

Apprenticeship Equality Action Plan

Annual Report 2019



Our nation's biggest asset is its people – their skills are the basis for achieving inclusive growth, wealth creation, equality and sustainability.

At Skills Development Scotland, we are committed to ensuring that individuals from a diverse range of backgrounds can access work-based learning opportunities and achieve equitable outcomes. We are also working to encourage employers to value and develop a diverse talent pool with the right skills for their business.

First produced in 2015, the SDS Apprenticeships Equality Action Plan sets out our approach to delivering this ambition.

This report highlights the work we've undertaken in partnership with others over the last year, to help individuals access apprenticeships and employers develop inclusive approaches to recruitment and sustainable growth. Partnership working has long been at the heart of all we do – it is crucial in ensuring diversity and inclusion in apprenticeships and is a key theme of our Strategic Plan 2019-2022.

In recent years, we have made great strides in supporting disabled and care experienced individuals and those from different ethnic backgrounds into apprenticeships. We are working with partners across Scotland to raise awareness of apprenticeships, including a range of programmes to support people to access work-based learning opportunities.

Addressing the gender imbalance in some sectors remains a challenge. We continue to face significant cultural and societal inhibitors in our society which result in gender bias and stereotyping, which is reflected in apprenticeships. However, we remain absolutely committed to affecting change within the education and skills system. We work closely with partners from the public, private and third sector to combine our expertise and resources.

Our work through the Scottish Apprenticeship Advisory Board (SAAB) has continued to provide feedback from employers on how we support diversity within apprenticeships. SAAB's Employer Equality Group provides us with guidance on tackling under-representation and supporting better participation and access to apprenticeships. The group has established a Gender Commission in recognition of the need to address occupational gender segregation. The Commission aims to offer business-ready, practical solutions to employers on what they can do now, and in the future, to address any real or perceived barriers to improving gender balance in their workforce.

Scotland's Apprenticeship family has continued to grow through the increase in Foundation Apprenticeship opportunities for school pupils and Graduate Apprenticeships for new and existing employees to achieve up to a Master's degree-level qualification.

Latest statistics show that more people are choosing apprenticeships and we are on track to meeting the target of 30,000 Apprenticeship starts

by 2020, which will include Modern and Graduate Apprenticeship starts. As we continue this ambitious expansion of work-based learning, we are absolutely committed to ensuring that all people in Scotland regardless of gender, ethnicity, disability or family circumstance have equal access to these opportunities.

Looking to the future, we will continue to work with our enterprise and skills agency partners, the learning and skills system and industry to deliver innovative and effective approaches to change perceptions and increase participation.



Frank Mitchell
SDS Chair



Lovemore, Graduate Apprentice,
Amey Highways

Scotland's Apprenticeship Family

'Scotland's Apprenticeship family' is the combined term we use to refer to Foundation, Modern and Graduate Apprenticeships in Scotland.

Modern Apprenticeships (MAs)

are the most established and well-known. They provide individuals with the opportunity to secure industry recognised qualifications while they are in employment, earning a wage. There are over 80 types – or frameworks – of Modern Apprenticeships available, covering a range of industries including chemicals and biotechnology, construction, creative and cultural skills, engineering and energy, financial services, food and drink, health and social care, hospitality and tourism, transport and logistics, and sport.

Foundation Apprenticeships (FAs)

were first introduced in the 2014/15 academic year and provide work-based learning (WBL) opportunities for senior phase secondary school pupils alongside their other studies. FAs are designed and developed in partnership with Industry and SQA and are aligned to key sectors of the economy with current skills shortages and projected future jobs growth. Based on existing MA frameworks, FAs provide young people with demonstrable experience of the workplace which can aid the successful transition from education into employment.

Graduate Apprenticeships (GAs)

offer a combination of academic study and work-based learning at an advanced level. Delivered in conjunction with Higher Education partners and employers, GAs are accredited work-based learning programmes at SCQF levels 8 to 11. They lead to degrees or to degree level, professionally recognised, qualifications. GAs support the learning and development of new and existing employees so that they acquire the skills, knowledge and competence necessary to work and progress in their careers.

About Skills Development Scotland

Skills Development Scotland is the national skills agency. Our purpose is to drive a productive and inclusive economy by ensuring Scotland's businesses and people develop the skills they need to achieve their potential. We are committed to collaborating with our enterprise and skills agency partners to help Scotland to meet its ambition of ranking in the top quartile of OECD countries for productivity, equality, wellbeing and sustainability.

Equality and inclusion are central to our [Strategic Plan 2019-2022](#). We aim to achieve our strategic goals through multi-faceted service delivery, driven by extensive collaboration and partnership working. We engage with partners at national, regional and local level, flexing and shaping our delivery to meet local needs and priorities, while informed by the knowledge of effective practice from across the country and beyond. By increasing innovation, efficiency and productivity in our own organisation, we aim to model the change we want to see in others.

Case Study - Junjie Xu, Financial Services Foundation Apprentice

Lanark-based Junjie Xu believes his Foundation Apprenticeship has given him the perfect start for a career in finance.

While in sixth year at the Royal Blind School in Edinburgh Junjie found out about doing a Foundation Apprenticeship in Financial Services, alongside his Highers and Nat 5s.

He found out about it from his Skills Development Scotland careers adviser who knew he was interested in this type of career. Junjie saw the opportunity as a first step towards him studying accountancy.

The 19-year-old said: "The Foundation Apprenticeship really appealed to me because it gave me the opportunity to try out the career I wanted to pursue.

"I could gain work experience that would look good on my CV and the qualification would give me a better chance of getting into college."

During his apprenticeship Junjie attended classes at Edinburgh College for two days a week, before undertaking a three-week intensive work placement with Virgin Money.

Junjie said: "Everyone at Virgin Money, especially my mentor, Raymond, was very helpful and made sure starting my work-based learning was a smooth process."

At college, Junjie gained an understanding of the finance sector by successfully completing his National Progression Award (NPA) in Financial Services. He could apply this new knowledge in a real working environment during his placement.

Junjie's mentor at Virgin Money, Raymond Martin, was impressed by his knowledge and work ethic.

He said: "Although Junjie had challenges to manage his placement this didn't affect his contribution to the team, which was fantastic. Not only has he benefitted from taking the Foundation Apprenticeship, the staff and business have built on their experience of managing employees with additional needs."

Junjie was also a finalist in the Foundation Apprentice category of the Scottish Apprenticeship Awards.



