



Scottish Qualifications Authority
Modern Slavery and Human Trafficking
Statement

1. Introduction

At SQA, 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 2023 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 SQA 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. We conduct our 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.

2. About SQA

SQA is a non-departmental public body and in this role, we remain fully committed to working with other organisations, agencies, and institutions in the Scottish family to help meet the 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.

3. Our statement

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.

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.

The Anti-Bribery, Corruption and Anti-Slavery incorporating Human Trafficking Policy is available to all staff and is available on SQA's website. This contains guidance to our staff.

Such policies are reviewed on a regular basis, at times of legislative change and following feedback, as required.

In compliance with the Procurement Reform (Scotland) Act 2014, SQA's Corporate Procurement Strategy, 2023–25, currently being revised, along with our Procurement Policy, sets out our principles and approaches to ensuring responsible and sustainable procurement practices.

These include:

- ◆ SQA's adoption of Fair Work First ('FWF') and our expectations in connection with this from contractors
- ◆ the requirement on SQA to adhere to the public sector equality duty
- ◆ seeking future opportunities to utilise the Supported Businesses framework
- ◆ continuing to work with small and medium sized organisations

- ◆ seeking community benefits for relevant contracts

4. 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 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 across the world in regions including Europe, Middle East, Asia and the Americas.

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 qualifications and services
- ◆ agency staff

4.1 Anti-slavery and human trafficking

We are committed to preventing the risk of instances of 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 are not taking place in our supply chains.

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

The Anti-Bribery, Corruption and Anti-Slavery incorporating Human Trafficking Policy is available to all staff and is available on SQA's website. This contains guidance for our staff.

4.2 Supply chain

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 are not present — either in our operations, our supply chains, or among 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.

SQA identify areas of risk to ensure all those in the supply chain and our contractors comply with our ethical standards. We observe the following processes to identify and mitigate the risk of slavery and human trafficking in our supply chains:

1. Identify potentially at-risk suppliers by recognising key risks, such as if a supplier is in an at-risk country, or how critical the product is to our operations, and the size of the supplier.
2. Communicate our zero-tolerance approach to at-risk suppliers.
3. Carry out the relevant probity checks to our supply chain prior to a contract award to ensure compliance with all relevant regulations such as health and safety, child labour, slavery, fair work practices and payment of the national living wage.
4. Assess and, where necessary, conduct on-site audits where slavery and human trafficking compliance issues arise.
5. Make sure 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.

4.3 Internationally

Due to the COVID-19 pandemic, SQA's activities in the international market have been limited. International markets started to reopen in 2022. SQA will continue to engage with their partners to ensure they continue to comply with the requirements of the Due Diligence Process and provide their annual declaration of compliance to SQA's policies.

This declaration, in addition to the Centre Operating Agreement, ensures the partner maintains policies and procedures (such as an equality, anti-bribery, anti-corruption and complaints) designed to respect, protect, and promote human rights in the course of its operations.

5. Our procurement activity and due diligence

The risk of modern slavery in SQA's activities is considered low. However, we recognise the potential risks linked to the extended and indirect supply chain of goods and services. For SQA, such risks are reduced as procurement of goods and services are increasingly sourced through framework agreements (such as Scottish Procurement or Crown Commercial Services).

6. Staff awareness

SQA has embedded the fair work principles into the way we work. It is embedded in our all tender activity, as per guidance from Scottish Government on the 7 elements of Fair Work First.

7. Effectiveness in combating slavery and human trafficking

SQA use the following key performance indicators 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:

- ◆ Any incidents of modern slavery and human trafficking are reported in accordance with our anti-slavery compliance procedures. No incidents have been reported during the period of April 2022 and March 2023.
- ◆ Suppliers' acceptance of SQA's supplier terms and conditions.

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

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 2023.

Signed: 

Scottish Qualifications Authority

Date: September 2023