



Anti-Slavery & Human Trafficking Policy (UK)

Please note:

In countries where ACS International Schools is operating outside of the United Kingdom the UK regulatory framework will provide the foundation for best practice as far as this policy is concerned. All ACS schools will operate in compliance with the relevant legislation of the country in which they are operating.

Document Status

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Accountable:	Chief Executive
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Change Control

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March 2017	Version 1
October 2018	V 1.1
October 2019	V2
October 2020	V2.1
October 2021	V2.2 Inclusion of automation of new supplier verification processes
October 2022	V2.3



Policy Statement

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. ACS International Schools Ltd (ACS) has a zero-tolerance approach to modern slavery and 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 ACS or in any of ACS supply chains.

ACS is committed to inclusion across race, gender, faith, identity and abilities. We believe that diversity helps us to fulfil our purpose, realise our vision and exemplify our values.

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

ACS's commitment to the principles of the Modern Slavery Act 2015

ACS is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we are committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the UK and to safeguard employees from any abuse or coercion.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.



Our supply chain

Due to the nature of our business, we assess ourselves to have a low risk of modern slavery in our business and supply chains.

Our supply chains are limited and we procure goods and services from a restricted range of UK and overseas suppliers

Embedding the principles

We will continue to embed the principles through:

- providing awareness training to staff on the Modern Slavery Act 2015 and informing them of the appropriate action to take if they suspect a case of slavery or human trafficking
- ensuring staff involved in procurement activity are aware of and follow [modern slavery procurement guidance on GOV.UK](https://www.gov.uk/guidance/modern-slavery-procurement-guidance)
- ensuring that consideration of the modern slavery risks and prevention are added to ACS's policy review process as an employer and procurer of goods and services
- making sure ACS procurement strategies and contract terms and conditions include references to modern slavery and human trafficking
- continuing to take action to embed a zero-tolerance policy towards modern slavery
- ensuring that staff involved in buying or procurement and the recruitment and deployment of workers receive training on modern slavery and ethical employment practices

Transparency

ACS is committed to ensuring there is transparency in its business and in its approach to tackling modern slavery throughout its supply chains, consistent with disclosure obligations under the Modern Slavery Act 2015. ACS expects the same high standards from all contractors, suppliers and other business partners, and as part of ACS contracting processes, including specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and ACS expects its suppliers will hold their own suppliers to the same high standards.

Responsibility for the Policy

The Board of Directors for ACS International Schools Ltd has overall responsibility for ensuring this policy complies with ACS legal and ethical obligations, and that all those under ACS control comply with it.



The HR Director has 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.

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

Compliance with the Policy

To Managers and Staff in ACS

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

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

You must notify your manager or the HR Director, or the confidential ACS Whistleblowing Email (whistleblowing@acs-schools.com) as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

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

If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or the HR Director, or report it in accordance with the ACS Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, ACS will give support and guidance to its suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of ACS supply chains constitutes any of the various forms of modern slavery, raise it with your manager or the HR Director, or through the ACS Whistleblowing Policy.

ACS 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. ACS, The Board and Leadership Team are 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 ACS or in any of its 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 the HR Director immediately. If the matter is not remedied, and you are an employee, you should raise it formally using ACS Grievance Procedure, which can be found on the ACS Intranet.



ACS Whistleblowing Email (whistleblowing@acs-schools.com)

Breaches of the Policy

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

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

ACS anti-slavery and human trafficking statement for the financial year ending 31 July 2022

ACS International Schools Ltd. (ACS) has a zero-tolerance approach to modern slavery. We are 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 ACS or in any of ACS supply chains.

ACS operates three schools in the UK and has a Head Office and support services, HR, IT, Advancement, Finance, Facilities & Estates and Education Programmes. The broad staffing categories are Faculty Staff (e.g. teachers and librarians), support staff (e.g. administrators and functional professionals), temporary and substitute staff (both faculty and support), sports coaches, casual workers and volunteers.

ACS uses suppliers to provide other operational support functions, e.g. transport services (busing) and agency staff for certain roles (e.g. Catering, Cleaning, Security) and use 'Fair Trade' suppliers for catering. Fair Trade standards include 'no forced labour' and require decent working conditions.

ACS also use professional suppliers and contractors for construction projects and specific facilities support.

ACS has a policy for Anti-slavery and Human Trafficking and it is available from the ACS HR Director on request. The Board of Directors are responsible for ACS's compliance with the policy, supported by the HR Director. ACS take its responsibilities as a good employer very seriously, championing a fair wage calculated through an annual benchmarking review based on external market practices and the cost of living. In the UK we pay particular attention to the London Living Wage rate for setting the base level of pay for all roles at ACS.

Potential risk areas are in busing, contractor and casual labour support for certain facilities services, building contractors and other contractors. To ensure compliance ACS prefer and generally hire staff directly under employment contracts and use agency staff only for specific functions, expertise and as last resort for employment support.

ACS actively encourages its staff to speak up about any unethical behaviour within the

organisation and has various channels of communication via line managers, its Senior Leadership Team, and the HR department. There are also effective grievance and whistleblowing policies and procedures in place.

ACS also operates a school in Doha, Qatar. ACS Doha is committed to progressive employment practices subject to local jurisdictional and cultural requirements. Where we contract staff from external agencies we require minimum expected standards for the accommodation and living conditions provided by their employers.

Throughout 2021–22, ACS has continued to embed and enhance the various controls and activities outlined in its policy, notably through provision of staff training on this topic, and the continued refinement and operation of supplier due diligence and approval procedures. It added its statement for the previous financial year (2020–21) to the new national Modern Slavery Statement Registry.

ACS did not receive any reports of instances of modern slavery or human trafficking in the financial year ending 31 July 2022.

ACS will continue to raise awareness of modern slavery and human trafficking and of the need for proper due diligence and risk assessment processes to be applied by staff and suppliers, in accordance with its policy.

This statement has been approved by the ACS People Committee, for the financial year ending 31 March 2022 on 11 October 2022.

This statement will be reviewed and updated every year.