Junjie, Foundation Apprentice,
Virgin Money

Our role in the delivery of apprenticeships

SDS is responsible for the administration of Scotland's Apprenticeships on behalf of Scottish Government. Scottish Government is responsible for setting the policy, targets and budget for apprenticeships. SDS commissions learning providers to deliver apprenticeships in line with Scottish Government policy and priorities. We evaluate the bids from providers, allocate volumes and issue contracts. We then manage those contracts on an ongoing basis, including assuring quality of provision, handling contract funding and building the capacity and capability of our providers.

Beyond this, SDS plays a wider role in the promotion of apprenticeships, targeted at both employers and individuals, including through our dedicated web service apprenticeships.scot, our all-age careers service, and through various marketing campaigns throughout the year. Responsibility for the training, development, and assessment of individual apprentices is shared by a network of employers and learning providers across Scotland. Modern and Graduate Apprenticeships can be undertaken by both new and existing employees. Recruitment is usually undertaken by employers, though in some cases the learning provider may support them with this.

The extent of the challenge

The original action plan identified that the challenges surrounding under-representation of certain groups within apprenticeships is complex. People need to be currently in, or newly recruited into, employment before they can undertake a Modern or Graduate Apprenticeship. Selection for these opportunities is the responsibility of the employer. The uptake of apprenticeships therefore tends to reflect the demographics of the wider workforce in each sector, resulting in evidence of cultural and societal issues such as occupational segregation by gender.

As Scottish Government policy focuses apprenticeships primarily on younger people, it is also impacted by the post-school destinations chosen by under-represented groups. This includes the fact that women and people from ethnic minority groups are more likely to move into further or higher education after school than seek employment, and that disabled and care experienced young people face additional barriers when moving into employment.

To improve equality of access to apprenticeships, we must work in partnership with others to shift long-standing cultural norms.

About this report

This report outlines progress in 2018-19 against the actions committed to in our [Apprenticeship Equality Action Plan \(2018 Update\)](#). It also summarises our planned activity for 2019-20.

As well as responding to the ambitions within Developing the Young Workforce, this plan also forms part of our response to the following national strategies and action plans:

- Race Equality Framework for Scotland and associated action plan
- British Sign Language (BSL) National Plan
- Science, Technology, Engineering and Mathematics (STEM) – Education and Training Strategy for Scotland

To help bring about the necessary change we undertake activity aimed at:

- Individuals – ensuring young people are aware of the variety of opportunities available and are supported to access them.
- Employers and learning providers – helping them to understand the importance and benefits of diversity and equality of access, and providing them with information on how to support individuals from under-represented groups.
- Partners – working with local, regional and national partners to utilise their expertise and influence in their particular fields, and ensure people have the support they need to access and sustain apprenticeships.

Under-representation and disparities in outcomes, which can be seen across education and in the wider workforce, cannot be addressed by any one organisation or single approach. Partnership working is, therefore, critical to the success of this action plan.

- Fairer Scotland for Disabled People Delivery Plan
- A Fairer Scotland for Women: Gender Pay Gap Action Plan

The content relating to care experience also contributes to fulfilling our duties as a corporate parent as defined in the Children and Young People (Scotland) Act 2014, and builds upon the current [SDS Corporate Parenting Plan](#).

The aims of the Apprenticeship Equality Action Plan

Our [Apprenticeship Equality Action Plan](#) outlines our priorities for improving diversity and equality of opportunity in apprenticeships. The plan outlines our contribution towards achieving the ambitions from Developing Scotland's Young Workforce to:

Disability

Increase the employment rate for young disabled people to the population average by 2021

Gender

Reduce to 60% the percentage of MA frameworks where the gender balance is 75:25 or worse

Ethnic Minority Groups

Increase the number of MA starts from minority ethnic communities to equal the population share by 2021

Care Experience¹

Increase positive destinations for looked after children by 4 percentage points per annum resulting in parity by 2021.

¹ SDS contributes to this by aiming to increase the number of care leavers who successfully take up an MA.

This section provides an overview of the wide variety of work we have undertaken in the past year, in line with the priorities highlighted in our 2018 report, to improve diversity in apprenticeships and increase equality of access to work-based learning opportunities.

Case study - Partnership with British Deaf Association

In recent years, the BSL (Scotland) Act 2015 has been passed to ensure Scottish Government funded employment programme and training opportunities are accessible to British Sign Language (BSL) users. The BSL (Scotland) Act 2015 was introduced to remove the barriers that Deaf and Deafblind people face when accessing public services, employment and education services.

Skills Development Scotland and the British Deaf Association Scotland launched a partnership to raise awareness of apprenticeship opportunities available to Deaf young people in Scotland.

We held a joint event in Glasgow to promote the job opportunities currently available through Modern Apprenticeships, which provided Deaf young people, parents and teachers with apprenticeship information in BSL.

BSL/English interpreters and SDS Careers Advisers both attended the event and Deaf young people had the opportunity to discuss opportunities with employers and training providers.

This has led to an increase in interest for Modern Apprenticeship opportunities from Deaf young people and from deaf people's organisations.

Mitchell Graham, Transition Officer at the British Deaf Association Scotland said: "I am pleased to have this opportunity to work with Skills Development Scotland to create breakthroughs for Deaf young people with Modern Apprenticeships. We're very excited about this work and are looking forward to engaging with more Deaf young people."

Attendees at the SDS and British Deaf Association Modern Apprenticeship Event



Achieving change through local and national partnerships

In our first action plan update, we highlighted the importance of continuing to develop our regional and national partnerships to share and embed good practice and to ensure our work is aligned with others to affect long-term cultural change.

SDS supports national initiatives aimed at joining up key partners to influence policy at a strategic level which can help bring about the systemic change required to tackle inequality in employment. These include the consultation on the Gender Pay Gap report, the Developing the Young Workforce (DYW) Equality Group, the First Minister's Advisory Council for Women and Girls, and the steering group for Recognition of Prior Learning for Migrants and Refugees.

We also support sector-wide initiatives such as improving the diversity of the childcare workforce through the current expansion of childcare provision, including working with CEMVO to try to encourage individuals from BME communities to apply for roles in the sector. We also facilitate the Tackling the Technology Gender Gap Together group. This work involves working with Digital Technology employers, educational institutions and other partners, such as Equate Scotland, to try to improve female representation within the Digital Technology sector. This included work with Girlguiding Scotland to develop the country's first Digital Challenge Badge. This work will help generate an interest from young girls in digital technology and support them to develop their digital skills. In the last few years the proportion of technology occupations held by women has increased from 18% to 23.4%.

Whilst working to influence strategic change, our regional approach to tackling inequalities provides tangible, practical support and outcomes. Our team of regional Equality Executives work with employers, learning providers and local organisations to utilise the strengths and expertise of each partner. Collectively, we are better able to break down stereotypical assumptions about who apprenticeships are for and offer individuals from under-represented groups preparation and support to apply for opportunities which are appropriate for them.

