

# Centrepoint - Modern Slavery Statement

- 1.1 In accordance with Section 54 (1) of the Modern Slavery Act 2015, Centrepoint makes the following statement for the financial year 2024-25.
- 1.2 Centrepoint recognises all forms of Modern Slavery and Human Trafficking including, but not limited to, servitude, is a crime and a violation of fundamental human rights.
- 1.3 Our commitment starts with an unequivocal intolerance of all forms of modern slavery and human trafficking. We are committed to acting ethically, with integrity and using all reasonable endeavours to take appropriate action within our direct operations and supply chains of influence to ensure modern slavery and human trafficking is not taking place. Centrepoint recognises that we have a responsibility to raise awareness of modern slavery and human trafficking by researching, educating and engaging staff and young people on this issue.

## 2. Our organisation

- 2.1 At Centrepoint, we pride ourselves on our record of excellence as the UK's leading youth homelessness charity. More than 500 staff work for Centrepoint across the country, supporting homeless young people into a home and a job every day. Our staff includes front line workers based in our hostels, counsellors and health supporters. Centrepoint provides housing and support for young people regionally in London, Manchester, Yorkshire and the North East and through partnerships all over the UK. We aim to give homeless young people the support they need by developing their skills in employment and to help them secure a home for a better future and together working towards ending youth homelessness.
- 2.2 We are also led by a Board of Trustees, which holds us to account, and is supported by a wonderful Patron and group of dedicated ambassadors. We also report to the Audit and Risk Committee (ARC) who regulate us to ensure overall safe, legal and good practice.

### 2.3 Centrepoint supply chain

- 2.4 At Centrepoint, we use a wide range of suppliers who support and provide services and works which are necessary for our daily operation. The support or services provided by suppliers can include teaching and training, accommodation services, cleaning services, IT & CCTV equipment, construction facilities maintenance services, travel, furniture and recruitment services. Our supply chain is varied and includes SME's and multi-national corporations, therefore, we are committed to ensuring that our suppliers share our high standards by ensuring there is no slavery or human trafficking in our supply chain. Centrepoint recognises that modern slavery and human trafficking can occur anywhere within its supply chain, therefore we have taken the necessary steps to ensure all our suppliers are compliant with the annual reporting requirements contained within Section 54 of the Modern Slavery Act.

## 3. Policies in relation to Modern Slavery and Human Trafficking.

- 3.1 Centrepoint have several policies and procedures in place in order to minimise the risk of modern slavery taking place within our organisation, to our staff and the young

people we work with and support, our supply chain and supplier relationships, particularly:

- Modern Slavery Policy;
- Overarching Ethical Policy;
- Recruitment Policy;
- Procurement Policy;
- Whistleblowing Policy;
- Code of Conduct Policy.

#### **4. Modern Slavery Statement 21-22**

4.1 Centrepont as a charity and registered housing provider acknowledges our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place within our organisation or within our supply chain.

4.2 Centrepont will never knowingly work with any organisation involved in, or connected to, modern slavery, human trafficking or child labour. Additionally, we recognise that we do not regulate the conduct of individuals and organisations in our supply chains. Therefore, we have developed a robust system to underpin our compliance with practical measures. We follow five steps to ethical and sustainable procurement, which includes:

- Conducting risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery, so that efforts can be made to focus on those areas.
- Updating the Corporate Risk Map to reflect any risks in this area, together with our controls for dealing with those risks.
- Supplier pre-screening, as part of our procurement and tender process to convey to potential suppliers our Modern Slavery Policy and to gain an understanding of the measures they take to ensure modern slavery is not occurring in their businesses and their supply chain (use of **CP1 SD1** and **CP1 SD3**).
- Introducing a Supplier Conduct Principles Agreement into the contractual provisions for our suppliers. This will confirm they will follow this policy and will accept our right to audit their activities and relationships (where practicable), both routinely and at times of reasonable suspicion.
- Continuing engagement with our suppliers, to monitor the measures they take to ensure modern slavery is not occurring in their businesses and their supply chain.

#### **4.3 Risk management**

4.4 Centrepont believe that the risk of for modern slavery and human trafficking taking place within Centrepont is low. Our country of operation is the UK.

4.5 The risk appetite for Modern Slavery or human trafficking is **zero tolerance** in terms of a potential risk affecting one of our Young People. If we believe there is any risk of Modern Slavery or human trafficking for any one of our Young People, we will report it immediately, both internally, and to the Local Authority Designated Officer (LADO) within the respective local authority as an urgent safeguarding concern. It may well be appropriate to call emergency services if there is an immediate risk.

- 4.6 We are actively working to identify and mitigate the risk of modern slavery within our supply chain. This includes but is not limited to:
- Continued commitment to reviewing our Procurement Policy;
  - Renewing our ISO 27001 accreditation and other accreditation;
  - Discussing Modern Slavery and Human Trafficking at our Risk Forum;
  - Communicating the Indicators of forced labour to all staff via our internal compliance bulletin.

## 5. Due Diligence

During the last year, we have continued to monitor all of suppliers in our supply chain. Our main focus is to continue to ensure that we have policies in place as well as due diligence procedures for our supplies as well as adequate support for our staff.

Additionally;

- We also ensure that modern slavery is part of the mandatory training for managers so they are equipped with the knowledge and skills to offer support to their staff,
- We also ensure that Modern Slavery and human Trafficking training is available to all staff,
- We ensure that staff are aware of how to report concerns and are also encouraged to raise any concerns about suspected modern slavery,
- We continue to ensure that our safeguarding policies, procedures and training are updated to acknowledge modern slavery and human trafficking as area of risk. We recognise that child modern slavery is child abuse,
- We offer support to staff, recognising that former victims, young people, women, homeless people, those with dependencies on drug or alcohol are disproportionately more likely to be victims of Modern Slavery,
- We recognise that potential victims may be reluctant to disclose their information and or may not recognise themselves as having been trafficked or enslaved,
- We also ensure that pre-employment checks are in place,
- We ensure that a robust procurement process is in place to ensure that all suppliers adhere to our policies and procedures,
- We continue to ensure that all staff and volunteers read our Code of Conduct Policy by monitoring staff engagement, by developing and maintaining our core policies and procedures as well as mandatory training modules.

## 6. Future plans

- 6.1 Centrepont will cascade this statement to staff, locum, volunteers, trustees and suppliers on an annual basis, in order to raise awareness of the modern Slavery Act 2015 and what action to take should concerns arise.
- 6.2 Centrepont will regularly monitor this statement and make any changes, where and when appropriate.

## 7. Approval

- 7.1 This Modern Slavery Statement will be approved by the Board of Directors of Centrepont, who have responsibility for ensuring its implementation.