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 modern 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 second 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 2017 to ensure that slavery and human trafficking are not taking place in our supply chain or in any part of our business.

This statement additionally sets out how we will continue to develop and embed our assurance in tackling these crimes.

**Our Business**

The Growth Company 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:

* Business start-up, business growth, inward investment, business finance, and international trade services
* 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.

We are committed to creating a sustainable inclusive society, actively managing our operations in ways which optimise our value to the communities in which we work. Social Value is therefore intrinsic to everything we do. For this reason we manage Social Value through a suite of interdependent policies and procedures which collectively deliver our objectives. 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 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 and Social Value Policies.

**Our Employment**

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 and appropriate due diligence processes.

**High-risk Activities**

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. These checks include documentation checks, reference checks and ensure clients are paid directly into a personal bank account.

**Reporting**

A Safeguarding Policy and associated guidance, procedures and training is in place covering those aspects of our work where needed. In addition, our Whistleblowing Policy ensures that all our workers, customers and business partners can report any concerns related to GC activities.

**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. Our key areas of approach to tackle modern slavery are outlined below:

*Our Supply Chain* – We will implement a set of Responsible Procurement Principles in FY17/18.  We will work to embed these principles in our procurement practice and will use these key Principles to promote our business ethics and values to our supply chain. In addition, we will establish a Modern Slavery Procedure for our Supply Chain setting out our expectations in this important area and identify our operating and reporting procedures regarding modern slavery.

*Our Business* – we will review the risk of modern slavery and human trafficking in our business operations and put in appropriate measures to mitigate the risk of these crimes.

We will use our influence to encourage and support the businesses we work with to help us in tackling modern slavery. In FY17/18 we will establish a Modern Slavery Procedure for business customers who are in receipt of free to access or commercial services from GC and its subsidiaries. It sets out how we will ensure that our customers are complying with the law on modern slavery and our group values and principles.

*Employment and Recruitment* – we will review and update our recruitment processes to further mitigate any risks of modern slavery or trafficking.

*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. In FY17/18 we intend to use our Employee Consultative Committee communications to increase the awareness and understanding of modern slavery across our business. We will equip our staff, partners and associates with the training, systems and tools to identify, deter and report suspected instances of modern slavery.

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 2017. It has been approved and authorised by The Growth Company Board on 5th December 2017.