

Anti-Modern Slavery Statement 2025

1. Introduction

The United Westminster & Grey Coat Foundation (**UWGCF**) has a zero-tolerance approach to modern slavery, will follow high ethical standards in its procurement and is committed to eradicating modern slavery from all parts of UWGCF's operations and to taking reasonable steps to ensure 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.

2. 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.

GCH and WCS are also part of UWGCF, 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 their respective governing body, although GCH and WCS are encouraged 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 usually located in the UK.

3. 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:

- Contracts of employment for all employees
- Ensuring the National Living Wage is paid
- Checking Right to Work documentation within the recruitment process
- Checking the payroll onboarding – bank accounts match employee name
- Safer recruitment procedures
- Child protection and safeguarding training
- Whistleblowing policies
- Complaints procedures
- Grievance procedures
- Employee codes of conduct
- Awareness raising among students through PSHE programmes of study
- Anti-modern slavery awareness training for staff engaged in procurement
- Health and Safety statements.
- Model due diligence in procurement questionnaire for use by schools and Foundation
- Model “Anti-modern slavery policy” for schools within the Foundation

4. 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:

- a. Inappropriate use of “gap students” and interns.
- b. Using local services that might be acting unethically e.g. use of local handwash companies for minibus fleet cleaning.
- c. 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.
- d. Labour exploitation within the construction supply chain. Including in major construction contracts and potential risks through the main contractor's engagement of sub-contract labour.

Actions to minimising risks, includes:

- a. Proper supervision and mentoring of gap students and interns.
- b. Requiring assurance from local suppliers of services that their labour practices are ethical and fair and do not contravene the MSA; and
- c. 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.
- d. Building in anti modern slavery compliance and the avoidance of labour exploitation into construction contracts and undertaking due diligence through the procurement process.

5. 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. 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 and use a supplier questionnaire to assist with this process. Where schools have let major construction contracts, assurance has been sought through the tendering process for MSA compliance.

6. Training and communication

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

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. Modern Slavery Awareness Training is provided in schools using compliance training platforms. Schools have provided data on training undertaken with particular focus for staff involved in procurement. Foundation Staff have also undertaken online training.

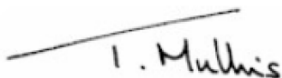
UWGCF's zero-tolerance approach to modern slavery are communicated to suppliers, contractors, and business partners at the outset of business relationships with them and reinforced as appropriate thereafter.

7. 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 2024.

The statement is reviewed annually by Trustees and published in updated form on the Foundation website within approximately six months of the financial year end.

This statement was approved by the Trustees of UWGCF and is signed by the Chair of UWGCF.



Chairman
10th March 2025