

Rugby School

Statement on Prevention of Modern Slavery and Human Trafficking

Introduction

Rugby School is committed to preventing modern slavery and human trafficking in its operations and supply chains. We take our responsibilities seriously and are dedicated to acting ethically and transparently in all our activities. Rugby School supports:

- Adherence to local and national laws;
- Workers' freedom to terminate their own employment;
- Workers' freedom of movement and association;
- The prohibition of any threat of violence, harassment and intimidation of workers;
- The prohibition of the use of worker paid recruitment fees;
- The prohibition of child labour;
- The prohibition of compulsory overtime; and
- The prohibition of discrimination in the workplace.

We equally expect our suppliers to sign up to these core principles.

Our Structure

Rugby School is a charitable, co-educational independent school, which provides boarding and day opportunities for our pupils. The School is registered with the Charity Commission with charity number 528752. The wider Rugby School Group includes nurseries, prep schools, and trading subsidiaries. The School also has partnership agreements with overseas schools that utilise the 'Rugby School' name.

Our Policies

We are committed to promoting human rights and safeguarding against modern slavery in all its forms. To this end, Rugby School has implemented the following policies and procedures:

- **Anti-Slavery and Human Trafficking Policy:** Outlines our commitment to identifying and addressing risks of modern slavery and human trafficking.
- **Safeguarding and Child Protection Policy:** Ensures the safety and wellbeing of students and staff, and which includes addressing concerns about exploitation.
- **Whistleblowing Policy:** Provides a confidential channel for reporting unethical or illegal behaviour, including concerns related to modern slavery.

Our Supply Chains

Rugby School works with suppliers in sectors such as construction, catering, IT and AV equipment and uniform production and we have made an assessment that these sectors may carry a higher risk of modern slavery. We are committed to working with suppliers across all spheres - but in these higher risk sector in particular - who uphold our values and comply with all relevant legislation. We expect all of our suppliers to engage in fair employment practices, free from forced or compulsory

labour and without the threat of penalty or exploitation. In return, we commit to avoiding purchasing practices that could lead to modern slavery (for example, aggressive pricing or demanding unrealistic lead times).

Due Diligence and Risk Assessment

To mitigate the risk of modern slavery in our supply chains, we:

- Conduct risk assessments to identify areas of higher vulnerability.
- Require suppliers, covered by the Act, to confirm adherence to the Modern Slavery Act 2015.
- Include anti-slavery and human trafficking clauses in contracts where appropriate.
- Monitor supplier compliance through periodic reviews.

Training and Awareness

We ensure that staff and Governors understand the risks of modern slavery through regular training and updates. We provide guidance on identifying and reporting potential issues in our operations and supply chains, including through use of the Whistleblowing Policy. All staff are required to read, understand and comply with the School's Anti-slavery and human trafficking policy.

Measuring Effectiveness

Rugby School monitors the effectiveness of our efforts through:

- Annual reviews of policies and practices related to modern slavery.
- Investigating all reports of unethical practices and taking corrective action where necessary.

Approval and Review

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015. It has been approved by the Board of Governors and will be reviewed annually.

Nick Bacon

Chair of Governors
Rugby School

Date: January 2025