

TURNING POINT & TURNING POINT (SERVICES) LTD MODERN SLAVERY STATEMENT 2019/20



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 & Turning Point (Services) Ltd (the “Group”) during the year ending 31 March 2020 to prevent modern slavery and human trafficking in its business and supply chain.

Introduction

We recognise that slavery, servitude, forced labour and human trafficking (Modern Slavery) is a serious crime being committed across the UK in which victims are exploited for someone else’s gain.

In England and Wales, 5,144 modern slavery offences were recorded by the Police in the year ending March 2019 (ONS, 2020) an increase of 51% from the previous year.

Modern slavery can affect anyone in society, with victims being exploited in a number of ways. For example: 23% of the 6,985 potential victims referred through the National Referral Mechanism (NRM) in the year ending December 2018 were UK nationals.

We are committed to ensuring that there is a zero-tolerance approach to Modern Slavery of any kind within our operations and supply chain.

Therefore, our combined Modern Slavery Statement seeks to expand and develop on our continuing commitment to tackle Modern Slavery.

Our structure and supply chain

Turning Point (Company Number: 00793558) is the parent company and Turning Point (Services) Limited (Company Number: 02166697) is a wholly owned subsidiary company. The companies share the same supply chain.

The registered office for both companies is Standon House, 21 Mansell Street, London, E1 8AA.

Our services

During the last year we supported 112,795 people from 307 locations across England as follows:

- 59,393 in our drug and alcohol services;
- 45,590 in our mental health services;
- 2,593 in our healthy lifestyles services;
- 2,639 in our sexual health services;
- 1,593 in our employment services; and
- 987 in our learning disability services.

This was achieved through the efforts of 4,748 staff, 210 peer mentors and 93 volunteers.

The Group has an annual turnover of £128m and a broad range of carefully approved suppliers.

Our policies to address modern slavery

We have developed new policies, and revised existing policies, applicable across the Group, to specifically address modern slavery and employee responsibilities.

These include:

- Procurement policy;
- Incident Management Policy;
- Agency Workers Policy;
- Raising concerns at work (whistleblowing) policy;
- Equality, Diversity and Human Rights Policy;
- Customer Feedback policy;
- Recruitment & selection policy;
- Code of Conduct;
- Training Policy;
- Safeguarding children and young people policy; and
- Safeguarding adults' policy.

Our due diligence

We use an online Supplier Registration Form ("SRF") to facilitate due diligence checks on all suppliers irrespective of value or commodity area.

As part of the on-boarding and contracting process, all of our suppliers are required to confirm that they meet all legal obligations specified under the:

- Equality Act 2010;
- Human Rights Act 1998;
- Modern Slavery Act 2015; and
- Prevention of Less Favourable Treatment (Part-time Workers) Regulations 2000.

The sub-contracting of third parties is permitted only with our formal consent.

Further to contract safeguards, people engaged via employment agencies are subject to further checks upon arrival and induction at services via Fit and Proper Persons Employed checks, required by the Health and Social Care Act 2012 ("HSCA") which provide additional safeguards against the risk of modern slavery. Employees also have supervision and access to confidential health and wellbeing support.

Risk assessment and management

Victims of modern slavery are often hidden; however, we conduct person-centred, individual, risk assessments to inform the support and clinical treatment delivered to all who use our services.

Where appropriate to do so, the risk assessment includes safeguarding (including modern slavery) risk management plans and liaison with other agencies.

Our supply chain areas most at risk from Modern Slavery are assessed to be:

- providers of agency staff;
- building contractors; and
- cleaning contractors.

Our risk management approach for our supply chain utilises our supplier due diligence checks and contract management. For our employees and the people who use our services, we also risk assess and manage risk by the application of our policies and procedures, combined with incident reporting, raising concerns and safeguarding processes.

Effective action taken

There were no reported incidents, or concerns raised during the year regarding our suppliers and supply chain. There were no reported safeguarding cases of modern slavery or human trafficking.

We worked with the Police and other agencies with two reported cases where a history of modern slavery was a factor.

Training on modern slavery

We operate a HSCA and Care Quality Commission ("CQC") guidance compliant Training Policy in conjunction with the Care Certificate, Level 5 Diploma and professional qualifications.

Our staff and managers are trained to identify and act upon the signs or reports of modern slavery and have a clear responsibility to report incidents and concerns. Information on how to raise concerns, or whistleblowing, is displayed prominently in every service location.

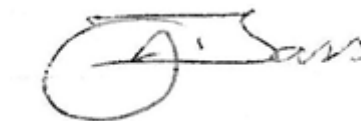
Frontline staff undertakes initial induction e-learning for safeguarding adults and children, (which includes specific reference to modern slavery) as part of the Support Worker Foundation. They also complete the Care Certificate, which also includes Modern Slavery as part of the Care Certificate Standards.

Furthermore, face-to-face support worker and manager safeguarding training include specific case studies on modern slavery.

Our supply chain is managed by a professionally trained and accredited Procurement Manager who completes regular ongoing training, including Ethical Procurement and Supply ("CIPS").

Approval

This statement is made pursuant to the requirements of the Modern Slavery Act 2015 and has been signed on behalf of the Group by Julie Bass, Chief Executive of Turning Point.

A handwritten signature in black ink, appearing to read 'Julie Bass', is written over a faint, light-colored rectangular stamp or watermark.