

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

This is the ninth 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 2024 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 six business areas: International; Employment; Skills & Education; Business Support & Business Finance; Green Services; and Consulting and Commercial.

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;
- Provide business support and finance services designed to drive productivity, improve innovation and create high quality and inclusive growth;

- 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; and
- Attracting investment and raising Greater Manchester's profile.

As an accredited social enterprise, our broad range of services align to our Purpose to 'Enable Growth, Create Jobs and Improve Lives.' 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 this principle of Good Growth – with thriving businesses, creating well-paid jobs for talented and empowered individuals across our diverse communities.

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 provider of social value impact in the way we deliver each of our services. GC is currently carbon neutral across scopes 1, 2 & 5 categories of scope 3, with a target to be Net Zero across all scopes by 2035. Through our Green Services, we help businesses to adopt more environmentally sustainable business practices and accelerate Net Zero ambitions.

In June 2022 GC was awarded the [Gold Social Enterprise Mark](#) evidencing best practice across key business areas that are central to social enterprise excellence, such as governance, stakeholder engagement, business ethics, transparency and social impact.



We also help businesses to improve their employment and procurement practices so they can become more inclusive. We are a Member of the [GM Good Employment Charter](#) and are accredited by the [Real Living Wage](#) Foundation.

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 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 reporting 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, 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 businesses to develop their approach to Social Value and provides tailored support to the Voluntary, Community, Faith and Social Enterprise (VCFSE) sector.

Organisational Policies

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

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

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 Customer Complaints, Concerns and Compliments Policy ensures that all our colleagues, customers and business partners can report any concerns related to GC activities. Our Safeguarding Policy and reporting arrangements are incorporated through our delivery, and we have a number of designated safeguarding leads. All relevant colleagues 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, 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.

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. 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

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 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 an annual basis.

In the year ending March 2024 we have had no reports of modern slavery or suspected incidents within GC's supply chain or our business. Through our robust safeguarding arrangements, we identified two potential incidences of modern slavery between a client and a third party. GC contacted the Modern Slavery Helpline for advice and while both cases were deemed to not be cases of modern slavery, we worked to provide support to the individuals 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 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 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: 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. 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. In our latest assessment, undertaken in February 2024, GC achieved a score of 74% (green rated). The recommendations from the assessment are used to develop our Modern Slavery Action Plan and Key Performance Indicators.

Activity Considered High 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 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. In August 2023 we rolled out Modern Slavery awareness 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 available on our Learning and Development platform. This was developed in-house which allowed bespoke content relevant to

our business and incorporates clear reporting requirements. This training was updated in the year and all colleagues were asked to complete it in January 2024.

We continue to collaborate with organisations operating in this area, including the Greater Manchester Police Modern Slavery Unit where we 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. In the year ahead, we plan to review and understand how GC can embed approaches to modern slavery risks in the environmental services we deliver;
- Awareness Raising – we are planning a Modern Slavery Briefing session for businesses we work with;



- Training - we understand that modern slavery is not easy to identify or to deal with. We will continue to work with our colleagues, customers, clients, suppliers and partners to raise awareness about this issue.

In our Education and Skills division, we are developing curriculum and learner forums aimed at educating against hate themes, specifically addressing the issue of modern slavery tailored with age-appropriate content and local context for our learners.

In our Employment division, building on our work with our teams in South Yorkshire, we are planning additional training to our operational teams in the North West and with our Employer Engagement Team.

Performance Indicators (KPI)

In line with the key performance indicators we set last year, we provided additional training for our Safeguarding Leads in South Yorkshire delivered by The Snowdrop Project, a South Yorkshire based charity who supports survivors of Modern Slavery, this was undertaken in April 2024. In addition, we marked Anti-Slavery Day in October through a blog post in our colleague newsletter to continue to raise awareness and understanding about modern slavery.

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

- Provide our supply chain partners training on our modern slavery policies and reporting requirements.
- Deliver at least one modern slavery briefing session to suppliers and businesses alongside key industry experts

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
4th June 2024**

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 2024. It has been approved and authorised by The Growth Company Board on 4th June 2024.