



SLAVERY AND HUMAN TRAFFICKING STATEMENT

1. The Right Course ("TRC") is a registered charity that provides hospitality training and employment opportunities to offenders in England and Wales.
2. TRC is committed to the highest level of ethical standards and sound governance arrangements and sets high standards of impartiality, integrity and objectivity in relation to the stewardship of public funds and the management of its activities.
3. TRC adopts zero tolerance to modern slavery and human trafficking and all forms of corruption and bribery directly and indirectly associated with these criminal acts.
4. We fully support the government's objectives to eradicate modern slavery and human trafficking.
5. Our annual statement will provide information to supplement this policy, including details of our activities and supply chains and actions we are taking to support government.
6. We call upon all organisations we engage with to influence their global supply chains by improving transparency and accountability; and together we can help the government eradicate the injustice and brutality of modern slavery and human trafficking.

Fred Sirieix
Chairman of the Trustees

Simon Sheehan
CEO

Date of Original Signature: 1st June 2020

Review Dates:

Date	Reviewed by
20.9.21	S. Sheehan
14.9.22	S. Sheehan
19.9.23	S. Sheehan
10.10.24	S. Sheehan



Statement

Introduction

1. The Right Course ("TRC") is a registered charity that provides hospitality training and employment opportunities to offenders in England and Wales.
2. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 for the financial year ending 31 December 2020.
3. This is our first annual statement and it contains a summary of progress undertaken within Year 1 of our current work plan. We continue to engage with a large number of private and public sector organisations in pursuit of our regulatory interventions and our investment and procurement activities.
4. Our activities are usually undertaken at arms-length and take place solely in England and Wales. Our investment model is to support hospitality training and employment opportunities for offenders using Delivery Partners, such as registered providers of training, registered charities, catering suppliers, prison services and other key delivery partners in the public and private sector.
5. We occasionally undertake activities by partnering with local authorities and developers within a special purpose or joint venture partnership organisation; and where appropriate we will undertake direct development using Delivery Partners or construction companies procured for that purpose.

Steps taken by TRC since July 2020 – Annual workplan

1. Management responsibility and general awareness
Responsibility for the preparation and publication of this policy resides with our CEO. We have:
 - a. Reported progress to our Board of Trustees.
 - b. Reconfirmed management responsibility for this policy and statement.
 - c. Raised awareness of this published statement and the Modern Slavery Act by notifying organisations in our Frameworks, Delivery Partnerships and other companies with which we regularly engage.

Risk assessment

We have:

1. Completed a review of this policy and statement against our activities to establish whether the approach we have taken follows emerging best practice by:
 - a. Assessing and interpreting any recent or emerging case law and best practice; and



- b. Benchmarking our activities against statements and action plans undertaken by similar public and private organisations.
- c. Re-evaluating the risk of non-compliance as part of our cyclical Compliance Risk Register assessment.
- d. Reconfirmed that our primary risk is an association with a Delivery Partner, Framework participant or company with an ambiguous or non-compliant supply chain.

Additional risk mitigation

We have:

1. Introduced new processes and procedures in relation to procurement and due diligence.
2. Confirmed the applicability and enforceability of clauses and conditions included in our legal agreements and contracts.

Scope of our procurement activities

1. Our procurement activities take place in England; and our contractors and suppliers are predominantly UK and EU based.
2. We place general reliance upon prison and government procured supply chains for our consumable goods and operationally-focused services.
3. In our own right we maintain a number of professional services and development Agreements.
4. In common with many organisations, our employees occasionally stay in UK hotels when conducting business away from the office. We occasionally procure accommodation, meeting and conference venues to support our general business activities and these are selected to ensure good value for money. We note that the hotel and hospitality trade recognise the risk of modern slavery within their sector and a Stop Slavery Hotel Industry Network is being developed by the industry.

Expectation and encouragement

1. We expect all Delivery Partners, organisations within our Frameworks and other companies we engage with to ensure their goods, materials and labour-related supply chains to:
 - a. Fully comply with the Modern Slavery Act 2015; and are
 - b. Transparent, accountable and auditable; and are
 - c. Free from ethical ambiguities.

Public reporting of non-compliance TRC supply chains

Individuals with evidence of non-compliance with the Modern Slavery Act in connection with TRC supply chains or businesses we engage with are encouraged to report their concerns to TRC's Trustees using the following address trustees@therightcourse.org.uk or use the national reporting service below. If you hold information that could lead to the identification, discovery and recovery of victims in the UK, you can contact the Modern Slavery Helpline on 08000 121700.