

Modern Slavery Statement 2019-20

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 2020.

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); and its head office moved from Bircham Newton in Norfolk to Peterborough in Cambridgeshire in October 2019.

CITB continues its major transformation programme, whereby, a number of its services are outsourced and divested. All three card services (CPCS, CSCS and CISRS) were transferred in December 2019, and the Bridgend office was closed in August 2019. The reform programme will continue into 2020.

As of the 31st March 2020, CITB had 852 employees at its offices and National Construction Colleges located across England, Scotland and Wales, and has 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.

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 is monitored by the 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

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

- Procurement Policy – it 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. 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. Working with its enabling partner SSCL, CITB are looking at ways to further sustainable procurement.

- Supplier Management Policy – it provides detail on 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) 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’.
- Sustainability Policy – details CITB’s 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 – 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.
- Recruitment Policy – 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.
- Complaints procedure - provides a means for external parties to report concerns of Modern Slavery within CITB’s 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.

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

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 Modern Day Slavery (MDS) and will undergo mandatory e-learning training, namely:

- Procurement & Commissioning – the staff within this team, and CITB’s enabling partner SSCL, are able to conduct risk analysis and due diligence checks on our supply chain and commissioning work.
- Apprenticeships – the Apprenticeship Officers visit construction sites and employer premises for lengthy periods of time and have the opportunity to identify key indicators. They also foster relationships with learners becoming a trusted person to whom they can report concerns.

- Qualifications & Standards – staff visit industry partners (such as test centres) and have the opportunity to deliver key training to staff on spotting the signs of MDS.
- Partnerships - 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

In April 2019, the Executive Team made a commitment in its Sustainability Strategy to procure sustainably and responsibly, and it has been looking at how best to work with its supply chain to ensure they adhere to fair working practices.

CITB has approximately 180 commercial contracts. The majority of new contracts are procured through its enabling partner (SSCL), with the ongoing management of contracts being undertaken by a newly formed contracts management team within CITB. CITB utilise some government framework contracts, and are in the process of gaining a deeper understanding on what checks are undertaken as part of their screening process.

Compared to 2018-19, CITB has made no significant changes to the nature of the products and services that it procures, and uses well known businesses that are registered within the United Kingdom; and deems the risk of modern slavery to be low.

A risk assessment was completed on Tier 1 suppliers 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 four suppliers (covering promotional merchandise, laundry services, IT hardware and PPE) that were deemed to be medium or high risk due to their own supply chains.

As a Non-Departmental Public Body (NDPB), CITB is 'in-scope' to apply the Cabinet Office's *Public Procurement Notice (PPN 05/19) – Tackling Modern Slavery in the Supply Chain* that was released in September 2019, and began taking the necessary action.

The section relating to Modern Slavery within CITB's existing supplier contract was reviewed, and the following changes will be made in 2020/21:

- Contracts identified as medium and high risk will be asked to complete a Modern Slavery Assessment Tool (MSAT).
- Termination of the contract will be highlighted as a last resort.
- Suppliers will be advised to alert the relevant authorities if they have concerns; and to notify CITB by phone followed up in writing. This will avoid delays in getting investigations started and victims rescued.

In March 2020, CITB pledged its commitment to the People Matter Charter. The Charter was created by the Supply Chain Sustainability School and delivery partner Action Sustainability, to encourage organisations up and down the supply chain within the Construction sector to treat people responsibly. There are eight commitments covering the following areas: equality, diversity and inclusion, skills and training, workforce culture, The Living Wage, due diligence, employment law, labour exploitation and payments. A Road Map and free resources are available to help organisations assess their current activity and work towards continual improvement.

CITB is embedding a more detailed process from Prequalification stage, including additional questions and scoring, through to contract monitoring and management as a result of the newly formed contracts management team within CITB. It will allow CITB to gain a greater insight on its suppliers' current practices and how they are progressing towards best practice. Key suppliers will be allocated specific e-learning modules to complete such as Modern Day Slavery, and Equality and Diversity through the Supply Chain Sustainability School; their completion of the modules will be tracked to help demonstrate that their staff have the necessary subject matter knowledge and awareness.

CITB is also a member of TISCreport – the world's largest open data platform committed to ending corruption, supply chain labour abuses and modern slavery. CITB uploads its annual MDS Statements to the platform, committing to increased transparency; and has started adding its suppliers to the dashboard to check on their compliance, and to assess whether it is a beneficial tool in helping CITB track supply chain compliance.

As of 31 March 2020, 38 suppliers (35% of CITB's commercial contracts) have been added to the dashboard. Of those with confirmed turnovers - 11 are required to produce statements, of which only two have statements that currently meet all the Home Office criteria.

