

## **Modern Slavery and Human Trafficking Statement**

This statement sets out UK Coaching's actions to understand potential modern slavery<sup>1</sup> risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking within our own business and our supply chains. Although, as an organisation, UK coaching turns over far less than the threshold for organisations required to publish a statement under the Act, we are committed to ensuring that we treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent, and trusted.

We develop great coaches, and our mission is to become the leading destination for coach learning and development in the UK. We are a not-for-profit organisation, which means that every penny is invested back into improving learning and services for coaches.

At UK Coaching we expect the highest standards of conduct and probity throughout our supply chain and business relationships, we will not have any dealings with any organisation that has been found to be involved in modern slavery. If we became aware of a substantiated issue relating to Modern Slavery or Human Trafficking with a supplier, we would terminate our contract with them.

All our operations are UK based; our supply chain activities, all of which are UK based, include the sourcing of materials and equipment to support our UK based operations. As part of UK Coaching's assessment of risk in these areas, the current status is that our activities in relation to modern slavery and human trafficking are low risk.

However, we expect all those in our supply chain to comply with our zero-tolerance approach to slavery and human trafficking. We have recently reviewed our anti-slavery compliance procedures. As a result, we have updated our supplier contracts to include terms that they will provide relevant services in accordance with the provisions of the Modern Slavery Act 2015.

With regards to our suppliers' approach to Modern Slavery and Human Trafficking, the organisation expects its suppliers to assume responsibility for ensuring that their supply chain is assessed for risks in these areas and those risks are actively managed. This expectation is contained in contracts we sign with suppliers or tenders for work in relevant departments.

### **Policies, standards and procedures**

We have a comprehensive range of HR policies aimed at providing a safe, healthy and motivational work environment and treating all colleagues equitably, with dignity and respect. Our recruitment and human resources policies and processes comply with legislation and embrace best practice. Relevant policies and procedures include:

- a. Code of Conduct. This policy drives ethical behaviour, demonstrating our commitment to acting with integrity, managing conflicts of interest and the reporting of issues.
- b. Whistleblowing. This policy is in place to guide and support UK Coaching group employees in raising a whistleblowing concern made in the public interest.

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<sup>1</sup> 'Modern Slavery' is defined by the Modern Slavery Act 2015 ("the Act") as a term to encapsulate the offences of slavery, servitude and forced or compulsory labour, and human trafficking. It is used with this definition throughout the statement to support compliance with section 54 of the Act)

- c. Recruitment. This policy outlines our recruitment and selection process, which helps to ensure that this is transparent and equitable. It also includes checks on the right of employees and agency workers to work within the UK.
- d. Anti-Bribery. This policy compliments our Code of Conduct policy and outlines the UK Coaching Group’s commitment to conducting business in an honest and ethical manner. It includes the recording of hospitality and gifts received by UK Coaching Group employees.
- e. Pay Matters. This policy outlines the process in place to review the salary of all permanent staff to ensure an equitable approach and to ensure that all staff we employ receive fair pay.
- f. Annual Leave. This policy encourages all employees to make full use of their leave entitlements to support a positive work-life balance.

Policies and processes are reviewed on a periodic basis to ensure they remain fit for purpose.

### **Employees**

UK Coaching has its head office in England and our staff are directly employed and are not in any category generally seen to be vulnerable to modern slavery in the UK. Our recruitment processes are transparent and reviewed regularly. We communicate directly with candidates to discuss job opportunities and to confirm the details of any offer made. We have robust procedures in place for the vetting of new employees and ensure that we are able to confirm their identities and that they are paid directly into an appropriate, personal bank account. We have policies and procedures in place to ensure compliance with all human rights laws and UK employment laws and provide market-related pay and rewards which are reviewed annually. Employees are given access to an employee assistance programme which provides an external and confidential 24-hour telephone support helpline through which advice and information can be provided on a wide range of topics. We are satisfied that our employees are not exploited in any way.

### **Risk areas**

In regular assessment and monitoring of our business operations it is of paramount importance that we systematically consider our wider business and assess possible risk areas to ensure that they are free from slavery, servitude, human trafficking and forced labour. The area of our business which warrants the greatest consideration is our involvement with other suppliers. In this regard we consider the risk of slavery or human trafficking within our supply chain to be low. In general, our supply chain involves regulated professional advisers, reputable recruitment agencies, and in respect of our IT infrastructure and operational requirements, reputable service providers.

<b>Reviewed and approved by the FAR Committee</b>	<b>30 September 2021</b>
<b>Next review due September 2023</b>	