

## **Modern Slavery Act - Statement**

Cheltenham Ladies' College ("College") is an independent school for girls which provides both day and boarding opportunities for our pupils. As part of our commitment to both pupils and staff, we are proud of our core values which sit at the heart of College and are incorporated in every aspect of our organisation. We are passionate about excellence and committed to complying with the highest standards of ethical and professional behaviour and we expect the same high standards of our suppliers.

This statement explains the steps taken by College and the steps we continue to take to reduce the risk of modern slavery in our own organisation or in any of our supply chains.

College is fully committed to preventing slavery and human trafficking in its activities, and seeks to ensure that its supply chains are free from both. We are committed to ensuring there is transparency in our own organisation and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015 ("MSA"). We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

College's Council has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Chief Operating Officer has primary and day to day responsibility for implementing this policy and monitoring its use and effectiveness.

### **Suppliers**

Our relationship with suppliers is critical to our business and success and we expect our suppliers to adhere to the principles of this statement. Our key suppliers are those which help us in the delivery of our services to our pupils and parents and the operation of our premises. We expect our suppliers to engage in fair employment practices, free from forced or compulsory labour and without the threat of penalty or exploitation.

### **Risk Assessment process**

College has a process for assessment of its suppliers for compliance with the MSA, this includes the initial completion of a new supplier set up form. The supplier response will determine whether College is prepared to engage with the supplier as part of the delivery of goods and/or services.

### **Due Diligence**

As part of an on-going monitoring and due diligence process, all new suppliers will be assessed upon engagement and thereafter, as appropriate, to check on their MSA compliance status.

### **Training**

All staff are required to read, understand and comply with the College Anti-slavery and human trafficking policy. Compulsory training is also provided for all staff joining College with update training provided thereafter.

### **Code of Conduct**

All College personnel are required to read, understand and comply with its Anti-slavery and human trafficking policy.

College aims to encourage openness and will support anyone who raises genuine concerns in good faith under its policy, even if the employee turns 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 our own business or in any of our supply chains.