

TURNING POINT & TURNING POINT (SERVICES) LIMITED MODERN SLAVERY STATEMENT 2022/23



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 Turning Point & Turning Point (Services) Limited (the “Group”) during the year ending 31 March 2023 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.

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

Our organisation and structure

Turning Point is a registered charity (no. 234887) and a company limited by guarantee (company no. 00793558) as well as the parent company of Turning Point (Services) Limited (company no. 02166697), a private company limited by shares. Together they form the Group and share the same supply chain. We provide a wide range of health and wellbeing services across England.

The registered office for both companies is 2 America Square, London, EC3N 2LU.

Our services

The Group provides the following services:

- Drug and alcohol services;
- Mental health services;
- Learning disability services;
- Healthy lifestyles services;
- Sexual health services; and
- Employment services.

Further details can be found in our annual report and accounts available on the Group website.

Our supply chain

Our supply chain includes clinicals supplies, utilities, IT, consumables, pharmaceuticals, marketing, support services, consulting and professional services.

We procure our goods and services from a rigorously selected group of predominately domestic suppliers. A number of factors are taken into consideration when evaluating a supplier, including and not limited to; social value, the environment and achieving best value.

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:

- Establishment Management policy (incorporating Agency workers);
- Code of Conduct;
- Customer Feedback policy;
- Diversity, Equity, and Inclusion policy;
- Incident Management policy;
- Procurement policy;
- Raising concerns at work (whistleblowing) policy;
- Recruitment & selection policy;
- Safeguarding adults policy;
- Safeguarding children and young people policy; and
- Training Policy.

Our due diligence

We believe the risk of slavery within our own business is low due to the nature of services we offer, however we undertake appropriate due diligence and have effective controls in place. 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.

Raising concerns

We have number of channels through which individuals can raise concerns including our “Speak Up” communications channel which creates a safe environment for staff to raise workplace concerns including those relating to modern slavery.

Training on modern slavery

We operate to the 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.

Looking ahead and next steps

We have followed relevant regulatory developments to inform our approach to modern slavery and human trafficking.

In 2023, we will:

- Continue to review our approach to modern slavery and human trafficking and raise awareness of the Act across the Organisation.
- Continue to provide training to all staff members and educate them of appropriate action to take if they suspect an instance of slavery and human trafficking.
- Ensure our whistleblowing processes remains effective and fit for purpose. We encourage all staff members working with us to report concerns about suspected wrongdoing at work via our internal reporting mechanism.

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 on 9 May 2023.

