

Modern Slavery Statement 2018-19

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 2019.

2. Organisational structure 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) and its head office is based in Bircham Newton, Norfolk.

Future CITB will focus on its priorities to deliver its vision and on doing fewer things itself to allow it to concentrate on outcomes for the industry. In February 2019, CITB outsourced the provision of its enabling services functions (including procurement), and its customer operations that support the retained products and services, and apprenticeships processing to external providers Sopra Steria Limited (SSCL). On the 1st March, CITB transferred its card services (CPCS) to NOCN Group, one of a number of divestment projects that will continue throughout 2019 due for completion in January 2020.

As of the 31st March 2019, CITB had 943 employees at its offices and national Construction Colleges located across the UK in England, Scotland and Wales and had a high number of mobile workers.

CITB's Corporate Responsibility Manager is the point of contact for any Modern Slavery enquiries and reports to the Head of Audit, Risk and Compliance within the Corporate Performance Directorate.

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.

CITB's Modern Slavery Steering Group had its final meeting in March 2019. The work required to ensure that CITB does not have any forms of Modern Slavery or Human Trafficking within its supply chain and its own business operations will be monitored by the new Fairness, Inclusion and Respect (FIR) Group and reported to the Corporate Responsibility Leadership Group (CRLG) and any areas of concern raised to the Executive.

3. Policies in relation to slavery and human trafficking

As part of the Future CITB, a number of cross-cutting policies need to be in place and forms part of a wider Corporate Framework Project. In light of the project, a number of reviews of existing policies planned for 2018/19 have not yet been carried out.

The Reporting Concerns (Whistleblowing) Policy was reviewed in September 2018 and provides a means to report and deal with any concerns including those on slavery and human trafficking.

The Complaints Procedure is scheduled for review in May 2019 and provides a means for external parties to report concerns of Modern Slavery within CITB business operations. 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.

The following policies are scheduled for review in the next two years, with the Human Resources policies commencing in June 2019.

- Procurement Policy – it will outline CITB’s approach to sourcing its external needs, its relation to public procurement rules, the financial levels for any different types of procurement and include CITB’s approach to the use of SME’s and local suppliers. Our current 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. Working with our new enabling partner SSCL, we shall look to further sustainable procurement.
- Supplier Management Policy – it will provide detail of CITB’s approach to supplier and supply chain management including payment terms and process for issue resolution, ensuring that payments are not withheld causing companies to potentially resort to bad practice i.e. not pay their staff on time.
- Reporting Concerns (whistleblowing) – it will provide detail for the approach to reporting any concerns (including someone that may be at risk of slavery or human trafficking) and how these will be dealt with, and the protection of ‘whistleblowers’.
- Corporate Social Responsibility Policy – it will detail CITB’s approach to Corporate Social Responsibility and its commitments to the UN Sustainable Development Goals which includes the Goal 8.7 to “end modern slavery and human trafficking”.
- Fairness, Inclusion and Respect Policy – it will detail 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.
- Recruitment Policy – it will detail 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, and everyone has an employment contract stating terms and conditions and paid directly.
- Pay and benefits Policy – it will detail pay and reward and the benefits framework and its link to performance, and mechanics by which pay decisions are fairly made.
- Safeguarding – it will detail CITB’s approach to safeguarding and promoting the welfare of children and vulnerable adults.

Further policies may be developed as part of the review process. All policies are, and will continue to be, available on CITB’s intranet (the Hub) for staff to access.

CITB has a working protocol titled ‘Strategy Policy Approval’ that outlines the process for development, sign-off and ownership of policies within the business. If staff do not comply with CITB policies, it may result in disciplinary action or dismissal.

4. Risk assessment, prevention and mitigation

4.1 Within our business operations

There are a number of teams across CITB identified as having a greater likelihood of coming into contact with MDS and will undergo mandatory e-learning training, namely:

- Procurement & Commissioning – our staff and enabling partner SSCL are able to conduct risk analysis and due diligence checks on our supply chain and commissioning work.
- Apprenticeships – our Apprenticeship Officers visit construction sites and employer premises for lengthy periods of time and have the opportunity to identify key indicators; and to foster relationships with learners becoming a trusted person to whom they can report concerns.
- Qualifications / standards – our staff visit industry partners (i.e. Test centres) and have the opportunity to deliver key training to staff on spotting the signs of MDS.
- Partnerships - our staff visit industry partners and have the opportunity to identify key indicators that may be missed.