5. Due Diligence processes

CITB is a signatory to the Gangmasters and Labour Abuse Authority's (GLAAs) Construction Protocol and committed to working in partnership to protect vulnerable and exploited workers. It agrees to the sharing of information to help stop or prevent exploitation, and pledges to raise awareness of slavery through supply chains within the construction industry. CITB's Fraud Manager attends the quarterly meetings and supports the GLAA and police in investigating potential cases of Modern Slavery, with at least two on-going cases and one conviction during the reporting year.

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 2019-20 there were three instances in relation to individuals and their 'right to work' reported via the email and passed to the relevant authorities for investigation, which may in some cases be linked to MDS issues.

Case study

Three men jailed for 28 years in total for modern slavery offences

Three men from a Romanian organised crime group were sentenced to 28 years' imprisonment for modern slavery and Proceeds of Crime Act offences. The trio, who are all brothers, were sentenced at Blackfriars Crown Court on Friday 21 June, after being found guilty earlier following an eight week trial.

The court heard how between July 2015 and October 2018, the three men worked with other unknown gang members to traffic victims into the UK in order to exploit them within the construction industry.

In September 2017, a Joint Investigation Team made up of the Met's Modern Slavery and Kidnap Unit, CPS, Romanian Police and Prosecutors, EuroPol and EuroJust was launched in order to investigate the criminal network.

The investigation established that the victims were commonly deceived into travelling on the promise of being paid £500 per 30 days. They had their identify cards confiscated and were forced to stay in the defendants' overcrowded and poorly kept houses in East London.

The gang would exploit them by forging construction qualification documents and putting them to work at a number of building sites across London and the Home Counties. Violence, degrading living conditions and the constant manipulation of the derisory monies paid to victims were key levers to ensure the victims remained subservient.

A total of 33 victims of human trafficking (24 men, 4 women and 5 children) were recovered from four of the London addresses raided and taken into safety.

Throughout the three years and two months' of offending, the brothers generated more than £1.2 million by keeping the victim's wages for themselves through the exploitation of dozens of victims.

CITB Involvement

The CITB Counter Fraud Team was involved in the investigation from the outset and supported the enquiry with research onto the testing and qualifications that had been produced to obtain CSCS cards. The team was also able to offer evidence in respect of fake or counterfeit documents that the brothers had used to obtain genuine CSCS cards for their victims. As a result of the investigation CITB has terminated a number of test centres and revoked any tests linked to this fraudulent activity.

Chris Simpson, CITB's Quality & Assurance Manager said: "Modern slavery is a horrific crime that unfortunately is becoming far too prevalent in the UK's construction industry. Forcing people to work illegally not only deprives people of their human rights, it also harms the reputation of the industry, puts employers at risk, drives down wages and denies employment opportunities to many others."

"CITB has been working with industry, implementing measures to ensure that modern slavery is eradicated from the UK construction industry. CITB will also continue working with the Police, GLAA and other law enforcement agencies to bring offenders to justice."

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

In July 2019, a new Standard Operating Platform was introduced by SSCL, whereby invoices are logged on the system and paid on the next payment run thereby significantly reducing payment periods. By making prompt payment, it is hoped that creditors 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 following KPI's are being introduced in 2020/21 at the Corporate Performance Hub:-

- % of required staff completing the mandatory training
- % of those required to issue MDS statements that are published and meet the Home Office criteria

For the latter - data will be taken from the TISCreport and suppliers 'invited' through the dashboard to submit their statements.

What we plan to do in 2020/21

- Continue to review relevant policies as outlined in Section 3 and consider the need for additional policies.
- Develop the procurement process, namely:
 - update the clauses in our supplier contract
 - add further questions and scoring to the PQQ
 - request completion of MSAT's where necessary
 - provide awareness and training to our supply chain through the Supply Chain Sustainability School
- Continue communications to CITB staff on modern slavery and related policies.

7. Training and capacity building

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

The Executive Team completed an e-learning module on Modern Slavery and the module was made mandatory for CITB staff likely to come across incidents: namely, Procurement, Apprenticeships, Qualifications & Standards and Partnerships team whom, through working with our supply chain or being out on-site, may witness suspicious behaviour. In order to ensure that staff complete their required learning, the completion rates are now monitored at the Corporate Performance Hub.

The Corporate Responsibility Manager, responsible for drafting the Modern Slavery Statement attended the StrongerTogether webinar on the 14th February 2020 titled 'Is your modern slavery statement fit for purpose' and is scheduled to attend a 'Tackling Modern Slavery through Purchasing Practices' Workshop in London in November 2020.

This statement has been approved by CITB's Executive Directors on the 14th September 2020.

Director's signature



Adrian Beckingham
Corporate Performance Director
September 2020