

## **MODERN SLAVERY STATEMENT**

### **For the City & Guilds Group Financial Year commencing 1 September 2020**

The City & Guilds Group (**Group**) is a leader in global skills development. We work with education providers, employers, and governments in over 100 countries across the world to help people, businesses and economies grow by shaping skills systems and supporting skills development.

The Group is committed to improving our practices to combat modern slavery within our business and within our supply chains.

The Group has a zero-tolerance approach to modern slavery, and we are committed to:

- acting ethically and with integrity in all our business dealings and relationships; and
- implementing and enforcing effective policies and procedures to ensure modern slavery is not taking place within our business or our supply chains.

## **OUR STRUCTURE**

The City and Guilds of London Institute is a registered charity in England, Wales, and Scotland, and is the parent organisation of the Group. The Group has over 1400 employees, and operates in over 100 countries.

The Group is made up of seven businesses: City & Guilds, ILM, Kineo, The Oxford Group, Gen2, Intertrain, and DigitalMe. Together, these businesses set the standard for professional and technical education and corporate learning and development around the world.

## **OUR PURPOSE**

Each of our businesses has its own distinct focus. As a Group, our combined products and services provide a comprehensive range of work-relevant qualifications, assessment, training, and learning support services.

Everything we do contributes to achieving our purpose: helping people, organisations and economies develop their skills for growth. We reinvest our surplus through the activities of the City & Guilds Foundation to support our social purpose, which aims to change people's lives through skills.

## **OUR POLICIES**

We have published an Anti-slavery and Human Trafficking policy on our Group website that reflects this commitment. Our policy applies to all members of staff and to our suppliers, and is communicated to staff through our intranet, and to our suppliers through our supplier-onboarding process.

In order to act ethically and with integrity, to support our people, and to ensure there is no modern slavery or human trafficking within our supplier chain or any part of our business we have a number of policies and procedures that relate to the people within our business and to the suppliers within our supply chain.

Each policy is owned by a member of the Senior Leadership Team within the Group and is kept up to date on a periodic basis or when required due to a change of law or best practice.

## **OUR BUSINESS**

### **Recruitment**

We operate a robust and transparent recruitment process in accordance with published recruitment guidelines. Our guidelines require that checks must be carried out on all shortlisted candidates on their eligibility to work in the relevant country to safeguard against modern slavery. Our guidelines include a statement on modern slavery including a list of the key signs to look out for which could indicate that someone may be a victim of modern slavery or human trafficking. We work with established and reputable organisations to provide our associated work force, such as building security and maintenance staff.

## **Covid 19**

Although recruitment in financial year 2021 was limited due to Covid-19, our HRD team continued to stay alert to any risk of modern slavery in accordance with our guidelines.

However, due to the Covid 19 pandemic, additional measures were put in place to support the wellbeing of our staff. We provided office equipment to staff to ensure occupational health when working from home. All staff have free of charge access to an Employee Assistance Programme, external mental health advice and support such as Mind, internal 1 to 1 and peer coaching, and a network of internal mental health first aiders. Each area of the Group is represented by a member of the Employee Forum whose role is to feedback any issues to the Employee Forum, for escalation to the Senior Leadership Team where appropriate. Staff members have access to a Smart Working hub that provides our policies and procedures on working from home, our flexible working policy, together with work life balance guidance.

## **Awareness**

We offer on demand and face-to-face training on modern slavery via our intranet to enable staff members to gain a high level of understanding of the risks of modern slavery and human trafficking. We monitor changes in the legislation and best practice, and keep the Group updated on any changes via our intranet.

## **Whistleblowing**

We encourage our staff to 'speak up' if they have any concerns about any conduct taking place within the Group, and monitor the Group 'speak up' score through our Employee Engagement Survey. If a staff member identifies any of the signs of modern slavery, they may report this to their Line Manager, to the Legal Department, or via our whistleblowing process. In addition, all staff have free of charge access to an external organisation, Protect, to support the whistleblower.

## **OUR SUPPLY CHAINS**

Our supply chains include organisations and individuals that support the delivery of our products and services in order to achieve our purpose, including providers of:

- qualifications, assessment, and accreditation
- e-learning and learning technology
- leadership and management development
- operational products and services
- professional services
- technical skills training.

## **Supplier Due Diligence**

Although the engagement of new suppliers in financial year 2021 was limited due to the Covid-19 pandemic, the Procurement team continued to act in accordance with relevant policies and procedures.

As part of our process to identify and reduce the risk of modern slavery and human trafficking in our business and supply chains, we:

- require all bidders responding to formal tenders to provide their anti-slavery and human trafficking policy for us to review as part of the supplier selection process
- ensure that anti-slavery and human trafficking considerations form part of the procurement process in accordance with our Procurement Policy and our Sustainable Procurement Handbook
- include anti-slavery and human trafficking provisions within all of our standard supplier agreements
- provide our Modern Slavery Policy to suppliers as part of the new supplier on-boarding process.

## **Risk Assessment**

As part of our procurement process, we carry out appropriate checks on potential new suppliers in order to evaluate whether there is any risk of slavery or human trafficking. We require all of our suppliers to adhere to our supplier code of conduct and our anti-slavery policy if they do not have their own policy. If we become aware of a failure to comply with our anti-slavery policy, the relevant member of the Group may terminate its relationship with the supplier, or elect to work with the supplier to resolve such issues.

## **FURTHER STEPS**

No incidents of modern slavery have been identified within our business or supply chain in financial year 2021.

The Group intends to build on its modern slavery programme year on year in order to raise awareness, identify and manage risk, and continue to prevent modern slavery from arising. In the financial year 2022, we intend to:

1. Roll out a refresher modern slavery training to relevant members of the Group including Legal, HR, Facilities and Procurement.
2. Update the information on modern slavery available to staff on our new intranet to be implemented in FY22.
3. Set the criteria by which suppliers will be risk assessed in relation to modern slavery, including evidence of compliant modern slavery policies and procedures.
4. Identify key suppliers based on risk, likelihood versus impact, taking geographical location and industry into consideration.
5. Audit key suppliers against the established criteria, and record each risk assessment in new supplier management software to be implemented in FY22, and undertake any remedial action.

## **APPROVAL**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the financial year ending 31 August 2021.



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Dr Ann Limb  
Chair  
The City and Guilds of London Institute

09/02/2022

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Date