

Modern Slavery Statement 2023-24

1. Introduction

This Statement sets out the steps that have been taken by the Construction Industry Training Board (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 2024.

2. Organisational structure, business and supply chains

The CITB is the Industry Training Board for Construction and is one of two remaining Industry Training Boards established under the Industry Training Act 1964. The statutory purpose of the CITB is: "To make better provision for the training of persons over compulsory school age for employment in any activities of the industry".

The CITB is funded by a statutory levy on eligible employers operating in the construction industry, and its strategic purpose is: "To support the construction industry to have a skilled, competent, and inclusive workforce, now and in the future".

The 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. It provides training services from three sites comprising the National Construction College (NCC), in Bircham Newton, Norfolk; Erith, London; and Inchinnan, Glasgow; and through commissioned services via both public sector colleges and private sector training providers.

The CITB is also classified as a Non-Departmental Public Body (NDPB) and is an Arms-Length Body (ALB) of the Department for Education (DfE). The CITB has agreed with the DfE to continue to publish its own annual Modern Slavery Statement ('MSS') rather than be included in the Ministerial Statement published for the DfE.

The CITB has approximately 260 live contracts, with an annual spend of £55m with the top five spends in 2023-24 covering our enabling partnership arrangement, the provision of HSE testing centres, accommodation for apprentices, catering and cleaning, and print. Most of our Tier 1 suppliers are registered in the UK but many of their operations and supply chains are global. However, we do not generally have visibility of our Tier 2 supply chain locations, only those for our medium and high-risk categories.

The CITBs Commercial and Contracts Team works with its outsourced enabling partner, Shared Services Connected Limited (trading as SSCL) - a leading provider of business-critical support services to Government and the UK public sector – to procure goods and services. Together they ensure that all relevant requirements, as set out in Public Procurement Notes (PPNs), such as PPN 02/23 – *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. Any changes because of the new Public Procurement Act 2023 and Transforming Public Procurement (TPP) requirements will be implemented from October 2024.

The CITBs total expenditure in 2023-24 was £255m, and it employed an average of 763 employees, (748 directly employed and 15 temporary) across Great Britain over the reporting period.

The CITB has a high number of mobile workers, alongside those working at head office and the NCC, and any temporary staff required throughout the year are recruited through Capita or Brook Street, both sourced through an approved Government procurement framework.

The CITB's Corporate Social Responsibility Manager is the point of contact for any Modern Slavery enquiries, and they report to the Chief Financial Officer, with whom executive accountability for Environment and Sustainability (including Modern Slavery) sits.

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

The CITB has several policies that relate to modern slavery that are periodically reviewed, namely:

- Procurement and Contract Management Policy – outlines the CITB's approach to sourcing its external needs, including its compliance with public procurement rules, the financial thresholds for different types of procurement, and its approach to the use of SME's and local suppliers. It is also guided by the requirements of Public Contracts Regulations 2015 to which the CITB must abide. The majority of the CITB's procurement activity is undertaken through Government approved frameworks (via the Crown Commercial Service (CCS), London Universities Purchasing Consortium (LUPC), and Eastern Shires Purchasing Organisation (ESPO)), which have preconditions on suppliers to adhere to good practices relating to modern slavery. Where the CITB contracts directly, its 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 and updated in August 2023 and will be updated to reflect the new Transforming Public Procurement requirements in 2024.
- Protected Disclosure Policy – 'whistleblowing' – 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'. The Policy was last reviewed, updated and approved by the Board in February 2024.
- Corporate Social Responsibility (CSR) Policy – this is to be replaced by an Environment, Social and Governance (ESG) Policy to align to the CITB's sustainability priorities that includes equality, diversity, and inclusion, and will be issued following publication of its new Sustainability Strategy in 2025.
- Fairness, Inclusion and Respect Policy – details the CITB's commitments and practices to ensure that people are treated fairly, with respect and ensure that the CITB is an inclusive place to work. The Policy was approved by the Board in February 2024.
- Recruitment 'Step by Step guidance' – details the 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 – a new pay and grading system for colleagues was introduced in Summer 2023 following negotiations with trade unions and colleagues. A review of the wider benefits package is planned in 2024-25.
- Safeguarding Policy – details the CITB's approach to safeguarding and promoting the welfare of children and vulnerable adults. The Policy was approved by the Board in September 2023.

