



**ALCS**

AUTHORS' LICENSING AND COLLECTING SOCIETY LTD

# **Modern Slavery Statement**

April 2024

Review September 2024

## **Organisation**

This statement applies to the Authors' Licensing and Collecting Society Ltd (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year ended 31 March 2023.

## **Organisational structure**

The Organisation has a Chief Executive Officer and a senior leadership team with seven departments: Finance, Operations, Membership, Rights and Licensing, IT, Communications, and Advocacy. The Organisation is located at 6<sup>th</sup> Floor, International House, 1 St. Katharine's Way, London E1W 1UN.

The main activities carried out by the Organisation are the collection and distribution of secondary royalties for writers and advocacy to protect and promote authors' rights.

The labour supplied to the Organisation in pursuance of its operation is carried out in International House, London.

## **Definitions**

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse, or the threat of abuse
- being dehumanised, treated as a commodity, or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

## **Commitment**

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant UK employment legislation and in many cases exceeds those minimums in relation to its employees.

## **Supply chains**

In order to fulfil its activities, the Organisation's main supply chains include those related to the supply of data and monies from mainly regulated Collective Management Organisations (CMO) around the globe.

## **Potential exposure**

The Organisation considers it has minimal exposure to the risk of slavery and human trafficking existing in its supply chains because they primarily involve the provision of administrative labour in a country where protection against breaches of human rights may be limited.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken reasonable steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

## **Steps**

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- Mapping the supply chain broadly to assess particular geographical risks of modern slavery and human trafficking.
- Evaluating the modern slavery and human trafficking risks of each supplier.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

## **Key performance indicators**

The Organisation has set the following key performance indicator to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains:

- Review the CMOs with whom we have bilateral agreements and access their Modern Slavery Statements.

## **Action taken to address modern slavery**

Due to the nature of the supply chain, modern slavery risks are minimal in many parts of the supply chain in developed countries. Additional steps to manage the risk include working with CMOs with good reputations. Countries and regions are assessed for risk on the Global Slavery Index ([www.globalsslaveryindex.org](http://www.globalsslaveryindex.org)), taking into consideration the latest updated information from the Department for International Trade.

## **Policies**

The Organisation has the following policies which further define its stance on modern slavery: Modern Slavery Statement; Corporate Social Responsibility Policy; Equal Opportunities Policy; Recruitment Policy.

## **Training**

The Organisation provides training to staff to effectively implement its stance on modern slavery by including it as part of the employee induction programme.

## **Slavery compliance**

HR is responsible for modern slavery compliance in the Organisation, and all concerns regarding modern slavery should be addressed to the Organisation's HR department which will then undertake relevant action in line with the Organisation's obligations in this regard.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed each financial year.