The regional team engages with a range of local stakeholders including youth groups, community groups and ASL (Additional Support for Learning) staff, to highlight the benefits of apprenticeships to young people, their parents and carers. Examples of our work with partners are given throughout this action plan.

Much of the team's work is focused on building the capacity of our local partners to support young people through the employability pipeline into meaningful learning and work opportunities. This includes working with local DYW groups to encourage employer engagement in schools and apprenticeships. For example, we provided input on equality at the West Lothian Employer Apprenticeship Breakfast and the DYW employer event in Ayrshire to raise employer awareness of apprenticeships and of the benefits of attracting a diverse range of individuals onto these opportunities.

The Equality Executives also provide advice and support to learning providers and employers who want to take positive action to address under-representation within their sector, more detail on this is provided below. Our regional team of Equality Executives can be contacted at MAequality@sds.co.uk for advice on how to attract and support individuals from under-represented groups onto apprenticeships.

Commissioning and contract management

Although we do not recruit the apprentices directly, we can use our commissioning and contract management process to influence the actions of our contracted learning providers, including encouraging them to promote good practice to employers.

As part of the contract monitoring process in 2018/19, Modern Apprenticeship learning providers were required to complete a Quality Action Plan, which includes equality actions to show steps taken to address under-representation.

In addition, learning providers must evaluate their own performance in supporting under-represented groups in relation to the [SDS Quality Assurance and Improvement Framework](#). They are required to develop improvement actions for each contracting year relating to how they support recruitment and retention onto their programmes from under-represented groups. This is monitored by our Skills Investment Advisers who visit providers regularly to gauge performance against their plans. Where providers are deemed not to be taking appropriate and proportionate measures to improve their equality outcomes, SDS has sanction measures that can be implemented.

Approximately 50 from 300 annually contracted providers are formally reviewed on a cyclical basis by a team of Quality Assessors in relation to the quality assurance and improvement framework. This review includes an equality grade. These quality outcomes are considered as part of the commissioning process for the following contracting year.

Equality is also embedded within the thematic inspections of apprenticeships which are undertaken by Education Scotland.

Aligned to the approach for Modern Apprenticeships, equality is also embedded into the commissioning process for Foundation and Graduate Apprenticeships. This ensures our delivery partners consider equality from the earliest stage. During the commissioning process for Foundation Apprenticeships, delivery partners are asked to include the steps they will take to attract and support individuals from under-represented groups on the programme.

For Graduate Apprenticeships, we are working to align our quality processes as part of the wider SDS Quality Management Framework (QMF). Learning Providers will be required to evidence their approach to widening equality of access as part of quality management. The QMF will be refined based on the outcome of a current pilot and will be rolled out to all Graduate Apprenticeship learning providers in 2019-20.

We believe that embedding equality within our commissioning has been a key driver of the proactive steps now being taken by learning providers to support apprenticeship employers to recruit more diversely. We are beginning to identify incremental improvements in representation across our provider network which is culminating in the improvements seen in the national statistics.



BAE System's education outreach activity

Case study - BAE Systems

The most recent formal quality assessment review of BAE Systems highlighted a number of areas of good practice including the active and successful Education Partnership Strategy that outlines BAE Systems' intent and aspirations in relation to education outreach activities.

Through early intervention and interaction, BAE Systems aims to increase the quality and diversity of its future talent pool to meet the demands of its Early Careers Programmes. The operating model sees a structured approach to interventions with schools from P1 through to S6 along with targeted activities with other organisations such as Girlguiding UK and the Thomas Lipton Foundation.

Engagement activities such as Schools Roadshows, Careers Events, STEM promotion, work experience, Schools Engineering Challenge, BAE Systems site visits and the provision of specific teacher resources have sought to build awareness and raise the profile of BAE Systems within schools.

In addition, BAE Systems has a network of STEM Ambassadors from across the business who engage in schools. They have developed a STEM Ambassador Handbook which contains relevant labour market information and a variety of resources which can be used when engaging with school (e.g. Build an Aircraft Carrier Challenge and Watercraft Challenge). The handbook promotes diversity through its images which showcase women and individuals from BME communities throughout.

All this activity has made a positive contribution to the STEM agenda and provided a high quality and diverse pool of applications for apprenticeship vacancies. During the 2018-19 academic year 58 events took place engaging with 7,234 pupils/students and 42 school teachers/guidance staff. 43 pupils completed a period of work experience with BAE Systems, of which 38% were female.

In addition, BAE Systems' partnership with The Thomas Lipton Foundation has been successful in engaging with primary school children for those living in areas of high social deprivation, offering site visits and school activities.

Building capacity of colleagues, learning providers and employers

SDS recognises the key role that employers and learning providers play in the delivery of apprenticeships. The Equality Executives work closely with Skills Investment Advisers who manage relationships between SDS and our contracted learning providers.

Working with Skills Investment Advisers and other colleagues, the team encourage contracted learning providers and employers to consider how to diversify their workforce and take positive action. This is achieved by providing practical tips based on using approaches that we know can have an impact, and by promoting any funding or support available via SDS or other partners.

We run training sessions for contracted learning providers to help them to understand better the needs of different customer groups. These encourage providers to reflect on how they could improve their recruitment practices and support, to enable more individuals from diverse backgrounds to access and achieve apprenticeships.

In 2018-19, our equality training covered a number of topics, including: Religion and Belief Awareness, Understanding Race Equality, and Supporting Individuals with Autism. We also organised sector-specific sessions for learning providers and employers which focussed on diversifying the workforce within Childcare and Health and Social Care, and recruiting more women into Engineering. We found that sector-specific events allowed employers with similar needs and experiences to come together to share ideas on diversifying their workforce.

Through these sessions and other events, we promote good practice and encourage employers and learning providers to share ideas and lessons learned with each other.

Case study -Sharing Good Practice: Provider Events

SDS organised events for learning providers to help share best practice on action taken to attract and support under-represented groups on apprenticeships.

There were also workshops from partner organisations giving expert advice on supporting particular groups covering:

- Supporting Carers (Carer Positive)
- Supporting Care Experienced Young People (Barnardo's and Action for Children)
- Engaging ethnic minority communities (CEMVO and Radiant and Brighter)
- LGBT Inclusive Workplaces (Stonewall Scotland)
- Developing equality actions (SDS)

The events provided an opportunity for providers to hear from experts and peers, and to share ideas with other attendees.

As a result, providers have committed to making a number of changes to their practice, including reviewing application processes, engaging with third sector organisations for expert advice and cascading their learning from the events to employers to support them to attract and support under-represented groups in their workforce.

