

Slavery and Human Trafficking Statement 2021



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 sixth 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 2021 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 Structure

The Growth Company Limited is the holding company of a number of subsidiary and affiliate companies, including some charities. Details of our group companies can be found on [our website](#). Our diverse and wide-ranging work streams are delivered through five key business units, GC Employment, GC Education & Skills, Business Support Business Finance, B2B Commercial, Marketing Manchester.

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
- Raising Greater Manchester's profile

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, develop 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, Supply Chain Framework, Supplier Risk Management Policy and Social Value Policy.

We have a number of supply chain partners who deliver a range of people facing services, such as employment, training and qualification providers. We have due diligence and management 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 governance and safeguarding arrangements. Our supply chain partners are based in the UK and we generally do not accept second tier subcontracting.

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](#) set out our commitment to ethical and responsible labour practices that we expect of our suppliers. These standards are included in our tender specifications in our procurement opportunities and are published on our website.

Our contracts include modern slavery clauses and underpin our zero-tolerance stance to the exploitation of labour.

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 ongoing role in the development and promotion of the GM Good Employment Charter.

Our Modern Slavery Procedure for Business Customers, who are in receipt of fully funded 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.

Organisational Policies

GC implemented an Anti-Slavery and Human Trafficking Policy in 2019 setting out our approach to ensuring that this crime is not taking place in our business and supply chain.

In addition, our Whistleblowing Policy ensures that all our workers, customers and business partners can report any concerns related to GC activities. We encourage openness and are committed to investigating any concerns raised by colleagues and stakeholders.

Our Employment Practices

Our Recruitment and Selection Policy identifies robust procedures to ensure that our recruitment processes are fully compliant with UK employment law. This includes checking right to work documents for all staff, agency workers and contractors. We operate an internal recruitment team to promote safer recruitment pre-employment checks. Our internal recruitment team aims to minimise the use of external agencies.

The professional standards and behaviours we pride ourselves on is set out in our employee code of conduct. We strive to provide a safe, ethical and professional environment and promote consistency in the behaviour of all who work or represent GC.

Reporting

We have a modern slavery reporting procedure for instances of modern slavery, providing a clear mechanism for the reporting and governance of suspected or identified instances of modern slavery. Our Internal Audit Team keep a record of any such instances and will notify the Board of any reported instances through the Audit Committee. Our company mobile telephones have the [‘Unseen’ reporting application](#) available for download which makes reports to the Modern Slavery Helpline available.

Our Safeguarding Policy and arrangements were developed in the year and include modern slavery training and reporting to complement and integrate with our existing modern slavery reporting process.



In the year ending March 2021 we had no reports of modern slavery or suspected incidents.

Due Diligence

We incorporate due diligence procedures in our tendering processes and in our supplier management arrangements. In March 2021 we consolidated our approach to due diligence with through our Supplier Risk Management Policy and New Supplier Procedure, setting out modern slavery requirements. All in-scope providers are required to provide a link to their annual statement. Ongoing supply chain partner management include site visits and annual detailed checks, such as financial checks and key policy reviews.

Review and Assessment of Risk

During the year the Covid-19 pandemic has caused significant disruption to a number of markets and has led to a surge in demand for items such as PPE, which in turn has increased the risk of labour exploitation globally. In April 2020 GC worked with partners in Greater Manchester to secure stocks of PPE from reputable businesses.

Country Risks: Our exposure to the risk of modern slavery in high risk countries (where protection against breaches of human rights are limited) is low. Our supply chains are predominately in the UK and not generally characterised by second tier subcontracting.

Sector Risks: We recognise that we work with some businesses and within some sectors considered higher risk, including hospitality, construction and manufacturing. We aim to increase our colleagues and our business contacts awareness and knowledge about modern slavery, 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, Training and Communication

In the past year we have offered support to our supply chains to better understand their responsibilities in relation to modern slavery requirements through workshops.

An internal online training course has been developed and will be made available to all colleagues in the year ahead on our training platform.

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.

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:

Ongoing Risk Assessment - We will undertake a review of 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 Reporting Procedure into the organisation and further embed our training arrangements.



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. The roll out a modern slavery online training module will be for all colleagues, and for all new starters as part of the induction process. We are also looking to see if we can make this training course available for our supply chain partners.

Performance Indicators (KPI)

In the year ahead, our Modern Slavery Action Plan includes the following KPI's:

- **80%** of colleagues focused on supply chain and compliance successfully complete the modern slavery training online course
- **2** modern slavery workshops or events delivered for suppliers, businesses, supply chain partners

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

2nd June 2021

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 2021. It has been approved and authorised by The Growth Company Board on 2nd June 2021.