

**Strathclyde Partnership for Transport (SPT)  
Modern Slavery Statement  
July 2023**

**Introduction**

Modern slavery is a criminal offence and a violation of fundamental human rights. It takes on various forms, such as servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. Modern slavery includes labour exploitation, sexual exploitation, domestic servitude and criminal exploitation. Human trafficking is defined as arranging or facilitating the travel of another person with a view to exploitation and includes travel within a country, not just across international borders.

The transportation industry plays a crucial role in efforts to combat human trafficking since traffickers often rely the transportation system to recruit, move or transfer victims of human trafficking.

Section 54 of the Modern Slavery Act 2015 (MSA) requires any commercial organisation with a turnover of £36m or more that carries out business in the UK to produce a slavery and human trafficking statement for each financial year. This statement explains the steps SPT has taken during the 2022-2023 financial year to identify, prevent and mitigate modern slavery and human trafficking in our operations and supply chains and sets out our aims for the 2023-2024 financial year.

As a public sector organisation SPT recognises that we have a responsibility to take a robust approach to slavery and human trafficking. We are committed to acting ethically and with integrity in all of our business dealings and relationships and in implementing and enforcing effective systems and controls to combat modern slavery and human trafficking. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains.

**About this statement**

In line with the Modern Slavery Act 2015, this is SPT's modern slavery and human trafficking statement for the financial year ending 31 March 2023.

It sets out:

- Who we are as an organisation and what we do
- Where we believe our risks of slavery and human trafficking exist
- How we currently manage those risks
- Steps we are taking to ensure we continue to manage those risks
- Our relevant policies and training aimed at combatting human trafficking and slavery
- Our next steps

**SPT Organisational Structure**

Strathclyde Partnership for Transport (SPT) is the Regional Transport Partnership for the west of Scotland. SPT was formed in 2006 as part of the transport framework created by the Scottish Government, which is made up of a national transport agency, Transport Scotland, and seven Regional Transport Partnerships.

The SPT area comprises of the following council areas: East Dunbartonshire, East Ayrshire, East Renfrewshire, Glasgow City, Inverclyde, North Ayrshire, North Lanarkshire, Renfrewshire, South Ayrshire, South Lanarkshire, West Dunbartonshire and the Helensburgh and Lomond area of Argyll and Bute.

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SPT's role involves planning and delivering transport solutions for all modes of transport across the region, in conjunction with our member councils and industry partners. SPT is at the centre of the region's transport planning; analysing all travel needs and developing the transport system for now and the future.

SPT's responsibilities include:

- Preparing and delivering the Regional Transport Strategy
- Management and operation of the Subway in Glasgow
- Providing supported bus services
- Operating regional Bus Stations
- Acting as Secretariat for the Strathclyde concessionary Travel Scheme
- Acting as agent for our member Councils to deliver school transport
- Operating the MyBus demand responsive transport service
- Provision of information, journey planning and ticketing
- Investment in regional transport projects including bus infrastructure
- Support for Active Travel

**Our people**

We employ around 480 staff in a variety of professions including transport operations, transport planning, policy development, engineering, human resources, information technology, security, legal, finance and procurement.

We aim to employ a workforce that reflects, at all levels, the diversity of society as a whole.

For all people we employ, 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 recognised Trade Unions. SPT has attained Glasgow Living Wage Accreditation.

**SPT Supply Chain**

SPT have adopted the principles of the Modern Slavery Charter and expect all businesses who we contract with to similarly comply.

We buy a wide range of goods, services, and works directly from suppliers and contractors. Our main supply chains fall under the following categories:

- Estates and Facilities: Construction, Capital Infrastructure Projects, Cleaning and Catering Services, Security, Clothing and Furniture.
- Professional Services: Consultancy & Research support, Media, Printing, Recruitment
- Corporate Services: ICT Equipment and Services
- Transport Services: contracted bus services and the maintenance of supporting infrastructure.

SPT has three contracts in place for external services where we consider that Modern Slavery may be a factor, and with these SPT has now committed to introduce criteria where all persons employed by the awarded Contractor are paid as a minimum the Real Living Wage as defined by the Living Wage Foundation. The contracts affected relate to the

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provision of Cleaning for both buildings and for bus shelters, and for Security services throughout the estate.

These contracts will thereafter be subject to a system of enhanced monitoring, with a dedicated Contracts Manager being allocated and minimum frequency of monthly meetings and measurable KPI's put in place to ensure full compliance.