- Complaints procedure - provides a means for external parties to report concerns of Modern Slavery with regard to the CITB's business operations, and is available on the CITB's website. If a concern is raised and the complainant feels that the issue is not resolved to their satisfaction, they can escalate the matter via contacting, their Member of Parliament, or the Parliamentary Ombudsman (England and Wales) or the Scottish Public Services Ombudsman (Scotland).

All policies are available on the CITB's Sharepoint pages (known as Connected) for colleagues to access. Further policies will be developed if required.

The organisation wide process for development, sign-off and ownership of policies has been reviewed by the Corporate Information & Document Controller and adopted in 2023. If colleagues do not comply with any of the CITBs policies, it may result in disciplinary action, with a sanction up to and including dismissal.

4. Risk assessment, prevention and mitigation

Compared to 2022-23, CITB has made no significant changes to the nature of the products and services that it procures, and it continues to contract with recognised businesses that are registered within the United Kingdom. Consequently, the CITB continues to assess the risk of modern slavery across its business operations to be low.

Fraudulent activity is still one of the CITB's key corporate strategic risks (and such activity could involve modern slavery and human trafficking), and measures have been put in place to reduce this risk, including monitoring at Executive and Board level.

The risk assessment of the CITB's Tier 1 suppliers was reviewed by the CITB's Head of Procurement and Contract Management to see which contracts were deemed medium or high risk, namely: those that had two or more relevant 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.

The CITB has five suppliers (covering warehousing, catering and cleaning services, laundry, PPE and merchandising) that were deemed to be medium or high risk due to their own supply chains and four contracts that exceed the value of £5m

The CITB is registered to use the Modern Slavery Assessment Tool (MSAT) and shall do so for all new procurements and extant contracts involving medium to high-risk suppliers and contracts exceeding the value of £5m. The suppliers will be invited to complete the MSAT. Further action, if necessary, will then be considered following receipt of the information.

Clause 40 'Modern Slavery' within the CITB's Standard Goods and Service contract terms and conditions, states that the CITB has 'absolute discretion' as to what action(s) it may take in the event of a case of modern slavery being discovered within its supply chain, including exploring all potential avenues for action before considering terminating the contract. In the event of a concern being identified or raised, the supplier should contact the CITB and the Modern Slavery helpline.

All of the CITBs relevant suppliers must prepare an annual modern slavery and human trafficking report, for submission no later than 1 October of each year and, in future, complete the MSAT if required.

All CITBs new suppliers must now comply with the CITB’s new Supplier Code of Conduct that sets out what the CITB expects of its suppliers in terms of responsible business practice and behaviour covering human rights, modern slavery and good employment practices more generally.

5. Due Diligence processes

Following the Gangmasters and Labour Abuse Authority’s (GLAAs) withdrawal of the Construction Protocol to which the CITB was a signatory, the CITB’s Fraud team continues to support the multi-agency Operation Enterprise meetings run by the Metropolitan Police, including with requests for information and intelligence.

The CITB is joining the Norfolk Anti-Slavery Network (NASN) business sub-group, the first of its kind in the United Kingdom, commencing in April 2024. The purpose of the NASN is to provide leadership and to strengthen and enhance the multi-agency response to modern slavery and human trafficking (MSHT) in Norfolk, home to the CITB’s largest National Construction College (NCC) site. Through sharing and learning, we hope to ensure that the CITB delivers best practice throughout its entire operations.

The 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 2023-24, there were no new cases reported via this email address.

6. Effectiveness, measured against appropriate KPIs

The CITB reviewed its KPI framework in 2023-24 to ensure it was effective and proportionate to support the monitoring and review of its performance in tackling modern slavery.