SDS is running a programme of similar events in 2019-20. To find out more, please contact MAequality@sds.co.uk.

We encourage delivery partners to share any challenges or successes observed in introducing and developing Foundation and Graduate Apprenticeships. A Community of Practice event on recruiting learners, held for all Foundation Apprenticeship delivery partners, including employers, provided an opportunity to discuss potential actions to improve equality of access to the programme.

Similarly, for our Graduate Apprenticeships, we invited all lead delivery partners to attend SDS-led events which allowed them to share their learning, and encouraged discussion around key themes such as evaluation and employer engagement. Through these forums, we presented statistics on gender imbalance within some frameworks and discussed the role of learning providers and employers in trying to redress this balance.

We also produced a guide for partners on Graduate Apprenticeships which included information on [Access to Work](#) (funding available via DWP for workplace adjustments for disabled apprentices).

The Scottish Apprenticeship Advisory Board (SAAB) is led by employers and representatives of industry bodies across a range of sectors. It provides employer leadership and contribution to the development of apprenticeships in Scotland. We work closely with the [SAAB Employer Equality Group](#) to understand the challenges faced by employers in increasing apprenticeship uptake by under-represented groups. We have previously worked with this group to develop employer guides to inclusive recruitment and these were updated in 2018-19 to include information on how to support and retain these groups following recruitment. These guides are now available on apprenticeships.scot.

Our Career Information, Advice and Guidance (CIAG) colleagues seek to provide an inclusive service where customers are supported to make well-informed career decisions that are not limited by stereotypes or bias.

Our Equality Executives work closely with local CIAG teams to ensure that customers are aware of the opportunities available through apprenticeships and the support that is available to access them, where required.

Our CIAG team are currently developing their Equality Action Plan which will provide more detailed information on their activity to continue to challenge stereotypes; encourage engagement and ensure access; and enable customers to broaden their horizons through the development of lifelong career management skills. This will be available in 2019.

Case study - Apprenticeships: be a part of it!

SDS partnered with inclusive employer, Wheatley Group, to host a recruitment event aimed to encourage disadvantaged groups into apprenticeships.

The event featured a range of apprentice employers that have built up diverse workforces and take positive action to be inclusive in their recruitment practice.

Participating organisations including Glasgow Life, City Building and Arnold Clark all promoted apprenticeship jobs at the Modern Apprenticeship and Opportunity Fair, where Enable Scotland also provided information on support offered through its Modern Apprenticeship Enhanced Support project.

Wheatley Group delivered a workshop on its apprenticeship opportunities and SDS promoted its careers advice services and the range of Scottish Apprenticeships.

SDS worked with its network of equality groups to promote the event, with around 80 people attending from disabled, care experienced and ethnic minority backgrounds including representatives from support organisations.

Financial support

Access to additional funding can provide important support to learning providers and employers and encourage them to take action to improve equality outcomes. Enhanced funding for Modern Apprenticeships is offered up to the age of 29 for disabled and care experienced young people. This recognises that these young people often experience later entry to the labour market than their peers. In 2018-19, 1,577 individuals were supported by this funding. In 2018-19 we began an evaluation of the uptake, effectiveness and impact of this funding and this will be concluded in 2019-20.

In 2018-19, we piloted additional funding for learning providers to support them to recruit ethnic minority individuals, specifically targeted at those with multiple barriers to employment. This was initially trialled as a small pilot with 13 applications being received and approved. This pilot will be extended into 2019-20 and the learning from this evaluation will inform our approach in future.

The Employability Fund can be an effective route into an apprenticeship. We provide funding to disabled customers undertaking Employability Fund training, who are not eligible for Access to Work, to support equal access and opportunity for participation and related outcomes.

The Scottish Employer Recruitment Incentive (SERI) formed part of the Scottish Government's commitment to help unemployed young people into sustainable employment. The programme has been administered by SDS and delivered by local authorities. Since 1 April 2016, SERI introduced a sharper focus of supporting young people with the greatest barriers to employment. It was designed to provide a financial contribution towards the additional costs of recruiting and sustaining a young person in employment, including a Modern Apprenticeship.

In 2018-19, SERI supported 508 young people to start work, 50% of those were supported onto an apprenticeship. We committed to ensuring that at least 25% of those supported by SERI were care experienced, had a caring responsibility, were a disabled person or had an offending history. Current figures show that the programme achieved 49% of starts from these groups during the 2018-19 delivery year.

From 2019-20, a Local Employability Model will be delivered by Local Authorities which will incorporate funding for the two previous programmes, SERI and Activity Agreements.

Promotion and marketing of apprenticeships

In the past year, we continued to focus on equality and diversity in the promotion of apprenticeships, to drive uptake from individuals from under-represented groups and encourage more employers to be inclusive in their recruitment practices.

Our priority has been the mainstreaming of equality and diversity across communications channels and marketing materials, encompassing messaging, accessibility, imagery and representation such as our use of individual case studies.

Almost everything we do is illustrated by stories, of both individuals and employers, to help inspire others to get involved.

Within that, we prioritised equality and diversity when choosing role models to be representative of apprenticeships. Last year around 60 per cent of all of our case studies specifically highlighted individuals from under-represented groups.

This included highlighting the achievements of women in STEM industries such as Engineering Design and Manufacture Graduate Apprentice [Robyn Urcia](#) or profiling talented apprentices from BME communities, such as Civil Engineering Foundation Apprentice, [Zakir Naeem](#).

This approach was embedded into campaigns, with our case studies to support Scottish Apprenticeship Week and our Foundation Apprenticeships campaign representing areas such as gender balance, black and minority ethnic communities and disabled people.



Zakir, Foundation Apprentice,
Network Rail



Darshan, Modern Apprentice,
Punjabi Junction

The Scottish Apprenticeship Awards continued to promote inclusive recruitment, giving recognition and promotion to businesses who have demonstrated a commitment to diversifying their workforce. The Awards provide us with an opportunity to promote and share good practice amongst employers, such as the winner of the 2018 Promoting Diversity award, apprentice employer Rearo Laminates, which supports its employees to ensure the business has a diverse and inclusive workforce.

For example, one of Rearo's factory apprentices, Sam Speirs, is profoundly deaf, and he is being fully supported to achieve his qualifications and gain relevant work experience. Rearo's communications assistant, Paula Marshall, accompanies Sam to college where she is doing a sign language interpretation course. Paula held fortnightly sign language sessions at Rearo and now more than 20 staff within the factory have basic sign language capabilities.

