

# Modern Slavery Act Transparency Statement 2020

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Further Information	



# **Modern Slavery Act Transparency Statement**

### 1. Introduction

At Academy of Live Technology we are committed to protecting and respecting human rights and do not tolerate slavery, human trafficking and other exploitation. 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.

### 1.1 Definition of Modern Slavery

- 1.1.2 "Modern slavery" is a term which covers slavery (where ownership is exercised over a person); servitude (which involves the obligation to provide services imposed by coercion); forced or compulsory labour (which involves work or service exacted from any person under the menace of a penalty and for which the person has not offered himself voluntarily); and human trafficking (which concerns arranging or facilitating the travel of another with a view to exploiting them, even where the person consents to the travel).
- 1.1.3 We will ensure that we will comply with the Modern Slavery Act 2015 and are putting strict measures in place to ensure that modern slavery is not part of any of our business operations. This includes our supply chains, goods and services. This statement sets out the steps we are taking to continually develop our procedures and to check our compliance.

### 2. Overview

2.1 An overview of our organisational structure, key business activities and supply chains is as follows:

Academy of Live Technology Ltd is a privately funded organisation.

We bridge the gap between industry and education, working closely with leading professionals to respond quickly to current skills shortages and write training programmes in line with specific demands. As a centre of excellence for backstage and technical training we specialise in degree courses, short courses and bespoke training programmes for students, established professionals and community groups.

With Production Park Ltd. as our parent company, we are part of a group of dynamic industry leading companies who operate on Europe's first live events campus.

Since our inception we delivered University of Bolton degrees under franchise and are now validated by them, but we are now in the process of seeking autonomy as an educational provider through joining the Office for Student's Register of Higher Education Providers and apply in for New Degree Awarding Powers (NDAPS).

2.2 We work closely with our main suppliers and customers; with our employees and their representatives (where appropriate) to ensure the highest level of compliance with the Office for Students regulatory framework.

# 3 Our approach

Academy of Live Technology is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our organisation.

Our existing policies and procedures demonstrate the Institution's commitment to acting ethically



and with integrity in all our business relationships.

Academy of Live Technology supports the Base Code of the Ethical Trading Initiative:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided wherever possible
- No harsh or inhumane treatment is allowed.

# 4 Responsibilities

- The Academy of Live Technology Council is responsible for overseeing our efforts to help to eliminate modern slavery and for monitoring progress against the KPIs contained in this document.
- The HR Manager and Senior Leadership Team are responsible for ensuring that all recruitment and terms and conditions of employment comply with statutory requirements, and that any agencies used are appropriately checked and commit to ethical standards.
- Line-managers are responsible for upholding our "core values" and for ensuring that employees who work for them also behave in accordance with these.
- Our Modern Slavery policy is reviewed annually by the Senior Leadership Team and a representative from HR, as well as (where appropriate) trade union representatives and volunteer employee representatives.

### 5 Documentation

- 5.1 We have the following policies in place for employees:
  - Ethical policy
  - Code of conduct
  - Grievance procedure
  - Equal opportunity policy
  - Recruitment and selection policy
  - Whistleblowing policy
- 5.2 These are referenced in our employee handbook, and copies are available from Human Resources. All policies are updated on an annual basis, and we consult with managers and employee representatives prior to updating them.
- 5.3 Employees are reminded of the policies from time to time and notified of any updates.

# 6 Our Supply Chains

- 6.1 We consider that the main areas of risk of modern slavery within our business and supply chain are as follows:
  - Employees
  - Site Maintenance
  - Procurement Processes
  - Contractors and Sub-Contractors.

We believe that Academy of Live Technology's risk is minimised by the scale of the organisation and our minimal requirement for agency workers.



### 6.2 Employees

We have a recruitment and selection policy to assist compliance with equal opportunity.

- 1. All new employees are recruited directly.
- 2. Right to work checks are conducted prior to joining, and we check with all new recruits that they have not been required to pay any fees to gain work with us and inform them of the procedures that should be followed should they wish to leave our employment. In addition, we check that their passports have not been withheld and that they have not been required to sign any agreements with any third parties in respect of our offer of employment.

### 6.3 Agency Workers

- 1. We only use agency workers rarely, for temporary placements and holiday/sickness cover.
- 2. We will ensure that any recruitment agencies we use have strict compliance to the Modern Slavery Act and require written confirmation from them that no agency worker is being exploited as part of any slavery or human trafficking.
- 3. Recruitment agencies used will all be on our Preferred Supplier Listing

### 7 Our due diligence processes in relation to slavery and human trafficking

Academy of Live Technology has a zero-tolerance approach to slavery and human trafficking. To ensure all those in our supply chain comply with our values we shall put in place an anti-slavery compliance programme that consists of the following:

- We will provide suitable training for all employees to ensure that they are aware of this Statement and can be vigilant in identifying and reporting any concerns they have.
- Employees and managers are informed of any updates to our policies.

A review of agreements and/or dealings with suppliers to ensure compliance with anti-slavery measures.

## 8 Relevant Performance Indicators

The following key performance indicators will be used to assess our progress in the year 2019-20 towards eliminating modern slavery:

- All staff in purchasing roles to be trained by 31/08/20.
- Number of complaints raised through our grievance or whistleblowing procedures.
- Number of suppliers who are terminated due to allegations of modern slavery.