KPI framework

Key Performance Indicator	Score
1. Percentage of contracts of medium/high-risk & high value where the supplier has completed a Modern Slavery Assessment Tool (MSAT)	To start in 24-25
2. Percentage of action plans that exist for MSAT entries to manage red / yellow risks and implement recommendations	To start in 24-25
3. Percentage of required colleagues completing the mandatory training (excludes new starts)	97%
4. Percentage all Category Team colleagues (including SSCL) will have undertaken the annual CIPS Ethical Procurement and Supply e-Learning (or recommended equivalent)	100%
5. Percentage of medium/high-risk suppliers & high value suppliers that have published a Modern Slavery Statement on the Government registry if in-scope of the MSA Section 54.	3/6

7. Training and capacity building

The construction industry is consistently assessed as being an industry at high risk of labour exploitation by the National Crimes Agency (NCA), with construction the second most recorded form of labour exploitation in UK police investigations. The construction industry incorporates a wide variety of work on different types of sites.

Smaller companies or individuals typically working on domestic or small-scale commercial projects are more likely to see the end user model of offending, where a victim carries out work directly for the exploiter. However, the commercial construction industry is almost certain to present the highest risk industry for infiltration by high sophistication Organised Crime Gangs (OCGs), where victims work on behalf of the exploiter or their business but completing work for a third party. It is almost certain that this is due to the demand for workers, lack of right to work checks, potential for high profits from commercial construction contracts and complex supply chains. The CITB is well positioned to raise awareness of MSHT through educating its workforce and the wider industry and continue to support any further Op Aidant campaigns planned for 2024-25

Existing colleagues are required to complete a mandatory e-learning module on Modern Slavery bespoke to the construction industry. If mandatory training is not completed within the specified time, this is notified to the relevant line manager and discussed with the employee, setting a new target date for completion. Modern Slavery Champions across the CITB help raise awareness of modern slavery and inform others of how they can get help.

A Teams Live event was held on the 18 October 2023 with Pamela Zielinski from StrongerTogether. She presented to colleagues on modern slavery within the construction industry. Coinciding with Anti-Slavery Day, it was an opportunity to raise awareness and remind colleagues how to spot the signs and report concerns.

SSCL's Procurement Team members continue to undertake an annual refresher as part of their CIPS membership for Ethical Procurement and Suppliers, which includes modern slavery.

In support of the National Crimes Agency's Op Aidant two weeks awareness campaign on 'labour exploitation in construction' in July 2023, the CITB's Counter Fraud team and Communications team liaised with the NCA's media team to co-ordinate media releases on its social media platforms.

In April 2024, the CITB's Fraud Manager will attend a Metropolitan Police/Deloitte led Modern Slavery and Human Trafficking (MSHT) Conference. The conference will include keynote speakers on:

- Collaborating with both public and private sector groups on tackling MSHT to make the most positive impact
- Organisations to discuss insights, best practices and challenges they are facing
- Data sharing and how to capture intelligence which then can be shared with the Metropolitan Police and law enforcement partners (via tool/form)
- Current themes and methods of Modern Slavery Human Trafficking within the different sectors

8. Activity Planned for 2024-25

- Continue to support the raising of awareness and the availability of resources via the CITBs media channels and help the industry in addressing fraudulent activity.
- Review the resources needed to invite and follow up actions with suppliers using the MSAT and to seek annual MSSs.
- Ensure the updates made to PPN 02/23 in March 2024 are fully embedded and that the risk of modern slavery is contained and effectively managed within Procurement's operational risk register.

- The CITB's Counter Fraud Team will continue to work with law enforcement agencies, gathering and sharing intelligence, in relation to construction tests, qualifications, and card checks, to avert the expansion of modern slavery by organised crime groups and other scrupulous employers.
- Participate in the Norfolk Anti-Slavery Network (NASN) to share knowledge and best practices to continue to develop our programme to tackle modern slavery.

This Statement has been approved by the Directors of the CITB's Executive Committee on the 25 September 2024.

A handwritten signature in blue ink, appearing to read 'T Balcon', with a long horizontal flourish extending to the right.

Tim Balcon
CEO
September 2024