Look Ahead Care and Support Limited
Modern Slavery and Human Trafficking Statement

For the financial year ended 31 March 2026
Approved by the Board approval on 5 November 2026

1. Introduction

Look Ahead is committed to:

1. Undertaking and promoting ethical practices to prevent slavery, servitude, forced or compulsory labour and human trafficking (modern slavery);
2. Protecting people from exploitation in our operations and supply chains; and
3. Reporting transparently on the steps taken and areas requiring further improvement.

What is the Modern Slavery Act 2015?

The Modern Slavery Act 2015 is a UK law that consolidates offences on slavery, servitude, forced labour, and human trafficking, introduces tougher penalties including life sentences, creates an Independent Anti-Slavery Commissioner, and requires large businesses to publish annual modern slavery statements.

Section 54 of the Modern Slavery Act 2015 requires qualifying commercial organisations supplying goods or services in the UK with total annual turnover of at least £36 million to publish an annual slavery and human trafficking statement. Look Ahead meets these criteria and must therefore publish a statement. This statement outlines the steps taken during the year ended 31 March 2026, with proposed priorities for 2026/27 set out separately in the final section.

2. Organisational Structure

Look Ahead Care and Support Limited (Look Ahead or LACS) is a charitable registered society under the Co-operative and Community Benefit Societies Act 2014, registration number 21004R, and a registered provider of social housing regulated by the Regulator of Social Housing (RSH), registration number LH0013.

Look Ahead has four wholly owned 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 (trading as Proactive Development), which provides care and support services; and Kingswood Care Services Limited, a care provider. These subsidiaries are registered at Companies House. This statement covers Look Ahead and these subsidiaries, including their operations and supply chains.

Look Ahead is regulated by the Regulator of Social Housing, which monitors compliance with its economic and consumer standards. The Board has adopted the National Housing Federation Code of Governance 2020 (Code) and considered Look Ahead's compliance with the Code during 2025/26.

Look Ahead operates services registered with the Care Quality Commission (CQC) and subject to its Fundamental Standards. Services providing supported accommodation for 16- and 17-year-olds are 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

Policies are approved through the routes set out in Look Ahead's policy approval framework and Scheme of Delegated Authority, including Board or committee approval where required. Policies are reviewed periodically and in response to audit findings, legal and regulatory changes, and customer and partner feedback.

Our Safeguarding policy and procedure identify modern slavery as a form of abuse. Information on recognising and reporting concerns is also available to employees on the Look Ahead Hub, our intranet.

Anyone can experience modern slavery. Vulnerability can increase where people face homelessness, disability, insecure immigration status, language barriers, debt or dependence on others for work, accommodation or care. We seek to understand these risks for our customers, workforce and supply chains, and to reflect learning in staff training and our 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.

Supplier and contract risks are considered through the procurement and risk management processes, with referral to the Risk Panel where required by its remit and delegated authority. The Board oversees the organisation's risk and internal control arrangements. Contractor agreements include requirements to comply with applicable modern slavery law. These clauses support, but do not replace, due diligence and monitoring.

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

Our Code of Conduct and Raising Concerns and Whistleblowing policy provide routes for employees to raise concerns about wrongdoing, including suspected modern slavery. Concerns are handled sensitively, with protection against retaliation and confidentiality so far as possible, subject to safeguarding and legal requirements.

Recruitment

Our Recruitment and Selection policy and procedure address right-to-work requirements and role-appropriate checks, including Disclosure and Barring Service checks where eligible and required. These checks do not by themselves establish that a worker is free from exploitation. We are committed to paying directly employed staff at least the applicable voluntary Living Wage Foundation rate for their basic salary, while also meeting statutory National Minimum Wage and National Living Wage requirements.

4. Responding to concerns and safeguarding

Directors and senior managers, supported by the Safeguarding Panel, coordinate the response to suspected modern slavery under our safeguarding and serious incident procedures. Immediate safety and support take priority; internal enquiries must not delay safeguarding referrals or prejudice a police investigation. Staff should contact the police on 999 where there is immediate danger. Concerns should otherwise be raised promptly through our safeguarding or whistleblowing routes. Where a National Referral Mechanism referral is appropriate, we will work with a designated first responder organisation. Adult referrals normally require informed consent; children do not need to consent, and concerns must be escalated to children's safeguarding services. Information is shared lawfully and only as necessary.

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 (the Hub). 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

Look Ahead operates in London and the Southeast. Its supply chains include property development, maintenance and other contracted services, and agency staffing for care and support. The risks below identify areas for attention; they do not establish that exploitation has occurred or that any sector is free from risk.

- **Property development and maintenance**: subcontracting, labour supply arrangements and limited visibility beyond the main contractor can increase exposure to exploitation. Controls and due diligence should be proportionate to the supplier and activity, rather than contract value alone.

- **Agency staffing and care services:** reliance on recruitment intermediaries, recruitment fees or debt, and dependence on work or accommodation can create exploitation risks. Agency workers should not be treated as inherently low risk simply because they work in a regulated care service.
- **Other purchased goods and services:** the 2026/27 review will consider whether categories such as cleaning, security, catering, uniforms and equipment create additional exposure through labour arrangements or sourcing. Supplier-specific risk ratings and any limitations in supply chain visibility will be documented.

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.

Our policies, safeguarding arrangements, recruitment controls and procurement processes provide a framework for preventing and identifying concerns. Their existence does not, by itself, demonstrate effectiveness, and we recognise the need for continuing review and improvement.

We assess effectiveness through completion of mandatory safeguarding training, the number and nature of concerns raised and the action taken, and progress in strengthening supplier due diligence. Relevant information is reported through executive, safeguarding and governance arrangements. During 2025/26, safeguarding training completion was monitored through the organisation's mandatory learning programme, including for Board members and employees. No modern slavery or human trafficking concerns were recorded through HR or safeguarding reporting arrangements during the reporting period As part of our supplier assurance arrangements, recruitment agencies are required to provide evidence of their compliance with the Modern Slavery Act before being added to approved supplier arrangements. Whilst the absence of reported concerns does not in itself demonstrate effectiveness, these measures provide assurance regarding awareness, reporting routes and preventative controls.

Priorities for 2026/27

We will continue to strengthen and document supplier risk assessment and due diligence, prioritising property contractors and agency staffing. This will include reviewing recruitment fees, pay and labour supply arrangements, subcontractor visibility and contractual reporting requirements. We will clarify routes for workers and customers to report concerns safely, provide targeted training for procurement and recruitment staff, and report progress and any significant gaps through our existing governance arrangements. Where exploitation is identified, the response will prioritise the safety and support of affected people, appropriate referrals and corrective action; contractual action will take account of the risk of further harm.

We will review relevant changes to labour enforcement and procurement requirements as they take effect, including the Fair Work Agency established in April 2026 and further implementation of the Employment Rights Act 2025. We will also monitor proposed changes to modern slavery reporting and update our arrangements when requirements are enacted and commenced.

Approval and publication

This statement is made under section 54(1) of the Modern Slavery Act 2015 for the financial year ended 31 March 2026.

Approved by the Board of Look Ahead Care and Support Limited on 5 November 2026 and signed on its behalf by Liz Butler, Chair and Board member. .

Following approval and signature, the statement will be published promptly on Look Ahead's website with a prominent homepage link. We also intend to submit it to the government's modern slavery statement registry. A new statement will be approved and published for each year.

Signed on behalf of the Board:



Elizabeth Butler

Chair and Board member

Date: 06 November 2026