

# **NRS MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

## **1. Introduction**

Here are the steps National Records of Scotland (NRS) has taken to take to minimise the potential risk of modern slavery in its business and supply chains. This statement is published in line with section 54(1) of the Modern Slavery Act 2015.

## **2. About Us**

National Records of Scotland (NRS) is a Non-Ministerial Department of the Scottish Government. Our purpose is to collect, preserve and produce information about Scotland's people and history and make it available to inform current and future generations.

We employ around 450 staff.

Paul Lowe is our Chief Executive and fulfils the roles of two non-ministerial office holders: the Registrar General for Scotland and the Keeper of the Records of Scotland.

Further information about the work of NRS can be found at: [What We Do | National Records of Scotland \(nrscotland.gov.uk\)](https://www.nrscotland.gov.uk/what-we-do).

We put our people at the heart of what we do and deliver in accordance with our values. One of these is being accountable, being responsible for what we do, delivering with transparency and clarity of purpose.

Further information about NRS strategy can be found at: <https://www.nrscotland.gov.uk/about-us/corporate-planning>

## **3. Our commitment to the principles of the Modern Slavery Act 2015**

NRS is committed to the principles of the Modern Slavery Act 2015 and supporting the abolition of modern slavery and human trafficking.

As an equal opportunities employer, we're committed to creating and ensuring a non-discriminatory and respectful working environment for our staff. We want all our staff to feel confident that they can expose wrongdoing without any risk to themselves.

NRS staff have Scottish Government (SG) terms and conditions of employment and we adhere to SG:HR policy and recruitment processes as well as the Civil Service Recruitment Principles.

We do not enter into business with any organisation, in the UK or abroad, which knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.

## 4. Procurement

### Our Supply Chain

Due to the nature of our business, we assess ourselves as having a low risk of modern slavery and human trafficking in our business and supply chains. The reasons for this assessment are detailed below.

In procuring goods and services from UK, and sometimes overseas suppliers, we:

- Utilise collaborative contracts set up by Scottish Government, Crown Commercial Services and other public bodies;
- Ensure all Contractor personnel requiring access to our sites are subject to the UK Government pre-employment Baseline Personnel Security Standard (BPSS);
- Exclude companies from tendering for NRS contracts where they have been convicted of any offence under [Part 1 of the Human Trafficking and Exploitation \(Scotland\) Act 2015](#) (18) or under any provision referred to in the Schedule to that Act.

### Procurement Guidance, Legislation and Documentation

There is a range of Procurement legislation and guidance that can help ensure NRS does not contract with organisations involved in Modern Slavery for example:-

- [Regulation 57\(2\) of PC\(S\)R 2015](#) allows NRS to reject bids that do not comply with applicable obligations in the fields of environmental, social and labour law established by EU law, national law, or collective agreements.
- [Regulation 69\(5\)](#) places a legal obligation on public bodies to reject bids that have been found to be abnormally low because they do not comply with applicable obligations in environmental, social or labour law. Abnormally low bids can be an indicator of human trafficking / exploitative practices.
- [Scottish Procurement Policy Note 3 / 2020](#) promotes a range of measures in place aimed at helping to reduce the risk of human trafficking and exploitation in the performance of public contracts.

### Other Procurement Steps Taken To Date

We have included clauses in our contracts to ensure our contractors comply with environmental, social and employment law obligations. Our contract terms and conditions allow for contract termination if the contractor or a sub-contractor fails to comply with environmental, social and employment law when carrying out that contract.

## Sustainable Procurement

Section 9 of the Public Procurement Reform (Scotland) Act 2014 places a sustainable procurement duty on a Contracting Authority (NRS) to consider, before carrying out a regulated procurement (over £50k), how the procurement process can help improve the economic, social and environmental wellbeing of the Contracting Authority's area. Wellbeing of the Authority's area includes, in particular, reducing inequality<sup>1</sup>.

## Fair Work First

NRS is committed to the [Fair Work First principles](#) ensuring that those who are awarded contracts are also committed to fair work practices and this is evaluated (where appropriate) as part of tender responses.

### **5. Organisational policies**

The following policies which can help identify and prevent Modern Slavery and Human Trafficking are available to all staff through the Scottish Government intranet (Saltire):

- Civil Service Code
- Whistleblowing policy
- Grievance policy
- Equal Opportunities and Diversity policy
- Civil Service Recruitment Code

### **6. Partnership with Trade Unions**

Trade unions (TUS) can play an important role in preventing trafficking and exploitation, and in raising awareness within the workforce of issues of Fair Work, which feeds into the strategy for eradicating trafficking.

NRS meets with the TUS quarterly at the NRS Joint Partnership Board meeting to consult with them at the formative stages of NRS organisational policy development, both at strategic and operational level.

We believe that this partnership approach in conjunction with our policies and procedures will help us to mitigate against the most significant slavery and human trafficking risks that we face.

### **7. Embedding the principles**

We will continue to embed the principles through:

- Complying with any legislation or guidance issued in relation to suppliers having a slavery and human trafficking statement (section 54 of the Modern Slavery Act 2015);

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<sup>1</sup> Regulation 9 of the Equality Act (2010) (Specific Duties) (Scotland) Regulations 2012

- Addressing ethics as part of our balanced scorecard approach to Contract and Supplier Management, where applicable, which can help reduce the likelihood of human trafficking and exploitation occurring in their contracts;
- Raising awareness amongst our staff, to ensure they have a clear understanding of what modern slavery and human trafficking is, and that they're alert to the key warning signs as they go about their work engaging with suppliers and delivery partners;
- Ensuring staff involved in procurement activity are aware of and follow the latest modern slavery procurement guidance from Scottish Government and the Home Office;
- Ensuring that consideration of the modern slavery risks and prevention continue to be fully considered as an employer and procurer of goods and services;
- Making sure we consider the potential for modern slavery and human trafficking in our procurement strategies;
- Maintaining a zero tolerance policy towards modern slavery;
- Reviewing our procurement approach as more information and advice becomes available.

This statement has been approved by Paul Lowe, Chief Executive of NRS, for the financial year ending 31 March 2023.

This statement will be reviewed and updated every year.