CITB recognises fraudulent activity as one of its 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.

4.2 Within our supply chain

Compared to 2017, CITB has made no significant changes to the nature of the products and services that it procures, and therefore the risk of modern slavery is still deemed low.

Relevant policies are requested from third party organisations as part of CITB's commissioning and procurement process, however, no further assessment is currently undertaken.

During 2019/20, CITB will work with its new procurement partner (SSCL) to look at the opportunities to carry out further assessment, and to exchange information with its supply chain to further identify the risk of modern slavery and human trafficking.

4.3 Within our Industry

In 2018, CITB signed the Gangmasters and Labour Abuse Authority's (GLAAs) Construction Protocol, committing to work in partnership to protect vulnerable and exploited workers, agree to the sharing of information to help stop or prevent exploitation, and pledge to raise awareness of slavery through supply chains within the construction industry.

CITB's Fraud Manager attends the quarterly meetings and has delivered presentations to two GLAA regional teams explaining the role of CITB and potential links to Modern Slavery issues in the construction industry. CITB have also supported five GLAA investigations and three police investigations into Modern Slavery, one of which is currently at court. In addition, the Fraud Manager has also delivered a webinar to the Banks and Building Society Joint Money Laundering Intelligence Taskforce (jmlit).

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 2018/19 there were no incidents or reports of MDS issues reported via the email.

5. Due Diligence processes

Following CITB's review of its corporate cross-cutting policies as outlined in section three, its processes will subsequently be reviewed.

CITB is committed to promoting positive working conditions and practices and supports the principles in the Ethical Trading Initiatives (ETI's) Base Code (the internationally recognised set of labour standards). CITB pays the Living Wage Foundation rates to its staff and as part of its Sustainability Strategy it aims to encourage its supply chain to do the same.

CITB is aware that the Construction Industry is one of the economic sectors in the European Union most prone to labour exploitation and as outlined in section 4.3, is working with industry colleagues and government agencies to tackling the issue.

6. Effectiveness, measured against appropriate KPIs

CITB has a number of KPI's monitored at Executive and Corporate Performance level.

Existing KPI's

- Collections (excluding Levy & Grant) – is how timely we are collecting the money
- Payments (excluding Levy & Grant) – is how timely we are at paying our bills

Our standard terms are 30 days, although we adhere to Government guidelines i.e. in relation to small employers.

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

In July 2019, a new Standard Operating Platform will be introduced by SSCL, whereby invoices are logged on the system and paid on the next payment run thereby significantly reducing payment periods.

What we plan to do in 2019/20

- Review relevant policies as outlined in section 3 and consider the need for additional policies.
- Agree a Sustainability Strategy with an objective to procure sustainably and responsibly and invest ethically; and meet with SSCL (our new procurement partner) to discuss an action plan to carry out further assessment and communications with our supply chain.
- Continue communications to CITB staff on modern slavery and related policies.
- Look at further opportunities to train and raise awareness amongst staff, SSCL and our supply chain.

7. Training and capacity building

Communications on CITB's Modern Slavery Statement and highlighting Anti-Slavery Day was shared with colleagues using internal communication channels, raising awareness on how to spot the signs, report concerns and what action CITB was taking.

As well as a generic staff e-learning module, a mandatory e-learning package has been developed specifically for all test centre administrators, with the roll out due to commence in April 2019.

The Corporate Responsibility Manager, responsible for drafting the Modern Slavery Statement, attended the Modern Slavery and Labour in Construction Leadership Symposium in September 2018.

This statement has been approved by CITB's Executive Directors on the 11th June 2019.

Director's signature

A handwritten signature in black ink, appearing to read 'A. Beckingham', with a long horizontal flourish extending to the right.

Adrian Beckingham
Corporate Performance Director
June 2019