

## Modern Slavery Act Transparency Statement

This statement is made on behalf of Coaching Direct UK Limited, pursuant to Section 54(1) of the Modern Slavery Act 2015 (the "Act"). It has been approved and signed by our Director, Kirsty McWilliam.

The purpose of this statement is to set out the steps that we as a consultancy have taken to ensure that slavery and human trafficking are not occurring in our business or in our supply chain. In accordance with our culture of continuous improvement and development, we also set out the steps that we plan to take in the forthcoming financial year to improve upon and enhance our policies and procedures in this area.

### **OUR APPROACH**

Coaching Direct is a coaching and coach training consultancy, established in Scotland in 2008. We are committed to preventing slavery or human trafficking in any aspect of our business or supply chain. We have undertaken an assessment of the risks of slavery or human trafficking and reviewed our existing business policies and procedures to ensure that the preventive measures are appropriate and proportionate to the level of risk.

### **OUR SUPPLY CHAIN**

As a consultancy firm, we have a relatively simple supply chain, the purpose of which is to support our coaching and coach training practice and internal office and technology functions.

Our supply chain can broadly be broken into the following key categories:

**Business Services:** including outsourced administration, document production and business process services.

**Professional Services:** including services provided by our coaching sub-contractors, consultants and other specialists.

**Real Estate:** including contracts for our training venues, services provided by catering providers and contractors engaged in relation to the operations of our business.

**Human Resources:** including services in relation to recruitment and payroll.

**Technology:** including services provided in relation to our technology, software and equipment.

## **OUR POLICIES**

Relating to our staff

**Recruitment & Selection Policy:** We currently do not employ any members of staff but engage the services of freelance sub-contractors who are thoroughly screened. We conduct due diligence on our prospective sub-contractors prior to them joining Coaching Direct. When recruiting, we will comply with all employment legislation and any applicable regulations.

All of our staff are expected to comply with relevant laws and professional codes of conduct, as well as our internal policies and procedures.

**Health & Safety Policy:** We are dedicated to providing a healthy and safe working environment for all of its partners, employees and contractors working on site, as more fully detailed in our Health & Safety Policy.

**Respect & Dignity and Diversity & Inclusion Policies:** We take a rigorous approach to preventing the occurrence of discrimination, harassment, bullying or victimisation at work and actively.

**Fair Reward Policies:** We are a registered living wage employer and committed to fair reward through its policies on salary, bonus and benefits schemes.

Relating to our supply chain:

**Risk assess:** We assess risk related to human trafficking and forced labour associated with our suppliers. This assessment is based upon geography, the product or services being purchased, supplier quality performance and the nature of the business transaction.

**Due diligence:** We carry out due diligence on all relevant and appropriate suppliers, and where appropriate, ask for information on their policies on fair sourcing of goods and services, and employment practices.

## **OUR FUTURE IMPROVEMENTS**

**Training:** We will soon be rolling out a programme of training on modern slavery and human trafficking which will be available to all sub-contractors.

**Supplier contracts:** We will seek to impose contractual terms on all our suppliers asking them to:

(i) warrant that they and their suppliers comply with all applicable laws, statutes, regulations and codes relating to labour, anti-slavery and human trafficking laws, including but not limited to the Act; and

(ii) ensure that any person associated with the supplier in performing the goods or services in connection with the agreement, does so only the basis of a written contract which imposes on the third party the obligations to comply anti-slavery and human trafficking laws.

The right to audit will also be included in all supplier contracts, where relevant and appropriate. We will audit our suppliers from time to time to ensure their compliance.

Approved, and signed by

A handwritten signature in black ink, appearing to read 'K McWilliam', written in a cursive style.

Kirsty McWilliam, Director