

MODERN SLAVERY POLICY

Responsible for Implementation: EXECUTIVE HEAD OF PEOPLE SERVICES

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Authorised By: CHIEF EXECUTIVE OFFICER

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About Us

Armstrong Learning Limited and its subsidiary companies, Access to Music Ltd and the DBS group of companies, have various trading names and trading partnerships through which they operate (“The College”). The trading names and partnerships might have their own names or brands, but the legal entity for the purpose of this policy is Armstrong Learning Limited. Trading subsidiaries, trading names and trading partnerships include Access Creative College, National College for Creative Industries, Access Sport and The dBS Institute.

Purpose

This Policy details The College’s approach to complying with the Modern Slavery Act 2015, and our commitment to acting ethically throughout our business practices. In addition, it will also outline our processes and controls to ensure slavery is not taking place within our supply chain.

This Policy’s use of the term ‘modern slavery’ has the meaning assigned to it within the Act.

Scope

This policy applies to all individuals associated with The College, including all employees, agency and freelance workers, consultants and the self-employed. It extends to all activities conducted for and on behalf of all departments, entities and subsidiaries.

Responsibilities

The Board of Directors & Executive Leadership Team are responsible for ensuring that this policy is implemented

It is the responsibility of all other employees to be vigilant to the flags and warning signs of modern slavery, and to report these through the appropriate channels.

What is Modern Slavery?

Modern slavery is a crime, and a violation of fundamental human rights. The Modern Slavery Act 2015 encompasses the crimes of slavery, servitude, forced or compulsory labour, and human trafficking within their definition of modern slavery, all of which remove an individual's liberty, while in the process allowing those who exploit them to do so for commercial gain.

The College has a zero tolerance approach to modern slavery. We are committed to conducting our business activities ethically and with integrity. We expect all members of our supply chain to uphold similar values, and to be proactive in their approach to tackling modern slavery.

Our Approach

All employees must read, understand and adhere to this policy.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Appropriate due diligence will be carried out on all suppliers, particularly those within geographies or industry sectors where the risk of modern slavery is higher. The College has implemented a Supplier Code of Conduct which includes specific prohibitions on the use of any form of forced labour or child labour.

The College will act on any information received, either from internal or external sources, on the possibility of modern slavery practices within the business or in its supply chain.

Investigations will be led by the Modern Slavery Champion, an individual selected by the College to act as the designated point of contact for these issues, and to ensure the business maintains good working knowledge of this issue. The ELT and Board will support all investigations and will promote openness across the business.

Employees will be provided with training annually on the issue of Modern Slavery, and the key indicators to look out for, particularly when dealing with learners and their families.

Reporting a Modern Slavery concern

Employees are asked to speak to their direct line manager regarding any concerns relating to modern slavery. Managers are asked to escalate this to the next level of management and the Modern Slavery Champion. These reports will be used to mitigate and eliminate risk.

Where appropriate, the Modern Slavery Champion will escalate the concern externally:

- In emergency situations, where there is an imminent threat to an individual's safety, modern slavery crimes will be reported to the local police by dialling 999.
- If information is collected that could lead to the identification, discovery and recovery of victims in the UK, we will contact the Modern Slavery Helpline 0800 0121 700.

For more information, colleagues are advised to visit: www.unseenuk.org