

Modern Slavery Statement

2020-21

December 2021

1. Introduction

At The Skills Development Scotland Co. Limited (SDS) we recognise the responsibilities under the Modern Slavery Act 2015 (the Act). In voluntary compliance with the provisions of Section 54 of the Act, this statement sets out the steps we have taken during the financial year ending 31 March 2021 to prevent the risk of modern slavery or human trafficking taking place in any part of the organisation or our associated supply chains. This statement summarises the actions and activities carried out by SDS in order to better understand the potential risks of modern slavery and human trafficking and the systems and controls that have been introduced to mitigate those risks. We will review this statement annually.

2. About SDS

We are Scotland's national skills body, focused on contributing to Scotland's sustainable economic growth by supporting people and businesses to develop and apply their skills. We work with partners at national, regional and local levels to create a Scotland where:

- Employers are able to recruit the right people with the right skills at the right time.
- Employers have high performing, highly productive, fair and equal workplaces.
- People have the right skills and confidence to secure good work and progress in their careers.
- There is greater equality of opportunity for all.

3. Our Statement

We are committed to preventing the risk of instances of modern slavery and human trafficking taking place in any part of our operational activities or within our supply chains. We are committed to protecting and respecting human rights across SDS's activities and will take, where reasonable, appropriate and possible steps to influence others to ensure slavery and human trafficking does not take place.

Our Human Resources Policies confirm our commitment to workplace rights for employees and we promote our Code of Conduct to ensure an environment based on dignity and respect, that does not condone or allow bullying, harassment, discrimination or any other unacceptable behaviour. Additionally, our [Fraud and Financial Irregularity Policy](#) and [Whistleblowing Policy](#) provide staff with the means to report improper conduct or unethical behaviour.

In compliance with the Procurement Reform (Scotland) Act 2014, SDS's [Corporate Procurement Strategy 2016 – 2020](#), along with our [Procurement Policy](#), set out our principles and approach to ensuring responsible and sustainable procurement practices. These include;

- Seeking to ensure that Conditions of Contract which enhance health & safety and equalities will be included.
- Encouraging ethical sourcing practices amongst our suppliers, partner organisations and the broader market.
- Seeking to ensure forced, bonded or compulsory labour practices are not used, and employees are free to leave their employment after reasonable notice. Employees must not be required to lodge deposits of money or identity papers with their employer.
- Mandating that work undertaken by people of 16 years or under without consideration for their personal development, safety, education or health is prohibited. This will be supported by policies and programmes, which promote the development of any employed child. Placing children in employment deemed to be hazardous (in accordance with ILO definitions) shall not be tolerated.

Further, our [Prevention of Modern Slavery in Procurement Policy](#) sets out the specific measures being used by the Procurement Team to mitigate the risk of modern slavery and specifies the warning signs to which all staff should be vigilant.

4. Our Supply Chains

Our supply chain includes Training Providers, IT suppliers, Facilities Management, sub-contractors and consultants. With all contractors, SDS encourages ethical sourcing which mitigates the risk of modern slavery further down our supply chains.

We internally review by undertaking a Programme of Audits of Skills and Training Programme Suppliers which includes checks on learner eligibility (Payment Terms and Conditions Compliance Monitoring), learner experience (National Operations Quality Reviews) and learner feedback (National Operations Skills Investment Adviser participant interviews). SDS also co-ordinate a Complaints/Concern Portal on our corporate website for anyone to raise any issues. Additionally, we include contractual clauses which allow us to audit contractors which include rights to site visits.

5. Our Procurement Activity and Due Diligence

The risk of Modern Slavery in SDS's activities is considered low. However, we recognise the potential risks linked to the extended and indirect supply chain of goods and services. For SDS, such risks are reduced as procurement of goods and services are increasingly sourced through framework agreements (such as Scottish Procurement or Crown Commercial Services). All of our prime contractors are also required to complete a Single Procurement Document Questionnaire which includes a question on child labour and other forms of trafficking in human beings to gain assurances that these crimes are not present in the contractor's business, as set out in our [Best Practice Guidance Note on Modern Slavery in Procurement](#). Any sub-contractors of those contractors are also required to complete a Single Procurement Document Questionnaire.

Additionally, SDS considers Fair Work First (FWF) for all regulated procurements in a relevant and proportionate manner. When FWF applies to any contract, we will evaluate with a relevant weighting if required and evaluate each submission fairly and in the same way. SDS will continuously monitor progress against tender submissions throughout the contract lifetime and support suppliers to deliver on their commitments to FWF. For contracts of lower value or where FWF does not apply, contract managers will have an awareness of the signs of modern slavery through training and awareness (including our Best Practice Guidance Note on Modern Slavery in Procurement).

FWF is also considered in a fair and proportionate manner for all SDS grants using the same methodology applied to contracts.

Within our National Training Programmes there are strict Programme Specifications and Conditions which clearly highlight requirements and consequences for non-compliance (including sub-contractors).

6. Staff Training and Awareness

Working in partnership with our recognised Trade Unions we have embedded the fair work principles into the way we work, incorporating effective voice, fulfilment, opportunity, respect and security into our strategic plan.

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, and to further promote understanding and awareness, we have produced an e-learning module. Partnered with internal comms (including our

Procurement Policy), this training is intended to improve the understanding and awareness of modern slavery across the organisation.

Specific e-learning was created in January 2020 and is available to all staff with the intention of raising awareness of the risks of modern slavery and our obligations. In addition, updated information was provided on our intranet to advise colleagues of our approach to FWF and how that informs our practices.

7. Our Effectiveness in Combating Slavery and Human Trafficking

We use the following to measure how effective we have been to prevent the risk of slavery and human trafficking taking place in any part of our business or supply chains:

- Effective use of appropriate pre-employment checks
- Modern Slavery e-learning available for SDS personnel
- Supplier selection checks.

This statement is made voluntarily pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2021. It was approved by the board on 17 December 2021.



Damien Yeates

Chief Executive

The Skills Development Scotland Co. Limited

Date: 22 December 2021