The American School in London

Modern Slavery Statement

The current version of any policy, procedure, protocol or guideline is the version posted on the ASL website. It is the responsibility of all employees to ensure that they are following the most up-to-date version.

Responsible party	Director of Finance and Operations
Approved by	Board of Trustees
Approval date	6 September 2024
Next review date	September 2025

Introduction
The American School in London (ASL) is committed to preventing acts of modern slavery* and human trafficking* within its business and its supply chain.

ASL's Modern Slavery Statement is made pursuant to section 54 of the Modern Slavery Act 2015.

Structure of the organization
ASL was established in 1951 and is an international, independent and non-profit school in central London. It offers an American curriculum, delivered by a first-rate faculty to 1,400 students, aged 4-18. ASL is a registered charity employing 350 people and has a commercial subsidiary that gift aids any of its profits to the School.

To provide an education for our students, we use third party suppliers for discrete areas (e.g., catering, transport, building contractors) and for consumables, including office and laboratory supplies and IT and AV equipment.

Policy
The School takes a zero-tolerance position on violations of anti-human trafficking and anti-modern slavery laws. If breaches of these laws are found within our supply chain, a thorough investigation will ensue and, where appropriate, the School will look to support companies in their efforts to comply with the legislation or else find alternative suppliers.

** As defined within Section 54 of the Modern Slavery Act 2015*

Our core values of respect, responsibility, kindness, integrity and the courage to act underpin all aspects of our school culture, including how ASL engages suppliers.

These values set the standard for how the School expects students and employees to behave with their peers, colleagues, community members and the world around us. All the school's policies and procedures seek to create an environment that is open, transparent and trustworthy. ASL's Modern Slavery Statement, therefore, informs all the school's policies, in particular those that offer guidance in safeguarding and child protection, data protection, employment, expenses, equal opportunities, health and safety, psychological support for employees, recruitment and selection, safe working practices and whistleblowing.

Procedures

The School has a number of procedures in place that contribute to ensuring modern slavery does not occur in our organization or its supply chains.

Employment

Robust recruitment processes in line with UK employment laws, including: 'right to work' document checks; background checks; timely contracts of employment and checks to ensure everyone employed is 16 and above; pay and benefits, which are reviewed annually by the Board and the Senior Leadership Team (SLT); and rigorous documentation of all employees on the school's Single Central Record and HR systems, which is part of our ongoing child safeguarding requirements.

Risk assessment and review of our supply chains

The School complies with regulatory and legal obligations with respect to procurement of goods and services. The assessment of risk in its supply chains is that it is low with few supplies originating in high-risk countries nor are they in high-risk sectors. The School works collegially with its suppliers for contracted services and monitors the terms, conditions and circumstances of employment of their staff. ASL builds relationships with excellent suppliers who align with the school's values and business behaviors. When appropriate, the School holds tenders for professional suppliers, contractors for construction, and other services where ASL ensures compliance with legislation.

Order forms, which are issued to smaller suppliers who are not required to issue a Modern Slavery Statement, carry a clause that requires them to have committed no breach of the Modern Slavery Act 2015 and to notify ASL in writing as soon as they become aware of any breach.

Employee training

We highlight the modernslavery.co.uk site to those employees closely involved in the procurement process and the members of SLT are aware of their legal responsibilities for compliance. These employees also need to sign that they have read and understood the Anti Modern Slavery Policy.

Risks

Given the profile of third-party suppliers, policies and checks in the School, ASL considers that the risk of an incidence of modern slavery in our business is low.

The risks for schools such as ASL are that we may be exposed to, for example: i) inappropriate use of "gap students", interns or other workers by the School; ii) using local

services that might be engaged in modern slavery; and iii) the possible use of forced labor lower in the school's extended supply chains for goods or services used at ASL.

The school mitigates these risks by i) providing proper supervision of gap students/interns and workers who are all paid through payroll; ii) building relationships with trusted local suppliers who provide cost-effective services rather than the cheapest; and iii) using reputable suppliers who are also committed to eliminating modern slavery from their supply chain.

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Incidents

For the American School in London's fiscal year ended 30 June 2024, there have been no reported incidents of modern slavery by The American School in London or suppliers to the American School in London.

Statement of Compliance

This statement was approved by the Trustees on 6 September 2024 and is signed by the Chair of the Board.

Signed by:

Hahnah Seminara, Chair