

Modern Slavery Policy

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Diversity compliant	Yes
Equality Impact Assessment required	No
Data Protection compliant	Yes
Health and Safety compliant	Yes

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1. What this policy is about and why we need it

- 1.1 Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including sexual exploitation, domestic servitude, forced labour, criminal exploitation and organ harvesting. Victims of modern slavery can be any age, gender, nationality and ethnicity. They are tricked or threatened into work and may feel unable to leave or report the crime through fear or intimidation. They may not recognise themselves as a victim.
- 1.2 The Modern Slavery Act 2015 ('the Act') requires organisations supplying goods or services with a turnover of more than £36 million to prepare and publish an annual Modern Slavery Statement. Within that statement Acis Group Limited has set out its commitment to preventing slavery and human trafficking in all its business activities and supply chains, as far as it is within Acis' gift.
- 1.3 The purpose of this policy is to set out our commitment to mitigating the risk of modern slavery, forced labour and human trafficking (together called "Modern Slavery") within the Acis Group which also includes our customers.
- 1.4 For the purposes of this policy, Modern Slavery may be viewed to be within Acis, effecting our customers or within Acis Group's Supply Chains (see Modern Slavery Act 2015, Section 54, clause 4(a).

2. Who does this policy apply to?

- 2.1 This policy applies to Acis Group Limited and to all its subsidiary companies (herein referred to as "Acis").
- 2.2 The following must comply to this policy (herein referred to as "You");
 - Employees which includes but not limited to directors, agency workers, seconded workers, volunteers, interims and
 - Suppliers which includes but not limited to service providers, contractors, sub-contractors, employer agents and consultants (the "Suppliers").
- 2.3 Key Roles & Responsibilities
 - Legal and Governance Department has overall responsibility that this policy complies with our legal obligations.
 - Procurement Manager has primary responsibility for training and auditing internal control systems to ensure that they are effective in countering Modern Slavery within our control within our Supply Chain.
 - Managers are responsible for those reporting to them to understand and comply with this policy.
 - The prevention, detection and reporting of Modern Slavery with Acis or its supply chains is the responsibility for all those working for Acis, including

anything that is within Acis' control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

3. Our policy is...

- 3.1 Modern Slavery can take various forms, all of which includes the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Acis has a zero-tolerance approach to Modern Slavery.
- 3.2 Examples of Modern Slavery include, but are not limited to, the following;
- Failing to pay employees and workers the national minimum wage,
 - Making any unlawful deductions from employees' wages,
 - Requiring employees to work excessive hours which do not comply with the law,
 - Forcing employees to work overtime, or any other form of forced, non-voluntary work,
 - Forcing people to work to pay off a debt,
 - Failing to provide a suitable and safe working environment for employees, and
 - Employing workers who are under the legal minimum age of employment.
- 3.3 You are encouraged to raise concerns about any issue or suspicion of Modern Slavery within Acis, Acis customers or within Acis Supply Chains as early as possible. Any concerns raised are covered under Confidential Reporting (Whistleblowing) policy. If you believe that a **breach has occurred or may occur, you must notify a member of Acis Executive Leadership Team** which is the route for non-employees stated in the Confidential Reporting (Whistleblowing) policy. If the breach or potential breach is related to our customer then the **Safeguarding notification route** needs to be followed which is the route for our Safeguarding policy. If you are unsure if it is Modern Slavery in some form but remain concerned that it may represent a breach of this policy and the Act, then please still report it. Acis will support anyone who raises a genuine concern, in good faith, under this policy, even if they turn out to be mistaken. Acis guarantees that no one will suffer any detrimental treatment as a result of reporting their suspicion where it is done in good faith.
- 3.4 Acis is committed to acting ethically and with integrity in all its business dealings and relationships and by ensuring effective controls are in place to ensure that Modern Slavery is not taking place anywhere in our direct operational control. For the avoidance of doubt "operational control" includes contact with our customers in a similar manner to our safeguarding responsibilities.
- 3.5 Acis also is committed that there is transparency in our own business and our approach to tackling Modern Slavery in our Supply Chains. We require the same high standards from our Suppliers. Acis is committed to provide awareness communication and where appropriate relevant training.
- 3.6 Acis shall apply a risk-based approach to ensure that Modern Slavery is not taking place anywhere within our direct operational control. Where relevant this

approach shall take into account our expenditure with any Supplier and if the sector that the Supplier operates within is at a higher risk of Modern Slavery.

4. How we will monitor this policy

4.1 We will monitor this policy by:

- Recording the number of concerns reported, and the outcome of any investigations,
- Training and refresher training to relevant employees that perform procurement and supplier management function.
- Employees joining Acis have demonstrated their eligibility to work in the UK.

5. Procedures and other documents that link into this policy

5.1 There are no other procedures or other documents that link to this policy.

6. Links to other policies, legislation and/or regulations

6.1 Other policies, legislation and/or regulations that link into this policy are:

- Modern Slavery Act 2015
- Employee Code of Conduct
- Dignity at Work Policy
- Equality, Diversity and Inclusion Policy
- Health & Safety Policies
- Recruitment Policy
- HR suite of policies
- Confidential Reporting (Whistleblowing) Policy
- Domestic Abuse and Safeguarding Policies

7. When this policy will be reviewed

7.1 This policy will be reviewed every three years or in the event of a change in Act.

8. Jargon buster

Reference	Definition
Acis	Means Acis Group Limited and its subsidiary companies
Acis Contact Centre	Means Acis main telephone number 01427 678000 and or email info@acisgroup.co.uk
Acis Executive Leadership Team	Means the Acis employees that are Executive Leadership Directors
Act	Means the Modern Slavery Act 2015

Modern Slavery	Means modern slavery, forced labour and human trafficking
Supply Chain	Means the activities required by Acis suppliers to provide Acis with goods, services and works. The Supply Chain includes our supplier's suppliers and all the other suppliers stretching back to the first supplier in the chain e.g. provided the raw materials or component parts.
You	Means Employees (which includes but not limited to directors, agency workers, seconded workers, volunteers, interims) and Suppliers (which includes but not limited to service providers, contractors, sub-contractors, employees agents and consultants).