Slavery and Human Trafficking Statement 2017-18

Modern slavery is the offence of slavery, servitude and forced or compulsory labour and human trafficking. It is an abhorrent crime and a violation of fundamental human rights. The Growth Company (GC) and its subsidiaries (including Skills and Work Solutions Limited) commit to uphold the highest standards of ethical conduct and integrity in the way we conduct our business. We strive to ensure slavery and human trafficking is not taking place in our supply chain or in any of our business activities and take a zero-tolerance approach to modern slavery in all its forms. We look to our partners, customers, suppliers, associates and contractors to adopt and commit to these same principles.

This is the third Slavery and Human Trafficking Statement we have made, and it sets out the steps that GC has taken during the financial year ended 31st March 2018 to ensure that slavery and human trafficking are not taking place in our supply chain or in any part of our business.

This statement additionally sets out how we will continue to develop and embed our assurance in tackling these crimes in the year ahead.

**Our Business**

GC drives forward business, economic, personal and professional development within communities by growing employment, skills, investment and enterprise for the benefit of all. Our mission is to Enable Growth, Create Jobs and Improve Lives.

As a not-for-profit, we reinvest any money we make to enhance our service delivery and are dedicated to making a positive difference and leaving a legacy of growth. GC delivers a wide range of business and people-facing services across the country and internationally. These include:

* Helping Businesses Grow
* Skills training for individuals and businesses
* Recruitment and Employment Services
* Careers advice and guidance
* Attracting Investment
* Policy, Strategy and Research
* Organisational development services
* Official Tourist Board for Greater Manchester
* Promotion of Greater Manchester nationally and internationally

**Our Values**

We are a values led organisation and our five core values are: Making a positive Difference, Stronger Together, Empower People, Do the Right Thing, and Build on Success. These values promote our responsible and ethical ways of working across our operations.

We are committed to creating a sustainable inclusive society, actively managing our operations in ways which optimise our value to the communities in which we work. Social Value is therefore intrinsic to everything we do. We act to secure environmental, social and economic benefits through the way we organise and reward our staff, through our volunteering and community engagement and through the commissioning and procurement of the goods and services we use.

**Our Supply Chain**

GC’s supply chain involves a range of goods and services, including office and business supplies and services. GC seeks to work responsibly and with integrity, as demonstrated by our group policies and procedures, including our Procurement and Social Value Policies.

In the past year we have established a Modern Slavery Procedure for Suppliers which sets out how we will ensure our suppliers are complying with the law on modern slavery and inform suppliers of our operating and reporting procedures regarding this crime.

In support of this procedure, GC has developed a set of Responsible Procurement Principles to promote our business ethics and values to our supply chain and reinforce our expectations and requirements to our suppliers in the fight to end labour exploitation in all its forms.

**Our Business Customers**

Last year we developed a Modern Slavery Procedure for Business Customers who are in receipt of free to access or commercial services from GC and subsidiary companies. It sets out how we will ensure that our customers are complying with the law on modern slavery and reinforces our group values and principles in relation to labour practices. We aim to use our influence to encourage and support the businesses we work with to help us in tackling modern slavery.

**Our Employment**

Our Recruitment and Selection Policy sets out our robust procedures to ensure that our recruitment processes are fully compliant with UK employment law. This includes checking right to work documents and appropriate due diligence processes.

**High-risk Activities**

One of the GC trading companies is a not-for-profit, ethical recruitment agency, Aspire Recruitment (http://aspirerecruitment.org.uk/). As such we put ethical conduct at the heart of what we do and our procedures include due diligence checks to prevent the occurrence of labour exploitation. These checks include documentation checks, reference checks and ensure clients are paid directly into a personal bank account.

**Reporting**

We have further defined our reporting procedures for instances of modern slavery found in our supply chain and our business, putting in place a clear mechanism for the reporting and governance of suspected or identified instances of modern slavery. We encourage openness and are committed to investigating any genuinely held concerns raised in good faith.

In addition, our Whistleblowing Policy ensures that all our workers, customers and business partners can report any concerns related to GC activities.

**Awareness and Communication**

We have engaged with our employees by raising awareness of modern slavery through our Employee Consultative Committee and have provided staff with information and resources to build a greater understanding of these crimes, including key indicators of modern slavery to assist staff in recognising potential victims of these crimes.

**Building on our Commitment**

GC and its subsidiaries are working together to continue to ensure that modern slavery has no part in our business or our supply chain. We understand that tackling modern slavery requires our continuous effort, vigilance and review. Our key areas of approach to tackle modern slavery are outlined below:

*Continual Review* – following three years of activity aimed to ensure that slavery and human trafficking are not taking place in our supply chain or our business, we intend to undertake a re-assessment of our risk across the Group. We will reflect on the effectiveness of our current processes and target any residual risk identified through our review. We aim to establish a group of key individuals from around the Group to share experience and best practice and drive forward our risk based approach.

*Our Supply Chain* – We will continue to imbed our Responsible Procurement Principles alongside our Modern Slavery Procedure for our Supply Chain setting out our expectations in this important area and identify our operating and reporting procedures regarding modern slavery.

*Employment and Recruitment* – we will review and update our recruitment processes to further mitigate any risks of modern slavery or trafficking.

*Our Business Customers*– we will continue to implement and imbed our Modern Slavery Procedure for Business Customers and the promotion of our values and labour principles.

*Awareness Raising and Training* - We understand that modern slavery may not be easy to identify, or to deal with. We will work with our staff, our customers, clients, suppliers and partners to raise awareness about this issue.

We intend to further raise awareness of modern slavery and human trafficking by marking World Day Against Trafficking in Persons in July 2018 with staff communications and briefings.

We will continue to equip our staff, partners and associates with the training, systems and tools to identify, deter and report suspected instances of modern slavery.

Signed by Director:

Mark Hughes

Group Chief Executive

5th June 2018

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes The Growth Company and its subsidiaries’ slavery and human trafficking statement for the financial year ending 31st March 2018. It has been approved and authorised by The Growth Company Board on 22nd June 2018.