



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

Document Name:	Anti-Slavery & Human Trafficking Policy (UK)
Document Status:	Final
Document Owner:	HR Director
Responsible:	Board
Accountable:	Chief Executive
Next Review Date:	October 2025

Change Control

Date Produced	Version
March 2017	Version 2
October 2018	V 1.1
October 2019	V2
October 2020	V2.1
October 2023	V2.2
October 2024	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.

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 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 align salaries 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.
- Incorporated our requirements for new suppliers into our standard contracting procedures and documentation.

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 ensures salaries are aligned to the Living Wage; championing a fair wage calculated independently based on the cost of living, ensuring the agencies we engage for temporary staff also have to ensure that they honour align with 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.
