



Look Ahead Care, Support and Housing: Anti-Slavery and Human Trafficking Statement

Introduction

Look Ahead is committed to:

- Undertaking and promoting ethical practices and policies to prevent modern slavery and human trafficking (Modern Slavery);
- Ensuring its personnel and assets are not involved or exploited for the benefit of those involved in such activities; and
- Providing a full statement as required under the transparency provisions of the Modern Slavery Act 2015.

The Modern Slavery Act requires that organisations take steps to address modern slavery and human trafficking in their businesses and supply chains. As Look Ahead has a turnover of over £36.0 million, we are publishing this statement setting out what we have done to recognise and prevent potential incidences of modern slavery.

Organisational Structure

Look Ahead is a charitable housing association registered under the Co-operative and Community Benefit Societies Act 2014: No. 21004R and also registered with the Homes and Communities Agency: No LH0013.

Look Ahead has a trading subsidiary, Look Ahead Developments Ltd (LADL) which undertakes design and build, and major refurbishment and renovation contracts on its behalf. LADL is registered with Companies House.

Look Ahead is regulated by the social housing regulator, the Homes and Communities Agency (HCA). The HCA sets regulatory standards that registered providers are expected to meet and it regularly monitors compliance against a number of governance and economic standards. Our Board has adopted, and regularly monitors, the organisation's compliance with, the National Housing Federation's Excellence in Governance Code.



Look Ahead has a number of services, which are registered with the Care Quality Commission (CQC), the regulator of health and social care services, and complies with CQC's essential standards of quality and safety.

Look Ahead's mission is to work with people to make choices, achieve goals and take control of their lives through high quality care, support and housing. This is in line with our values of: Excellence; Aspiration; Partnership and Trust.

Policies on slavery and modern trafficking

All Look Ahead policies are reviewed and signed off by senior managers on behalf of the Executive Team where appropriate under a delegated authority from the Board of Management. All policies are reviewed on a rolling basis in response to longevity, audit, statutory or regulatory change and customer and partner feedback.

Look Ahead's response to the Modern Slavery Act has been encompassed in our Safeguarding policy and procedure which identifies modern slavery as a type or pattern of behaviour which constitutes abuse. Additional information on the Modern Slavery Act has also been published and made available to all employees as part of the safeguarding information page of the Look Ahead Hub (intranet).

The most vulnerable groups in the UK include migrant workers, illegal migrants, asylum seekers and individuals such as homeless people and people suffering from learning difficulties. We are working on identifying how modern slavery and human trafficking may affect our customers, our business and our supply chains. This involves educating staff about potential risks and capturing best practice in policies and procedures.

Procurement

Our procurement processes are designed to ensure that we operate in a legal, ethical and inclusive manner whilst achieving best value for money. This includes enabling our procurement activity to generate social and environmental, as well as commercial benefits. During 2018/19 we will be further strengthening our procurement processes to ensure our suppliers



and contractors must confirm their compliance with the Modern Slavery Act 2015.

All new supply contracts are subject to rigorous risk assessments as part of the risk management process overseen by our internal risk panel. All risks, controls and assurances are signed off by our Board of Management on an annual basis.

Safeguarding

The Safeguarding policy and procedure requires all Look Ahead employees to complete mandatory safeguarding training which covers aspects including modern slavery and human trafficking. This is also covered within our safeguarding information leaflet communicated to all customers and employees.

Code of Conduct and Whistleblowing

All Look Ahead's policies emphasise our commitment to dignity at work and fair treatment of all colleagues. We have reviewed our Raising Concerns and Whistleblowing policy and procedure and Code of Conduct to ensure they are compliant with the Modern Slavery Act 2015.

Recruitment

We have reviewed our Recruitment and Selection policy and procedure to ensure it contains all relevant requirements in relation to eligibility to work in the UK, as well as carrying out of necessary checks such as DBS (Disclosure and Barring Service).

Investigations/due diligence

Individual Directors or Senior Managers with assistance from our Safeguarding and Serious Incidents Group are responsible for investigating any suspected instances of modern slavery and human trafficking. This is in



line with our standardised response to any reports of safeguarding or serious incident.

Training

A briefing about modern slavery and human trafficking is available for all staff on the Look Ahead Hub (intranet). This provides background information and advice about how to raise a concern if they suspect slavery, human trafficking, forced labour or domestic servitude are taking place. Modern slavery is incorporated into our safeguarding e-learning; safeguarding training; staff induction and manager's induction.

Supply Chains

The Modern Slavery Act requires that organisations take steps to address modern slavery and human trafficking in their businesses and supply chains. Look Ahead's supply chains are drawn mainly from the property maintenance and services sector as well as the adult social care market. Look Ahead operates in London and the South East and has an annual turnover of £55.0 million. Look Ahead has assessed the risks of modern slavery and human trafficking associated with these sectors as follows:

- **High risk activities:** Look Ahead does not believe there to be any high risk operations within the work of the organisation and its supply chain with regards to modern slavery and human trafficking.
- **Medium risk activities:** Supply chains linked to the property maintenance and services as a result of the organisations' reliance upon external contractors to undertake a high percentage of the organisations maintenance work.
- **Low risk activities:** Supply chains in the provision of agency staff predominantly in adult social care.

Effectiveness



The Board, Executive Directors and Senior Management have not been made aware of any issues of Modern Slavery within our business or supply chains. Look Ahead believe the policies and due diligence procedures in place should be sufficient to prevent or enable early identification of matters which may be of concern.

Look Ahead will continue to provide training to relevant staff to ensure that they understand the potential risks of Modern Slavery in delivering our services and managing our supply chain.

This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes Look Ahead's slavery and human trafficking statement for the financial year ending 31st March 2019. This statement has been approved by the Board of Look Ahead who will review and update it annually.