

United Westminster & Grey Coat Foundation
Modern Slavery Statement (year ending 31 August 2019) ¹

Introduction

The United Westminster & Grey Coat Foundation (**UWGCF**) has a zero-tolerance approach to modern slavery and is committed to eradicating modern slavery from all parts of UWGCF's operations and to ensuring that it does not take place in UWGCF'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

UWGCF is a company limited by guarantee and a registered charity. UWGCF is responsible for five schools: Emanuel School (ES), Queen Anne's School (QAS), and Sutton Valence Schools (SVS), all independent fee-paying, and Grey Coat Hospital (GCH) and Westminster City School (WCS), both academies.

UWGCF has direct legal responsibility for ES, QAS and SVS. In order to exercise its duties effectively, UWGCF makes extensive delegation to the three Governing Bodies as set out in its Governor Terms of Reference. However, these three schools form part of a single legal entity and UWGCF does not divest itself of legal responsibility for any action taken arising from this delegated authority. Legally, therefore, UWGCF is the contracting party for all contracts (employment, commercial for the supply of goods/services, and parent contracts) but the governing bodies of ES, QAS and SVS are able to enter into contracts signing for their school as part of UWGCF. The governing bodies, Heads and Bursars are therefore advised of this statement and held accountable for the implementation of relevant policies.

UWGCF also controls GCH and WCS but as academies they are separately registered companies. Both have a turnover below the threshold for a published statement on modern slavery, and legal responsibility rests with the respective governing body but, nonetheless, GCH and WCS are expected to abide by UWGCF group policies.

In order to operate and to provide services, UWGCF and the schools procure a range of goods and services from third party suppliers. These suppliers are almost exclusively located in the UK.

2. Policies on modern slavery

UWGCF 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.

UWGCF 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 UWGCF, our schools and suppliers.

UWGCF and its schools have a number of policies and procedures in place to ensure that modern slavery is not taking place within UWGCF's business or supply chains, and to mitigate the risk of committing an offence under the MSA. These include, for example:

- (i) Contracts of employment for all employees and contracts of service for volunteers
- (ii) Safer recruitment procedures
- (iii) Child protection and safeguarding training
- (iv) Whistleblowing policies
- (v) Complaints procedures
- (vi) Grievance procedures
- (vii) Employee codes of conduct
- (viii) Awareness raising among students through PSHE programmes of study

¹ A modern slavery statement must be produced annually and within 6 months financial year-end. The statement applies to the same year as the Annual Accounts.

- (ix) Health and Safety statements.

3. Due diligence and risk assessment processes

Given the profile of the third party suppliers to UWGCF and the policies and checks in the schools themselves, UWGCF 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 UWGCF) 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; and
- (iii) The possible use of forced labour lower in UWGCF’s supply chains for goods used at the schools, for example food products, school uniform or and/or sports kit.

Minimising risks, therefore, include:

- (iv) Proper supervision and mentoring of gap students/interns;
- (v) Requiring assurance from local suppliers of services that their labour practices are ethical and fair and do not contravene the MSA; and
- (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

Each year, governing bodies review their own processes in this area and this is recorded in the meeting minutes which are received by UWGCF trustees. From 2019-20 this includes a specific statement that the governing body has ensured that policies and activities at their school have due regard to the modern slavery requirements of UWGCF. UWGCF trustees annually review its approach to modern slavery, raising queries and placing necessary actions on the schools or the foundation office officers.

Schools are responsible for checking that suppliers are acting in accordance with the requirements of the MSA.

5. Training and communication

The schools have primary and day-to-day responsibility for implementing the modern slavery policy, monitoring implementation and reporting to UWGCF trustees that they have done so.

Information on this policy, and on the risk UWGCF faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for UWGCF and the schools, and regular information will be provided as necessary.

UWGCF’s zero-tolerance approach to modern slavery are communicated to suppliers, contractors and business partners at the outset of business relationships with them and reinforced as appropriate thereafter.

6. Statement of compliance

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes UWGCF’s slavery and human trafficking statement for the financial year to 31 August 2019.

UWGCF publishes this statement on our website (www.westminstergreycoat.org).

The statement is reviewed annually by Trustees, as required, and published in updated form within six months of the financial year end.

This statement was approved by the Trustees of UWGCF on [8 April] 2020 and is signed by the Chair of UWGCF.

Signed by: [Vice-Admiral P A Dunt]