

Modern Slavery Statement 2024-25

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 2025.

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 2024-25 covering our enabling partnership arrangement for business and corporate services, the provision of Health Safety and Environmental testing centres, accommodation for apprentices, catering, cleaning and security services, and printing. 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, other than for those in 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 the updated PPN 009 – *Guidance on tackling modern slavery in government supply chains*, and PPN 002 - *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 due to the new Public Procurement Act 2023 and Transforming Public Procurement (TPP) requirements were implemented from October 2024. CITB's Commercial and Contracts Team have strengthened modern slavery requirements in tender documents and contracts and have developed a suite of relevant social value model questions that are

mandatory to be included on all above threshold procurements from 1st October 2025. To strengthen oversight and improve operational control, the CITB will bring the services currently delivered by SSCL in-house, by the end of September 2026.

The CITBs total expenditure in 2024-25 was £296m, and it employed an average of 861 employees, (844 directly employed and 17 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 National Construction College (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 Environmental, Social and Governance (ESG) 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 employees at CITB are Unite and GMB, although the significant majority of employees are represented by their management. 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 – This 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 and Procurement Act 2023, which came into force in February 2025 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 direct, 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 October 2024 and incorporates the new requirements set out in the Transforming Public Procurement programme.
- Protected Disclosure Policy – 'Whistleblowing' – This 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, with the next planned review in February 2026.
- 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 – This details the CITB's commitments and practices to ensure that people are treated fairly, with respect and ensures that the

CITB is an inclusive place to work. The Policy was last reviewed and approved by the Board in February 2025.

- Recruitment 'Step by Step guidance' – This details the CITB's approach to recruiting people into the organisation: sourcing, selection, on boarding and induction, and for example, ensuring that appropriate right-to-work checks are completed, everyone has an employment contract stating terms and conditions, and they are paid directly. New guidance will be issued in 2025 as recruitment services are brought back in-house.
- Pay Award - An annual benchmarking exercise is undertaken to inform the pay award process, carried out in consultation with trade unions and management representatives.
- Safeguarding Learners – Colleagues Code of Conduct – This details the CITB's approach to safeguarding and promoting the welfare of children and vulnerable adults. The Policy was last reviewed and approved by the Board in August 2024, with the next planned review in August 2026.
- Complaints procedure – This 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 employees to access. Further policies will be developed if required.

If employees do not comply with any of the CITB's policies, it may result in disciplinary action, with a sanction up to and including dismissal. The organisation wide process for development, sign-off, and ownership of policies is overseen by the Corporate Information & Document Controller.

4. Risk assessment, prevention and mitigation

Compared to 2023-24, 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 remains one of CITB's key strategic corporate risks, with potential links to modern slavery and human trafficking. To mitigate this risk, enhanced monitoring measures have been implemented, including oversight at both Executive and Board levels. Additionally, there is a strategic risk of harm to apprentices, young people, and vulnerable adults due to either the absence or failure of appropriate safeguarding arrangements. Safeguarding has, therefore, been a key area of focus and development for the NCC and apprenticeship programmes over the past 18 months. The Leaders in Safeguarding Award was achieved for England in 2023-24 and for Scotland in 2024-25. A dedicated Safeguarding Team monitors the arrangements and any incidents that occur, and the overall operation of the process is monitored by the NCC and Apprenticeships Committee on behalf of the Board.

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, cleaning and security services, laundry, personal protective equipment, 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 planned to use this for all new procurements and extant contracts involving medium to high-risk suppliers and contracts exceeding the value of £5m. The completion rates are very low, with suppliers requesting to send their MSS's instead.

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 are asked to prepare an annual modern slavery and human trafficking report, for submission no later than 1st October of each year and, in future, complete the MSAT (if required).

All CITBs new suppliers must now comply with the CITB's 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

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 Fraud Team are also associate members of the national Government Agencies Intelligence Network (GAIN) and regularly receive requests for information to support law enforcement agencies modern slavery investigations.

The CITB joined the Norfolk Anti-Slavery Network (NASN) business sub-group, the first of its kind in the United Kingdom, 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 NCC site. Data from Norfolk Constabulary shows some victims of forced labour were in the local construction businesses, and the CITB is well placed to help raise awareness through the work of its national Engagement Teams and new Employer Networks to help prevent this occurring.

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 2024-25, there were no new cases reported via this email address.

6. Effectiveness, measured against appropriate Key Performance Indicators (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. Due to the low response rate to the MSAT, the two associated KPIs scheduled for launch in 2024-25 have been withdrawn. Instead, we will engage directly with the

suppliers of our medium- and high-risk contracts during contract review meetings to discuss their actions in addressing modern slavery risks.

KPI framework

Key Performance Indicators	Score
1. Percentage of required employees completing the mandatory training (as of Feb 25) (excludes new starters)	97%
2. Percentage of all Category Team employees (including SSCL) who have undertaken the annual CIPS Ethical Procurement and Supply e-Learning (or recommended equivalent)	100%
3. Percentage of medium/high-risk suppliers and high value suppliers that have published a Modern Slavery Statement on the Government Registry (if in-scope of the MSA Section 54)	6/6

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). The NCA's National Strategic Assessment 2025 of Serious and Organised Crime, reported that sectors in which work is often informal or short-term, such as agriculture, beauty services, construction, food processing and preparation, and hand car washes, are particularly vulnerable to labour exploitation, with construction identified as one of the most common sectors for labour exploitation in the UK. 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 sector is almost certain to present the highest risk for infiltration by highly sophisticated Organised Crime Groups (OCGs), where victims work on behalf of the exploiter or their business through completing work for a third party. It is almost certain that this is due to the demand for workers, a 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 continues to support any national campaigns by the NCA.

CITB employees are required to complete a mandatory e-learning module on Modern Slavery bespoke to the construction industry on a three-year cycle. 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. Between times, communication is shared on key calendar awareness dates to support and refresh employee's knowledge and understanding.

CITB's and 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 April 2024, the CITB's Fraud Manager attended a Metropolitan Police/Deloitte led Modern Slavery and Human Trafficking (MSHT) Conference. The conference included 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 their online tool/form)
- Current themes and methods of MSHT within the different sectors

8. Activity Planned for 2025-26

Over the next year, CITB plans to:

- Continue to support the raising of awareness and the availability of resources through utilising key calendar dates, such as Anti-Slavery Week.
- Ensure the updates made to PPN 009 are fully embedded and that the risk of modern slavery is contained and effectively managed within the Contracts and Procurement Team'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 OCG's and other scrupulous employers.
- Continue participation in the NASN to share knowledge and best practice to continue to develop our programme to tackle modern slavery; and to explore how we can raise awareness to the construction industry using CITB's Engagement Teams and local Employer Networks.

This Statement has been approved by the Directors of the CITB's Executive Committee on the 15th September 2025.



Tim Balcon

CEO

15th September 2025