Our work has also focused on promoting SDS-led and supported projects and initiatives covering events, partnerships and publications. This included the launch of the Scottish Apprenticeship Advisory Board guides to support employers retain apprentices from under-represented groups mentioned above.

Over the last year there was a specific focus on the promotion of apprenticeship opportunities to those who influence young people's career ideas and aspirations, including our careers advisers, education practitioners and parents. Scottish Apprenticeships online learning module was developed for Careers Advisers, education partners and teachers. It was promoted through SDS channels, such as the SDS staff intranet, our teachers' newsletter and with the help of partners such as Education Scotland.

“The Scottish Apprenticeship Awards provide us with an opportunity to promote and share good practice amongst employers”

Our work also included the translation of a parents' guide to Scottish Apprenticeships into Arabic, Punjabi, French and Kurdish, which is being used at events across the country to support those who do not have English as their first language.

Through our Digital Equality Action Plan, the SDS Digital team conduct annual accessibility review of apprenticeships.scot to ensure it is accessible to disabled customers.

The team also meet with apprentices and potential apprentices to gather feedback on our online offer. This included a focus group specifically for BME young people to gather views on how we make the apprenticeship programme more inclusive. Their feedback included promoting more case studies of BME customers and closer working with community organisations. These actions are being taken forward by our Marketing and Digital teams, and our regional Equality Executives.

In addition, we carried out research with Lesbian, Gay, Bisexual and Transgender (LGBT) young people to look at their perceptions of our services to gather insight into how we include different groups within our digital services to make them more welcoming to them.

Case study - Microcom Training: supporting care experienced young people

Training provider, Microcom Training has been working with organisations such as Barnardo's and Enable Scotland to offer Modern Apprenticeships to vulnerable young people, including those with care experience.

This has involved using the expertise of the charities' staff to put in place a workable model of support for both individuals and employers before apprenticeships are in place.

As part of the partnership, the support charities' staff meet with Microcom's local assessors, who have a more direct working relationship with the candidates and the employers. This will ensure all those involved in delivering the project are given the right support and information needed to carry out the model.

Microcom Training advertises the vacancy on apprenticeships.scot and alerts partners including Barnardo's and Enable, who check caseloads to establish if they are working with any suitable candidates interested in the position. Microcom reviews the individuals' CVs and gains background information on each candidate from the charity to understand any support needs of individuals to inform the right approach when conducting interviews.

The key worker continues to be a support by keeping candidates informed of the process and providing any help to set up face to face interviews, usually conducted via Facetime, Skype or WhatsApp video platforms.

Once the candidate has been interviewed, arrangements are made for a formal interview with company.

In the last year, four individuals have gained apprenticeships with three different companies based in Dundee, Perth and Aberdeen. All individuals have completed their Modern Apprenticeships and three remain employed and are doing well within their respective roles.

“It is important for learning providers and employers to be able to access relevant information and advice at the beginning of an apprenticeship to ensure they can fully support the individual.”

Supporting apprentices

We recognise that some individuals require additional support to prepare and apply for apprenticeship opportunities. It is important for learning providers and employers to be able to access relevant information and advice at the beginning of an apprenticeship to ensure they can fully support the individual.

By supporting the individual to access opportunities and building the capacity of the learning provider and employer to better understand the needs of the individual, we better enable apprentices from all backgrounds be successful in their role.

An example of this is our close work with Barnardo's and Action for Children who support care experienced young people into employment. We have raised awareness of apprenticeship opportunities with their staff to enable them to support care experienced young people to access apprenticeships.

In addition, their staff have provided advice and guidance to learning providers and employers on recruiting care experienced young people, including advice on individual circumstances, to ensure the appropriate support is put in place for the young person. This project will run until September 2019 and learning from this will inform future models of support to help improve the achievement rates of care experienced apprentices.

We worked with local partners to offer pre-employment support, including additional information about apprenticeship opportunities, to individuals from under-represented groups.

These projects included support and training for employers to help them understand the needs of the individuals and better support them in their apprenticeship. We worked in partnership with Fife Council to deliver Accessible Fife, an employability programme to help young people with a disability or health condition to access apprenticeship

and, where possible, support them to progress into an apprenticeship or paid job. In the first cohort, 10 people started the course, with 9 successfully completing. The second cohort took place earlier in 2019 and will be evaluated to assess the outcomes.

We delivered an Employability Club with Central Scotland Regional Equality Council (CSREC). This included workshops in Stirling and Falkirk to promote Modern Apprenticeships and how to access them to ethnic minority communities and other groups facing inequalities in the labour market. The club improved participants employability skills and built understanding among participants and parents of the different pathways to work.

Similarly, we funded Radiant and Brighter to run a programme of pre-employment support to help individuals from BME communities, including migrants and refugees, onto apprenticeships.

This project was based in Glasgow and included support for the individuals as well as building capacity with learning providers and employers to better understand the needs of these customers. Some participants had more complex needs, such as limited English and use of sign language from their home country. This project also helped our delivery partners and employers learn more about supporting individuals with additional needs.

Language can be a particular barrier for some ethnic minority groups. Recognising this, we worked with the Bridges Programme in Glasgow to look at approaches to supporting individuals through vocational ESOL² courses and onto apprenticeships where appropriate. This project runs until Summer 2019 and learning from this will be used to inform future approaches to supporting this group.

² English for speakers of other languages (ESOL)

Enhanced Support Modern Apprenticeships

Scottish Government has funded a package of tailored in-work support, commissioned and administered by SDS, for individuals with more complex needs who need additional support to apply for, and sustain, employment. In 2018/19 this support was delivered nationally by Open Doors Scotland.

The assistance available includes specialist employer services, which can include mentoring, job coaching, training, orientation visits and providing training to the apprentice's colleagues. Help to apply for funding via Access to Work can also be provided.

The project ran from June 2018 to June 2019 and delivered around 60 supported apprenticeship opportunities, including relevant employer training.

Understanding and improving participation in apprenticeships

We regularly review data and, where required, conduct research into the needs, aspirations and potential barriers for different customer groups. For example, our research into the perceptions of young carers about the apprenticeship programme identified potential barriers for this group accessing apprenticeship opportunities. Many of the challenges were not specific to apprenticeships and included the time and financial impact that caring responsibilities can have on individuals.

We have worked with Scottish Government Carer Policy team to review the recommendations and identify appropriate actions for SDS. From this we have taken steps to raise awareness with our learning providers of the needs of this group and to promote Carer Positive through our work with learning providers and employers.

We have also used customer insight from refugees and relevant support organisations to inform our work to support individuals with refugee status onto apprenticeships, including developing links with refugee organisations and ESOL provision. We have translated information on apprenticeships into key languages and shared information with our learning providers on how to support refugees onto apprenticeships.

