

## **SCOTTISH RUGBY UNION LIMITED**

### **MODERN SLAVERY ACT 2015**

#### **SLAVERY AND HUMAN TRAFFICKING STATEMENT**

Scottish Rugby Union Limited falls within the ambit of the Modern Slavery Act 2015.

This Statement is published in accordance with the requirements of Section 54 of that Act. It provides a brief explanation of: Scottish Rugby's structure, business and supply chains; the approach taken to assessing and managing risk; steps taken in relation to suppliers and the supply chain; policies and values which are considered relevant to the issue of modern slavery and human trafficking; training of relevant staff and reporting.

#### ***Structure, business and supply chain***

Scottish Rugby Union Limited is the main operating company of the Scottish Rugby Union, which is the governing body of the sport of rugby union in Scotland. The organisation derives its revenues largely from the sale of tickets to attend international and professional team rugby matches, sponsorship, broadcasting, provision of hospitality and payments from international bodies of which the organisation is a member.

With the exception of retail and merchandising, supply chains are short and predominantly service-based, with the point of delivery of service within Scotland. Retail merchandising does involve the manufacture, through the organisation's external contractor, Macron, of goods, particularly clothing, overseas.

For further information about Scottish Rugby Union Limited, its organisational structure and operations, please see: <http://scottishrugby.org/about-us>.

#### ***Assessing and managing risk***

Scottish Rugby is committed to having systems to safeguard against modern slavery existing within our business and supply chains. We have reviewed our operations and our supply chain to assess the risk of modern slavery taking place taking into account a number of factors, including the nature of our activities, their location, the sources from which we are supplied goods or personnel and the risk profile of relevant locations.

Many of the organisation's activities are outsourced, including in particular the provision of hospitality services, retail and merchandising and the provision of stewarding services. These are the areas which are considered, in the context of the business as a whole, to be most relevant to issues surrounding modern slavery and human trafficking. Taking account of the small number of suppliers involved, the detailed contracts and service agreements in place and the well-established and reputable nature of the contractors, that risk is itself considered to be small. However, we remain vigilant for any suspected instances of forced labour across all aspects of our business.

### ***Due diligence processes with suppliers and the supply chain***

We seek to partner with suppliers that share our values, and we expect our supply chain to operate fair and equitable practices, whereby modern slavery is not tolerated.

Contracts routinely contain provisions requiring compliance with applicable laws and, as appropriate, good industry practice. Failure to adhere can ultimately result in termination. The contractual terms and conditions that we put in place with our suppliers are regularly reviewed..

Contractors have not routinely been checked in the past in relation specifically to slavery or human trafficking, with the exception of the retail service provider where it has been recognised that garment manufacturing overseas may carry with it a greater risk in relation to the treatment of labour. In the current contract cycle knowledge of the industry and established good practice has been relied upon, rather than the conduct of a formal detailed risk assessment in relation to modern slavery or human trafficking. The contractor concerned is nevertheless obliged to comply with a specific Code of Conduct in relation to the sourcing of goods and must apply that Code of Conduct to its own suppliers.

A senior manager of Scottish Rugby experienced in the merchandising industry regularly visits supplier factories in China to inspect working conditions and worker welfare at several facilities operated by the retail service provider's suppliers. The results from those visits have been satisfactory and are reported to Scottish Rugby's Board of Directors following each visit.

***Tender processes involve specific consideration of whether there is a risk of slavery or human trafficking and seek additional supplier or contractor assurances where that risk is identified. Our Procurement department have received training in identifying potential risks regarding slavery and human trafficking. Our effectiveness in combatting slavery and human trafficking***

We use the following methods to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- We deal with well-established reputable organisations on a long-term basis with service level agreements and requirements to adhere to applicable laws and good practice Scottish Rugby has taken some steps towards satisfying itself that modern slavery and human trafficking is not occurring in its supply chain.
- We continue to review statements published by our suppliers on the use of forced labour to ensure that they in turn are taking what appear to be appropriate steps.
- Maintain communication and personal contact with our supply chain to ensure their understanding of, and compliance with, our expectations.
- Further steps, including formal contractual warranties and indemnities and additional rights of inspection of workplaces and records are likely to be introduced where appropriate into new contracts and on contract extension to provide greater assurance in future.

## ***Policies and Values***

Scottish Rugby has a number of well-publicised core values: Leadership, Enjoyment, Achievement, Engagement and Respect. In pursuit of these a number of policies exist which are relevant to the area of modern slavery and human trafficking but these do not yet specifically address the subject. These include a policy on Equality and Diversity, a probity policy which encourages the reporting of improper or unethical business practices and Whistleblowing. As part of the regular review of policies specific reference to slavery and human trafficking will be introduced where appropriate.

Scottish Rugby has robust procedures for recruiting staff. The organisation has a permanent full time Human Resources department with professionally qualified staff members who manage recruitment and employee management processes. Job vacancies are subject to internal approvals of terms and conditions and pay. Most recruitment of non-playing staff is through direct application to Scottish Rugby; recruitment consultants and agencies are used sparingly. Applicants are encouraged to complete equality and diversity questionnaires as part of the recruitment process and references are checked with previous employers. Scottish Rugby is a registered sponsor with the Home Office and takes particular care in the recruitment, employment, resettlement and integration of foreign workers.

## ***Training***

Specific training focussed on the issue of modern slavery and human trafficking has been carried out for those considered to be most likely to have an exposure to the issues involved, principally employees dealing directly with the main suppliers and contractors mentioned above, in procurement, finance and human resources. The aim of this training has been to increase awareness of human slavery issues and to help those members of staff understand them and be alert to relevant indicators, their particular relevance to Scottish Rugby, and their role in managing them in accordance with our values. As policies are updated and communicated, the organisation will continue to provide and reinforce training as required. Staff have also been provided with training in relation to the policies in place and the wider values of Scottish Rugby. This has included an award-winning training programme for managers and leaders within the business which includes, among other things, principles of equality and diversity and a number of other areas of employee welfare and behaviour.

## ***Reporting***

The organisation reports both to its Board of Directors and, as appropriate, a designated Audit and Risk Sub-Committee in relation to a number of areas including probity, combatting fraud and whistleblowing. The Board has also created a Safeguarding, Wellbeing and Inclusion Committee for which the remit specifically covers other issues of slavery and human trafficking.

Scottish Rugby recognises the importance of maintaining constant vigilance to identify and address any impacts associated with slavery and human trafficking throughout its supply chains, and to continuing to enhance its capacity to identify, prevent and mitigate any actual or potential impacts in this field.

This statement was approved by the Board of Directors on 1 November 2018.

A handwritten signature in blue ink, appearing to read "M. Dodson" with a horizontal line extending to the right.

**Mark Dodson**

**Chief Executive**