



# Slavery & Human Trafficking Statement 2024-25



[www.growthco.uk](http://www.growthco.uk)





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. We look to our partners, customers, suppliers, associates and contractors to adopt and commit to these same principles.

This is the tenth 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 2025 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 is a leading social enterprise delivering insight, business, employment and skills support that drives economic, social and environmental change. It is the holding company for the Growth Company [Group of companies](#) (the 'Group' or 'GC'), setting strategy, overseeing operations and providing a range of corporate services to its subsidiaries. We have some 1,700 employees, with a head office in Greater Manchester, and deliver services across the UK. Around 80% of The Growth Company's income comes from local and central government, delivering on a variety of contracts through its subsidiaries and other supply chain partners, to enable jobs, create jobs and improve lives. The Group also has a growing commercial offer, providing support and insight to businesses.

#### Our Business

The Group delivers across the following pillars:

**Business:** delivers business support, funding and expertise, to businesses and entrepreneurs across the UK, promoting sustainable and inclusive growth and innovation. We also add value to businesses through our accreditation services, including delivery of the Matrix and Trusted Charity Mark standards;

**Education and Skills:** delivers a range of accredited and targeted education and skills services supporting people to reskill, upskill and secure employment, and working with employers to future-proof their workforce;

**Employment, Justice and Health:** works with employers and partners to deliver good jobs and opportunities that are inclusive and accessible to all, helping people to thrive. This area of the business has expanded its service offer into specialist areas of justice and health, helping people overcome barriers and into good jobs;

**Insight:** through GC's commercial offering, the Group creates insight, research, advice and intelligence for its clients and partners; and

**International:** through Marketing Manchester, MIDAS and the GM Business Growth Hub, GC promotes and sells the Greater Manchester city-region and provides business support and expertise.



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 and define how we hold ourselves accountable in our practice and in our service delivery.

Our Commitment to Social Value

GC is widely recognised as a leading deliverer of positive social value impact in the way we provide each of our services. GC is currently carbon neutral across our activities which we have operational control with a target to be Net Zero across all scopes by 2035. We are members of the UNs Race to Net Zero via partnership with Business Declares. Through our Green Services, we help businesses to adopt more environmentally sustainable business practices and accelerate Net Zero ambitions. In 2024-25, GC helped businesses reduced their carbon emissions by 3,919 tCO2e.

We also help businesses to become more responsible through their employment, procurement and community engagement practices. We are a Member of the [GM Good Employment Charter](#) and are accredited by the [Real Living Wage Foundation](#). This means we pay our colleagues at least the Real Living Wage. Crucially, this living wage agreement covers all third party regularly contracted colleagues working indirectly for GC.

We act to secure environmental, social and economic benefits through the way we organise, develop and reward our colleagues, 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.

Our largest spend category is our supply chain (our primary value chain) who deliver a range of people facing services, such as employment, training, specialist support and qualification providers. We have ongoing due diligence and contract management procedures in place. Key individuals within our Group provide compliance and quality oversight as well as ensuring we operate robust governance and safeguarding arrangements. We operate a reporting process for our supply chain partners for raising safeguarding concerns which includes modern slavery. Our supply chain partners are based in the UK with no second-tier subcontracting.

In our tender planning processes, we identify if we are buying goods or services that may be of higher

risk of modern slavery and will ensure our tender documentation and assessment includes specific modern slavery criteria.

Our Modern Slavery Procedure for Suppliers sets out how we will ensure all 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, and new supplier onboarding documents and are published on our website.

Our contracts include modern slavery clauses and underpin our position on 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 includes the promotion of the GM Good Employment Charter and the delivery of business support, including a designated Social Value team that supports businesses to understand, monitor and report their impact, whilst strengthening their relationships with suppliers, customers and communities. As a social enterprise, we also champion the Voluntary, Community, Faith and Social Enterprise sector (VCFSE) through our partnership and supply chain development activity.

