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## 1. Purpose

This policy sets out the context for ethical trade practices and the ethical core objectives that NHS Education for Scotland (NES) will deliver through commissioning and procurement activities.

NES is committed to ensuring a high standard of ethical trade practices, across its commissioning and procurement activities. In accordance with this Policy NES expects its suppliers, service providers and contractors to observe the policy's provisions and to demonstrate a similar commitment to an ongoing programme of ensuring, and where necessary, improving ethical practices locally and globally.

NES will proactively work to ensure that all goods and services it procures are sourced ethically in terms of both the way the NES procures and in terms of the standards that we expect our suppliers, service providers and contractors to meet. In compliance with UK legislation, NES will conduct its procurement process in line with this Ethical Procurement Policy ("the Policy") which is based upon the principles of the Ethical Trading Initiative (ETI) Base Code, which were founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of labour practice.

## 2. Scope

The aim of the Policy is, in addition to the commissioning and procurement processes, ensure that NES considers the wider impact of the service's delivery. It allows NES to, for example, choose a supplier under a tendering process who not only provides the most economically advantageous service, but one which goes beyond the basic contract terms and secures wider benefits and improvement to the lives of people and the environment. The Policy applies to all areas of NES and to its direct suppliers and contractors. NES requires all direct suppliers and contractors to observe the provisions of this Policy and requires that such suppliers and contractors, in turn obtain similar compliance with its provisions from their suppliers and contractors. All parties to whom this Policy applies are also required to comply with applicable national and international laws. This policy statement sets out NES's aims in this regard. It seeks to:

- Set out a definition of ethical practice for NES
- Sets out a clear statement of policy for ethical practice in NES
- Set out the core policy objectives
- To promote the adoption and improvement of ethical practices globally
- Sets out a NES Ethical Framework

## 3. Defining Ethical Practices

Procurement processes which respect fundamental standards and conduct relating to criminal/non-criminal conduct, human rights (as set out in The Human Rights Act 1998, which is implemented in Scotland via the Scotland Act) and environmental abuse which are designed to discourage conduct and behaviours resulting in progressive improvement to the lives of people and the environment to the extent that the same can be influenced by supply chain decision-making.

Criminal/non-criminal conduct includes:

- transparency
- bribery
- fraud

- corruption
- Tax Abuse
- conflict of interest
- fairness

Human Rights/Environmental Abuse includes but not exhaustive to:

- Employment
  - Improving working conditions
  - Paying a living wage
- Health and safety
  - Accidents
  - Diseases
- Right to be part of a trade union
- Child employment
- Working hours - Zero-hour contracts
- Training
  - Regular employment
  - Apprenticeships
- Equality – hiring, compensation, access to training, promotion, termination or retirement
  - Race
  - Caste
  - National Origin
  - Religion
  - Age
  - Disability
  - Gender and Gender Identity
  - Marital status
  - Sexual orientation
  - Union membership
  - Political affiliation
  - Slavery
  - Abuse – Physical, Verbal and Sexual
- Environment
  - Sustainability
  - Global Warming
  - Global Climate Change
  - Deforestation
  - Pollution
  - Threat of Extinction

#### 4. Working with NHS Education for Scotland

All procurement must be undertaken in line with the requirements of the Public Contracts (Scotland) Regulations 2015, the Procurement Reform (Scotland) Act 2014, the Procurement (Scotland)

Regulations 2016, the principles set out in the Scottish Governments Scottish Procurement Policy Handbook 2008 and the Scottish Governments published Procurement Journey.

In accordance with the Procurement Reform (Scotland) Act 2014, and the sustainable procurement duty of a contracting authority, before carrying out a regulated procurement, to consider how in conducting the procurement process it can

- (i) improve the economic, social, and environmental wellbeing of the authority's area,
- (ii) facilitate the involvement of small and medium enterprises, third sector bodies and supported businesses in the process, and
- (iii) promote innovation

“third sector bodies” means organisations (other than bodies established under an enactment) that exist wholly or mainly to provide benefits for society or the environment.

