



## MARLBOROUGH COLLEGE

### Modern Slavery Statement

#### Introduction

Marlborough College is 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. This statement sets out the steps Marlborough College has taken during the financial year 1<sup>st</sup> July 2017 to 31<sup>st</sup> August 2018 (Please note that a change to financial year-end implemented in the academic year 2017/18 provides for a one time only fourteen-month accounting period). These steps are being taken to understand potential modern slavery risks within its business and to ensure that there is no slavery or human trafficking taking place in its business and supply chains.

#### Organisation Structure and supply chains

Marlborough College is one of the country's leading co-educational boarding schools. Founded in 1843, it is a vibrant community of over 950 pupils, nearly all of whom board: sixteen Boarding Houses offer excellent accommodation and the College houses many of its teachers.

Marlborough believes firmly in its duty to offer a balanced and broad education, based upon ideals of rigour, respect and responsibility. It is an Anglican foundation with a rich heritage of strong academic leadership. The College is a major local employer: the Common Room consists of over 150 teachers and there are more than 500 supporting staff.

In 2012, Marlborough College Malaysia opened and currently has over 900 pupils from over 40 different nations.

As Marlborough College is a charity, procurement of quality goods and services has always been an important part of ensuring charitable funds are carefully spent. Supply chains utilised by Marlborough College currently include uniform, catering, maintenance, grounds and gardens, cleaning, furniture and equipment, stationery and ICT hardware.

Marlborough College has considered which of its supply chains could be at a high risk of slavery or human trafficking. Regard was given to supply chains which are high risk, originate outside the UK and guidance from ISBA (The Independent School Bursars Association) which identifies high risk supply chains for schools as catering, stationery and uniform.

#### Due Diligence

As part of Marlborough College's initiative to identify and mitigate the risk of slavery and human trafficking in supply chains, Marlborough College carries out stringent due diligence on new suppliers. This includes:

Obtaining general information on supplier companies and understanding their corporate structure

Assessing suppliers 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 through their recruitment and remuneration policies

Ensuring suppliers are able to provide relevant health and safety checks

Ensuring suppliers on Marlborough College framework contracts are ISO 9001 compliant and provide details of their quality assurance systems and policies across a number of areas – this is to ensure high standards particularly in relation to working conditions and people

Obtaining details of supplier policies for the purchase of consumables

### **Relevant Policies**

Marlborough College has an Anti-Slavery policy, which demonstrates its commitment to act ethically and with integrity in business relationships. The policy also demonstrates Marlborough College's commitment to having effective systems in place to ensure slavery and human trafficking are not taking place within its business and its supply chains.

Marlborough College's Anti-Slavery policy refers to their relevant and long standing Marlborough College policies including:

Code of Conduct

Whistleblowing

Equality and Diversity

Bullying and Harassment

Recruitment, Selection and Disclosure

Disciplinary

These policies are all carefully monitored and reviewed on a regular basis.

Marlborough College is confident that together these policies effectively 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.

Marlborough College's Anti-Slavery policy will be reviewed annually and supplemented with details of additional steps that can be taken by staff to ensure there is no slavery or human trafficking in Marlborough College's business or supply chains

### **Further steps and Key Performance Indicators**

Marlborough College is committed to improving its practices to ensure that its business and supply chains are free from slavery and human trafficking. Some of the additional steps that Marlborough College will consider implementing in future are:

Enhanced due diligence specific to slavery and human trafficking

Enhanced due diligence on existing suppliers rather than on new suppliers only

Regular risk assessment of supply chains

Staff training to raise awareness of slavery and human trafficking, especially from a procurement and employment perspective.

Proactive engagement with high-risk suppliers to obtain more detail on the entire supply chain

Increased use of ethical suppliers

Clause in supplier contracts ensuring suppliers comply with the Modern slavery Act 2015

Agreed key performance indicators to monitor the effectiveness of the steps taken by Marlborough College to ensure slavery and human trafficking is not taking place in Marlborough College's business or supply chains

### **Council Approval**

Marlborough College makes this statement pursuant to section 54(1) of the Modern slavery Act 2015, for its financial year ending 31<sup>st</sup> August 2018. This statement has been approved on 23<sup>rd</sup> March 2019 by the Council of Marlborough College, who will review and update it annually

A handwritten signature in black ink, appearing to be a stylized 'M' followed by several horizontal and diagonal strokes.

Author: Director of Corporate Resources

Date: 26<sup>th</sup> March 2019

Review: March 2020