



# Slavery & Human Trafficking Statement 2025-26



[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 eleventh 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 2026 to ensure that modern 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, rooted in Greater Manchester and delivering services across the UK. The Growth Company Limited is the holding company for the wider 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 in the region of 1,700 employees, with a head office in Greater Manchester, and deliver services across the UK.

Over 80% of GC's income comes from local and central government, delivering on a variety of contracts through its subsidiaries and other supply chain partners, to enable growth, create jobs and improve lives.

#### **Our Business**

The Group delivers across the following five core pillars:

**Help businesses succeed:** we deliver business support and access to finance in order to drive productivity, boost innovation and create high-quality, inclusive jobs.

**Develop skills and careers:** we connect youth services, adult skills, apprenticeships and employer-led training by creating a clear route to high-quality jobs.

**Support people to thrive:** we deliver person-centred, specialist support, helping people overcome barriers, improve wellbeing and access to opportunities to live a good life.

**Secure impact through insight:** we provide evidence-based insight, programme evaluation and intelligence-led tools to help clients make decisions, unlock investment, and design impactful services.

**Promote place and secure investment:** through Marketing Manchester, Invest Manchester and GM Business Growth Hub, we promote Greater Manchester as a great place to visit, invest, meet and do business.

## 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 underscore 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 the activities over which we have operational control, with a target to be Net Zero across scopes 1 and 2 by 2035, and scope 3 in 2045. We are members of the UN's Race to Net Zero via partnership with Business Declares and a Bronze Carbon Literate Organisation. Through our Green Services, we help businesses to adopt more environmentally sustainable business practices and accelerate Net Zero ambitions. In the last three years, GC supported more than 9,000 individuals and businesses to accelerate action against climate change.

GC also helps 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.

GC acts to secure environmental, social and economic benefits through the way we organise, develop and reward our colleagues, including 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 at higher risk of modern slavery and, where such cases are identified, will ensure our tender documentation and assessment includes specific modern slavery criteria.

Our Modern Slavery Procedure for Suppliers informs our suppliers of our requirements, and 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 and our commitment to ethical and responsible business practices.

## Our Business Customers

GC continues to use its influence to encourage and support the businesses we work with to help 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 the supply chain:

- Procurement Policy
- Supplier Risk Management Policy
- Supply Chain Framework, including supply chain safeguarding reporting requirements
- Anti-Slavery and Human Trafficking Policy
- Anti Bribery Policy
- Safeguarding and Prevent Policy
- Safeguarding Information Sharing Guidance.

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

In addition, our Whistleblowing Policy and 'Speak Up' reporting mechanism, together with the Customer Complaints, Concerns and Compliments Policy ensure that all our colleagues, customers and business partners can report any concerns related to GC activities.

## Our Safeguarding Policy

GC's Safeguarding Policy and reporting arrangements are embedded in our service delivery and we have a

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



number of designated safeguarding officers and leads. All relevant colleagues receive in-depth safeguarding training, including the topic of modern slavery. Some of our delivery programmes include customers from higher risk groups and as such, in the past year, we have supported customers and participants who have disclosed to GC advisor's circumstances that indicate potential modern slavery. Building on our previous year's activity, we have been delivering modern slavery CPD training to our supply chain partners and other stakeholders. All colleagues in the GC Employment, Justice and Health receive Level 2 CPD training in understanding Prevent and Safeguarding and all Designated Safeguarding Officers receive Level 3 CPD training in Safeguarding.

procedures to ensure that our recruitment processes are fair, transparent, inclusive and fully compliant with UK Employment Law. This involves checking right-to-work documentation 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. When 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. This includes prohibiting the use of worker paid recruitment fees.

The professional standards and behaviours GC prides itself on are set out in the Employee Code of Conduct. Since 2022 and the launch of our Dignity at Work Policy, our dignity at work group continues to campaign across the organisation to engage our colleagues and make our workplace a safe place in which our workforce feel they belong. Our work promotes this 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

GC 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 2026, GC have had no reports of modern slavery or suspected incidents within GC's supply chain or its business operations. Through our robust safeguarding arrangements, 19 potential or suspected incidences of modern slavery or exploitation between a customer or participant and a third party have been identified. This represents a slight increase in number of instances (1) from the previous year and reflects our community-based delivery and our work with customers and participants who are from higher risk groups. The cases identified this year were often characterised with additional safeguarding issues, such as domestic abuse and homelessness. In all these instances of suspected exploitation, GC worked to provide support and referrals for their situations and were in contact with the relevant authority, such as the Modern Slavery Helpline, Job Centre Plus, First Responder Agency (Migrant Help, Salvation Army), local council, or the police.