All suppliers, service providers and contractors to NES must commit to employing the highest ethical standards in every area listed in all sections of this policy, in their own operatives and those within their supply chain, ensuring maximum benefits are gained for improving economic, social and environmental well-being.

### Counter Fraud

As with the Scottish Government (<http://www.gov.scot/Topics/Government/Finance/spfm/fraud>) and NHS Scotland Counter Fraud Service ([www.cfs.scot.nhs.uk](http://www.cfs.scot.nhs.uk)), NES has a zero-tolerance approach to fraud: there is no acceptable level of fraud. There is a role for all members of staff and all suppliers in establishing an effective counter fraud culture by engaging and being alert to the risk of external and internal fraud; identifying suspicious activities and control weaknesses; and reporting any suspicions quickly and appropriately.

Our approach to counter fraud aims to ensure that a zero-tolerance culture to fraud is maintained and that fraud is effectively managed at all levels of NES service delivery as follows:

- Committing to clear ethical standards through a formal counter fraud policy
- Communicating our attitude to fraud by raising awareness of our counter fraud policy to all staff and suppliers
- Supporting all staff and suppliers in their responsibilities in preventing and detecting fraud through guidance and training
- Providing specialist support in designing, operating and reviewing internal controls
- Maintaining comprehensive procedures for preventing and detecting fraud that is carefully followed and monitored
- Protecting members of staff and suppliers through a robust process for reporting suspicions of fraud
- Responding to fraud effectively through a comprehensive fraud response plan
- Using data and technology efficiently in the systems in place to combat fraud
- Sharing knowledge of vulnerabilities and lessons learned through strong communication channels

## 5. Improving labour conditions in the supply chain

Through the following principles:

Freedom of association and the right to collective bargaining are respected

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- The employer adopts an open attitude towards the activities of independent trades union or other workers' association and their organisational activities
- Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

## Equalities

Through the following principles:

- Practice no discrimination in hiring, compensation, training, promotion, termination or retirement either directly or indirectly.
- Suppliers, service providers and contractors shall not unlawfully discriminate within the meaning and scope of any Law (whether in age, race, gender, religion, disability, sex orientation or otherwise in employment) including but not limited to the Equality Act 2010 or other relevant or equivalent legislation, or any statutory modification or re-enactment thereof.
- Eliminate unlawful discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010;
- Advance equality of opportunity between people who share a relevant protected characteristics and those who do not; and
- Foster good relations between people who share a relevant protected characteristic and those who do not

## Blacklists

- Suppliers, service providers and contractors shall not unlawfully compile, use, sell or supply a prohibited list which:
  - a. contains details of persons who are or have been members of trade unions or persons who are taking part or have taken part in the activities of trade unions, and
  - b. is compiled with a view to being used by employers or employment agencies for the purpose of discrimination in relation to recruitment, or in relation to treatment of works within the meaning of The Employment Act of 1999 (Blacklists) Regulations 2010.
  - c. contains details of persons who are or have been involved in whistleblowing to appropriate bodies as a result of becoming aware of any deficiency in service provision, impropriety, fraud, customer abuse, breach of procedure or maladministration.

## Employment is freely chosen

- There is no forced, bonded or involuntary prison labour.
- Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice
- Afford employees the freedom to choose to work and not use forced, bonded or non-voluntary prison labour.

- Afford employees freedom of association with the right to join an independent trades union or other workers' association and to carry out reasonable representative functions in the workplace.
- Facilitate alternative means of democratic representation where laws restrict freedom of association and collective bargaining.

### Safe working conditions

- Appropriate health and safety policies and procedures are operated and are overseen by a senior manager responsible for compliance and monitoring and for ensuring employees have the necessary training and health and safety equipment.
- Adequate steps are taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- Provide comfortable and hygienic working conditions with clean toilets and water suitable for drinking and washing. Where worker housing is provided it should meet the same standards for health and safety as the workplace.
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

### Good health promotion

- Suppliers must invest in measures for tackling ill health as healthy employees experience a better quality of life and tend to be more productive.

