



Anti-Slavery & Human Trafficking Policy (UK)

Document Status

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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.

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.

This policy does not form part of any employee's contract of employment and ACS may amend it at any time.

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.



You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the HR Director, ACS International Schools Ltd.

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

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 taken the following steps during 2017 to endorse and update our commitment to ensure that slavery and human trafficking is not taking place in any of its supply chains and/or in any part of its own business:

- ACS has re-confirmed its commitment to the London Living Wage (Living Wage Foundation).
- Continue to ensure that contractors have an up to date Corporate Social Responsibility policy and staff welfare policies.
- Written to suppliers to seek further assurances about anti-slavery and human trafficking.

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 and is a member of the Living Wage Foundation; championing a fair wage calculated independently based on the cost of living. As a member of the Living Wage Foundation, the agencies we engage for temporary staff also have to ensure that they honour the Living Wage Foundation pay rates.

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 have various channels of communication via line managers, Senior Leadership Team, Staff Forums and the HR department. There are also effective grievance and whistleblowing policies and procedures in place. To date, no reports or concerns have been raised in ACS.

ACS also operates a school in Doha, Qatar. ACS Doha is committed to progressive employment practices subject to local jurisdictional and cultural requirements.



Model Letter To ACS Suppliers

«Supplier_Name»

«Address»

«Town»

«Post_Code»

Heywood, Portsmouth Road,
Cobham, Surrey, KT11 1BL, England

Tel: +44 (0) 1932 867251

Fax: +44 (0) 1932 869781

Sent by Email: «Email_Address»

www.acs-schools.com

DATE

Dear Sir/Madam

ACS International Schools' Response to the Modern Slavery Act

As you are aware the Modern Slavery Act ("the Act") requires organisations to investigate its own supply chain to ensure it is wholly free from incidents or risk of Modern Slavery. You, or your company, has been identified as forming part of that chain in the provision of goods or services to ACS International Schools.

ACS International Schools is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We have drafted and implemented an Anti-Slavery & Human Trafficking Policy which is applicable to all our employees (enclosed with this letter). The Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure incidents of modern slavery are not taking place. This Policy has been approved by the ACS Board and they have asked me to manage the company's compliance with the Act and with the ethical standards set by the company globally.

As part of our efforts to identify and mitigate the threat of modern slavery, we are contacting all suppliers who provide goods and/or services to ACS International Schools in the UK. It is clear to the Senior Management of the organisation, that our Suppliers play a crucial role in the successful operation of this Policy. Their compliance with their legal obligations reflects not only on their own culture, but that of ACS International Schools. It is therefore of critical importance to ACS International Schools, that all Suppliers scrutinise on their own supply chains and operations and specifically those services supplied to ACS International Schools.

The Chartered Institute of Purchasing and Supply (CIPS) has released guidance to help businesses comply with the Act and they suggest that all companies:

- Ensure all UK workers receive the national minimum or living wage (as applicable) and have robust immigration checks;
- Map supply chains to identify where there is highest risk of exposure to modern slavery;
- Undertake site inspections;
- Provide training to employees and local suppliers on modern slavery risks and compliance; and
- Publish a statement outlining the steps you are taking to tackle modern slavery.

To assist with our efforts in identifying the risk, if any, faced by ACS International Schools, we request that you provide the following:

- Confirmation that you have investigated the goods/services you provide ACS International Schools in the UK, and that you have no concerns about the arrangements, status of the staff employed, or any other reason related to the provisions of the Act;
- Confirmation about whether you have sub-contracted any part of the contract with ACS International Schools to a third party and if so, what assessment have you made to ensure their compliance with the Act;
- A copy of your Modern Slavery Act/Anti-Slavery & Human Trafficking Policy;
- The name of the individual within your organisation who has responsibility for compliance with the requirements of the Act;
- Evidence of how you identify and assess potential risk of Modern Slavery in your operations and supply chain;
- Description of the steps you would take to report a breach of the Act and how you would take steps to remediate the breach;
- Evidence of how you protect whistleblowers;
- A description of the training you provide to your staff and employees, and anyone providing or connected with the goods and/or services you provide to ACS International Schools; and
- Any other information which you feel may be relevant to the obligations under the Modern Slavery Act or any similar legislation.

We would be grateful if you could provide the information requested above as soon as possible, but no later than 28 days from the date of this letter.

If you have any queries about the contents of this letter, please contact me.

Yours faithfully

Gerry Peyton
HR Director

Encl. ACS International Schools' Anti-Slavery & Human Trafficking Policy