Slavery & Human Trafficking Statement
Turning Point Scotland 2025

Introduction

This statement sets out Turning Point Scotland's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2025 to 31 March 2026.

As part of the social care sector, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its activities, and to ensuring that its supply chains are free from slavery and human trafficking.

This statement has been approved by the organisation's Executive Team and Trustees who will review and update it annually, in compliance with the Modern Slavery Act 2015.

Organisational structure and supply chains

This statement covers the activities of Turning Point Scotland:

Turning Point Scotland specialises in supporting people facing the most complex and challenging situations. Our 'people centred' ethos places the people we support first in our thinking and ensures that our staff convert their passion into great services. Turning Point Scotland delivers improvement in Scotland's social care sector through high quality services, leadership and innovation.

The organisation currently operates in Scotland only.

Turning Point Scotland is committed to ensuring that there is no modern slavery or human trafficking in any part of our business. We act ethically and with integrity in all our business relationships and in our relationships with our own employees. We apply consistent and appropriate recruitment and selection activities, and take steps to comply with all legal requirements, ensuring fairness, equality and consistency.

Due Diligence

The organisation undertakes due diligence when considering taking on new suppliers which includes specific reference to the prohibition of any practices that breach the Modern Slavery Act 2015, and we expect that anyone in our supply chain will hold their own suppliers to the same high standards. The organisation's due diligence and controls include:

- An organisational Risk Register
- he organisation, in the main, uses large, recognised, reputable suppliers who are open and transparent about their own recruitment and employee standards and behaviours
- conducting supplier audits or assessments which focus on the recruitment practices and statutory responsibilities for pay and benefits the supplier organisation undertakes
- taking steps to improve substandard suppliers' practices, including providing advice and guidance to suppliers where required
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policies:** The Head of HR has responsibility for ensuring HR practices regarding recruitment and selection are adhered to and remain valid. Updating is carried out in light of changing employment and eligibility to work legislations as and when required. The Director of Finance and Resources has responsibility for ensuring Procurement policies and procedures are adhered to and remain valid to ensure contractors are used appropriately and in line with procedures.
- **Investigations/due diligence:** Where there is a suspected incidence of slavery or human trafficking, this will be investigated by the Head of HR.
- **Training:** HR provides training to managers involved in decision making both at recruitment stage and after recruitment which includes the principles of fairness, reasonableness and equality as well as the legal requirements in identity checking with regards to eligibility to work in the UK.

Relevant Policies

The organisation operates the following policies that support its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing policy:** The organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The

organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation.

- **Code of conduct:** The organisation's contract of employment and the SSSC Code of Practice for Social Service Workers makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when working with other organisations and individuals in the course of its operations.
- **Recruitment and Selection policy:** Turning Point Scotland is an equal opportunities employer and is committed to applying fair, effective and professional recruitment and selection methods across the organisation. In line with Turning Point Scotland's Citizenship based approach and the Equality Act 2010, all applicants will be considered solely on their ability to do the job against unbiased selection criteria and not on the basis of their age, disability, gender, gender reassignment, marriage and civil partnership, ethnic group, religion and belief, and/or sexual orientation. The Policy contains guidance which will ensure compliance with relevant employment legislation with regards to checking eligibility to work in the UK and obtaining required background checks.
- **Supplier/Procurement code of conduct:** The organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Where applicable, suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. As part of our tender process suppliers are asked to confirm that they understand and comply with the Modern Slavery Act 2015.
- **Agency workers:** The organisation uses only vetted, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency. This includes verification of right to live and work in the UK, references from other organisations, confirmation of training standards and work experience. Failure to confirm the basic verification checks will result in an agency not being permitted to provide staff.