

Modern Slavery Statement 2025-26

At Independent Living Fund Scotland (ILF Scotland) we are committed to doing everything we can to ensure that there is no form of modern slavery or human trafficking within our organisation or our supply chains and aims to align with the [Modern Slavery Act 2015](#).

1. Introduction

ILF Scotland conducts its business activity in accordance with our stated core values of ensuring that the interests of disabled people are at the heart of our decision-making processes and that we treat everyone with dignity, trust and respect. We apply these inherent values across our organisation and with all others that we come into contact with.

ILF Scotland is a Non-Departmental Public Body and as such is fully committed to working with organisations, agencies and other bodies to assist the Scottish Government to meet its agreed policy objectives.

Our organisation has adopted a “zero tolerance” towards slavery and human trafficking and we will endeavour to take all reasonable and pragmatic steps to ensure that it is not present in our core business or with third parties with whom we engage.

During 2026–27, ILF Scotland will continue to review its approach to staff awareness, supplier engagement and risk assessment to ensure ongoing alignment with best practice and emerging guidance

ILF Scotland supports the worldwide commitment to securing elimination of forced labour.

2. Structure

Established on 1 July 2015, ILF Scotland is a Scottish Non-Departmental Public Body and a company limited by guarantee. We are directly responsible for the assessment and delivery of financial awards intended to support disabled people to live independent lives in their communities.

Based in Scotland, ILF Scotland oversees this commitment across Scotland and Northern Ireland, working closely with Health and Social Care Partnerships and Trusts, together with other agencies, to assess need and to provide appropriate levels of financial support to enable disabled people to live independently.

ILF Scotland employs a wide range of appropriately trained and experienced personnel to carry out the required assessments with disabled people and to determine the necessary requirements to support their independent living goals and objectives.

ILF Scotland aims to adopt and influence new ways of utilising social policy to improve its primary purpose and to secure groundbreaking approaches to managing our workforce.

Key to our organisational successes is a strong commitment to actively engaging and listening to those we support and to those we employ.

3. What is Modern Slavery?

Modern slavery describes situations where individuals are exploited and controlled by others for personal or commercial gain, and where they are unable to leave due to coercion, threats, deception, or abuse of power. It includes slavery, servitude, forced or compulsory labour, and human trafficking, as set out under the Modern Slavery Act 2015. [\[gov.uk\]](https://www.gov.uk)

Modern slavery can occur in any setting, including those considered low-risk. While it is more commonly associated with high-risk industries, UK Government guidance makes clear that exploitation can occur wherever vulnerable individuals are present, and organisations must remain alert to potential indicators.

Human trafficking is one form of modern slavery and involves arranging or facilitating the movement of a person for the purpose of exploitation. Movement can occur across borders or within the same community, and victims may not always recognise themselves as being exploited. What distinguishes modern slavery is not distance travelled, but the loss of personal freedom and the presence of control or coercion.

Indicators of modern slavery can include restriction of movement, excessive working hours, threats or intimidation, withheld wages or documentation, and an inability to freely leave employment. Recent UK guidance encourages organisations to build awareness of these signs so concerns can be identified and acted upon swiftly and appropriately.

4. Supply Chains

Supply chains are a vital part of ILF Scotland's operations, and all third-party appointments are made in accordance with Scottish Government procurement protocols. These frameworks include mandatory due-diligence checks on suppliers' ethical, labour and human-rights compliance, ensuring that high

standards are embedded from the outset. Because we operate exclusively within these frameworks, our exposure to high-risk suppliers is minimal. Nevertheless, we continue to review suppliers where relevant to provide ongoing assurance and to uphold our organisational commitment to ethical and lawful practice.

In line with these expectations, we require all contractors and suppliers to demonstrably meet clear ethical and professional standards and to comply fully with all applicable policy and legislative requirements. ILF Scotland operates within, and is guided by, the practices set out in Scottish Government procurement policy, which further strengthens our approach to responsible supply-chain management.

ILF Scotland is considered a low-risk organisation due to the following factors:

- The majority of our suppliers are UK-based and therefore subject to UK employment law.
- We have no overseas manufacturing, logistics, or other high-risk labour categories.
- Scottish Government procurement frameworks significantly reduce exposure to unethical or non-compliant supply chains.

5. Policies on Modern Slavery (Due Diligence and Risk Assessment)

ILF Scotland adopts a non-tolerance approach to all issues associated with modern slavery and / or human trafficking and this approach is built upon and enshrined within a suite of organisational policies that are regularly reviewed and updated as required.

In keeping with organisational commitment of openness and transparency, all our policies including Anti-Bribery and Corruption are publicly available. We will develop additional support and guidance to our workforce as required.

Our organisational commitment to and adoption of internal and external policy and practice scrutiny will continue to be a mainstay of our attitude to policy practice.

6. Measuring Effectiveness in Slavery and Human Trafficking

- Slavery and human trafficking is included in our risk register, and we undertake regular risk reviews to prioritise action and channel resources accordingly.
- We have developed an appropriate level of knowledge about the third parties we deal with to ascertain any likely risk of slavery or human trafficking.
- Our contract costs are set at a fair price, and we commit to interrogate bids that appear unrealistically low.
- We raise awareness among smaller suppliers to improve understanding.
- We work with inspectorates and law enforcement to share information.
- Any incidents of modern slavery and human trafficking are reported in accordance with Scottish Government or Northern Ireland guidance on compliance procedures.
- We have a number of policies to ensure that we are conducting our business with integrity and transparency including our Whistleblowing policy.
- We advertise the whistleblowing and the Modern Slavery Helpline numbers.
- Staff are trained to identify indicators of potential exploitation and report concerns appropriately through mandatory induction, annual mandatory eLearning, and refresher training as required. This is supported through ongoing peer group discussions centred around the annual Modern Slavery Statement, and refresher eLearning modules. These measures help ensure that a consistent and informed approach is applied, with an added layer of scrutiny embedded within our review processes.

- If anyone believes or suspects that a contravention of above policy has occurred, or may occur, they should notify; Their line manager; or
 - Chief Operating Officer; or
 - Chief Executive Officer

Appropriate action will be determined at that stage. This may include contacting Police Scotland, Police Service of Northern Ireland or the UK Modern Slavery helpline.

- We encourage openness and will support anyone who raises genuine concerns in good faith under this policy.

Throughout the 2025–26 reporting period, no concerns or incidents relating to modern slavery or human trafficking were raised

This statement was approved by our Board of Directors on 02 June 2026

ILF will continue to regularly monitor the effectiveness of our compliance procedures and where necessary take appropriate corrective steps to address any instances of modern slavery and or human trafficking.

ILF Scotland's financial year end is 31 March each year. This statement covers the preceding period 1 April 2025 to 31 March 2026. We will aim to publish any revised statement within six months of the financial year end.

You can view an electronic version of this statement on our website: www.ilf.scot.

Signed:



Peter Scott
Chief Executive Officer