



MODERN SLAVERY STATEMENT

THIS POLICY APPLIES TO MILLFIELD, MILLFIELD PREP SCHOOL, MILLFIELD PRE-PREP SCHOOL (INCLUDING EYFS) AND MILLFIELD ENTERPRISES LIMITED, TOGETHER REFERRED TO IN THIS POLICY AS "MILLFIELD".

PURPOSE

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 in order to exploit them for personal or commercial gain.

Millfield is committed to acting ethically and with integrity in all our business dealings and relationships. This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps the school is taking during the financial year ending 31 August 2023 to understand potential modern slavery risks within our business structure, and our supply chain, and to identify steps that the school should take to eradicate these risks, where possible. This statement is to be reviewed annually in accordance with clause 6 of the Modern Slavery Act 2015.

BACKGROUND

Millfield was founded in 1935 by RJO Meyer, following his return from India with seven Indian boys, six of whom were princes. The School is now one of the leading UK Independent schools for boys and girls, aged 2-18 years. Our purpose is to break the mould as an activist educator and provide an education and an experience that honours the individual. The School's strategic vision, Discover Brilliance, is available on the School's website. In addition to its principal activity, the School also operates a wide variety of educational and recreational holiday courses, retail outlets and related activities, some of which are carried out through a trading subsidiary company, Millfield School Enterprises Limited. All surpluses from these activities are reinvested in the School for the benefit of its principal educational activity.

The School also owns 100% of the share capital of Millfield Overseas Limited, a company incorporated on 21 December 2012 which has remained dormant since incorporation.

OUR SUPPLY CHAINS

Millfield is committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners. The School's supply chain includes suppliers of educational materials, school uniforms, catering, maintenance, cleaning, furniture, equipment, stationery, ICT hardware and construction. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

The Independent School's Bursars Association (ISBA) has identified catering, bed linen, furniture, stationery and uniform as high-risk supply chains for schools specifically. We will be making sure that

our high-risk suppliers are aware of our policies and procedures and request confirmation that they adhere to the same standards as our own staff in relation to preventing slavery and trafficking.

SCOPE/TO WHOM THIS POLICY APPLIES

This policy applies to all persons working for Millfield or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and Millfield may amend it at any time. This document will be reviewed and updated annually.

RELATED POLICIES AND PROCEDURES

This Modern Slavery (Anti-Slavery and Human Trafficking) Policy interacts with the following workplace policies, which can be found within the Staff Policies Section on Sharepoint. All staff are encouraged to familiarise themselves with the policies detailed below. If you have any queries about these policies, please contact the Head of Human Resources.

- Whistleblowing policy
- Safer Recruitment and Selection Policy
- Child Protection Policy
- Grievance Policy
- Staff code of conduct

RESPONSIBILITY FOR POLICY

School Governors have overall responsibility for approval of this policy and managers have day-to-day responsibility to ensure compliance with our legal and ethical obligations. The Finance Director has primary 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.

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

COMPLIANCE WITH THIS POLICY

All staff are required to have read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. Staff are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Staff are required to notify their manager or the Finance Director as soon as possible if it is believed or suspected that a conflict with this policy has occurred or may occur in the future.

Staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage in accordance with the Whistleblowing Policy.

We aim 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. Millfield 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 our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.

COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and is reinforced as appropriate thereafter.


BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Millfield may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Name of Director ROLAND RUDD, CHAIR OF GOVERNORS

Signature

A handwritten signature in black ink, appearing to read 'Roland Rudd', written over a light blue horizontal line.

Date 1st November 2023

Policy owner	Finance Director
Reviewed on	August 2023
Review by date	August 2024
Approved by Governor Committee	Audit
Approved on	October 2023
Approve by date	October 2024
Publication	Website, Sharepoint