



WELLINGTON  
COLLEGE

**The Wellington College**  
**Charity number: 309093**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) and constitutes our statement for the financial year ending July 2020. It covers the activities of the College (as defined below) and its two wholly-owned trading subsidiaries, Wellington College Enterprises Limited (“WCEL”) and Wellington College International Limited (“WCIL”).

This statement will be published on our website and can be accessed through a link on the homepage.

**Our Organisation**

The Wellington College is an independent co-educational boarding and day school providing education to boys and girls between the ages of 13 and 18 years and, through Eagle House School, for children between the ages of 3 and 13 years (the “College”). It was founded by a Royal Charter and is registered with the Charity Commission under charity number 309093. The Wellington College operates its trading activities through WCEL and WCIL.

**Our Policies and Procedures**

The College is committed to upholding the Act and improving our practices to combat modern slavery or human trafficking throughout within our supply chain or in any part of our business. We will continue to:

1. develop and implement responsible policies (including our Whistleblowing Policy, Safeguarding Policy, Recruitment and Selection Policy and Anti-Bribery Policy) to minimise these risks and to reflect our aim to act ethically and with integrity in all our business relationships;
2. carry out due diligence and risk assessments on our supply chains and subsequently monitor any identified risks; and
3. run training programmes for appropriate staff members to raise awareness of the possibility of modern slavery and human trafficking amongst the business and within the supply chain.

We use a wide range of suppliers who support or provide services to our operations and supply goods for sale. We are continuing to ask our suppliers who meet the turnover criteria to complete a detailed questionnaire regarding their compliance with the Act, code of conduct and policies and to declare that they have not been convicted of an offence under sections 2 or 4 of the Act with a focus on those identified as carrying the greatest exposure of risk whether due to geographic area, industry or sector or by value of spend. We are in the process of introducing a Procurement Policy which will further support our compliance in this area.

To date, the College has not identified any modern slavery concerns but will remain vigilant. Staff have been encouraged to raise concerns about any issue of suspicion of modern slavery in any part of our business or supply chain at the earliest possible stage.

**Further Steps**

The College is committed to improving its practices to ensure that its supply chains are free from modern slavery and human trafficking. During the next financial year, the College will (i) continue its review of new supply contracts for clauses regarding supplier compliance with the Modern Slavery Act 2015 and (ii) remind existing staff members and ensure that any new staff recruited to the relevant

departments are made aware of the obligations that the College and its subsidiaries have regarding modern slavery and human trafficking both in the business and within the supply chain.

**Approval**

This statement has been approved by the Governors of The Wellington College and signed on their behalf.

A handwritten signature in black ink, written over a dotted horizontal line. The signature is cursive and appears to read 'K. M. Taylor'.

Vice-President

11<sup>th</sup> December 2020