



Slavery and Human Trafficking Statement



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 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 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 fifth 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 2020 to ensure that slavery and human trafficking are not taking place in our supply chain or in any part of our business. It additionally sets out how we will continue to develop and embed our assurance in tackling these crimes in the year ahead.

This statement applies to all companies within the Growth Company Group, including Skills and Work Solutions Limited.

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.

Our Commitment to Inclusive Growth

We believe everyone should benefit from growth - that's why we target some of the hardest-to-reach communities across Greater Manchester and beyond. We also help businesses to improve their employment and procurement practices so they can become more inclusive. In the year ahead, we continue to support the roll out and adoption of the GM Good Employment Charter and are working towards achieving Real Living Wage accreditation.

We actively manage 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 IT, 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 Policy, our Tendering Procedure and Social Value Policy.

We have a number of Supply Chain Partners who deliver a range of people facing services, such as training and qualification providers. We have procedures in place to manage our Supply Chain and key individuals within our Group provide compliance and quality oversight as well as ensuring we operate robust safeguarding arrangements.



Our Modern Slavery Procedure for Suppliers 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. Our Responsible Procurement Principles are included in our tender specifications in our procurement opportunities.

Our Business Customers

We continue to use our influence to encourage and support the businesses we work with to help us tackle modern slavery and improve labour practices. Our work with businesses in this space is reflected by our role in the development of the GM Good Employment Charter.

Our Modern Slavery Procedure for Business Customers, who are in receipt of free to access or commercial services from GC, is in place to ensure that our customers are complying with the law on modern slavery and reinforces our group values and principles in relation to labour practices.

Developing our Approach

In September 2019 we implemented an Anti-Slavery and Human Trafficking Policy and Modern Slavery Reporting Procedure, alongside establishing a Modern Slavery Action Group with representatives from key areas of our business. This was undertaken to provide greater structure and visibility in our continuous effort to tackle this crime and to further define key responsibilities for driving forward our risk based approach to Modern Slavery. The Action Group meet on a quarterly basis and work together to deliver the Modern Slavery Action Plan.

Review and Assessment of Risk

During the year the Modern Slavery Action Group has met to further define the risk of modern slavery in our business and supply chain. We also recognise that we work with some businesses and within some sectors considered higher risk, including hospitality, construction and manufacturing. The Action Group has identified that a key step to managing the risk of modern slavery in our own business is increasing our colleagues and our business contacts awareness and knowledge about this crime, the signs to look for, and what steps to take if an instance is suspected.

High-risk Activity

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. This includes documentation checks, reference checks and ensuring that clients are paid directly into a personal bank account.

Awareness and Communication

In the past year we have hosted two Modern Slavery Awareness events designed for our internal colleagues, our supply chain and local businesses we work with. Both events were designed to aid greater understanding about this important issue and provide practical advice to businesses regarding their obligations, and information about how to spot the signs of exploitation. We additionally engaged with our GC colleagues by raising awareness of modern slavery through our internal newsletter, through our Employee Consultative Committee, and by marking Anti-Slavery Day in October with a group wide communication.

We are members of the Greater Manchester Modern Slavery Business Network where we keep up to date with developments in this area and share best practice and resources with other businesses. Through this network, we engaged in the Home Office consultation and focus group regarding Section 54 of the Modern Slavery Act to contribute towards future changes to the legislation.

Due Diligence

We incorporate due diligence procedures in our tendering processes and in our supplier management arrangements. In March 2020 we strengthened our approach to due diligence with the launch of a Supplier Risk Management Policy and New Supplier procedures, both setting out Modern Slavery requirements. Ongoing supply chain partner management includes site visits and annual detailed checks, such as financial checks and key policy reviews.



Our Employment Practices

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. Our People and Organisational Development strategy over the past year has focused, in part, on our recruitment initiatives and we have worked to reduce the use of external agencies through a new Internal Recruitment team providing greater control of our recruitment practice.

Reporting

We have a reporting procedure for instances of modern slavery, providing a clear mechanism for the reporting and governance of suspected or identified instances of modern slavery. In the past year, we had no reported instances (or suspected instances). We encourage openness and are committed to investigating any concerns raised by colleagues and stakeholders.

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

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.

We believe we have a key role to play to influence and raise awareness of slavery, not only for our staff and suppliers, but also the businesses and organisations we work with. We are well placed to support businesses in Greater Manchester understand their role in tackling these crimes.

Our Modern Slavery Action Plan for the year ahead identifies the following key themes:

COVID19 Risk Assessment - the global coronavirus pandemic has caused significant pressures and disruption to supply chains and markets globally. We will therefore reassess the risk of modern slavery and work to ensure that we continue to remain vigilant in our due diligence procedures, procurement and supply chain management.

Policy and Procedures – we recognise that we need to continue to embed the Anti-Slavery Policy and Procedure into the organisation and further integrate these arrangements with our Safeguarding policy, procedures and training arrangements.

Employment and Recruitment - Our internal recruitment team are working to drive forward further recruitment initiatives, which will include a review of the selection methods GC use to attract and recruit individuals, as well as redesigning our approach to onboarding and induction.

Awareness Raising and Training - We understand that modern slavery is 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 plan to continue to undertake further Modern Slavery Awareness Events for external and internal stakeholders in the year ahead as well as develop and roll out a Modern Slavery online training module.

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
12th June 2020

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 2020. It has been approved and authorised by The Growth Company Board on 12th June 2020.