### Working hours

- Suppliers must comply with national laws or industry standards on employee working hours, whichever affords greater protection.
- Suppliers must provide clear, easily understood disciplinary, grievance and appeal procedures that are lawful and appropriate. Any disciplinary measures should be recorded, and suppliers should not seek to deprive employees of their legal or contractual rights.

### Minimum wages

- Suppliers must provide wages and benefits at rates that meet at least national legal standards with no deductions made unless permitted under national law or agreed by the employee, without duress.

### Living Wage

- NES is a strong advocate of the Real Living Wage (RLW). The RLW is a voluntary rate of pay announced annually by the Living Wage Foundation and is based on an independent assessment of the real cost of living based on a number of indicators, including goods and services, which represent what people need to meet their basic everyday needs. NES, through its consistent and wide ranging use of public tenders, encourages all bidders to actively consider becoming a RLW employer and provide information relating to payment of the RLW to their employees and suppliers. In accordance with NES's aspirations and objectives we commend the adoption of the RLW to all our contractors and suppliers.

### Regular employment

- To every extent possible work performed must be based on recognised employment relationship established through national law and practice.

- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed term contracts of employment.
- Excessive use of Zero Hour contracts should be avoided and suppliers, service providers and contractors should be working toward eliminating such contracts or where used give more protection to the work force such as adopting an element of guaranteed hours where employees express a preference for this or where flexibility is required. In these circumstances it is expected that employers ensure their employees receive their entitlement to holiday and sick pay.

### Training is provided

- Raise employees' skills through training and access to professional development as befits their role to improve quality and secure greater value for money.

### Child labour

- Support the elimination of child labour conforming to the provisions of International Labour Organisation (ILO) Convention 138 and be consistent with the United Nation's Convention on the Rights of the Child.
- 'Child' refers to any persons less than 15 years of age, unless local legislation on the minimum age stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply.
- Ensure no children and young persons (over the age of a child, as defined above, but under the age of 18) are employed at night or in hazardous conditions, as defined by the International Labour Organisation.

### No inhumane treatment is allowed

- Prohibit physical abuse or coercion, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation.
- There is an explicit right to life and the right to freedom from torture and inhumane treatment

### Acting with integrity and transparency

- Procurement processes are conducted in an open and honest way
- There is transparency in the spending of public money
- Suppliers have systems in place to ensure high standards of propriety which make sure public money is used for the purpose it is intended.

### Whistle Blowing

The **Public Interest Disclosure Act 1998 (PIDA)** is known as the Whistleblowing law and is designed to encourage and enable employees to “speak out” and to report suspected wrongdoing at work. Whistleblowing is generally the term used when someone who is employed in an organisation reports a concern about suspected wrongdoing, malpractice, illegality or risk in the workplace.

The National Whistleblowing Standards set out how the Independent National Whistleblowing Officer (INWO) expects all NHS service providers to handle concerns that are raised with them and which meet the definition of a ‘whistleblowing concern’.



These Standards are underpinned by a suite of supporting documents, which provide instructions on how the INWO expects concerns to be handled. Together these documents form a framework for the delivery of the National Whistleblowing Standards.

The Standards consist of:

#### [Whistleblowing principles](#)

- The principles underpin and drive how concerns raised by staff or those working in NHS services are handled. They also include definitions of whistleblowing and whistleblower.

#### [The whistleblowing procedure](#)

- Definitions and explanations of what is a whistleblowing concern, who can raise a concern, and a description of the procedure for handling these concerns.

#### [Governance](#)

- Information for NHS boards and staff on their own responsibilities, requirements regarding recording and reporting concerns and expectations for external contractors.

#### [Training, guidance and resources](#)

- Supporting information setting out how the INWO expects the procedure to be applied, together with the governance arrangements that must be in place.

The Standards are applicable across **all NHS services**. This means that they must be accessible to anyone working to deliver an NHS service, whether directly or indirectly. This includes current (and former) employees, bank and agency workers, contractors (including third sector providers), trainees and students, volunteers, non-executive directors, and anyone working alongside NHS staff, such as those in health and social care partnerships.

