

MODERN SLAVERY ACT POLICY STATEMENT 2023

WHOLE SCHOOL

1. Introduction and Statement

1.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Methodist Independent Schools Trust (MIST), of which Kent College Pembury is a part, has a zero-tolerance for modern slavery. MIST is committed to acting ethically and with integrity in all business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in MIST's own business or in any of MIST's supply chains.

1.2 MIST makes a public statement about its commitment to dealing with Modern Slavery which is published on our website, reviewed annually, and recorded on the Government Modern Slavery Statement Registry. All staff, governors and Trustees are expected to read the statement and familiarise themselves with its contents.

1.3 MIST is committed to ensuring transparency in business and in approach to tackling modern slavery throughout MIST's supply chains, consistent with the disclosure obligations under the Modern Slavery Act 2015. MIST expects the same high standards from all contractors, suppliers and other business partners and expects its schools to do the same.

1.4 This policy is intended to ensure that we comply with our obligations under the Modern Slavery Act 2015. It documents our commitment to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

1.5 In the case of employees, this policy applies to all persons working for MIST or on MIST's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers (including school Governors), interns, agents, contractors, external consultants, third-party representatives and business partners. In the case of employees, this policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Responsibility for the policy

2.1 The Board of Trustees has overall responsibility for ensuring this policy complies with MIST's statutory obligations. Schools under MIST's control such as Kent College Pembury are required to comply with this policy.

2.2 The MIST schools have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

2.3 Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate induction and regular training on it and the issue of modern slavery in supply chains and partners.

2.4 MIST employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to Sandra Commins scommins@methodistschools.org.uk.

3. Compliance with the policy

3.1 You must ensure that you read, understand and comply with this policy.

3.2 The prevention, detection and reporting of modern slavery in any part of MIST business or supply chains is the responsibility of all. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3.3 You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of MIST business or supply chains of any supplier tier at the earliest possible stage.

3.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your line manager or report it in accordance with our Whistleblowing Policy as soon as possible.

3.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within MIST or any tier of MIST's supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or with MIST's Business Director.

3.7 MIST aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. MIST is committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of MIST's business or in any of MIST's supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the MIST's Grievance Policy.

4. Communication and awareness of this policy

4.1 Information on this policy, and on the risk MIST faces from modern slavery in its supply chains, must form part of the induction process for all individuals who work MIST, and regular information and training provided as necessary.

4.2 MIST's zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of business relationships with them and reinforced as appropriate thereafter.

5. Breaches of this policy

5.1 Any employee who breaches this policy will face disciplinary action, up to and including dismissal.

5.2 MIST may terminate business relationships with other individuals and organisations working on MIST's behalf if they breach this policy.

Date: September 2023

Approved by the Chair and Trustees of Methodist Independent Schools Trust

Reviewed by KCP Finance Committee: November 2023