

Anti-Slavery and Human Trafficking Statement

Statement from the CEO (extract from our *Code of Ethical and Professional Conduct*)

'Our code of ethical and professional conduct is an integral part of the Alpha Plus Gold Standard: the values we stand for are just as important as the services we provide. We expect directors, governors, teachers, managers and all staff within the Group to comply with this code and to act with the highest levels of professionalism and integrity.'

Mark Hanley-Browne, CEO, Alpha Plus Group

Modern Slavery and Human Trafficking

Consistent with our commitment to act ethically in all our relationships, and our zero tolerance of unethical or exploitative employment practices, we are committed to doing what we can to combat slavery and human trafficking. We will not engage in business with any party whom we deem to present a risk of participating in slavery or human trafficking.

Risk evaluation

Our business is the ownership, development, governance and management of a portfolio of independent schools and colleges, the majority of which are based in England. We also have one school in New York.

Though not directly geared towards anti-slavery and human trafficking, our highly-rigorous policies, procedures and staff training in child welfare and safeguarding contribute to an environment which is sensitive to the detection of the types of exploitation and abuse contemplated by the Modern Slavery Act 2015.

Most of our 'supply' costs are represented by qualified teachers. All staff (teaching and non-teaching) are employed in accordance with:

- the law,
- professional best practice in human resource management, and
- strict recruitment practices governed by statutory guidelines relating to the welfare and protection of children

For certain key outsourced services, such as catering and building maintenance, we use a small number of key suppliers whose staff are regularly present on our premises. We have well-established and trusted relationships with these suppliers. We obtain written assurances from them that their staff are appropriately trained, and have been subject to the appropriate statutory checking to work in environments with children. Consistent with these processes, we now also require these suppliers to give us assurances (where they don't produce their own *Anti-Slavery and Human Trafficking Statement*) that they have controls and processes in place to ensure that they do not engage in slavery and human-trafficking, and that they will not engage with any other party who presents a risk of engaging in such activities.

Consequently, we are satisfied that the practices of our suppliers present a negligible risk of supporting slavery or human trafficking.

Communication of our policy

This statement is published on our website at <http://www.alphaplusgroup.co.uk/>

Explicit reference to *Anti-Slavery and Human Trafficking* is also made in our *Whistleblowing (Malpractice Disclosure) policy*, along with the clarification of our expectation that any suspicion or evidence of slavery or human trafficking be disclosed.

Reference to our policy on *Anti-Slavery and Human Trafficking* is also explicitly referenced in our *Code of Ethical and Professional Conduct*. All staff, including Heads, Principals, Directors and Governors, are obliged to sign an annual affirmation that they have read and understood the Code, and that they have made any relevant disclosures.

This *Anti-Slavery and Human Trafficking Statement*, along with all our policies, is also available to all staff on our internal Portal.

This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes the Alpha Plus Holdings Plc statement for the financial year ended 31 August 2022. The turnover of the Group exceeded £36 million for that period.

The statement is approved by the Alpha Plus Holdings Plc Board of Directors, and applies to all organisations within the Group. It will be reviewed and updated on an annual basis.