Case study - Supporting refugees onto apprenticeships

Earlier in 2019, SDS teamed up with City of Glasgow College and Arnold Clark's training organisation, GTG Training Ltd, to deliver a pre-apprenticeship programme for refugees.

The programme was open to individuals attending the college's English for Speakers of Other Languages (ESOL) class and completion could lead to an automotive Modern Apprenticeship with Arnold Clark.

Participants were taught using workbooks relating to mechanics, to help build knowledge and skills relevant to the job.

Maryam Zeitoon, who passed the initial two-day workshop on teamwork and practical numeracy and literacy skills, has since taken a course with Prince's Trust to build on her skills. She has now started a 6 week 'Get into Cars' course with GTG in advance of starting her Modern Apprenticeship.



Maryam, Pre-apprentice Programme Participant, GTG Training

Modern Apprenticeships³

As of the end of 2018/19, progress against the targets identified by Scottish Government in Developing Scotland's Young Workforce for Modern Apprenticeships are as follows:

Measure	2021 target (%)	Actual achieved (%)			
		2015/16	2016/17	2017/18	2018/19
% of MA starts self-identified an impairment, health condition or learning difficulty	12.5	3.7	8.1	11.3	14.1
% of MA Frameworks where gender balance is 75:25 or worse	60	74	68	72	72
% of MA starts self-identified being from a Mixed or Multiple; African; Caribbean or Black and Other ethnic group	5.1	1.5	1.7	1.9	2.3
Number of care leavers who successfully take up an MA	Increase from baseline ⁴	0.9	1.3	1.6	1.5

Understanding the figures

From our evidence and past activity in our equality action plan, we know that:

- The number of Modern Apprenticeship starts identifying as disabled has increased year on year in line with our ambitions. We will continue to support disabled people to access and achieve modern apprenticeships, with a focus on those with more complex needs.
- Modern Apprenticeships continue to reflect the gender imbalance in the wider workforce as apprentices are employed and may be newly recruited to an apprenticeship or an existing member of staff.
- The gender imbalance is accentuated by the fact that our biggest Occupational Grouping is Construction and Related Apprenticeships where 2% of participants are female. In line with Scottish Government policy we have also increased the number of apprenticeships in STEM sectors, which tend to be traditionally male dominated.
- Despite this, we have seen some positive progress. For example, female starts in Construction and Engineering are the highest they have been in the past 5 years. Male starts in Sports, Health and Social Care, and in Administration and Related are also at the highest numbers compared to the past 5 years. This progress has been small and we will work to continue this trend towards addressing gender imbalance within particular sectors.
- Similarly, we can see some small incremental progress in the participation of BME individuals on Modern Apprenticeships. However, this is not at the level we would have hoped and we will continue to focus on support for these groups to access apprenticeship opportunities.
- There has been a slight decrease in the percentage of Modern Apprenticeship starts who are care experienced. We will monitor this to determine if this represents a trend and will continue to offer support to care experienced young people to access Modern Apprenticeships. There has been a slight increase (58% to 59%) in the achievement rates for care experienced young people.

Foundation Apprenticeships

As the Foundation Apprenticeships expand, we will continue to monitor participation across key equality groups and use this information to inform our activity. The information below outlines equality data for each year of the programmes.

Each group of apprentices is categorised according to the year they started their Foundation Apprenticeship either, 2016, 2017 or 2018. These are the first three groups (cohorts) of pupils that have engaged in the Foundation Apprenticeship. Start figures for Foundation Apprenticeships are reported as at 30th September for each year.

FA Cohort 1: Starts by framework and gender

	% Male	% Female
Business Skills	20.0	80.0
Civil Engineering	87.2	12.8
Engineering	93.0	7.0
Financial Services	39.5	60.5
IT: Hardware / System Support	92.3	7.7
IT: Software Development	96.7	3.3
Social Services and Healthcare	7.0	93.0
Social Services Children and Young people	7.0	93.0

FA Cohort 2: Starts by framework and gender

Framework	% Male	% Female
Business Skills	58.2	41.8
Civil Engineering	88.5	11.5
Creative & Digital Media	44.2	55.8
Engineering	93.5	6.5
Financial Services	53.7	46.3
IT: Hardware / System Support	100.0	0.0
IT: Software Development	90.0	10.0
Scientific Technologies	50.0	50.0
Social Services and Healthcare	10.3	89.7
Social Services Children and Young people	4.5	95.5

³ Further information on our Modern Apprenticeship Statistics can be found at [MA Statistics Quarter 4 2018-19](#)

⁴ There is no published population figure for the proportion of the Scottish population who are care experienced. Published data in the [Children's Social Work Statistics](#) suggests 1% of the 16-25 year old population in Scotland is currently looked after or a care leaver, although this is only an approximation.

FA Cohort 3: Starts by framework and gender

	Starts	% Male	% Female
Accountancy	28	53.6	46.4
Business Skills	85	42.4	57.6
Civil Engineering	93	83.9	16.1
Creative and Digital Media	135	64.4	35.6
Engineering	305	86.9	13.1
Financial Services	13	46.2	53.8
Food and Drink Technologies	10	*	*
IT Hardware / System Support	35	*	*
IT Software Development	105	86.7	13.3
Scientific Technologies	39	46.2	53.8
Social Services and Healthcare	190	10.0	90.0
Social Services Children and Young People	494	3.4	96.6
Total starts	1,532	666	866

Measure	Cohort 1	Cohort 2	Cohort 3
Total number of starts	346	1244	1532
% of FA starts self-identified an impairment, health condition or learning difficulty	7.8%	7.4%	7.1%
% of MFA starts self-identified being from a Mixed or Multiple; African; Caribbean or Black and Other ethnic group	4.6%	4.9%	6.1%

It is important to note that Foundation Apprenticeships are still relatively small so we must be careful when analysing the data for trends at this stage. Foundation Apprenticeships are part of the senior phase curriculum and should not be directly compared to other apprenticeships. Senior phase school pupils choose to study a Foundation Apprenticeship in the same way as they choose any other senior phase subject.

Our initial data for ethnic minority groups is encouraging but we will continue to monitor this and work to ensure that individuals from all groups can access Foundation Apprenticeships. We will also focus our efforts on ensuring all partners are able to fully support disabled pupils to apply and participate in Foundation Apprenticeships.

In terms of the gender split across Foundation Apprenticeship frameworks, these reflect the gender imbalance seen across subject and occupational groupings. Persistently, more females are choosing the social services frameworks and more males are focusing on engineering.

