactive measures organisations can take to prevent modern slavery. The course addresses key indicators of modern slavery, as well as best practices for prevention, intervention, and reporting of any concerns or suspicions of modern slavery in the organisation's business or supply chains.

Commitment to continuous improvement

At the GDST, we continue to be committed to continuously improving our response to modern slavery in order to prevent slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking.

Actions taken by the GDST in its financial year ending 31 August 2025 include:

- 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, and relevant updates, from our key catering and cleaning suppliers, as well as assurances of their own commitment to prevent modern slavery.
- Having an International Programme Lead in place, who fulfils the function of the immigration compliance officer as part of their role. This individual is responsible for overseeing engagement with agencies for the recruitment of overseas students, ensuring any engagement addresses modern slavery risk by reviewing the GDST's criteria and engaging with guardianship agencies to ensure that all homestay placements meet safeguarding requirements.
- Providing detailed guidance and 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.
- Continuing to require current and new 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.

- Continuing to work with GDST schools to consider how the understanding of modern slavery can be embedded into their educational provision.

Monitoring and evaluation

The GDST will continue to monitor and evaluate its practices, policies, procedures, and performance relating to modern slavery to effective identification, assessment, prevention and response in its business and supply chains. The Procurement Department, supported by the Legal and Risk Assurance Department, and People and Culture Departments, will lead this effort.

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 2025.

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 2026)