NES encourages individuals, including employees, contractors and anyone else who interacts with NES (e.g. trainees), to use internal mechanisms for raising any malpractice or illegal acts or omissions by NES employees or ex-employees, and as further set out in the **National Whistleblowing Standards**, has robust procedures in place to allow this to happen. Individuals can be assured that concerns raised in good faith will be protected under current legislation.

This can include:

criminal offences;

failure to comply with a legal duty;

miscarriages of justice;

fraud or corruption;

abuse of authority;

serious breaches of NES policy or procedure;

unethical conduct and actions deemed unprofessional or inappropriate;

victimisation (that is, discriminatory treatment or harassment of those who have raised complaints in regards to any of the various legal instruments -- eg anti-discrimination legislation, labour, health & safety, human rights issues or made whistleblowing complaints and it expects those standards to be upheld and maintained by its supply chain);

the health and safety of any individual has been, or is likely to be, endangered;

the environment has been, is being or is likely to be, damaged (as a result of NES's actions or inactions and those of its supply chain); and information about any of the above has been, is being, or is likely to be, deliberately concealed.

NES is committed to the highest possible standards of honesty, openness and accountability and will not tolerate malpractice or wrongdoing and expects that its suppliers, service providers and contractors are committed to and have in place a similar policy for its employees and subcontractors which seeks to protect those individuals who make certain disclosures about any instance of malpractice or wrongdoing and to investigate them in the public interest.

### Modern Slavery Act 2015

NES recognises that it has a responsibility to take a robust approach to slavery and human trafficking. In addition to our responsibility as an employer, it also acknowledges its duty to notify the Secretary of State of suspected victims of slavery or human trafficking as introduced by section 52 of the Modern Slavery Act 2015. NES is absolutely committed to preventing slavery and human trafficking in its corporate activities and to ensuring that its supply chains are free from slavery and human trafficking. NES requires that all direct suppliers, service providers and contractors to NES are absolutely committed themselves to preventing Slavery within their own activities and through their supply chain which includes manufacturers, and producers.

To report a suspicion or seek advice contact the Trafficking Awareness Raising Alliance (TARA) 0141 276 7724 or the Migrant Helpline 07837 937737 or 07789 791 110 or call the police on 101 at any time to report an incident. To report anonymously contact Crimestoppers on 0800 555 111. Always call 999 if there is a crime in action or immediate threat to life.

## 6. Responsible supply chain

NES expects a commitment by the supplier, service provider and contractor to continuous improvement of the ethical performance of their supply chain.

### Small to Medium Enterprises (SMEs)

NES is committed to improving engagement with SMEs, voluntary sector and charitable organisations and where appropriate tenders will be adapted to their needs, particularly with regard to dividing large contracts into lots, in accordance with The Procurement Journey and is compliant with the Public Contracts (Scotland) Regulations 2015, Procurement (Scotland) Regulations 2016 and the statutory guidance which encourages authorities to use the 'Code of Best Practices Facilitating Access by SMEs to Public Procurement Contracts'.

'Small to Medium Enterprises (SMEs)' means

The definition of an SME is that it must meet two of the following criteria:

- o It has a turnover of less than £25M
- o It has gross assets of less than £12.5M

- o It has less than 250 employees

## Environment

The Scottish Government has declared a climate emergency and has developed its action plan for tackling climate change. The National Performance Framework and Scotland's 2018-2032 Climate Change Plan sets out the Scottish Government's pathway to ambitious targets set by the [Climate Change \(Emissions Reduction Targets\) \(Scotland\) Act 2019](#) and forms part of the the sustainable Scotland Network and the wider Net Zero Climate Change Framework. The plans commit NHS Scotland to a green recovery and sets targets to reduce Scotland's emissions of all greenhouse gases to net-zero by 2045 at the latest, with interim targets for reductions of at least 56% by 2020, 75% by 2030, 90% by 2040.

