

Slavery and Human Trafficking

Statement 2024/25



Introduction

This Statement is made pursuant to section 54 of the UK Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 August 2025. In this Statement, slavery and human trafficking is referred to as modern slavery. This Statement applies to all legal entities that are subsidiaries of Girls' Education Company Ltd, trading as Wycombe Abbey ("the School"). The subsidiaries of Girls' Education Company Ltd are listed at the end of this Statement.

The School is committed to the highest standards of ethical conduct. We recognise our responsibility to identify, prevent, and mitigate the risks of modern slavery in all its forms, including forced labour, child labour, servitude, and human trafficking.

Our Organisation

Wycombe Abbey is a world class independent girls' boarding school, located in the United Kingdom, providing education to girls aged 11-18 and is a registered charity. The School employs teaching, pastoral, administrative, and support staff, and works with a wide range of suppliers and service providers, mainly in the UK but also internationally.

Our operations include:

- Educational provision and pastoral care
- Boarding
- Catering, cleaning, and facilities management
- Procurement of uniforms, IT equipment, educational materials, and professional services
- Engagement with overseas agents, partners, and service providers

Our Policy

We are strongly opposed to modern slavery. We do not tolerate such abuses in our business or in our supply chains.

We act ethically and with the highest standards of integrity, quality, probity, openness and accountability in all our business operations and relationships. We are committed to being open and transparent in how we conduct our business and interact with all of our stakeholders, and we publish a range of information relating to our approach to transparency and sharing information.

Our Supply Chain

The School's supply chain include suppliers based in the UK and globally. Our contractors and suppliers are predominantly UK based, though their equipment, components and materials suppliers and workforces are often not. Key categories include:

- Facilities and estates services
- Catering and food supply
- Uniforms, sportswear, and textiles
- IT hardware, software, and digital services
- Professional services (legal, financial, consultancy)
- Recruitment agencies and international education partners

We acknowledge that certain sectors – such as textiles, electronics, and agriculture – carry higher inherent risks of labour exploitation.

Policies and Governance

The School has established policies and procedures that support our commitment to preventing modern slavery. Our policies are reviewed at least every three years and are supported by training and effective communication. Key policies include:

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Safer Recruitment Policy
- Whistleblowing Policy, enabling staff and stakeholders to raise concerns confidentially

We are committed to reviewing and strengthening these policies regularly to ensure they remain effective and aligned with best practice.

Due Diligence and Supplier Standards

We expect all suppliers, contractors, and partners to uphold the same high ethical standards that we apply within our own organisation. Our due diligence measures include:

- Assessing new suppliers for ethical and labour-related risks
- Requiring suppliers to confirm compliance with the Modern Slavery Act (where applicable)
- Incorporating modern slavery clauses into contracts and tender documents
- Prioritising suppliers with transparent labour practices and recognised ethical certifications
- Monitoring higher-risk supply categories more closely

Where concerns arise, we will investigate promptly and take appropriate action, including terminating relationships with suppliers that fail to meet our standards.

Risk Assessment

We recognise that modern slavery risks may arise in:

- Overseas manufacturing of uniforms, sportswear, and IT equipment
- Food and catering supply chains
- Recruitment of temporary or seasonal staff
- International partnerships or agents

We are working to strengthen our risk assessment processes by:

- Mapping supply chains more thoroughly
- Identifying high-risk geographies and sectors
- Engaging directly with suppliers to understand their labour practices

Training and Awareness

The School is committed to ensuring that staff understand the risks of modern slavery and know how to identify and report concerns. Our approach includes:

- Training for staff involved in procurement, recruitment, and supplier management
- Awareness-raising for all employees on recognising signs of exploitation
- Guidance for staff on reporting concerns through safeguarding or whistleblowing channels

Monitoring and Continuous Improvement

We recognise that combating modern slavery is an ongoing responsibility. Over the next 12 months, the School aims to:

- Strengthen supplier vetting and contract clauses
- Improve documentation and transparency in procurement processes
- Expand staff training on ethical sourcing and modern slavery risks
- Review and update our risk assessment framework
- Engage more actively with suppliers to promote responsible labour practices

Compliance

We have not identified any breaches of the Act in our business or our supply chains during 2024/25.

This statement has been approved by the governing Council of Wycombe Abbey and will be reviewed annually.

Date of approval: **21 March 2026**

Signed: PJ Wa

This Statement applies to Girls' Education Company Ltd (company no. 00047031, registered charity no. 310638) and its subsidiaries as follows:

- Wycombe Abbey Services Ltd, company no. 02510811
- Wycombe Abbey International Ltd, company no. 09911805
- Wycombe Abbey Developments Ltd, company no. 09547970
- Wycombe Abbey Foundation, charity no. 1211252