Organisational Policies

GC has a number of policies which help to minimise the risk of modern slavery in our supply chain:

- Procurement
- Supplier Risk Management
- Anti-Slavery and Human Trafficking
- Anti Bribery
- Safeguarding and Prevent
- Safeguarding Information Sharing Guidance

Our responsible and inclusive procurement strategy is aligned to our organisational purpose and sets out our ambition to work with organisations with strong ethical and responsible business practices. This includes, employment practices, adoption of the Real Living Wage, environmental sustainability and equality, diversity and inclusion.

In addition, our Whistleblowing Policy and ‘Speak Up’ reporting mechanism and Customer Complaints, Concerns and Compliments Policy ensures that all our colleagues, customers and business partners can report any concerns related to GC activities.

Safeguarding

Our Safeguarding Policy and reporting arrangements are incorporated through our delivery, and we have a number of designated safeguarding officers and leads. All relevant colleagues receive in-depth safeguarding training, including modern slavery training. Some of our delivery programmes include customers from vulnerable groups and as such, in the past year, we have supported individuals who have disclosed to GC circumstances that indicate potential modern slavery.



Last year, we developed specific modern slavery training for supply chain partners and have started to roll this out to key partners.

Our colleagues are equipped and trained to spot the signs of possible exploitation and raise appropriate safeguarding cases for further investigation and action. We encourage openness and reporting and investigate and act upon concerns or indicators raised by colleagues and stakeholders.

Our Employment Practices

Our Recruitment and Selection Policy and Equality, Diversity and Inclusion Policy include robust procedures to ensure that our recruitment processes

are fair, transparent, inclusive and fully compliant with UK employment law. This involves checking right to work documents for all employees, agency workers and contractors.

Our Human Resources team ensures safer pre-employment checks are carried out, supported by Safer Recruitment Guidance for recruiting managers which is regularly reviewed. The internal recruitment team aims to minimise the use of external agencies. Where agencies are used, the team manages the

recruitment with contracted providers who have been pre-screened and our contracts with these providers include our Responsible Recruitment Requirements which incorporate key principles for the ways potential workers are treated in the recruitment process, including prohibiting the use of worker paid recruitment fees.

The professional standards and behaviours we pride ourselves on are set out in our employee code of conduct. In 2022 we introduced a Dignity at Work Policy, and our working group continues to campaign across the organisation to engage our colleagues and make our workplace a safe place that our workforce feel they belong. Our work promotes our inclusive





working environment, where all individuals are valued and treated with dignity and respect. We strive to provide a safe, ethical and professional environment and uphold consistency in the behaviour of all who work at or represent GC.

### Reporting and Governance

We have a modern slavery reporting procedure, providing a clear mechanism for the reporting and governance of suspected or identified instances of modern slavery by colleagues, co-ordinated by our Modern Slavery Lead. The reporting procedure is included in our online modern slavery training module and integrates with our safeguarding reporting process. Our company mobile telephones have the [‘Unseen’](#) reporting application available for download which allows users to make instant reports to the Modern Slavery Helpline.

Any such instances are notified to the Board on at least an annual basis.

In the year ending March 2025, we have had no reports of modern slavery or suspected incidents within GC’s supply chain or our business operations. Through our robust safeguarding arrangements, we identified 18 potential incidences of modern slavery or exploitation between a client and a third party. This increase from the previous year reflects the changing nature of our contract delivery and the individuals we support has expanded to include refugees and people from other vulnerable groups. In all these instances of suspected exploitation, GC contacted the relevant authority, such as the Modern Slavery Helpline, ACAS, First Responder Agency (Migrant Help, Salvation Army), local council, or the police. For all the individuals, we worked to provide support and referrals for their situations.

### Due Diligence

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

Our Employer Engagement Teams assess potential employers, including checks on terms and conditions. Other checks may include potential site visits and a health and safety check. Participants proof of right to work documentation is checked as well as ensuring personal bank accounts are in place.

