

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 seventh 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 2022 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

GC is the holding company of a number of subsidiary and affiliate companies. 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; Commercial and Marketing Manchester.

Our Business

GC delivers a wide range of business and people-facing services across the country and internationally. These include:

- Supporting people as a provider of education, skills, employment, youth and offender rehabilitation and support services;
- Improving businesses by helping them innovate, increase productivity and grow;
- Consultancy services collaborating with organisations, places and partnerships, delivering measurable results and

promoting good economic growth;

- Environmental services designed to accelerate net zero ambition and environmentally sustainable growth;
- Attracting investment and raising Greater Manchester's profile; and
- Organisational development services.

As an accredited social enterprise, we reinvest any money we make to enhance our service delivery, supporting growth that has real impact. Our Vision is for a society where economic growth and prosperity is inclusive, sustainable and leaves no person or community behind. The future we will help to create will be founded on promoting environmentally sustainable growth - with thriving businesses, creating well-paid jobs for empowered individuals across our diverse communities. Our Purpose is to Enable Growth, Create Jobs and Improve Lives.

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 Social Value

GC is widely recognised as a leading provider of social value impact in the way we deliver each of our services. GC is net Carbon zero and through its activity influences individuals and other businesses to adopt more environmentally sustainable business practices. We also help businesses to improve their employment and procurement practices so they can become more inclusive. We continue to support the [GM Good Employment Charter](#) and are working towards achieving [Real Living Wage](#) accreditation.

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.

Our largest spend category is our supply chain. We have a number of supply chain partners 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. Our supply chain partners are based in the UK with no second-tier subcontracting.

In November 2021 we introduced a new procedure to our supply chain partners for reporting safeguarding concerns including Modern Slavery.

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, 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 includes the promotion of the GM Good Employment Charter and the delivery of business support, including a designated Social Value team that supports Small to Medium Enterprises (SMEs) to develop their approach to Equality, Diversity and Inclusion, Social Value and Third Sector specialisms.

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

- Procurement Policy;
- Supply Chain Framework;
- Supplier Risk Management Policy;
- Anti-Slavery and Human Trafficking Policy;
- Anti Bribery Policy; and
- Safeguarding Policy.

In the previous year we launched a new responsible and inclusive procurement strategy aligned to our organisational purpose, which sets out our ambition to work with organisations with strong ethical and responsible business practices, including their employment practices, adoption of the Real Living Wage, environmental sustainability and approach to equality, diversity and inclusion.

In addition, our Whistleblowing Policy ensures that all our workers, customers and business partners can report any concerns related to GC activities. Our Safeguarding Policy and reporting arrangements are incorporated through our work and we have a number of designated safeguarding leads. All relevant staff receive in-depth safeguarding training, including in respect of modern slavery. We encourage openness and are committed to investigating any concerns raised by colleagues and stakeholders.

Our Employment Practices

Our Recruitment and Selection Policy and Equality and Diversity Policy include robust procedures to ensure that our recruitment processes are fair, transparent and fully compliant with UK employment law. This involves checking right to work documents for all staff, agency workers and contractors. We operate an internal recruitment team to promote safer 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, providing a clear mechanism for the reporting and governance of suspected or identified instances of modern slavery by colleagues. The reporting procedure is included in our online modern slavery training module and now 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 a six-monthly basis.

In the year ending March 2022 we have had no reports of modern slavery or suspected incidents within GC's supply chain or our business. Through our safeguarding arrangements, we identified a potential incidence of modern slavery between a client and a third party. We referred this case to the Police who dealt with the concern.

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 Team assess potential employers, including checks on terms and conditions and potential site visits and health and safety checks. Participants 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 are limited) is low. Our supply chains are predominantly 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.

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 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.