It is important that NES works with and influences other organisations to also play their full part in responding to the climate emergency, to support the country achieving its zero carbon ambitions. Through the Sustainable Procurement Duty and associated procurement activity, NES is therefore asking all suppliers to set out the measures they will take to reduce their own carbon emissions and how these will be monitored effectively.

## Community Engagement

The supplier, service provider and contractor should be able to demonstrate their willingness to work with communities and our partners to develop greater resilience in communities, building on the strong networks that exist. NES favours an asset-based approach which looks at the uniqueness of people, their potential skills, assets, relationships and community resources. This approach concentrates primarily on what is important to people, what they want to do, and the strengths and nature of their social networks. This underpins wider NES priorities of building self-reliance and strengthening communities.

The key principles are:

- o Connecting people with local community solutions which may include a community hub, a social group or peer support
- o People of all ages should have access to community facilities which support them to be healthy and engaged in the life of their place. This does not have to be just physical buildings or universal services, but residents should be able to readily find information to access to community initiatives either run by the voluntary sector or through individuals and groups of residents

## Fair Payments throughout the Supply Chain

NES is committed to ensuring fair payment for goods and services are paid for promptly through the supply chain. In accordance with the Scottish Public Finance Manual (SPFM) issued by the Scottish Ministers to provide guidance on the proper handling and reporting of public funds, NES is fully aligned to the 'Prompt Payment Policy.' NES's standard terms of payment to its suppliers, service providers and contracts are 30 days from receipt of invoice, however NES is committed to paying its suppliers as promptly as possible and endeavours to do so within 10 days of invoice date wherever possible. NES also encourages payment by Purchase card enabling suppliers to be paid within 4 days. NES requires that all direct suppliers, service providers and contractors demonstrate a similar

commitment through the supply chain in paying their suppliers and contractors which in turn is passed through to manufacturers, and producers.

### Mandatory exclusion

Mandatory grounds for exclusion are participation in criminal organisations, corruption, bribery, fraud, and money laundering; those who are guilty of child labour, people trafficking or drug trafficking offences or offences linked to terrorism; and those who have breached their tax or social security obligations (until the supplier has rectified the breach) within a period of five years prior to the procurement.

### Discretionary grounds for exclusion

Discretionary grounds for exclusion are more widely defined but include professional or commercial misfeasance and grave professional misconduct in the course of business, payment of taxes under UK law, payment of social security contributions under UK law.

“Grave Professional Misconduct” means:

It has been established by a final judgement or a final administrative decision made by NES that a supplier, service provider or contractor or persons employed by or subcontracted by a supplier, service provider or contractor that there is guilt of grave misconduct by having violated applicable laws or regulations or ethical standards of the profession to which the supplier, service provider or contractor belongs, or by having engaged in any wrongful conduct which has an impact on its professional credibility where such conduct denotes wrongful intent or gross negligence.

### UK Government additional recommendations on Tax Compliance

In accordance with the UK Governments recommendations NES places an obligation on suppliers, service providers and contractors to keep NES notified of any “occasion of tax non-compliance (OONC)” during terms of contracts.

NES will make all reasonable enquiries to see that the statements made by suppliers, service providers and contractors at selection stage remain valid at the commencement of the contract

“Occasion of Tax Non-Compliance” means:

(a) any tax return of the Supplier submitted to a Relevant Tax Authority on or after 1 October 2012 is found to be incorrect as a result of:

(i) a Relevant Tax Authority successfully challenging the Supplier under the General Anti-Abuse Rule or the Halifax Abuse Principle or under any tax rules or legislation that have an effect equivalent or similar to the General Anti-Abuse Rule or the Halifax Abuse Principle;

(ii) the failure of an avoidance scheme which the Supplier was involved in, and which was, or should have been, notified to a Relevant Tax Authority under the DOTAS or any equivalent or similar regime; and/or

(b) the Supplier’s tax affairs give rise to a criminal conviction in any jurisdiction for tax related offences which is not spent at the Effective Date or to a penalty for civil fraud or evasion.

