

Glasgow Life Modern Slavery Statement 2022

This statement refers to Glasgow Life practices in relation to Section 54 of the Modern Slavery Act 2015. It will be updated annually and approved by the Board of Glasgow Life.

Mission

Our mission is to inspire every citizen and visitor to become engaged and active in a city globally renowned for culture and sport. As a Charity, we find innovative ways to make this happen across Glasgow's diverse communities.

You can read more about the work of the organisation in the "About Us" section of our website: <https://www.glasgowlife.org.uk/about-us> where you will find our Annual Review <https://www.glasgowlife.org.uk/about-us/annual-review>

Charity Status

Glasgow Life is a charity and the operating name of Culture and Sport Glasgow (CSG) and its affiliated sub brands.

CSG is a company limited by guarantee, registered in Scotland with company number SC313851 and having its registered office at 38 Albion Street, Glasgow G1 1LH. CSG is registered as a charity with the office of the Scottish Charity Regulator (No SC037844). It operates and carries out its activities under the name Glasgow Life and/or the above sub-brands.

Culture and Sport Glasgow (Trading) CIC ("CSG CIC") is a community interest company, registered in Scotland with company number SC313850 and having its registered office at 38 Albion Street, Glasgow G1 1LH.

Governance

Culture and Sport Glasgow is governed by a Board of 14 Directors (8 Independent, 5 Partner and an Executive Director). The Board meets 5 times per year with trustees and senior management present. Decisions are taken to set the overall strategy for the business as well as to monitor its activities.

The work of the Board is supported by sub-committees whose responsibilities include Audit and Health and Safety, as well as a Nominations Committee and an Equalities Sub - Committee.

Day to day operations of Glasgow Life are delegated to the Chief Executive, Leadership Team and Senior Management Team.

Staff and Trade Unions

For all staff we employ, whether permanent or short-term posts, we require proof of eligibility to work in the UK. This is verified during the recruitment process before any offer of employment.

We work in partnership with our four recognised Trade Unions:

- Unite the Union
- GMB
- Unison
- BECTU

In addition, Glasgow Life is committed to achieving equality and diversification of its workforce, and in turn better reflecting the community which it serves. You can read about our ambitions and progress in this respect at:

<https://www.glasgowlife.org.uk/the-small-print/an-inclusive-employer>

Supporting Policies

The following policies/strategies are supportive of our aim to ensure that modern slavery is not part of our business.

- Recruitment and Selection Policy and Procedure
- Equal Opportunities Policy
- Code of Conduct and Whistleblowing Policy (which covers The Bribery Act 2010)
- Procurement Strategy
- Procurement Manual

Our Contractors and Supply Chains

Glasgow Life procure a wide range of goods, services and works from suppliers and contractors. Procuring goods, services and works from suppliers and contractors linked to supply chains across the world presents risks of slavery and human trafficking. Glasgow Life believe that this risk is minimised through the due diligence process carried out on our suppliers and contractors. Glasgow Life's procurement processes ensure that all staff approach procurement in a way that is legally compliant and which minimises the risk of modern slavery and human trafficking in our supply chains. Our commitment to acting ethically and with integrity in all our procurement business relationships embeds our obligations to ensure slavery and human trafficking is minimised.

Glasgow Life utilise many national and sectoral framework agreements to let contracts where stringent due diligence processes have been implemented as part of the procurement processes.

In conducting its own procurement, Glasgow Life utilise the measures available to them through public procurement legislation to ensure suppliers and contractors comply with environmental, social and labour laws when undertaking public

contracts. Glasgow Life uses the Single Procurement Document Scotland (SPD), an electronic self-declaration document submitted by contractors and suppliers in tendering for contracts. The utilisation of the SPD and relevant Scottish Government sustainable procurement tools and guidance provides assistance in ensuring suppliers and contractors, and their supply chain, is compliant with Human Trafficking and Exploitation Act 2015 and Modern Slavery Act 2015. These techniques cannot guarantee that there will never be an instance of modern slavery in our supply chains, however, they can significantly minimise the risk.

To have sight of any regulated Glasgow Life contracts please sign in or register for free to Public Contracts Scotland (PCS) website where you will be able to download Glasgow Life's Contract Register.

Risk Assessment

The risk of Modern Slavery in Glasgow Life's direct and local activities is considered low. However, Glasgow Life recognises the potential risks linked to the supply chain of goods, works and services we buy across the world.

Areas of contracting with a greater percentage of agency workers or outsourced services such as Construction, Hospitality and Cleaning Services have been highlighted by the sector as being potentially high risk in terms of Modern Slavery. The procurement team highlight high risk sectors within procurement plans and address concerns within tender documentation through the utilisations of specific evaluation questions and by requesting relevant organisational policies.

Staff Training

By nature, the Procurement Team has an understanding of Modern Slavery and keep up to date with relevant legislation and best practice developments from the Scottish Government.

We have not to date provided specific training to our staff on identifying and preventing modern slavery and human trafficking however, our Procurement Team recently undertook a four part training course (with two assessments) in Modern Slavery, where they learned why protecting human rights in the supply chain is important to the public sector, how to assess and prioritise risks, monitoring of supply chains, responding to abuses and measuring and reporting effectiveness. There was also a section on preparing the annual statement.

This was completed by all team members by 1 April 2021.

There is also a training course in respect of The Bribery Act 2010 on our e-learning platform.

Awareness

Awareness raising via an organisation-wide email to staff is scheduled for June. This is intended to promote awareness and understanding and ensure that all Glasgow Life staff know that they have an obligation to report any concerns.

Further communications/information may be disseminated as and when required throughout 2022/3.

Voluntary Income and Donations

As a charity which relies on donations and support from a variety of sources, it is the responsibility of Glasgow Life to make decisions relating to the acceptance or refusal of income in the best interests of the charity. Glasgow Life have an ethical fundraising policy which provides guidance to all staff on sourcing, accepting, recording and recognising income from any source, including corporate sponsorship and partnerships, donations from individuals and corporations, and grants from trusts and foundations.

Approval

Approved by the Glasgow Life Board on the 21st June 2022.

Signed on behalf of the Directors:

A handwritten signature in black ink, appearing to read 'S Deighan', with a large, sweeping initial 'S'.

Susan Deighan
Chief Executive