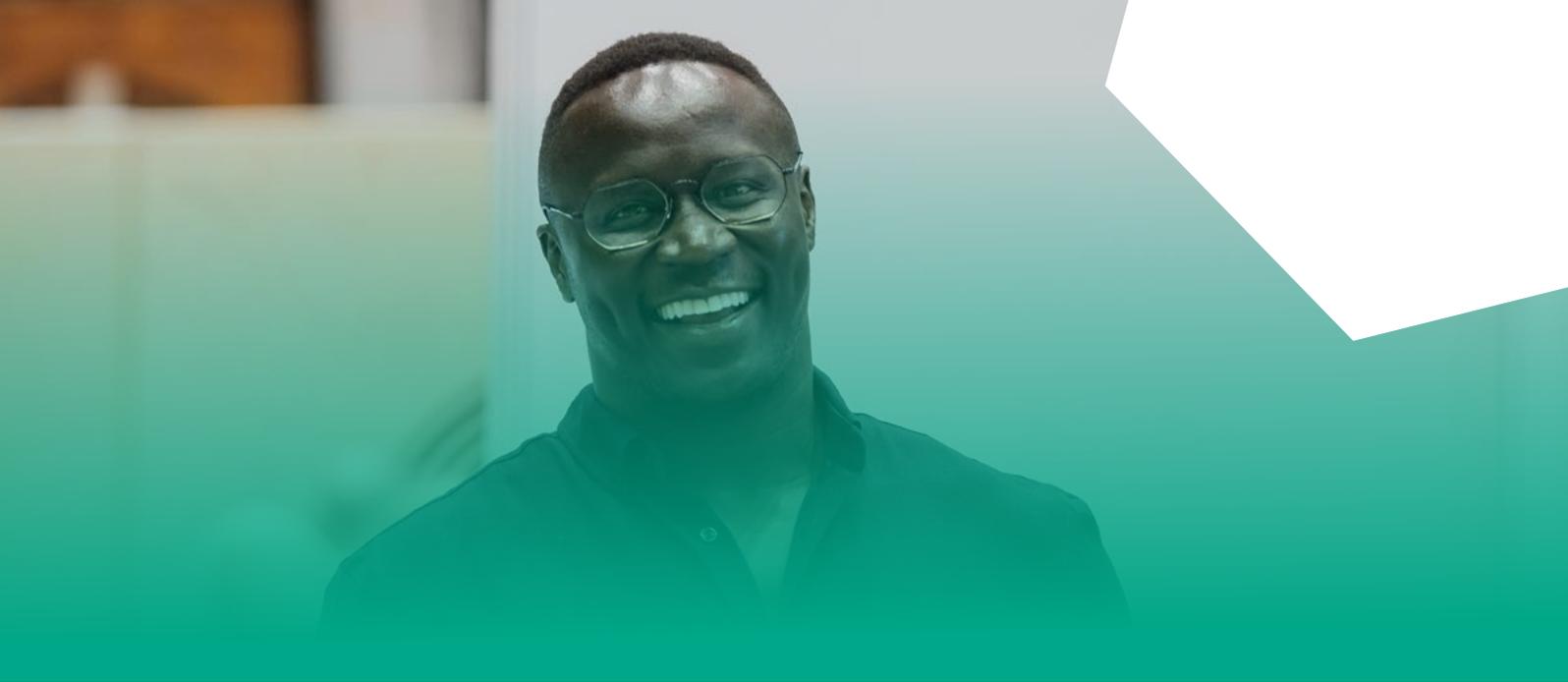
High-risk Activity

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 an internal online training course was launched on our Learning and Development platform. This was developed in-house which allowed bespoke content relevant to our business and incorporated clear reporting requirements.

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 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;

Policy and Procedures – we will review and update our Modern Slavery Policy in the year ahead; and

Awareness Raising and Training - we understand that modern slavery is not 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 will continue to roll out a modern slavery online training module.

Performance Indicators (KPI)

In the previous year we successfully exceeded our target for completion of the modern slavery training online course. We continue to focus on workshop and event delivery as a priority and are working to engage our target audience in our supply chain.

In the year ahead, our Modern Slavery Action Plan includes the

following KPIs:

- Provision of additional modern slavery training and resources for safeguarding teams; and
- Delivery of a modern slavery workshop for suppliers, businesses and supply chain partners

We will continue to equip our staff, 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
16th June 2022**

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 2022. It has been approved and authorised by The Growth Company Board on 16th June 2022.