

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Acuity Coaching

Document Version Control

Name	Modern Slavery and Human Trafficking Statement		
Status	Final		
Associated Policies	Whistle Blowing Corporate Social Responsibility Policy Code of Conduct		
Version No.	MSHTS/07/23		
Last Updated	12 th February 2023	Next Review Date	11 th February 2024

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1.0 INTRODUCTION

- 1.1** The statement sets down Acuity Coaching Ltd.'s commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Workers/Contractors are expected to report their concerns and management to act upon them.

2.0 DEFINITIONS

- 2.1** Acuity Coaching Ltd - "Acuity" for policy.

3.0 POLICY STATEMENT

- 3.1** This statement covers the business activities of Acuity which are as follows:
Acuity is a sourcing and management business that supplies Executive Coaches to large global companies. Our services are delivered by independent contractors who we source and manage on behalf of our client under a contract with the client. We have no offices and all our Workers/Contractors work remotely from home or client site. There is no supply chain we only provide services.
- 3.2** The Company currently operates in the following countries:
The countries we operate in changes over time. The countries we operate in most are: USA, UAE, UK, Italy, Singapore, China, France, Germany, Spain and Ireland.
- 3.3** The following is the process by which the Company assesses whether particular activities or countries are high risk in relation to modern slavery or human trafficking: Is there a risk assessment in place, if so, the process needs to be described.
There is no potential risk of this – for some Clients our coaches have to prove to us they are citizens of the country they operate in or have a work permit to work in that country. We commission individuals to deliver specific work packages and these cannot be delivered by third parties
- 3.4** Acuity hereby commits to ensuring that:
- 3.4.1** in supporting the effective implementation and ongoing compliance with the Policy, and management of risks pertaining to breaches of The Act, it deploys adequate and competent resources.
 - 3.4.2** in supporting the effective implementation and ongoing compliance with the Policy, and management of risks pertaining to breaches of the Act, all areas of the business will be structured, organised and managed appropriately.
 - 3.4.3** such structure, organisation and management will include the provision of adequate senior management and visual and effective operational oversight both within the business unit and of internally or externally outsourced functions.
 - 3.4.4** the effective management of risks pertaining to breaches of The Act are managed through:
 - 3.4.4.1** The development and implementation of control systems.

- 3.4.4.2** Deployment of adequate and appropriately skilled resources to support said control systems.
- 3.4.5** Such control systems must focus in particular on all aspects of job advertisement, recruitment, induction and training.
- 3.4.6** Acuity commits to ensuring that suitably detailed training is undertaken by way of evidenced practical support of the effective implementation and ongoing compliance with the Policy.
- 3.4.7** All Acuity's Workers/Contractors will receive awareness training, appropriate to the nature of their specific role in the effective implementation of this Policy, the prevention of risk, the identification of risk and/or non-compliance, the processes for reporting incidents if non-compliance and/or breaches, and the consequences of non-compliance and/or breaches.
- 3.4.8** More detailed support will be given to:
 - 3.4.8.1** those who have any role in the recruitment process (inc. advertising, interviewing, appointing, inducting and training);
 - 3.4.8.2** those who award supplier contracts;
 - 3.4.8.3** those involved with securing contracts with clients;
 - 3.4.8.4** those involved in transaction processing or relationship management who may identify suspicious activity by customers.

4.0 HIGH RISK ACTIVITIES

- 4.1** There are no activities undertaken by the Company in any of its geographical locations which are considered to be at high risk of modern slavery or human trafficking.
- 4.2** Responsibility for the Company's anti-slavery initiatives is as follows:
 - 4.2.1** **Policies:** Operations is responsible for creating and reviewing policies. The process by which policies are developed is looking at best practice and adapting to the needs of the company. Ensuring full compliancy with legislation
 - 4.2.2** **Risk assessments:** The Finance Director is responsible for risk assessments in respect of human rights and modern slavery.
 - 4.2.3** **Due diligence:** Operations is responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking.

5.0 POLICY SCOPE

- 5.1** Acuity recognises that The Act requires all organisations with UK operations and a global turnover in excess of £36M to publish a slavery and human trafficking statement on their website as soon as reasonably practicable after the year end. Such statement duly setting out the steps taken to ensure that no slavery or human trafficking is taking place within the organisation, nor within its supply chains (including all third-party suppliers and subcontractors). The Act also applies to any business (i.e. the provision of goods or services) in any part of the UK. ^[1]_{SEP}

- 5.2 However, Acuity takes the view that the financial turnover threshold provided for by The Act is morally irrelevant to the culture of the Acuity company; i.e. that is simply not the issue for Acuity. The principles of standing up and opposing modern slavery is the issue for Acuity.
- 5.3 Either way, absolute compliance to the practical requirements of The Act is the only acceptable way in which Acuity would conduct its business.
- 5.4 Absolutely without any exception, this Policy is mandatorily applicable throughout the entire Acuity business, together with all current and/or future potential 3rd Party outsourced functions and activities, including:
 - 5.4.1 all direct workers/contractors of Acuity;
 - 5.4.2 agency workers (i.e. temporary colleagues placed by recruitment agencies);
 - 5.4.3 self-employed 3rd Party Consultants and/or Contractors;
 - 5.4.4 any individual on work experience (including interns.

6.0 TRAINING

- 6.1 To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all Workers/Contractors to familiarise themselves with this policy and confirm that they have done so.

7.0 POLICIES

- 7.1 The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in its business relationships.
- 7.2 The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:
 - 7.2.1 **Whistleblowing Policy** - the Company encourages all its workers/contractors, customers and other business partners to report any concerns related to its direct activities or its supply chains.
 - 7.2.2 **Company Code of Conduct** - The Code of Conduct sets down the actions and behavior expected of employees when representing the Company.
 - 7.2.3 **Corporate Social Responsibility (CSR) Policy** - The Company's CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.

