

## Modern Slavery Statement 2020-21

### 1. Introduction

This statement sets out the steps that have been taken by CITB in relation to its responsibilities under section 54, part 6 of the Modern Slavery Act 2015 (MSA); and includes the activities undertaken in the last twelve months and those planned for the forthcoming year. This statement relates to the financial year ending 31st March 2021.

### 2. Organisational structure, business and supply chains

CITB is the Industry Training Board for Construction and its mission is to 'attract and support the development of people to construct a better Britain'. Its vision is for 'British Construction to have a recognised, world-class, innovative approach to developing its workforce to deliver quality in the built environment'. CITB is dedicated to ensuring the construction workforce has the right skills for now and the future, based on three strategic priorities – Careers, Standards and Qualifications, and Training and Development.

CITB is registered as a charity in England and Wales (Reg No 264289) and in Scotland (Reg No SCO44875) with its head office in Peterborough, Cambridgeshire.

CITB is a qualifying Arms-Length Body (ALB) of the Department for Education and has agreed with the Department to continue to publish its own annual Modern Slavery Statement ('MSS') rather than be included in the Ministerial Statement.

CITB is nearing the end of its 2020 Reform programme and will for the time being retain the National Construction Colleges at Bircham Newton, Norfolk and Inchinnan, Glasgow, whilst sale discussions with a training provider continue for Erith.

CITB has approximately 234 commercial contracts and the majority of new contracts are procured through its enabling partner Shared Services Connected Limited (trading as SSCL) - a leading provider of business-critical support services to Government and the UK public sector. As its Enabling Partner, SSCL ensures that all relevant requirements as set out in Public Procurement Notes, such as PPN 05/19 – *Tackling Modern Slavery in Government Supply Chains*, and PPN 06/20 - *Taking account of social value in the award of central government contracts* that covers tackling workforce inequality and addressing Modern Slavery are appropriately applied.

As of the 31st March 2021, CITB had 685 Employees (640 Full time, 45 Part time) at its offices and National Construction Colleges based across England, Scotland and Wales. CITB also has a high number of mobile workers. Any temporary staff required throughout the year are recruited through Capita or Brook Street, whom were sourced through a Government procurement framework.

CITB's Corporate Social Responsibility Manager is the point of contact for any Modern Slavery enquiries and following a restructure in 2020 now reports to the Board Secretary within the Legal, Governance and Compliance Directorate.

CITB's Corporate Social Responsibility action plan includes Modern Slavery and progress is reported bi-annually to the Executive Team with any concerns escalated promptly.

The two main unions representing staff at CITB are Unite and GMB. An agreement is in place establishing the general principles and ways of working between the parties.

### **3. Policies in relation to slavery and human trafficking**

CITB has a number of policies that relate to modern slavery that are periodically reviewed, namely:

- Procurement Policy – outlines CITB's approach to sourcing its external needs, its relation to public procurement rules, the financial levels for different types of procurement and its approach to the use of SME's and local suppliers; and is guided by the requirements of Public Contracts Regulations 2015 to which CITB must abide. The standard terms and conditions for suppliers require them to uphold human and labour rights and to prevent modern slavery and human trafficking in their own operations and supply chains. The Policy was last reviewed by the Executive in March 2021.
- Reporting Concerns (whistleblowing) Policy – provides detail on the approach to reporting any concerns (including someone that may be at risk of slavery or human trafficking), how these will be dealt with, and the protection of 'whistle-blowers'. This is scheduled for review by the Executive in July 2021.
- Corporate Social Responsibility (CSR) Policy – replaces the Sustainability Policy and focuses on four CSR pillars. The Pillar 'Our Business' sets the commitment for CITB to 'procure sustainably and responsibly' and aligned to the UN Sustainable Development Goals. The Executive recommended the approval of this Policy to the Board in March 2021 and it will be received by the Board at their August 2021 meeting.
- Equality and Diversity Policy – details how CITB will deliver, monitor and implement policies and practices that treat people fairly, with respect and ensure that CITB is an inclusive place to work. This Policy is to be reviewed as part of CITB's new People Strategy that will be published in 2021.
- Recruitment 'Step by Step guidance' – details CITB's approach to recruiting people into the organisation, sourcing, selection, on boarding and induction, for example, ensuring appropriate right-to-work checks are completed, everyone has an employment contract stating terms and conditions and they are paid directly.
- Pay and Benefits Policy – details pay and reward, the benefits framework, its link to performance, and the mechanics by which pay decisions are fairly made.
- Safeguarding Policy – details CITB's approach to safeguarding and promoting the welfare of children and vulnerable adults with the most recent version approved by the Board at their May 2021 meeting.