However, the proportion of females participating in the male dominated frameworks has increased since cohort 2, so there has been some progress made. Gender balance across Foundation Apprenticeship frameworks compares favourably to similar Higher subjects (based on the latest published data from 2016) with all Foundation Apprenticeship frameworks performing marginally better than Highers.

Graduate Apprenticeships

Similarly, we will monitor participation in the Graduate Apprenticeship programme across key equality groups to identify any areas of under-representation. This data will be included in our Graduate Apprenticeship Progress Report due to be published on the SDS website in Summer 2019.

Case study - Robyn Urcia, Engineering Graduate Apprentice

Engineer, Robyn Urcia is heading towards a degree thanks to her Graduate Apprenticeship.

The 26-year old works with global electrical power and materials company Mersen in Eurocentral and is on target to complete her engineering manufacturing Graduate Apprenticeship in 2021.

Robyn, from Glasgow, said: "I found out about the Graduate Apprenticeship through my employer and realised that it was something I wanted to do.

"Being able to work full-time and achieve a degree while I am getting experience is so good.

"You get to see what you learn at uni applied in work and you are also learning from your colleagues."

The Graduate Apprenticeship means Robyn can learn theory at the University of Strathclyde and put it into practice the next day at work.

Robyn was the first Graduate Apprentice at Mersen, but the company now has two others working towards their degrees.

Mersen Operations Manager Steven Lang said: "Robyn is already doing her own projects and putting her own stamp on things.



Robyn, Graduate Apprentice, Mersen

Our work continues to focus on improving participation across under-represented groups, though we are pleased to note that this is moving in a positive direction for some groups. We will continue to work closely with partners to ensure we are supporting individuals to fulfil their potential, whichever pathway they take.

Our on-going aim for the year ahead is to further embed equality into all stages of the apprenticeship process, from the promotion of apprenticeships to under-represented groups, through to supporting individuals to sustain their apprenticeship. We will particularly focus on improving participation from ethnic minority groups; addressing gender segregation in certain frameworks; and supporting care experienced and disabled individuals to access and sustain apprenticeships.

As Foundation and Graduate Apprenticeships grow, we will seek opportunities to apply our learning from our equality activity and partnership working on Modern Apprenticeships to encourage participation from under-represented groups. We will continue to monitor and evaluate our activity to ensure we target our resources at those who require the most support.

Achieving change through local and national partnerships

Addressing areas of under-representation and inequality in apprenticeships requires the on-going concerted effort of SDS and relevant national and local partners to engage with each other and align our work. We will continue to work closely with schools, learning providers and employers as our delivery partners to ensure that they:

- are aware of the issues and challenges that contribute to under-representation.
- have access to information and advice on how to more effectively support under-represented groups to access and sustain apprenticeships.

Through our regional structure, we will continue to use close working relationships with local partners to promote apprenticeships and provide clarity on the different learning and employment pathways individuals can take. This includes working with local Developing the Young Workforce (DYW) groups to raise the profile of equality and apprenticeships with employers and schools.

We will continue to work closely with partners who specialise in supporting people from different groups into employment, adding value to their delivery and ensuring pathways exist for these individuals onto the apprenticeship programmes.

Our local partnership working with organisations offering pre-employment support to individuals will continue to ensure we are sharing expertise; this will include providing advice to employers and learning providers on how to engage and support individuals from different groups to help them sustain their apprenticeship.

At a national level, we will continue to meet and share learning with key partners such as the Scottish Government, Education Scotland and the Scottish Funding Council. For example, there is work underway with Education Scotland to support their national campaign on gender equality at a framework level for Foundation Apprenticeships, and our apprenticeship and CIAG teams will work closely with Education Scotland's Gender Balance Officers to tackle gender stereotypes which may influence subject and career choice.

Our partnership with organisations such as Education Scotland, Scottish Funding Council and Universities Scotland provides us with communication channels to raise awareness of the importance of diversity and potential barriers for under-represented groups onto FAs at school, and Modern and Graduate Apprenticeships post-school, with education practitioners.

We will work with the Scottish Funding Council and our delivery partners in Further and Higher Education for Foundation and Graduate Apprenticeships to align our activity in widening access to apprenticeships and addressing gender imbalance in subject and career choice through these institutions' existing Gender Action Plans.

The Scottish Apprenticeship Advisory Board (SAAB) recognises that much still needs to change to address occupational gender segregation, which has resulted in the establishment of a Gender Commission. The Commission will draw upon the expertise of employers, education and other sectors to examine the potential of different pathways into occupations that are highly gendered. The Commission aims to add value to work already done in this area by having a specific focus on work based learning and what employers can do working with the public sector and other partners to impact positively on this enduring area of gender inequality.

We will also continue to work with learning providers and employers on regional and local activity designed to attract under-represented groups to apprenticeships as outlined on next page.



Eve, Foundation Apprentice,
Laing O'Rourke

Commissioning and contract management

SDS will publish high level outcomes in relation to both the strengths and areas for improvement on Modern Apprenticeships identified by our Quality Assessors, including equality outcomes, for the year 2019-20. These findings are used to enhance and refine our equality asks of providers for the following contracting year.

Foundation Apprenticeships will continue to include equality within the commissioning process for providers with a commitment to encouraging providers to undertake continuous improvement to identify and implement actions to recruit and support under-represented groups.

Graduate Apprenticeships will roll out their Quality Management Framework to all learning providers and, through the commissioning process, will identify improvement actions for learning providers which will be monitored via the relationship management approach with providers. Improvement actions will be informed by analysis of Graduate Apprenticeships equality data and any relevant evaluation and research activity.

Building capacity of learning providers and employers

We will continue to offer development opportunities to our contracted learning providers which increase their understanding of different customer needs, and how they can better attract and support those from under-represented groups onto apprenticeships. This year we will focus on providing opportunities for providers to engage with organisations who have expertise in supporting under-represented groups and encouraging providers to share good practice with each other.

As Foundation and Graduate Apprenticeships expand, we have been hosting 'communities of practice' events which allow providers to come together to share effective practice across a number of key areas. In 2019-20, we plan on using the equality data available for our apprentices to prioritise and focus this discussion on how to increase participation from under-represented groups using the expertise of our Equality Executives and key partners such as Education Scotland.