### Review and Assessment of Risk

Country Risks: Our exposure to the risk of modern slavery in high-risk countries (where protection against breaches of human rights is limited) is low. Our supply chains are predominantly in the UK and not generally characterised by second tier subcontracting. We undertake quarterly checks on financial transactions relating to high-risk jurisdictions with our Finance, Legal and Procurement Team.

Sector Risks: We recognise that we work with some businesses and within some sectors considered higher risk: hospitality; construction; green technologies; and manufacturing. In our tender processes, we consider sector and geography risk and tailor our procurements accordingly. 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.

Vulnerable Groups: Through some of our programmes we support some vulnerable groups who could be at a higher risk of modern slavery, including women, migrants, displaced workers and refugees. All participants are checked for their right to work, and that payment is made direct to the participants’ bank accounts. We work closely with participants to ensure potential issues are identified alongside our safeguarding arrangements. Our teams working on these programmes are trained to spot the signs of potential modern slavery and human trafficking.

GC undertakes the Cabinet Office [Modern Slavery Assessment Tool](#) (MSAT) annually to help identify and manage the risk of modern slavery in our supply chain. The recommendations from the assessment are used

to develop our Modern Slavery Action Plan and Key Performance Indicators.

### Activity Considered Higher Risk

One of the GC trading companies is a profit-for-purpose, ethical recruitment agency, [Aspire Recruitment](#). 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 procedures include meeting candidates face to face, undertaking documentation checks, reference checks and ensuring that candidates are paid directly into a personal bank account. In the year, we started to roll out a digital proof of right to work checking process to provide further assurance in this area.

In addition, we undertake on-site visits with all new clients with non-remote roles to check the working environment and culture is satisfactory and safe prior to placing candidates, including checks that legislative notices are displayed, and communal areas are satisfactory. We provide additional modern slavery training to relevant candidates being placed with the University of Manchester. As a Real Living Wage employer, Aspire will only place candidates in roles that pay at least the Real Living Wage.

### Awareness, Training and Communication

We have an internal online modern slavery training course which all GC colleagues are required to complete on our Learning and Development platform. This was developed in-house which allowed bespoke content relevant to our business and incorporates clear reporting requirements.





In our Employment division, in the last year our teams in the North West received specialist training from [Sophie Hayes Foundation](#) covering Modern Slavery and the National Referral Mechanism (NRM).

We continue to collaborate with organisations operating in this area and have in the last quarter of the year engaged with other organisations to re-launch the GM Modern Slavery Business Network which we were previously members. A meeting of the rejuvenated Network is planned for June 2025. We use these networks and contacts to keep up to date with developments in this area and share best practice and resources.

Our internal modern slavery group meets to drive forward our Modern Slavery Action Plan and champion our approach to Modern Slavery across the organisation.

### 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 colleagues and suppliers, but also the businesses and organisations we work with. We are well placed to assist businesses to 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. This will include the implementation of the additional good practice identified in the recently updated statutory guidance [Slavery and human trafficking in supply chains: guidance for businesses](#);
- Awareness Raising and Training – we are continuing to roll out modern slavery training, including displaced worker training with our supply chain and stakeholders
- Learner Engagement – in our Education and Skills division we are developing curriculum materials that address the issue of modern slavery, ensuring the content is age-appropriate and reflective of our local context. In addition, we will explore modern slavery themes in our Learner Forums, where learners can discuss and explore themes of hate and exploitation.

### Key Performance Indicators (KPI)

In line with the key performance indicators we set last year, we developed Modern Slavery training for our supply chain partners, further sessions are planned. In the year ahead, our Modern Slavery Action Plan includes the following KPIs:

- Complete our roll out of supply chain partner modern slavery training on our policies and reporting requirements to all
- Deliver at least one modern slavery and displaced workers briefing paper to GC colleagues, suppliers and businesses
- Update GC's Slavery and Human Trafficking Policy

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

Signed by Director:



**Mark Hughes**  
**Group Chief Executive**  
**3rd June 2025**

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 2025. It has been approved and authorised by The Growth Company Board on 3rd June 2025.



