



Modern Slavery Statement (year ending 31 August 2022)¹

Introduction

The Methodist Independent Schools Trust (**MIST**) has a zero-tolerance approach to modern slavery and is committed to eradicating modern slavery from all parts of MIST's operations and to ensuring that it does not take place in MIST's supply chains.

Section 54 of the UK Modern Slavery Act 2015 (**MSA**) requires commercial organisations (including charities) operating in the UK with an annual turnover in excess of £36 million to produce a 'slavery and human trafficking statement' for each financial year of the organisation.

This statement is based on Home Office guidance. MIST notes that a new Modern Slavery Bill was announced in May 2022. It remains unpublished (as at September 2023). However, MIST supports the aims of the new Bill which advocates for "strengthening the protection and support for victims of human trafficking and modern slavery and to increase accountability of companies and other organisations to drive out modern slavery from their supply chains".

MIST has registered its policy on the Government's Modern Slavery Registry. It is expected that the policy will be annually reviewed: [METHODIST INDEPENDENT SCHOOLS TRUST modern slavery statement summary \(2021\) - GOV.UK \(modern-slavery-statement-registry.service.gov.uk\)](https://www.gov.uk/modern-slavery-statement-registry.service.gov.uk)

1. Organisational structure and supply chains

- 1.a MIST is a company limited by guarantee and a registered charity. MIST is a group of independent schools and is directly responsible for 10 schools.

MIST is structured under a Unified Corporate Model in which ten Trust schools (the **Schools** - as listed below) are separate elements within MIST. MIST Trustees (who are the directors of the company) have the ultimate legal responsibility for these Schools. In order to exercise these duties effectively, MIST makes extensive delegation to the School Governing Bodies as set out in its Governance Manual and in the Governance Delegation Summary. However, MIST does not divest itself of legal responsibility for any action taken arising from this delegated authority.

MIST, together with the Schools within it, is a single legal entity. The Schools are, however, separately registered with the Department for Education (with MIST as their Registered Proprietor).

- 1.b The Schools are: Culford School; Farringtons School; Kent College Canterbury; Kent College Pembury; Lorenden Prep School; Moorlands School, Queen's College, Taunton; Shebbear College; Truro School; and Woodhouse Grove School.
- 1.c Legally, therefore, MIST is the contracting party for all contracts (employment, commercial for the supply of goods/services, and parent contracts) but a School is able to enter into contracts signing for the School as part of MIST. Thus, the Trust Schools, and particularly the governing body, Heads and Bursars, are advised of this statement and held accountable for the implementation of relevant policies.
- 1.d In order to operate and to provide services, MIST and the Schools procure a range of goods and services from third party suppliers. These suppliers are almost exclusively located in the United Kingdom.

¹ A modern slavery statement must be produced annually and within 6 months of the publication of the Annual Accounts. The statement applies to the same year the Annual Accounts.



2. Policies on modern slavery

- 2.a MIST recognises that slavery, servitude, forced labour and human trafficking (**modern slavery**) are a global and growing issue given the rapid rise in global migration, existing in every region of the world and in every type of economy, whether industrialised, developing or in transition. No sector or industry can be considered immune or untainted.
- 2.b MIST has a zero-tolerance approach to modern slavery of any kind within our operations. We all have a responsibility to be alert to the risks, however small, in MIST, our Schools and suppliers.
- 2.c MIST and its Schools have a number of policies and procedures in place which seek to ensure that modern slavery is not taking place within MIST's business or supply chains, and to mitigate the risk of committing an offence under the MSA. These include:
- (i) A Modern Slavery Act policy
 - (ii) Contracts of employment for all employees and contracts of service for volunteers
 - (iii) Safer recruitment procedures
 - (iv) Child protection and safeguarding training for staff, governors and Trustees
 - (v) Whistleblowing policies
 - (vi) Complaints procedures
 - (vii) Grievance procedures
 - (viii) Employee codes of conduct
 - (ix) Awareness raising among students through PSHE programmes of study
 - (x) Membership of the Living Wage Foundation
 - (xi) Health and Safety statements.

3. Due diligence and risk assessment processes

- 3.a Given the profile of the third-party suppliers to MIST and the policies and checks in the Schools themselves, MIST considers that the risk of it, or its Trust Schools, being involved in modern slavery is low. The following situations listed below include some example risks to which the Schools (and thus MIST) may be exposed:
- (i) Inappropriate use of "gap students" and interns
 - (ii) Using local services that might be acting unethically e.g. use of local handwash companies for minibus fleet cleaning
 - (iii) The possible use of forced labour lower in MIST's supply chains for goods used at the Schools, for example food products, school uniform and/or sports kit

Minimising risks, therefore, includes:

- (i) Proper remuneration, supervision and mentoring of gap students/interns
- (ii) Requiring assurance from local suppliers of services that their labour practices are ethical and fair and do not contravene the MSA
- (iv) Requiring suppliers to provide assurances about sources of such supplies and the ethical standards insisted upon by these suppliers at each stage of the supply chain.



4. Measuring effectiveness

- 4.a Each year, Governing Bodies of the Schools complete an Annual School Report for Trustees. This includes a “Governance Assurance Report” appendix requiring a specific statement from the School Governing Body that they have ensured that policies and activities at their School have due regard to the modern slavery requirements of MIST. Any actions or queries in relation to MIST's approach to modern slavery can be described on that form and are then reviewed by MIST.
- 4.b Trust Schools are regularly asked to provide a brief report to the Trust to specifically update their known risks to modern slavery and confirm the mitigations put in place at local levels.
- 4.c Schools are responsible for checking that suppliers are acting in accordance with the requirements of the MSA.

5. Training and communication

- 5.a The MIST Schools have primary and day-to-day responsibility for implementing the modern slavery policy, providing training to staff, monitoring implementation and reporting to MIST Trustees that they have done so.
- 5.b Information on this policy, and on the risk MIST faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for MIST and the Schools, and regular information will be provided as necessary.
- 5.c MIST's zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of business relationships with them and reinforced as appropriate thereafter.

6. Statement of compliance

- 6.a This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes MIST's slavery and human trafficking statement for the financial year to 31 August 2022.
- 6.b MIST publishes this statement on its website (www.methodistschools.org.uk).
- 6.c The statement is reviewed annually by Trustees, as required, and published in updated form within six months of the financial year end (which is 31 August each year).
- 6.d This statement relating to the year from 1 September 2021 to 31 August 2022 was approved by the Trustees of MIST (who are the directors of the company) on 12 September 2023 and is signed by the Chair of MIST.

Signed by Revd Dr Calvin T Samuel
Chair of Methodist Independent Schools Trust
Approved at Trustee Meeting – 12 September 2023