Cost increases in these contracts will in part be directly linked to increases in the Real Living Wage, to ensure that contractors staff are appropriately recompensed and are unaffected by the normal indices (RPI and CPI) which are more commonly used to affect the majority of annual contract uplifts and can in some cases be very low.

Currently, across all our supply chains, we have limited knowledge of our indirect suppliers. To address this weakness, we include appropriate clauses in contracts which require our direct suppliers to comply with the requirements of the Modern Slavery Act. These clauses also apply to indirect suppliers in the supply chain.

**Policies and Procedures**

SPT is committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our procurement procedures and contracts reflect our commitment to acting ethically and with integrity in all our business relationships, implementing and enforcing effective due diligence and contractual compliance to ensure modern slavery and human trafficking is not taking place anywhere in our supply chain.

SPT is committed to working in a responsible and sustainable way that serves the interests of our customers, employees, suppliers, the communities we serve and society more widely. We are committed to procuring goods and services in a sustainable and ethical manner in compliance with public sector policy, procurement law and our Procurement Strategy. SPT will therefore not engage in, condone or tolerate any act of modern slavery and human trafficking. We expect all those who work for and with us to adhere to our zero-tolerance approach to slavery and human trafficking. These principles are embedded in our human resources and procurement policies and practices.

The following policies help SPT to minimise the risk of modern slavery and human trafficking:

<b>Name of policy</b>	<b>Description</b>	<b>Policy approved by</b>	<b>Review frequency</b>
SPT Employee Code of Conduct	The Code of Conduct provides guidance to all SPT employees about their employee rights, responsibilities and duties while at work including fair treatment, disclosure of convictions, gifts and hospitality and conflicts of interest.	SPT	Ongoing
Grievance Policy	This policy provides staff with a clear framework for raising grievances / disputes and outlines how the cases will be managed.	SPT	Ongoing
Procurement Strategy	The strategy aims to maximise the benefits of procurement and make a positive impact on customers and service users, supporting	SPT	2023-26

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	SPT's strategic aims. The strategy also commits SPT to work collaboratively with other public bodies and with fairness, transparency, equality and integrity in all aspects of commercial activity.		
Counter Fraud Strategy	This strategy outlines SPT's Counter Fraud Strategy which is designed to ensure that our assets are safeguarded against loss and theft.	SPT	Ongoing
Whistleblowing Policy	This Whistleblowing Policy is intended to encourage and enable staff to raise serious concerns within the Partnership rather than overlooking a problem or approaching the media or other external bodies as a first resort.	SPT	Ongoing

**Due diligence processes**

In relation to SPT employees, we undertake appropriate pre-employment checks to ensure a right to work in the UK, and further identity checks where required. Our people policies include an Employee Code of Conduct.

SPT measures compliance with the Act in all tenders in excess of £50k in value, via use of the Single Procurement Document (SPD). Whilst use of the SPD is not mandatory at this value level, SPT took the decision in 2019 to introduce this across all tenders to increase visibility of its intentions and to encourage compliance of all bidders.

Where proportionate and appropriate, SPT will investigate all instances where abnormally low tenders have been received and in particular within industries where Modern Slavery is potentially prevalent. Only when wholly satisfied as to the reasons behind the bid submitted will SPT permit any bid of this nature to be considered further.

SPT has also introduced declarations and clauses into all procurement activity to disrupt, deter and prevent attempted fraud and the involvement of organised crime in SPT tenders and contracts.

**Risk assessment and management**

Through inclusion of Fair Work First questions in all tenders in excess of £50k, SPT measures the pay, terms and conditions of all contractors prior to any contract being awarded to ensure where possible that Modern Slavery is not practiced. Statements are included within tenders that encourage bidders to allow free and unrestricted access to Trade Union membership. This is measured within the Fair Work questions asked.

**Training on modern slavery and trafficking**

SPT staff who are accredited members of the Chartered Institute of Procurement and Supply (CIPS) have undertaken CIPS Ethical Procurement and Supply training.

SPT has also reviewed its' Modern Slavery training & awareness modules which are rolled out to SPT staff, including those with responsibilities covering procurement, finance and contracts among others.

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**Next steps**

SPT will keep our policies and practices under review to help ensure that there is no modern slavery or human trafficking in our supply chain or in any part of our business. In doing so we will continue to work with our partners, stakeholders and external agencies to help combat modern slavery and human trafficking. We will also raise awareness about modern slavery to our staff and provide the necessary appropriate training.

Valerie Davidson  
**Chief Executive**