

# Modern Slavery Policy

## Commitment

ACT & ALS are committed to operating our business ethically and with a strong sense of social responsibility. We recognise the existence of modern slavery and human trafficking in various forms and strive to prevent any association with these practices.

## Purpose

This Modern Slavery Policy outlines our commitment to combatting modern slavery and sets out the steps we take to ensure transparency, accountability, and compliance in line with the Modern Slavery Act 2015.

## Scope

This policy applies to all employees, contractors, suppliers, and partners working for or on behalf of ACT & ALS. It encompasses all activities carried out by the company, including but not limited to procurement, recruitment, and provision of educational services.

## Policy Statement

We condemn modern slavery and human trafficking in all forms and are dedicated to preventing these abuses within our business operations and supply chains. We are committed to upholding fundamental human rights, promoting fair labour practices, and maintaining a work environment free from exploitation.

## Employee Rights and Wellbeing

We maintain a safe and inclusive working environment that respects the rights and dignity of our employees. We strictly adhere to all applicable employment laws and regulations, including those relating to wages, working hours and health and safety.

## Employee Awareness & Training

We will provide our employees with training and resources to raise awareness about modern slavery, its indicators, and the actions they can take to report concerns. By promoting a culture of vigilance and responsibility, we aim to ensure that all employees are equipped to identify and address instances of modern slavery.

## Supplier Due Diligence

We conduct due diligence on our suppliers and contractors to ensure that they share our commitment to combating modern slavery. We assess their policies, procedures, and practices related to ethical sourcing, human rights, labour standards, and anti-slavery efforts. Ensuring they have their own safeguarding process to report Modern Slavery should they suspect it.

## Supplier Code of Conduct

We expect our suppliers and contractors to operate in accordance with high ethical standards. Our Supplier Code of Conduct explicitly prohibits the use of forced labour, child labour, and any form of modern slavery. We encourage our suppliers to adopt similar policies and actively monitor their compliance.

## **Reporting and Whistleblowing**

We maintain a confidential and accessible reporting mechanism that encourages our employees to report any suspicions, concerns, or incidents related to modern slavery through the 'My Concern' system. We take all reports seriously and investigate them promptly, ensuring appropriate actions are taken to address any identified issues. If an allegation is substantiated, we will take appropriate action, which may include termination of contracts, engagement with authorities, and support for victims.

## **Procedure**

Any instances of suspected Modern Slavery will be managed under ACT & ALS Safeguarding procedures.

## **Conclusion**

We are committed to continuously improving our practices and procedures to prevent modern slavery. We regularly review and update our policies to align with the evolving legal and regulatory landscape and best practices in combating modern slavery.

Our commitment to preventing modern slavery is a fundamental part of our business values and ethics. By implementing this Modern Slavery Policy, we aim to foster a responsible and ethical culture within ACT and contribute to the global fight against modern slavery and human trafficking.

## **Compliance and Accountability**

Our senior management is responsible for the implementation and oversight of this Modern Slavery Statement. We hold ourselves accountable to the commitments outlined herein and ensure compliance with all relevant laws, regulations, and guidelines.

This Modern Slavery Statement has been approved by ACT Ltd and ALS Ltd board of directors and is made in accordance with the requirements of the UK Modern Slavery Act 2015.

## **Document/Policy Change Request**

Changes to this Policy will be approved by the Head of People & Development.

## **Document / Policy Reviewing and Approving**

This document will be reviewed annually, by the Head of People & Development.

## **References**

ACT & ALS Safeguarding Policy and Procedures



Rosalyn Lovatt – Safeguarding and Prevent Manager/Designated Safeguarding Person

23<sup>rd</sup> February 2024