8.0 DUE DILIGENCE PROCESSES FOR SLAVERY AND HUMAN TRAFFICKING

- 8.1 The Company undertakes due diligence when considering taking on new suppliers and regularly reviews its existing suppliers. The Company's due diligence process includes.
 - 8.1.1 building long-standing relationships with suppliers and making clear our expectations of business partners
 - 8.1.2 evaluating the modern slavery and human trafficking risks of each new supplier

- 8.1.3** invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

9.0 MANAGEMENT INFORMATION / PERFORMANCE INDICATORS AND REPORTING

- 9.1** The Company ensures all relevant staff have completed awareness training on modern slavery to be able to conduct key performance indicators (KPIs) to measure effectiveness in slavery and human trafficking
- 9.2 Management Information:** Acuity commits to ensuring that meaningful Management Information is produced and reviewed on a monthly basis by middle and senior managers. In order to assess compliance standards and highlight potential weaknesses such management information will include reports on compliance levels to appropriately developed and defined key risk and performance indicators. The development of these indicators must be with due diligence to the levels of relevance to the operating environment of the business area(s) concerned.
- 9.3** As reporting and knowledge through quantifiable information becomes mature, these indicators will be reviewed as required by the Policy executive owner in conjunction with senior managers. Such reviews being intended to focus on the completeness of available management information, the relevance of the indicators, the value that is derived from the reports, etc.
- 9.4 Record Keeping:** Acuity commits to ensuring that all areas of the business comply with the record keeping requirements of this Policy and that they are required to evidence record keeping compliance with this Policy.
- 9.5** Factors that are subject to mandatory record keeping include, but are not limited to:
- 9.6** Documentation of decisions taken and the rationale on which they are based;
- 9.6.1** All documentation pertaining to job advertisement, recruiting induction and training
- 9.6.2** Whistleblowing records
- 9.6.3** Records of all relevant training undertaken.
- 9.7** Employee Reports: All risks or issues pertaining to potential breaches of The Act are to be reported immediately. Worker's/contractor's having a concern or knowledge of, having suspicions of a violation of this Policy are required to report the matter in a prompt and timely manner.
- 9.8** The first level of reporting should be to the individual worker's/contractor's line manager. However, if the Party about whom the worker/contractor has concerns is that worker's/contractor's line manager, the report should be made to the Head of Operations.
- 9.9** Acuity Executive and Management Team recognises the obvious difficulties that any employee would be faced with in speaking up on such matters. It is the responsibility of all executives and managers to ensure that all employees are reassured that in doing so:
- 9.9.1** They are absolutely doing the right thing (for themselves and for the company)

- 9.9.2** That all information received will be treated seriously
- 9.9.3** That all information will be investigated appropriately
- 9.9.4** That if a breach of The Act is found to have taken place, the appropriate disciplinary measures will be entered into with the person(s) who have been the perpetrator(s)

9.10 Report Documentation: In the event that worker/contactor requests to make a report of a suspected breach of The Act incident, the report will be formally documented by the worker's/contractor's line manager on the proforma on the next page.

10.0 PENALTIES APPLICABLE AND ASSOCIATED RISKS

- 10.1** Acuity takes its compliance to The Act and for enforcing controls to mitigate against breaches of it with the level of responsibility that would be expected of a professional services provider.
- 10.2** The main offences are subject to the toughest asset recovery regime under the Proceeds of Crime Act 2002. Albeit there are presently no monetary nor criminal penalties for non-compliance to reporting, Acuity takes the unequivocal stance that this is not the issue and is of no relevance to Acuity. Compliance with The Act is a moral and ethical responsibility and one which Acuity is absolutely committed to.
- 10.3** Companies who fail to comply and/or fail to have declared policies in place run the real risk of significant commercial and reputational damage.

11.0 THE PROACTIVE PREVENTION OF BREACHES OF THE MODERN SLAVERY ACT

- 11.1** Openness and visibility are effective tools to combat behaviour which may lead to breaches of The Act; i.e. in that workers/contractors of all levels are perfectly reasonably expected to be required to explain the course of their actions.
- 11.2** Acuity Coaching provides a managed service to multi-nationals for the sourcing and management of coaching and learning on a global basis.
- 11.3** From induction onwards, the expectation is set with all Acuity workers/contractors that they must be ready to challenge any arrangements that compromise them.
- 11.4** Working for Acuity is entirely a matter of the personal choice of the individual; there is no coercion. At Acuity we expect the same from our suppliers. Albeit the Acuity team is quite stable and not prone to substantial churn, it is always a matter of regret when a valued workers/contractors chooses to leave. In line with our 'Starters and Leavers' procedures, Acuity always works with the departing workers/contractors to make this difficult phase as painless as possible and tries to ensure that they leave with the good wishes of Acuity and with nothing but positive thoughts of the Company.
- 11.5** Acuity will never seek to gain any new business, retain existing business, nor knowingly enter into any kind of business relationship with any party (client or supplier) with whom Acuity has concerns about their practices and potential breaches of The Act.
- 11.6** In order to prevent the risk of Acuity being party to examples of slavery we specifically address the following two key risk areas:

11.6.1 Outsourcing: Acuity does not outsource any aspect of the company's services to any 3rd Party Company at home or abroad.

11.6.2 Supply Chain: In doing business with any 3rd party service provider for any supporting goods or services, Acuity conducts duly diligent sourcing processes in which declarations are required from suppliers of their adherence to The Act.

12.0 POLICY REVIEW

12.1 This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. The Management Team endorses this policy statement and is fully committed to its implementation.

This Policy has been approved & authorised by:

Name:	Simon Coops
Position:	Managing Director
Date:	12/02/2023
Signature:	