- [Complaints procedure](#) - provides a means for external parties to report concerns of Modern Slavery within CITB's business operations and is available on CITB's website. If a concern is raised and the complainant feels that the issue is not resolved to their satisfaction, they can contact, via Members of Parliament, the Parliamentary and Health Services Ombudsman.

All policies are available on CITB's intranet for staff to access. Further policies will be developed if required.

The process for development, sign-off and ownership of policies within the business is currently being reviewed and will be managed by the appointment of a Corporate Document Controller in 2021. If staff do not comply with CITB policies, it may result in disciplinary action or dismissal.

#### **4. Risk assessment, prevention and mitigation**

Compared to 2019-20, CITB has made no significant changes to the nature of the products and services that it procures and uses recognised businesses that are registered within the United Kingdom; and so, deems the risk of modern slavery to be low.

Fraudulent activity is still one of CITB's key corporate strategic risks (and such activity can involve modern slavery and human trafficking), and measures have been put in place to reduce this risk.

As a Non-Departmental Public Body (NDPB) of the Department of Education, CITB procures from a number of established frameworks from public sector procurement buying organisations, such as the London Universities Purchasing Consortium (LUPC), Crown Commercial Services (CCS) and Eastern Shires Purchasing Organisation (ESPO) who must adhere to the Public Procurement Notices.

The risk assessment on CITB's Tier 1 suppliers was reviewed by CITB's Commercial Corporate Contracts Manager to see what contracts were deemed medium or high risk, namely: those that had two or more risk factors. The risk factors applied are: Industry Type, Commodity, Supplier Location, Business Supply Chain Models, Nature of the Workforce, and the Context in which the Supply Chain Operates.

CITB has five suppliers (covering promotional merchandise, warehousing, catering and cleaning services, electronics and PPE) that were deemed to be medium or high risk due to their own supply chains. During 2020/21, as a result of the pandemic and with events cancelled, no promotional merchandising was purchased.

One of CITB's Commercial and Contract Manager's is now registered as a supplier on the Modern Slavery Assessment Tool (MSAT) and by applying a process that is proportionate to level of risk, will invite the medium and high risk suppliers to complete an MSAT. Further action will then be considered following receipt of the information.

As of 31 March 2021, of the 38 suppliers added to the Transparency in the Supply Chain ('TISC') dashboard (the world's largest open data platform committed to ending corruption, supply chain labour abuses and modern slavery); of those with confirmed turnovers (in excess of £36M) - 11 are required to produce statements, of which only four have statements that

currently meet all the Home Office criteria. This has seen an improvement by two companies to meet the required reporting criteria against the previous year.

## 5. Due Diligence processes

CITB remains a signatory to the Gangmasters and Labour Abuse Authority's (GLAAs) Construction Protocol and is committed to working in partnership to protect vulnerable and exploited workers. This includes the sharing of information to help stop or prevent exploitation, and pledges to raise awareness of slavery through supply chains within the construction industry.

The COVID-19 pandemic and subsequent lockdown period has seen a significant movement of low paid or other high-risk communities for modern slavery and human trafficking issues, move from areas such as car washes, entertainment, catering or other 'gig' economy employment into construction. This has then led to an increase in fraudulent activity in respect of construction related testing and qualifications used for construction competence cards.

Previously reported investigations and prosecutions have been delayed by the effects of the pandemic but support to two further large-scale investigations have been provided to law enforcement agencies.

CITB has also been invited to join a Metropolitan Police led initiative - project ENTERPRISE that seeks to work with partners, such as GLAA, DWP, NCA, Local Authority, Immigration and UKBF to name some active members in order to tackle these offences.

CITB has a dedicated email 'report.it@citb.co.uk' for construction industry colleagues to report any suspicions in relation to suspected fraudulent activity. This can include modern slavery and human trafficking activity. During 2020-21 there were no new cases reported via the email address.

