Ark and Ark Schools Modern Slavery 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. We take a zero-tolerance approach to modern slavery and want to ensure that we act ethically and with integrity in all our dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place:

- anywhere in Ark
- or in any of our supply chains

Our own business

We have strong policies in place that minimise the risk of modern slavery and human trafficking at Ark. These include:

- Recruitment and appointment policy
- Safeguarding policy
- Health and safety policy
- Whistleblowing policy

These policies are adhered to strictly and regularly reviewed by the HR, Governance, Estates and Safeguarding teams. Where we recruit and appoint via external agencies (e.g., for temporary staff), they are required to hold an equivalent policy.

Our supply chains

Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors, and partners at the outset of our business relationship with them and reinforced as appropriate. We ensure that this approach is embedded in our supply chains.

- Due diligence - 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. Where we procure via an external framework agreement, we will ensure that the framework provider has requested the same.

- Procurement policy - our Procurement Code of Practice places a strong emphasis on ethical procurement and includes processes for ensuring that suppliers comply with our approach.

- Risk assessment - we will aim to risk assess all our key contracts during the next year and take action accordingly in any high-risk or medium-risk categories.

- Training and communication - we will regularly communicate information on modern slavery to our staff and ensure that they are aware of how to identify the signs and what action to take.

- Real Living Wage employer - we are an accredited Living Wage employer and ensure that our suppliers pay all staff contracted to work in our schools the Real Living Wage. We will take strong enforcement action against any supplier that breaches its commitment here.

<u>Monitoring and Enforcement</u>

Our internal auditor carries out regular testing of internal procedures and controls. Any areas of non-compliance are included in internal audit reports, which are communicated to senior managers and the Risk and Audit Committee, and appropriate action is taken. This is further tested through our external auditors.

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 HR or Procurement team as appropriate.

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.

<u>Responsibility</u>

This Statement is reviewed at Board level. The HR team has day-to-day responsibility for implementation within our own business and the Procurement team for implementation within our supply chain.

Signed:

Lucy Heller, Chief Executive

Date: 15/01/2025

Date of last review: December 2024

Date of next review: December 2025