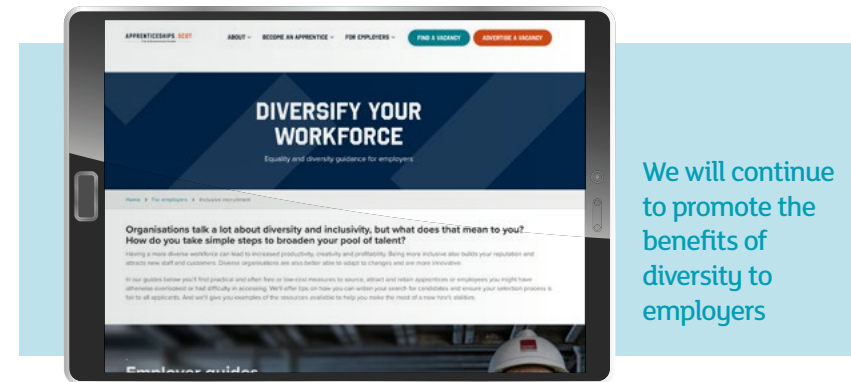
Our Foundation Apprenticeship team also host sectoral communities of practice which present an opportunity to look at any gender imbalance particular to that sector and discuss activity which partners could undertake to address this.

We have already developed a number of guides for our learning providers, including engaging with BME communities, supporting individuals with additional support needs and how to book a BSL interpreter. In 2019/20, we will review these guides and other relevant information on to ensure that providers across Foundation, Modern and Graduate Apprenticeships continue to have access to up-to-date information and resources on how to attract and retain diverse talent.

For employers, guidance on funding and support to take on under-represented groups will be outlined in the GA employer toolkits and through our employer guides on apprenticeships.scot.

With support from the Scottish Apprenticeship Advisory Board, we will facilitate sessions with individuals from ethnic minority groups and employers to raise awareness of apprenticeship opportunities. We will also promote information to employers on how to promote good mental well-being within the workplace.

We will continue to engage with employers from key sectors on topics specific to those industries, such as attracting more women into Construction and STEM sectors. Our regional equality executives will continue to work with employers and learning providers at a local level to support them to take appropriate action to address any areas of under-representation.



We will continue to promote the benefits of diversity to employers

Financial support

We will continue our pilot of additional financial support to increase participation in Modern Apprenticeships for individuals from minority ethnic groups. This funding is targeted at those with multiple barriers to employment including those who do not have English as a first language. Alongside this, we will finalise our evaluation of the enhanced funding rate for disabled and care experienced people to evaluate its impact and usage.

We will continue to promote to employers and providers the funding and support available to support disabled apprentices such as the DWP's Access to Work programme.

Financial support will remain in place for disabled people accessing the Employability Fund, who are unable to use Access to Work funding as they are in training rather than employment.

Promotion and marketing of apprenticeships

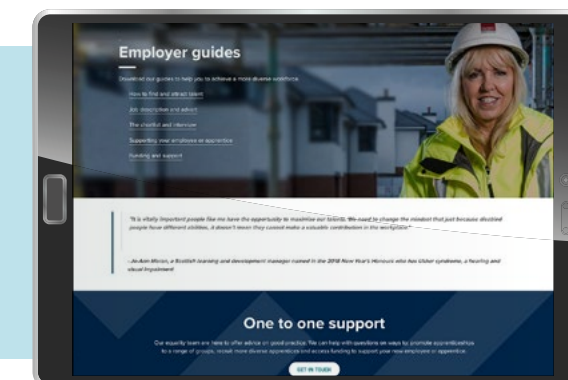
Mainstreaming of messaging will continue over the next year to promote accessibility of apprenticeship opportunities and the benefits an inclusive workforce can provide to apprentice employers.

We will continue to use our own online, social and print channels to promote the importance and value of diversity and equality in apprenticeships.

Our work to encourage more employers to take on apprentices will look to promote those employers who can support messages about the value of a diverse workforce.

There will also be more partnership work with local community groups to understand the right language and messaging for different audiences and identify the relevant communication channels and tools to reach them.

We will use our marketing and imagery to promote diverse role models





Ciara and Kara, Dare to be Different Programme Participants

Understanding and improving participation in apprenticeships

In partnership with Action for Children we are seeking to better understand the perceptions and experience of care experienced young people on apprenticeships to enable us to better focus our support for this group.

As mentioned above, we have a number of projects which will be completed during 2019 and the evaluation and learning from these will be used to inform our approach to working with our partners to support the needs of different groups. We will share learning from Modern Apprenticeships with Foundation and Graduate Apprenticeship teams to ensure learning can be embedded across all apprenticeship programmes, and equality will be considered within evaluation and research activity across each programme. This will provide us with relevant insight to focus and prioritise our work to recruit and support under-represented groups on apprenticeships.

We will also review evidence and data across all protected characteristic groups, including Gypsy/Traveller communities, to identify any differences in access or outcome. This will enable us to update our full equality impact assessment of apprenticeships which will be published in 2019. This work will help us to identify evidence-based actions to inform our priority and focus for coming years. The equality impact assessment, alongside the learning and evaluation from this Apprenticeship Equality Action Plan, will help us keep equality and diversity at the very heart of our activity and to drive forward change that will make an enduring difference.

Case study - Dare to be Different

A group of Shetland Islands secondary school pupils became Modern Apprentices for the day as part of an initiative challenging gender stereotypes in the workplace.

The Dare to be Different project delivered by SDS in partnership with Train Shetland gave boys the chance to spend time in traditionally female dominated workplaces while girls went to those workplaces which are seen as male dominated.

It supported and aim to raise awareness of apprenticeship opportunities and gender stereotyping in certain industries. The challenges around gender stereotyping are UK-wide, but can sometimes be even more difficult for young people in remote locations with smaller populations to overcome.

The pupils who took part came from Anderson High School, Baltasound Junior High School and Sandwick Junior High School.

The boys in the group experienced what it was like to be a social services Modern Apprentice at New Craigielea, Edward Thomason and Nordalea care homes and the nursery at Baltasound Junior High School.

The girls saw what Modern Apprentices in maritime engineering and construction do at the Ferry Dry Docks, NAFC Marine Centre, Shetland Islands Council Building Services and Shetland College.

Kevin Briggs, Joint Manager for Train Shetland, said: "When Marguerite from SDS put forward the idea of doing an event in Shetland to challenge gender stereotypes, I jumped at the chance as it is very important to ensure that children are not put off by stigma or perception.

"The boys were given the chance to try careers considered to be female dominated, and the girls were offered places in the STEM subjects. The offer was made to all S3 and S4 pupils in Shetland schools, including those where geographical isolation is a barrier."

Skills Development Scotland
Monteith House, 11 George Square, Glasgow G2 1DY.
T 0141 285 6000 E info@sds.co.uk
www.sds.co.uk

The Skills Development Scotland Co. Limited. Registered in Scotland SC202659. Registered office: Monteith House, 11 George Square, Glasgow G2 1DY.

If this document is required in a different format please contact Equality@sds.co.uk