

**DRAFT – SUBJECT TO BOARD APPROVAL**

**Look Ahead Care, Support and Housing: Anti-Slavery and Human Trafficking Statement**  
**For the Year End March 2026**

**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.

Section 54 of the Modern Slavery Act 2015 requires organisations carrying on business in the UK, supplying goods or services and having an annual turnover of £36 million or more to publish an annual slavery and human trafficking statement. Look Ahead meets these criteria and is therefore publishing this statement setting out the steps taken during the financial year ended 31 March 2026 to identify, assess and address the risks of modern slavery within its own operations and supply chains.

**2. Organisational Structure**

Look Ahead is a charitable registered society incorporated under the Co-operative and Community Benefit Societies Act 2014: No. 21004R and is a registered provider of social housing registered with the Homes and Communities Agency registered with the Regulator of Social Housing: No. LH0013.

Look Ahead has four wholly owned trading subsidiaries: Look Ahead Developments Limited, which undertakes design and build and major refurbishment and renovation work; Larch Residential Services Limited, which manages private rented accommodation; Blythson Limited Proactive Development (Blythson) Limited, which provides care and support services; and Kingswood Care Services Limited, a care provider. All four subsidiaries are registered at Companies House.

Look Ahead is regulated by the Regulator of Social Housing (RSH), which sets the regulatory standards registered providers are required to meet and monitors compliance with its economic and consumer standards. During 2025/26, the Board has adopted, and regularly monitors, the organisation's compliance with, the National Housing Federation's Excellence in Governance Code 2020 adopted the National Housing Federation Code of Governance 2020 and considered Look Ahead's compliance with the Code.

Look Ahead has a number of services registered with the Care Quality Commission (CQC), the regulator of health and adult social care services in England, and is required to comply with the CQC's essential standards of quality and safety Fundamental Standards. Service providing Services providing supported accommodation for 16- and 17-year-olds are also registered with and regulated by 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 modern slavery and human 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 2025/26 we continued work to strengthen our procurement processes and the assurance obtained regarding suppliers' compliance with the Modern Slavery Act 2015. Further work identified during the year will continue in 2026/27.

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**

During 2025/26, the Board, Senior Leadership Team and senior management were not made aware of any confirmed instances of modern slavery within Look Ahead's own operations or supply chains. This does not mean that no risk exists, and Look Ahead remains committed to strengthening its arrangements for identifying and responding to potential indicators.

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 considers that its policies, safeguarding arrangements, recruitment controls and procurement processes provide a framework for

preventing and identifying concerns, while recognising that these arrangements require continuing review and development.

We assess effectiveness through relevant measures including completion of mandatory safeguarding training; the number and nature of modern slavery concerns raised; action taken in response to any concerns; and progress in strengthening procurement and supplier due-diligence controls. Relevant information is reported through Look Ahead's established executive, safeguarding and governance arrangements.

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**