## Tax Rule IR35

'In compliance with the governments reforms of Tax Rule IR35 for off-payroll working rules in the Public Sector, NES take responsibility for ensuring that those who work for them pay the right amount of tax. NES requires that all its direct suppliers, service providers and contractors take responsibility for ensuring that those who work for them, including off-payroll, pay the right amount of tax.'

## Procurement law

NES shall act fairly, reasonably and in accordance with the requirements of the Public Contracts (Scotland) Regulations 2015, the Procurement Reform (Scotland) Act 2014, the Procurement (Scotland) Regulations 2016, the principles set out in the Scottish Governments Scottish Procurement Policy Handbook 2008 and the Scottish Governments published Procurement Journey in considering whether to exclude a potential tenderer from participation in any procurement procedure and shall also take into account any other relevant legislation

In accordance with the public procurement rules, it is therefore necessary to ensure that ethical issues are relevant to the subject matter of the contract and are consistent with the aforementioned Procurement Journey. In the context of procurement, best value for money means choosing the option or bid that offers "the optimum combination of whole life costs and benefits to meet the customer's requirements." Ethical considerations that are "relevant" to the subject matter of the contract may arise where there is a risk to NES from a supplier being unable to deliver the product or service to time and of sufficient quality due to say insufficient health and safety provisions for its employees. If a clear link can be established between poor conditions of employment and the ability or motivation of an employee to maintain required equality standards, this will be relevant to the supply of goods, works or services.

Public sector bodies may also work in partnership with suppliers to pursue wider ethical issues, in a constructive and collaborative way, outside the public procurement process. This must however be done post-award and on a voluntary basis as contracts must not set standards that exceed the parameters of what may be required under Scots or UK law.

## **Appendices of Bodies**

Equality Act 2010	<a href="#">Equality Act 2010</a>
Ethical Trading Initiative	<a href="http://www.ethicaltrade.org">www.ethicaltrade.org</a>
International Labour Code	<a href="http://www.ilo.org">www.ilo.org</a>
Climate Change Committee	<a href="#">Net Zero</a>
National Performance Framework	<a href="#">National Performance Framework</a>
Procurement Reform (Scotland) Act 2014	<a href="#">Procurement Reform (Scotland) Act 2014</a>
Procurement (Scotland) Regulations 2016	<a href="#">Procurement (Scotland) Regulations 2016</a>
Procurement and the public sector equality duty: A guide for public authorities (Scotland)	<a href="#">Procurement and the PSED</a>
Public Contracts (Scotland) Regulations 2015	<a href="#">Public Contracts (Scotland) Regulations 2015</a>
Scottish Government Climate Change Policy	<a href="#">ScotGov Climate Change</a>
Scottish Government Scottish Procurement Policy Handbook 2008	<a href="#">Scottish Procurement Policy Handbook 2008</a>
Scottish Government Procurement Journey	<a href="#">Procurement Journey</a>
Scottish Public Finance Manual (SPFM)	<a href="#">SPFM</a>
The Employment Relations Act 1999 (Blacklists) Regulations 2010	<a href="#">Blacklists</a>
Fairtrade Foundation	<a href="http://www.fairtrade.org.uk">www.fairtrade.org.uk</a>
Sedex	<a href="http://www.sedex.com">www.sedex.com</a>
Prompt Payment Code	<a href="http://www.promptpaymentcode.org.uk/">http://www.promptpaymentcode.org.uk/</a>
Scottish Council for Voluntary Organisations	<a href="https://scvo.scot/">https://scvo.scot/</a>
Slavery and Human Trafficking	<a href="https://www.antislavery.org/">https://www.antislavery.org/</a>
Sustainable Scotland Network	<a href="https://sustainablescotlandnetwork.org/home">https://sustainablescotlandnetwork.org/home</a>
Independent National Whistleblowing Officer	<a href="https://inwo.spsa.org.uk/whistleblowing-principles">https://inwo.spsa.org.uk/whistleblowing-principles</a>