

TURNING POINT GROUP MODERN SLAVERY STATEMENT 2018/19



This statement has been prepared for the purposes of Section 54(1) of the Modern Slavery Act 2015. It sets out the position and steps taken by the Turning Point (“The Group”) during the year ending 31 March 2019 to prevent modern slavery and human trafficking in its business and supply chains

Introduction

We know that slavery, servitude, forced labour and human trafficking (Modern Slavery) is a global and growing issue. According to Anti-slavery international, in 2017 over 5,000 people were referred to British authorities as potential victims of slavery.

The Group is committed to ensuring that there is a zero-tolerance approach to Modern Slavery of any kind within our operations and supply chains. We all have a responsibility to be alert to the risks and to take appropriate action when necessary. There is an expectation on staff to report concerns, using the appropriate channels, and management is expected to act upon all concerns raised.

We understand that we have a duty of care to ensure that our supply chain and our business are free from the risk of modern slavery. Therefore, our fourth Modern Slavery Statement seeks to expand and develop on our work to tackle Modern Slavery.

Our Structure and supply chain

The Group comprises of the following entities:

- Turning Point (Company Number: 793558)
- Turning Point (Services) Limited (Company Number:2166697)
- Northern Pathways Limited(Company Number: 6325398)
- Turning Point Building Futures Limited (Company Number: 6315659)

The registered offices are Standon House, 21 Mansell Street, London, E1 8AA.

The Group is one of the leading health & social care organisations in the UK. During the last year we supported 102,101 people through the services we provide in 350 locations operating across England and Wales. This was achieved through the efforts of 4,320 staff, 528 peer mentors and 678 volunteers. The Group has an annual turnover of £131m and a broad range of suppliers. Our supply chains most at risk from Modern Slavery are deemed to be (i) providers of agency staff (ii) building contractors (iii) cleaning contracts and (iii) IT equipment providers.

The people associated with our organisation are carefully selected and, where possible, we conduct due diligence on them. We expect all persons to comply with our policies and engage in continuous training.

Due diligence processes in relation to modern slavery and human trafficking

The Group’s approach to risk management consists of ensuring the following due diligence is effectively implemented:

- Our suppliers are required to confirm compliance with relevant legislation including the Modern Slavery Act as required.
- The Group uses an Online Supplier Registration Form (SRF) as the basis of initial due diligence checks.
- Suppliers are required to be on- boarded through the SRF irrespective of value or commodity area through our Web Customer Feedback Reporting.

- All incidents relating to Modern Slavery are tagged as 'safeguarding' to ensure they are robustly followed up in line with our safeguarding policy..

Training on modern slavery and trafficking

The Group specifically covers Modern Slavery Act training within its safeguarding courses. This is further supported by appropriate internal communications.

The Group currently undertakes the following training:

- E-learning Support Worker Foundation training includes specific reference to modern slavery.
- Face-to-face training includes specific case studies which addresses modern slavery.
- Manager Foundation Safeguarding training includes references to modern slavery.

Policies in relation to modern slavery and human trafficking

We have a range of policies and controls which have been enhanced to specifically address the risks from Modern Slavery. These include:

- Raising concerns at work (whistleblowing) policy – This policy ensures that any individual who raises a genuine concern under this policy will not be at risk of losing their job or suffer any form of retribution as a result. This policy applies to all people associated with The Group.
- Customer Feedback policy – This policy sets out The Group's position on the management of all customer feedback including complaints, suggestions, informal and formal complaints.
- Recruitment & selection policy – This policy applies to the recruitment of permanent, fixed term and zero hours

workers.

- Safeguarding adults' policy – This policy has been produced to promote the wellbeing and safeguarding of adults at risk of abuse or neglect.
- Safeguarding children and young people policy – This policy has been produced to promote the wellbeing and safeguarding of children by ensuring all employees involved in the service delivery work to promote wellbeing are aware of the action to take if they suspect that a child is in need of safeguarding.
- Procurement policy – This policy sets out the responsibility of managers during the course of procurement activities.

Effective action taken to address modern slavery and trafficking

Work continues to manage the number of suppliers and enhance policy controls in the supply chain. We have taken active steps to ensure that the management of our supply chains adhere to the Modern Slavery Act 2015 by establishing effective controls to ensure that our supply chain remains vigilant.

Approval

This statement has been signed by the Chief Executive of Turning Point Lord Victor Adebowale on behalf of the Boards of Directors within the Group.

