

## Modern Slavery Statement 2017

The following statement introduces the steps that have been taken in relation to our responsibilities under section 54, part 6 of the Modern Slavery Act 2015 (MSA).

It also includes the activities taken prior to, and will continue taking, as part of this legislation to ensure that slavery and human trafficking is not taking place in CITB's supply chains, or in any part of our business operations.

CITB has adjusted its financial year to end 31/03/2018, thereby, this statement covers 15 months.

### Our business structure and supply chain

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'. Our 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 registered as a charity in England and Wales (Reg No 264289) and in Scotland (Reg No SC044875).

We have approximately 1300 employees working at CITB offices and National Construction Colleges located across the UK in England, Scotland and Wales. We encourage our employees to work flexibly and have a large mobile workforce who don't have a specific office base.

CITB is devoted to building competitive advantage for the construction industry and the people who work in it by ensuring that:

- Individuals have the skills to compete for the best jobs and develop fulfilling careers
- Companies have a highly skilled workforce that gives them a unique selling point in their sector
- The industry has the skills to meet its clients' needs and future challenges
- UK plc has an industry that is world class and can compete with the best on the world stage

CITB is committed to Corporate Responsibility and the work is overseen by the Corporate Performance Directorate.

A Modern Slavery Steering Group was established in August 2017 that included members from across the organisation. The Terms of Reference (TOR) of the group were established, and a proposed action plan was established that outlined the following key steps:

- Carry out due diligence that related to the various layers of the supply chain
- Identify and assess risk from the due diligence process
- Determine which policies are relevant to modern slavery, review and update where necessary
- Develop and introduce KPIs
- Formulate a programme of training relevant to colleagues position and role within CITB-Construction Skills
- Prepare, approve and publish statement.

## Evaluation of our policies

In 2016, CITB identified a number of policies relating to s.54, transparency in the supply chain that will be reviewed and updated accordingly. They are as follows:

- Procurement policy
- Equality and Diversity policy
- Recruitment policy
- Safeguarding policies

Consideration was given to modern slavery concerns during the review of the Safeguarding in Employment Policy in June 2017. Due to operational issues the Equality and Diversity Policy, and the Recruitment policy were not reviewed but are scheduled during 2018/19.

The Procurement policy was updated in 2017 to ensure that all suppliers are asked to confirm that they are aware of, and comply with, the Act, and in turn that they ensure their supply chain are compliant.

## Due diligence assessments on the supply chain

Business operations and their supply chains identified at being at risk of conducting modern slavery and human trafficking were identified, and due diligence assessments scheduled. The areas of the business to be assessed were:

- Procurement
- HR
- Business Improvement supply chain
- Estates supply chain
- Apprenticeships
- Test Centres

Procurement carried out a desk top analysis of CITB's supply chain and, due to the nature of the products and services supplied, the risk of modern slavery was deemed low. New contracts now include a clause asking all suppliers to confirm that they are aware of, and comply with, the Act, and in turn that they ensure their supply chain are compliant. Due to the low level of risk, the clause has not been retrospectively added to existing contracts. The Procurement team will take an annual review of their major suppliers and identify any key risks or areas for possible non-compliance with the Act. Where significant risks are identified, these will be explored further.

CITB has been working with industry, implementing measures to ensure that human trafficking and modern slavery is eradicated from the UK construction industry. CITB's Fraud team has, and continues, to work with law enforcement agencies to bring offenders to justice. Construction industry colleagues are encouraged to report their suspicions (it can be done anonymously) to CITB using a dedicated email address - [report.it@citb.co.uk](mailto:report.it@citb.co.uk).

### Case Study

Metropolitan Police detectives began an investigation supported by CITB's Fraud Team in September 2017, after two Romanian men reported to Forest Gate police that they had been treated like slaves after coming to work in the UK. On 23 March 2018 at Inner London Crown Court, David Lupu was sentenced to seven years' imprisonment after being convicted of multiple offences of holding a person in slavery or servitude.

During the trial, seven Romanian men said they had been offered jobs in July 2017, but after travelling to the UK, were expected to live in a small one bedroom flat in Leyton, east London. Up to 15 men slept wherever they could in the kitchen, bedroom, hallway and storage cupboard, on mattresses found in the street. Victims said they were only allowed out of the house two at a time, and warned that they would be arrested if discovered.

They were told that they owed Lupu hundreds of pounds and were forced to work long hours in the demolition sector in order to repay the costs. Meanwhile, Lupu was paid a significant wage by the building site's employers for the men's labour. When the men discovered their wages from the building site had not been passed on by Lupu, they confronted him, only to be beaten and threatened to be killed if they insisted on being paid before they had paid their 'debts'.

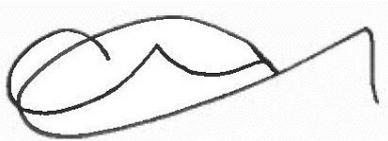
To further support the UK Construction Industry, CITB through its Flexible and Structured Fund has supported projects that aligns to its three priorities, and that includes gaps in training and development. Willmott Dixon Partnership was granted £18,500 for a Right to Work project aimed at providing construction businesses, and their entire supply chain, with accessible training on how to check the 'right to work' status of all their employees, thereby preventing illegal working and any modern slavery/trafficking activities. The project completed in July 2017. [Watch the Right to Work training videos](#).

### Training and awareness

An e-learning module (10 mins duration) was purchased and added to CITB's e-learning platform. Staff most likely to come into contact with those in slavery will be identified and the module added as mandatory to their training requirements and monitored.

### What we plan to do in 2018

- Continue the Modern Slavery Group, reviewing the Terms of Reference, and setting the years action plan.
- Report in the 2018 Statement the progress made against the plan.



**Craig Pemberton**

Corporate Performance Director  
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