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 fourth 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 2019 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 Ltd.

**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
* Promotion of Greater Manchester nationally and internationally

**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, this will be developed further as we support the roll out and adoption of the forthcoming GM [Good Employment Charter](https://www.greatermanchester-ca.gov.uk/what-we-do/economy/greater-manchester-good-employment-charter/).

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 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, our Tendering Procedure and Social Value Policy.

We have a number of Supply Chain Partners who deliver a range of people facing services, such as training and qualification providers. We have procedures in place to manage our Supply Chain and key individuals within our Group provide compliance and quality oversight (including Safeguarding).

We operate a Modern Slavery Procedure in relation to our Suppliers, which 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 are now included in our tender specifications in our procurement opportunities.

**Our Business Customers**

In the past year we worked to embed our Modern Slavery Procedure for Business Customers who are in receipt of free to access or commercial services from GC and subsidiary companies. The procedure sets out how we will ensure that our customers are complying with the law on modern slavery and reinforces our group values and principles in relation to labour practices. We continue to use our influence to encourage and support the businesses we work with to help us in tackling modern slavery and improve labour practices.  Our work with businesses in this space is reflected by our role in the development of the GM Good Employment Charter.

**Due Diligence**

We incorporate due diligence procedures in our tendering processes and in our supplier management arrangements.  Ongoing Supply Chain Partner management can include site visits and annual detailed checks, such as financial checks and key policy reviews.

Our Business Support and Business Finance Business Unit has enhanced their Business Registration processes when working with a new business (large or small) to reflect these requirements.

**Our Employment Practices**

Our Recruitment and Selection Policy sets out our robust procedures to ensure that our recruitment processes are fully compliant with UK employment law.  This includes checking right to work documents.

**Review and Assessment of Risk**

In the past year, we have reviewed our business and recognise that we work with some businesses and within some sectors considered higher risk, including hospitality, construction and manufacturing. Our activities planned for the year ahead will include greater investigation into these potential risks and what further steps we can take to eradicate slavery and human trafficking and ensure it is not taking place within our business.

**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.

**Reporting**

We have established a reporting procedure for instances of modern slavery, putting in place a clear mechanism for the reporting and governance of suspected or identified instances of modern slavery. In the past year, we had no reported instances (or suspected instances).  We encourage openness and are committed to investigating any concerns raised in good faith.

In addition, our Whistleblowing Policy ensures that all our workers, customers and business partners can report any concerns related to GC activities.

**Awareness and Communication**

We have engaged with our colleagues by raising awareness of modern slavery through marking World Day Against Trafficking in Persons through our Intranet News Feed, including publicising videos relating to ‘country lines’. We also promoted some FAQ’s relating to Modern Slavery and Human Trafficking which are available to staff alongside other modern slavery resources.

In the past year, we joined the Greater Manchester Modern Slavery Business Network to keep up to date with developments in this area and share best practice and resources.

**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.

We recognise that our approach would benefit from greater structure and oversight and to that end have developed a Modern Slavery Action Plan, to identify our key objectives for the year ahead and measure our progress in a more transparent way.

The key areas of our Action Plan include:

*Organisational Structure –* we plan to implement and communicate an Anti-Slavery and Human Trafficking Policy and Procedure.

*Employment and Recruitment* – One of the key priorities within our People and Organisational Development strategy focuses on recruitment initiatives. This will include exploring ways to reduce the use of agencies for employees and identifying innovative assessment methods in line with best practice, supporting a reduction of risk of modern slavery or trafficking directly within our own recruitment approach.

*Continual Review and Assessment of Risk* –We will continue to investigate and measure the risk of modern slavery occurring in our supply chain or business and target any residual risk identified.  We will take a risk-based approach and focus our efforts on the areas identified as high risk.

*Awareness Raising* *and Training* - We understand that modern slavery may 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.

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.

We are hosting a workshop in June 2019 for internal staff and external customers, supported by [www.safeandfree.co.uk](http://www.safeandfree.co.uk/). In the year ahead, we plan to include a Modern Slavery module within our induction briefings for all new starters.

Signed by Director:

Mark Hughes

Group Chief Executive    
**13 June 2019**

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 2019.

It has been approved and authorised by The Growth Company Board on 13th June 2019.