



RUGBY  
SCHOOL  
GROUP

## Anti-Slavery and Human Trafficking Policy

January 2025

## **1.0 INTRODUCTION**

- 1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.
- 1.2 The School has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the School or in any of our supply chains.
- 1.3 The School is committed to ensuring there is transparency in the School and in its approach to tackling modern slavery throughout its supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. The School expects the same high standards from all of its contractors, suppliers and other business partners, and as part of its contracting processes, it includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. The School expects that our suppliers will hold their own suppliers to the same high standards.

## **2.0 SCOPE**

- 2.1 This policy applies to all staff and persons working for the School or on the School's behalf in any capacity, including employees at all levels, governors, directors, officers, agency workers, contractors, seconded workers, work experience / placement students, volunteers, agents, external consultants, third-party representatives and business partners.

## **3.0 PERSONNEL RESPONSIBLE**

- 3.1 The Governing Body of Rugby School has overall responsibility for ensuring this policy complies with the School's legal and ethical obligations, and that all those under the School's control comply with it.
- 3.2 The Chief Operating Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 3.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 3.4 The prevention, detection and reporting of modern slavery in any part of School business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.5 All staff and persons working for the School or on the School's behalf in any capacity are responsible for the success of this policy and must ensure that they familiarise themselves with the policy and act in accordance with its aims and objectives. The School welcomes comments on this policy and suggested ways in which it might be improved. Comments, suggestions and queries should be addressed to the Chief Operating Officer.

## **4.0 WHAT TO DO IF YOU HAVE A CONCERN RELATING TO MODERN SLAVERY**

- 4.1 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the School's business or supply chains of any supplier tier at the earliest possible stage.

- 4.2 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager or the Chief Operating Officer, or report it in accordance with the School's Whistleblowing policy as soon as possible. A concern can also be raised anonymously in writing to the Chief Operating Officer.
- 4.3 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the School's supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or the Chief Operating Officer.
- 4.4 The School aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of the School or in any of our supply chains.

## **5.0 COMMUNICATION AND AWARENESS OF THIS POLICY**

- 5.1 Communication and awareness of this policy, and on the risk our school faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for the School.
- 5.2 The School's commitment to addressing the issue of modern slavery in our school and supply chains must be communicated to all suppliers, contractors and business partners at the outset of the School's business relationship with them and reinforced as appropriate thereafter.

## **6 SUPPLIERS**

- 6.1 The School is committed to ensuring that its supply chains are free from modern slavery and human trafficking. To this end, the School requires all current and prospective suppliers to adhere to the highest standards of ethical conduct, consistent with the School's zero-tolerance approach to modern slavery.
- 6.2 As part of our supplier due diligence process, the School will:
- Require Tier 1 suppliers in sectors that are considered at higher risk of modern slavery to complete the DEFRA Modern Slavery Assessment Toolkit or provide equivalent evidence to demonstrate compliance with the Modern Slavery Act 2015 and other applicable laws.
  - Conduct risk assessments to identify suppliers or categories of supply chains that pose a higher risk of modern slavery. This may include, but is not limited to, industries, regions, or practices identified as high-risk by reputable sources.
  - Engage with suppliers to understand their supply chains and the measures they have in place to mitigate risks of modern slavery.
- 6.3 The School expects all suppliers to:
- Comply with all applicable laws regarding anti-slavery and human trafficking.
  - Adopt and implement policies and procedures to ensure modern slavery is not present within their operations or supply chains.
  - Take appropriate steps to require their own suppliers and subcontractors to comply with similar standards, ensuring that ethical practices are upheld throughout the supply chain.

- Provide evidence of their compliance upon request, including but not limited to copies of policies, risk assessments, and training records.

6.5 In the event that a supplier is found to be in breach of this policy or unable to provide sufficient evidence of compliance, the School will:

- Work with the supplier to develop and implement a corrective action plan where appropriate.
- Terminate the relationship if the breach is severe, systemic, or remains unresolved despite reasonable efforts.

6.7 The School's expectations in relation to modern slavery and human trafficking will be communicated to suppliers at the outset of any business relationship and reinforced periodically thereafter. By working together, we aim to create a supply chain that is ethical, sustainable, and free from exploitation.

## **7.0 BREACHES OF THIS POLICY**

7.1 Any employee who breaches this policy may face disciplinary action, which could result in dismissal for gross misconduct. Anyone else who provides services to the School or on the School's behalf and is found to be in breach of this policy can expect to have their contract terminated.

## **8.0 RELATED POLICIES**

Whistleblowing Policy  
Discipline Policy and Procedure

## **9.0 FURTHER INFORMATION**

9.1 Further information and guidance regarding this policy or its application can be obtained from the HR Department via email at [hr@rugbyschool.net](mailto:hr@rugbyschool.net)