



## Methodist Independent Schools Trust

### Modern Slavery Statement (year ending 31 August 2019)<sup>1</sup>

#### 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.

#### 1. Organisational structure and supply chains

1.a MIST is a company limited by guarantee and a registered charity. MIST is a growing group of independent schools and is responsible for 12 schools (eight Trust schools and four acquired (i.e. sponsored) schools). [MIST also works actively with three associated schools and four affiliated schools (three in England and Wales and one in Dubai).]

MIST is structured under a Unified Corporate Model in which eight Trust schools (**Trust Schools**) and four acquired schools (**Acquired Schools**) (all set out below) (together the **Schools**) 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 Trust 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 Trust Schools are: Culford School; Farringtons School; Kent College Canterbury; Kent College Pembury; 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 Trust School is able to enter into contracts signing for the School as part of MIST. Thus, Trust Schools, notably the governing body, Heads and Bursars, are advised of this statement and held accountable for the implementation of relevant policies.

1.d MIST also has responsibility for the Acquired (i.e. sponsored) Schools: Lorenden School, Faversham; Moorlands School, Leeds; St Petroc's School, Bude and Truro High School for Girls. These are separately registered charities, each with turnover below the threshold for a published

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<sup>1</sup> 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 as the Annual Accounts.



statement on modern slavery but nonetheless, these Acquired Schools are expected to abide by MIST policies even though legal responsibility for these Schools rests with local Boards of Trustees.

1.e 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.

## **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 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, for example:

- (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
- (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) Abiding by the expectation of all Methodist -related organisations of paying at least the foundation living wage
- (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 Schools, being involved in modern slavery is low. The following situations listed below include some risks the Schools (and thus MIST) may be exposed to but not limited to, for example:

- (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 or and/or sports kit.

3.b Minimising risks, therefore, include:



- (i) Proper 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 (GAR) which from 2018/19 includes 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 this will be reviewed by MIST.

4.b 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, 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 2019.

6.b MIST publishes this statement on our website ([www.methodistschools.org.uk](http://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.

6.d This statement was approved by the Trustees of MIST (who are the board of directors of the company) on 16 September 2020 and is signed by the Acting Chair of MIST.

#### **7. Covid-19 Monitoring Statement 2020**

7.a Following on from guidance published by the UK Government (20 April 2020) relating to the Modern Slavery Statement associated with the published Statutory Accounts (year ending 2019), MIST is acknowledging that any delay to the completion of the Modern Slavery Statement 2019 is due to the unprecedented challenges faced by the Group – these challenges can best be



summarised as decreased staff levels (either through illnesses or furloughing) and the increased pressures placed on the remaining staff to complete business critical operational functions.

7b. However, MIST also understands that in some instances workers are more vulnerable to the risk of modern-day slavery during the Covid-19 pandemic. Therefore, MIST has instructed and monitored (through formal meetings and informal debriefings) potential risk areas as highlighted by the UK Government. These being:

- (i) The Health & Safety of Workers – Schools have adhered to published guidance on social distancing measures and, when required, ensured that workers are made aware of their rights regarding sick pay benefits in an effort to contain the spread of Covid-19. Additionally, when furloughed reduced staff salaries were judged to be below the national living wage, MIST instructed that those salaries affected should be supplemented to ensure that the living wage requirement is adhered to throughout the Group.
- (ii) Supporting Suppliers – Where possible Schools have honoured existing orders and ensured that any cancellations made were not made during production. During the official school closure period Schools used their facilities to provide extra resources to charities addressing food insecurity within their immediate areas.
- (iii) Grievance Procedures – Schools updated their policies to ensure that the extraordinary circumstances were considered. This occurred at both local School level and Group level at MIST where necessary.
- (iv) Recruitment – Schools and MIST in general have not had an increased demand for temporary recruitment of workers. However, during the normal recruitment of academic and operational staff Schools have ensured that their recruitment process addresses online challenges and safer recruitment where required.
- (v) Emerging Risks – MIST acknowledges that in this new operational landscape additional risk assessments will need to be considered and implemented to ensure operational and supplier chains particularly vulnerable to modern slavery risks are continuously monitored. The areas judged as particularly vulnerable for the Group remain as stated in section 3.

Signed by Revd Dr Calvin T Samuel, Chair of Methodist Independent Schools Trust  
Approved at Trustee Meeting – 16 September 2020