

Scottish Qualifications Authority (“SQA”)

Slavery and human trafficking statement

Introduction

SQA conducts its operations in accordance with our values of being progressive, enabling and trusted. These values apply both within the organisation and in our dealings with suppliers.

SQA is a non-departmental public body and in this role it remains fully committed to working with other organisations, agencies and institutions in the Scottish family to help meet Scottish Government’s National Outcomes, strategies, policies and priorities – both at home and abroad. In the conduct of our business we aim to tackle inequalities, improve life chances for children, young people and families at risk and ensure safety from crime, disorder and danger.

We are committed to fair employment practices in line with our core values and behaviours, and all relevant labour legislation. We also support the global commitment to eliminating forced or compulsory labour and to effectively abolishing child labour.

We adopt a “zero-tolerance” approach to slavery and human trafficking. We are committed to taking all reasonably practicable steps to ensure that slavery and human trafficking is not present either in our operations, supply chains or amongst third-party representatives working on our behalf. We believe that identifying and tackling slavery and human trafficking risks is a means to achieving this aim.

We expect the same standards from all those we work with, including business partners, consultants, contractors, suppliers and third-party representatives working on our behalf. SQA is committed to working with our suppliers to ensure that slavery and human trafficking risks are identified and managed proactively.

We maintain and comply with a suite of policies and guidance relating to procurement standards and business conduct. This is complemented by our contract and supplier management processes contained in our Procurement Policy, which can be found at: <http://www.sqa.org.uk/sqa/35865.html>

Since the Modern Slavery Act 2015 came into force, we have built on our existing commitment by:

- identifying key slavery and human trafficking risks in our operations and in our supply chains
- holding discussions with our Procurement, International and Business Development teams;
- developing specific anti-slavery wording to insert into SQA’s existing Anti-Bribery policy
- identifying Elaine Robertson as the person within SQA with day-to-day responsibility for anti-slavery and human trafficking compliance
- arranging for our external legal advisors to provide training to at-risk staff to ensure compliance with our anti-slavery standards.

- revising our supplier terms and conditions
- arranging to write to our at-risk suppliers outlining to them our zero-tolerance approach to slavery and human trafficking
- identifying Key Performance Indicators against which to assess our progress
- taking external legal advice on our statement, policy and overall compliance approach

Structure, business and supply chains

Established in 1997, SQA is responsible for the development and management of assessment and certification of a wide range of qualifications in Scotland. SQA was established under Section 1 of the Education (Scotland) Act 1996 and has its headquarters at in Glasgow.

Based in Scotland, SQA also works across the UK and internationally with schools, colleges, universities and training organisations to develop and deliver qualifications and assessments. Around 15,000 teaching professionals and industry specialists support SQA operations annually, helping to ensure that SQA qualifications accurately reflect learners' knowledge and skills and provide routes to jobs or further study. Our International team operates in around the world in countries such as Bahrain, China and Saudi Arabia.

SQA also awards a range of other qualifications, including customised awards to meet the needs of individual companies and organisations. In addition, SQA provides advice, support and services, such as expertise in assessment, that enable organisations to succeed in meeting a wide range of educational and workforce development challenges.

Further information about SQA can be found at: <http://www.sqa.org.uk>.

Our organisational structure is detailed at: http://www.sqa.org.uk/sqa/files_ccc/Organisation_Structure.pdf

Our supply chains include:

- Office catering and security services
- Courier services
- Professional services
- Consultants engaged to develop SQA accredited education authorities internationally

Anti-slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our organisation. This reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Our commitment to anti-slavery builds upon our existing framework of ethical policies, including our Procurement Policy Incorporating Sustainability, Dispute Resolution Policy, Code of Conduct, Anti-Fraud Policy, Whistleblowing Policy, Corporate Health and Safety Policy and our Anti-Bribery Policy.

We are currently in the process of re-formulating our existing Anti-Bribery Policy to create a new “Anti-Bribery and Anti-Slavery Policy”. This will contain guidance to our staff with examples of unusual behaviour displayed by workers which may be indicative of someone experiencing slavery or human trafficking. It will also make clear that SQA will support anyone who raises genuine concerns in good faith, even in circumstances where it transpires that those concerns are mistaken.

Supply chain

We have a supply chain compliance programme to ensure all those in our supply chain and contractors comply with our ethical standards. We observe the following process to identify and mitigate the risk of slavery and human trafficking being present in our supply chains:

1. identify potentially at-risk suppliers to identify key risks such as the presence of a supplier in an at-risk country, the criticality of the product to our operations and the size of the supplier;
2. communicate our zero-tolerance approach those at-risk suppliers;
3. carry out the relevant probity checks to our supply chain prior to contract award to ensure compliance with all relevant regulations such as health & safety, child labour, slavery and payment of the living wage;
4. assess and, where necessary, conduct on-site audits where slavery and human trafficking compliance issues arise; and
5. ensure the contract conditions and supplier management are robust to ensure supplier's performance in respect of slavery and human trafficking compliance and to remedy any issues that arise.

Training

We have engaged our external legal advisers to provide training on slavery and human trafficking to our Business Development team (procurement), our SQA International team and to our Human Resources department.

We also communicate our zero-tolerance approach to modern slavery and human trafficking to the third parties we work with (for example, those who manage supplier contracts and recruitment agencies).

Effectiveness in combating slavery and human trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Staff attendance at training seminars on slavery and human trafficking
- Any incidents of modern slavery and human trafficking are reported in accordance with our anti-slavery compliance procedures
- Acceptance by suppliers of revised supplier terms and conditions

We will continue to monitor the effectiveness of our compliance regime and take necessary steps to address any instances of slavery and human trafficking.

Further steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

- As far as reasonably practicable, we will seek to investigate the supply chain of an at-risk supplier (in addition to ensuring that our first-tier suppliers are obliged to comply with anti-slavery standards and to place equivalent obligations on their suppliers)
- Review the supplier due diligence processes followed by our Business Development (procurement), International and HR teams to ensure that appropriate supplier checks are conducted in at-risk areas
- Update the existing policies section of our website

This statement is made 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 2016.

Signed:



Dr Janet Brown
Scottish Qualifications Authority

Date: 29/09/2016