

Look Ahead Care, Support and Housing: Anti-Slavery and Human Trafficking Statement
For the Year End March 2025

1. Introduction

Look Ahead is committed to:

1. Undertaking and promoting ethical practices and policies to prevent modern slavery and human trafficking (Modern Slavery);
2. Ensuring its personnel and assets are not involved or exploited for the benefit of those involved in such activities; and
3. 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 £60 million, we are publishing this statement setting out what we have done to recognise and prevent potential incidents of modern slavery.

2. 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 four trading subsidiaries: Look Ahead Developments Ltd (LADL), which undertakes design and build, and major refurbishment and renovation contracts on its behalf; Larch Residential Services Ltd which manages private rented lettings; Blythson Limited, an entity to facilitate development, and Kingswood Care Services Ltd, a care provider. All four are registered at Companies House.

Look Ahead is regulated by the social housing regulator, the Regulator of Social Housing (RSH). RSH 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 2020.

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. Service providing supported living accommodation for 16 to 18 year olds are also registered with Ofsted.

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:

- We are caring and compassionate.
- We are inclusive and trusted.
- We focus on excellence and innovation.
- We work in partnership and are one-team

3. Policies concerning slavery and modern trafficking.

All Look Ahead policies are reviewed and signed off by senior managers on behalf of the Senior Leadership Team where appropriate under a delegated authority from the Board of Management, unless particular policies require Board approval. 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 behavior 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 continue to work 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 practices 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 2024/25 we began work on strengthening our procurement processes to ensure that our suppliers are compliant with their obligations under the Act. This work has not yet concluded and will continue into 2025/26.

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. We include provisions in agreements with our contractors which require them to ensure that they and their supply chains comply with the Modern Slavery Act 2015

Safeguarding

The Safeguarding policy and procedure require all Look Ahead employees and Board members to complete mandatory safeguarding training on an annual basis, 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 of 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 concerning eligibility to work in the UK, as well as carrying out of necessary checks such

as DBS (Disclosure and Barring Service). We are committed to paying all Look Ahead employees either the London Living Wage or UK Living Wage Foundation rates as a minimum for their basic salary.

4. Investigations/due diligence

Individual Directors or Senior Managers, with assistance from our Safeguarding Panel, 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 incidents.

5. Training

All staff and Board members are required to complete an e-learning module on modern slavery and human trafficking, which is part of the Safeguarding module. A briefing on modern slavery and human trafficking is also 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 also incorporated into our safeguarding e-learning, safeguarding training, staff induction and manager's induction.

6. 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 Southeast and has an annual turnover of £70 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 organisation's reliance upon external contractors to undertake a high percentage of the organisation's maintenance work.
- **Low-risk activities:** Supply chains in the provision of agency staff, predominantly in adult social care.

7. Effectiveness

The Board, Senior Leadership Team 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. We use Key Performance Indicators to measure how effective we have been in ensuring that slavery and human trafficking is not taking place in our business or supply chains, monitoring the e-learning staff undertake, and these KPIs are reported to the Board of Look Ahead regularly.

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 2025. This statement has been approved by the Board of Look Ahead, which will review and update it annually.

Signed



Mary Watkins
Chair

Signed



Chris Hampson
Chief Executive Officer