



## **Ark and Ark Schools Modern Slavery and Ethical Procurement Statement**

- 1.1. 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. We take a zero-tolerance approach to modern slavery and ensure we act ethically and with integrity in all our business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2. Our staff members are encouraged to raise concerns about any issue or suspicion of modern slavery or child labour in any parts of our business or supply chains of any supplier tier at the earliest possible stage. Safeguarding is at the core of Ark and Ark Schools' ethos and awareness of the importance of this matter is emphasised through a Safeguarding induction module undertaken by all new employees and signposting to the organisation's Safeguarding policy.
- 1.3. If it is believed or suspected a breach of this Policy Statement has occurred or that it may occur staff are requested to notify their manager or report it in accordance with our Whistleblowing Policy as soon as possible. If staff are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they are asked to raise it with the finance team. The Director of Governance is also a point of contact for raising any concerns with regards to Safeguarding for Ark, Whistleblowing for Ark and Ark Schools, and the Head of Safeguarding for any Safeguarding matters within Ark Schools. We 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 our own business or in any of our supply chains.
- 1.4. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards. We also have a Procurement Policy that strongly emphasises ethics and contains procedures to ensure that ethics are embedded in procurement practice. We endeavour to undertake an assessment of our key contracts to highlight and mitigate any risks of modern slavery.
- 1.5. This Statement applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. This Policy however does not form part of any employee's contract of employment and we may amend it at any time.
- 1.6. This Statement is reviewed at Board level, and the finance and procurement team takes day-to-day responsibility for ensuring this Statement is followed through in practice. The prevention, detection and reporting of modern slavery in any part of our delivery or supply chains is the responsibility of all those working for/ contracted by Ark and Ark Schools, and staff members are required to avoid any activity that might lead to/ suggest, a breach of this Policy.

- 1.7. Training on this Policy, and on the risk our business faces from modern slavery in its supply chains, is offered to individuals who work for us, and regular training will be provided as necessary. Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. All key suppliers are asked to confirm that where relevant they are compliant with the annual reporting requirements contained within Section 54 of the Modern Slavery Act 2015.
- 1.8. Any employee who breaches this Policy Statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this Policy under the organisation's Disciplinary Policy.

**Signed:**



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Lucy Heller, Chief Executive

**Date: 28 April 2020**

**Date of last review:** April 2020

**Date of next review:** April 2021