

ABBNEYFIELD LIVING SOCIETY

ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT 2025

We are committed to improving our practices to combat slavery and human trafficking.

Organisation's structure

We are a provider of sheltered housing, residential care homes and care at home services for older people. We have over 700 (full time equivalent) employees and operate within the United Kingdom. We meet the requirements in section 54 of the Modern Slavery Act 2015 for large commercial organisations who should publish an annual statement.

Our business

Our business is organised into Housing and Care.

Our supply chains

Our supply chains include food, consumables, utilities, and agency workers. We also sub-contract labour through the acquisition of services relating to property construction and ongoing maintenance and repair.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy (which can be found on our website) reflects our commitment to acting ethically and with integrity in all our business relationships and to identifying areas of risk and working with our suppliers to eliminate modern slavery from our supply chains. The policy is regularly reviewed and updated.

As set out in our Whistleblowing Policy, we encourage all our workers to report any concerns related to the direct activities of our organisation, or our supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to ensure that workers can raise concerns with Abbeyfield management without fear of victimisation, subsequent discrimination, disadvantage or dismissal. It is also intended to encourage and enable workers to raise serious concerns within Abbeyfield in the knowledge that those concerns will be taken seriously and investigated appropriately. In addition to the internal routes for raising a concern, the whistleblower may seek advice from Protect, an independent charity offering confidential advice and support to anyone concerned about wrongdoing or malpractice at work and are unsure whether or how to raise it.

We also have safeguarding policies and procedures which specifically highlight Modern Slavery as a type of abuse and provide guidance on what to do to raise a concern about this. These policies and procedures are reviewed annually and approved by the Board.

Our Agency Workers Policy states that there must be a written contract in place between Abbeyfield and the agency before agency workers may be hired. The contract must be signed by a director who has the appropriate delegated authority to sign the contract. In care services, only

agencies registered with CQC are used. The contract with the agency must include confirmation that all agency workers have been recruited in accordance with prevailing employment legislation and specifically that for all workers the following have been obtained:

- Proof of their identity, with a recent photograph
- Evidence of their right to work in the UK
- References, from previous and/or their most recent employer
- a full employment history to include reasons for leaving employment, with a satisfactory explanation of any gaps
- a satisfactory enhanced Disclosure and Barring Service (DBS) check within the last three years.
- documentary evidence of any relevant training and qualifications
- confirmation of their physical and mental fitness to perform the duties required.

We have introduced a new agency vendor to reduce the number of agencies we engage with and provide greater oversight. The vendor ensures all agencies on its approved list have been through a stringent audit process.

Induction of agency workers includes an explanation of key policies including whistleblowing and safeguarding policies.

Due diligence processes for slavery and human trafficking

As part of our initiative to identify and mitigate risk we also have in place systems to:

- Review central government guidance on occupations most at risk.
- Analyse our supply chains to identify areas of high risk.
- Ensure that all potential and existing suppliers are aware of our policy relating to modern slavery.
- Undertake to only contract with those organisations whose approach to modern slavery coincides with our own.
- Give us visibility of all recruitment in Abbeyfield through our Applicant Tracking System (part of our HR system) which automates our end-to-end recruitment process.
- Ensure agency workers are only hired in accordance with the Agency Workers Policy as referred to above.

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have in place a supply chain compliance programme. This consists of:

- A practice of procurement via approved frameworks where possible.
- All new and potential suppliers evidencing commitment to eliminating modern slavery from their supply chains prior to commencement of contract.
- Property works suppliers are also required to be Safe Contractor / CHAS accredited whereby they have to adhere to their code of conduct, which includes strict compliance with modern slavery legislation.
- On appointment of a new supplier, ensuring that our Modern Slavery Policy is clearly and effectively communicated.
- Continuously monitoring our supply chains and reviewing suppliers' policies towards modern slavery through the ongoing contract management process.
- Working with our suppliers to ensure that any areas of concern are identified quickly, and remedial measures are implemented effectively and as a matter of urgency.
- rationalising the number of contractors we engage with and introducing a contractor portal for all contractors to register to improve oversight.

We will not hesitate to report such offences against the Modern Slavery Act 2015 to the relevant legal enforcement agencies.

As a minimum requirement, we would expect all our suppliers, their agents and sub-contractors to adhere to the following code of conduct:

- All workers to be paid the prevailing minimum wage applicable to the location in which they are employed. All wages to be payable in full, excluding deductions, unless expressly agreed with the worker.
- All workers to have a contract of employment, setting out terms and conditions of employment, working hours and grievance procedures.
- Working conditions and safety provisions should be regularly inspected by our supplier or their agent to ensure the health and safety of workers.
- A worker's documents will remain their property and are not to be retained by their employer: all workers shall be free to leave at any point.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, modern slavery is covered in safeguarding training which is mandatory for all our employees and volunteers.

Further steps

Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains, we intend to take the following further steps to combat slavery and human trafficking:

We will increase the number of areas which are put out to formal tender to ensure that suppliers are under contract and bound to adhere to modern slavery policies.

We will nurture existing supplier relationships in high-risk areas with the aim of reducing reliance on products or services where geographical location or occupations are susceptible to modern slavery.

We will review and, where possible, improve contractor monitoring processes to ensure that contractors are complying with modern slavery policies and related legislation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 31 March 2025. It was approved by the Board on 4th December 2025.

A handwritten signature in dark ink, appearing to be "Mike Turner", written on a light blue grid background.

Mike Turner (Chair)

Abbeyfield Living Society

Date: 10 December 2025