### 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 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.

On a quarterly basis, representatives from our Finance, Legal and Procurement Team undertake checks on financial transactions relating to high-risk jurisdictions to consider modern slavery risks alongside the risk of tax evasion and fraud.

### 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 assess country risks in our quarterly legal, finance and procurement review of transactions.

Sector Risks: We recognise that we work with some businesses and within some sectors considered higher risk including: 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: Programmes delivered by GC mean that we support some vulnerable groups who could be at a higher risk of modern slavery, including women, migrants, and refugees. All customers and participants are checked for their right to work, and that payment is made direct to the participants' bank accounts. We work closely with customers and participants to ensure potential issues are identified alongside our robust safeguarding arrangements. GC's 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, [Aspire Recruitment](#), is a profit-for-purpose, ethical recruitment agency. Ethical conduct is put at the heart of the Aspire business, and their procedures include due diligence checks to prevent the occurrence of labour exploitation. Modern slavery is a regular topic at Aspire team meetings and discussed in meetings with clients. Procedures include meeting candidates face to face, undertaking documentation checks, reference checks and ensuring that candidates are paid directly into a personal bank account. Aspire continue to use a digital proof of right to work checking process to provide further assurance in this area.

In addition, on-site visits are undertaken 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. Additional modern slavery training is given 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

GC has an internal online modern slavery training course which all colleagues are required to complete on our Learning and Development platform. This was developed in-house, which allowed bespoke content relevant to GC's business and the incorporation of clear reporting requirements.

We have delivered modern slavery training to our Employment, Justice and Health supply chain during the year, which was developed in house and covers indicators, reporting, trauma informed practice and provides relevant signposting and reporting information. In GC Education and Skills, modern slavery awareness training was provided for Adult Skills businesses on the Essential Work Skills contract.

GC continues to collaborate with organisations operating in this area and have worked with other organisations in Greater Manchester to re-launch the GM Modern Slavery Business Network, of which GC was previously a member. The rejuvenated Network (now renamed Greater Manchester Anti-Slavery Industry Network) held an inaugural event in June 2025 and has hosted several events since to which GC has contributed. GC has worked with these stakeholders to re-establish and formalise the network with the intention to move to a sustainable funding model from 2027.

The Group's purpose is to support businesses connected to Greater Manchester to work together to tackle modern slavery in business operations and supply chain. We use these networks and contacts to keep up to date with developments in this area, sharing good practice, as well as to learn from lived experience and identify practical and survivor-centred approaches.

### 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 better understand their role in continuing to tackle these crimes.

GC's Modern Slavery Action Plan for the year ahead identifies the following key themes:

- Ongoing Risk Assessment – GC will undertake a review of the risk of modern slavery and work to ensure that we continue to remain vigilant in due diligence procedures, procurement and supply chain management. The implementation of the additional good practice identified in the recently updated statutory guidance [Slavery and human trafficking in supply chains: guidance for businesses](#) will continue in the year ahead.
- Awareness Raising and Training – GC is continuing to roll out modern slavery training with its supply chain, newly onboarded supply chain partners and stakeholders.
- GC Sustainability Group – GC will embed modern slavery insights and actions into the cross-organisational Sustainability Services Group being established in the year ahead.

### Key Performance Indicators (KPI)

In line with the key performance indicators we set last year, we developed our Modern Slavery Policy, we held modern slavery CPD training for our supply chain partners, and a briefing paper regarding displaced workers was provided to relevant teams, alongside a Smart Safeguarding Seminar to all colleagues in GC Employment Justice and Health.

In the year ahead, our Modern Slavery Action Plan includes the following KPIs:

- Deliver supply chain partner modern slavery training on our policies and reporting requirements and raise awareness and reporting.
- Update GC's online modern slavery training for all colleagues.

GC will continue to equip 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  
9th June 2026

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 2026. It has been approved and authorised by The Growth Company Board on 9th June 2026.



