

## **Modern Slavery Statement**

### **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 Organisation**

The American School in London 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 1,350 students, age 4-18. ASL is a registered charity employing 340 people and has a commercial subsidiary which 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 or AV equipment.

### **Our Policy**

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

Our Core Values of Respect, Responsibility, Kindness, Integrity and the Courage to Act underpin all aspects of our School culture, including how we engage suppliers. These values set the standard for how we expect our students and employees to behave with their peers, colleagues, community members and the world around us. All of our policies and procedures, including around our Modern Slavery Statement, seek to create an environment which is open, transparent and trustworthy. This statement stands alongside the following policies:

- a) Child Protection
- b) Data Protection
- c) Employment
- d) Expenses
- e) Equal Opportunities
- f) Health & Safety
- g) Psychological Support
- h) Recruitment and Selection

- i) Safe Working Practices
- j) Whistleblowing

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

## **Our Procedures**

We have a number of procedures in place that contribute to ensuring modern slavery does not occur in our organisation 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; and rigorous documentation of all employees on our Single Central Record and HR systems, which is part of our ongoing child safeguarding requirements.

### Risk assessment and review of our supply chains:

We comply with our regulatory and legal obligations with respect to procurement of goods and services. The assessment of risk in our supply chains is that it is low with few supplies originating in high risk countries nor are they in high risk sectors. We work collegiately with our suppliers for contracted services and monitor the terms, conditions and circumstances of employment of their staff. We build relationships with excellent suppliers who align with our values and business behaviours. When appropriate, we hold tenders for professional suppliers, contractors for construction, and other services where we ensure compliance with legislation.

### Employee training:

We highlight the [modernslavery.co.uk](https://modernslavery.co.uk) site to those members of staff closely involved in the procurement process and the members of the Senior Leadership Team are aware of their legal responsibilities for compliance.

## **Our Risks**

Given the profile of the third-party suppliers, the 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 engaging in modern slavery; and iii) the possible use of forced labour lower in the school’s extended supply chains for goods or services used at the schools.

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 eliminate modern slavery from their supply chain.

**Modern Slavery Statement Report 2021**

**Incidents**

For the American School in London’s fiscal year ended 30 June 2020, 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 21 April 2021 and is signed by the Head of School.



Signed by:.....