## 6. Effectiveness, measured against appropriate KPIs

The internal Performance Hub that provides key information to the Executive and Leadership Team is being refreshed in 2021/22 and Key Performance Indicators (KPIs) reviewed.

It is anticipated that the following KPI's will remain:

- *% of debt (£ and invoices) that are not paid within the agreed terms*
- *% of Levy paid on time*

By making prompt payment, it is hoped that creditors will do the same e.g. pay their staff on time; and if there are any overdue debtors, it can act as a warning that the company may have difficulties and may resort to bad practices warranting further investigation.

The Corporate Social Responsibility Manager will review

- % of required staff completing the mandatory training – target 100% completion
- % of those legally required to issue MDS statements that are published and meet the Home Office criteria (data taken from TISC)

## 7. Training and capacity building

The Executive Team and all staff members were required to complete a mandatory e-learning module on Modern Slavery by the 31<sup>st</sup> March 2021 with a completion rate of 86%.

SSCL's Procurement Team undertake an annual refresher as part of their CIPS membership for Ethical Procurement and Suppliers which includes Modern Day Slavery and provided confirmation.

As part of its commitment to the Sustainability Supply Chain School's 'People Matter Charter' which includes addressing labour exploitation, CITB is piloting a 'learning pathway' with some of its key suppliers, and if successful, will be rolled out to more of its suppliers. The Pathway allows CITB to allocate key bite-size e-learning modules to a supplier and track their completion, giving CITB some assurance that suppliers are aware of key legislation on key human right topics including Modern Slavery and Equality and what action they should and can take. The Pilot was delayed due to staff being furloughed during the Pandemic and will commence in 2021/22.

CITB Apprenticeships Team delivers a bitesize training module to its Apprenticeships Officers (AOs), and as the case study shows - they can now spot the signs and report concerns for individuals.

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### Case Study

An Apprenticeship Officer (AO) in a rural area mentioned to his Area Delivery Manager (ADM) that one of his apprentices was always short of money, asking for advice on how to broach the subject of getting the apprentice a wage rise from a challenging employer. On further discussion, the AO said that the apprentice was living in accommodation provided by his employer and that his deductions from his wages always seemed to be higher than his colleagues. The apprentice had been living alone since he was 18 (he was now 22), when his parents had said they were no longer responsible for him.

The ADM felt that this situation had indicators that the apprentice may be at risk of exploitation by the employer and suggested that the AO had another conversation with the apprentice when he was in college, ensuring that the AO did not to share his concerns but gathered facts. On finding out more, the ADM discussed the situation with the RDM. Both agreed further investigation would be useful – the ADM contacted the local police who took over the investigation. The apprentice continued to work with CITB and eventually moved into another rental property and new employment, going on to complete his apprenticeship.

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In March 2021, the Executive Team agreed to train a number of CITB staff to become Modern Day Slavery Champions who will help raise awareness of modern slavery and inform others how they can get help. A one day training course will take place on the 1st July 2021, delivered by the organisation Stronger2gether. The Champions will then help deliver communications at key times throughout the year. The Champions will report any concerns raised internally to CITB's Fraud Team, who will review all known intelligence and share with the appropriate enforcement agencies.

## 8. Additional Activity Planned for 2021/22.

- Complete the outstanding actions from 2020/21 that were delayed due to staff being furloughed during the pandemic.
- Draft a Supplier Code of Conduct developed in line with the United Nations (UN) Guiding Principles on Business and Human Rights and are informed by the International Bill of Human Rights and the International Labour Organization's (ILO) Declaration of Fundamental Principles and Rights at Work.
- Hold a workshop with CITB's Nation Councils for England, Scotland and Wales on MDS to consider what influencing role CITB could/should take to support the Construction Sector.
- Train a number of staff as Modern Day Slavery Champions to help raise awareness and understanding on the signs of MDS and how to report concerns.
- Join Business In The Community (BITC) and complete the training and begin preparation to participate in their Responsible Business Tracker in 2022/23 which includes reviewing what policies and processes are in place to keep individuals safe, free from abuse and neglect.

This statement has been approved by CITB's Executive Directors on the 23rd June 2021.

Director's signature



**Emma Black**

Legal, Governance and Compliance Director  
June 2021