

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Lifeways Group

Lifeways is a group of companies comprising several organisations that provide specialist support services to adults with diverse and complex needs, enabling individuals to live fulfilling and independent lives within their communities. Our companies include Lifeways Community Care Limited, Autism Care Limited, Future Home Care Limited, Care Solutions Limited, Living Ambitions Limited, and SIL Limited. All companies within the Group are registered at No. 2 The Square, Birchwood Boulevard, Warrington, WA3 7QY.

The Lifeways Group is committed to understanding and addressing the risks of modern slavery and human trafficking in all areas of our business and supply chains. We have a zero-tolerance approach to slavery, servitude, forced labour, and human trafficking and are committed to acting ethically, with integrity and transparency in all business dealings.

Introduction

Lifeways have been delivering health and social care services throughout the UK for over 30 years. We currently provide support to more than 6,000 individuals across a range of service models, including Supported Living and Registered Care Services, through a workforce of approximately 10,000 team members. Our supply chains include the procurement of agency workers, medical consumables, facilities management services, utilities, and waste management services.

Given the nature of our services and our responsibility to support vulnerable adults, we recognise the importance of taking proactive steps to identify, assess and mitigate the risk of modern slavery occurring within our operations and supply chains.

Our risk assessment considers both people in our own workforce and people who may be affected through our services or supply chains. In adult social care, particular attention is given to indicators such as recruitment debt, unlawful recruitment fees, control of identity documents or bank accounts, withheld pay, excessive working hours, tied accommodation, threats linked to immigration status, and workers appearing unable to speak freely.

We recognise that identifying no concerns does not, by itself, demonstrate that no risk exists. We therefore seek to improve visibility, encourage early reporting, and learn from safeguarding, whistleblowing, HR, and supplier assurance information.

Team members have several routes to seek help or raise concerns. They may speak to a line manager, another senior manager, their HR Business Partner, AskHR or the Quality team. They may also contact Lifeways' confidential Whistleblowing Line on 0800 090 2478. The number is promoted through modern slavery awareness communications and is available through workplace materials, including ID badge information.

The external Modern Slavery Helpline is also signposted as an additional confidential source of information and support: 08000 121 700 and www.modernslaveryhelpline.org.

Employee Wellbeing and Engagement

At Lifeways, we recognise that a safe, supportive, and inclusive workplace is fundamental to safeguarding our workforce, promoting wellbeing, and reducing the risk of exploitation, including modern slavery. We are committed to ensuring that all colleagues are treated with dignity, fairness, and respect, and have access to the resources, support, and opportunities they need to thrive both personally and professionally.

To support this commitment, we continue to invest in initiatives that promote financial wellbeing, mental health, and overall employee welfare. Through our 'Stream' financial wellbeing platform, colleagues can access practical tools, guidance and services designed to help them manage their finances effectively and build long-term financial resilience. We also provide a confidential Employee Assistance Programme (EAP), offering independent advice, practical support, and emotional guidance 24 hours a day, 365 days a year, across a wide range of personal and work-related matters. In addition, our Wellbeing Centre provides access to educational resources, self-help tools, and wellbeing information to support physical, mental, social, and financial health.

Employee voice remains a key element of our approach to workforce wellbeing. Our 'One Team' Forums provide colleagues with opportunities to share feedback, raise concerns, and contribute ideas that help shape local improvements and enhance the employee experience. We value open and constructive dialogue between managers and colleagues and recognise the significant role these forums play in fostering engagement, trust, and a culture of continuous improvement.

By providing accessible support, encouraging open communication, and promoting a positive workplace culture, Lifeways reinforces its commitment to fair employment practices, colleague wellbeing, and the prevention of exploitation in all its forms. We are committed to creating an environment where colleagues feel valued, supported and empowered to raise concerns confidently and without fear of detriment.

Policies and Governance

Lifeways have a range of policies and procedures that support our commitment to preventing modern slavery and human trafficking. These include:

- Modern Slavery and Human Trafficking Policy
- Recruitment Policy
- Raising Concerns and Whistleblowing Policy
- Safeguarding Policies and Procedures
- Equality, Diversity, and Inclusion Policy

These policies promote ethical business practices, support lawful and fair recruitment, and encourage team members to raise any concerns relating to suspected modern slavery, exploitation, or other wrongdoing. Any concerns reported through our safeguarding or whistleblowing arrangements are investigated appropriately, and action is taken where necessary. Failure by team members to comply with relevant policies may result in disciplinary action, up to and including dismissal.

Our Raising Concerns and Whistleblowing Policy confirms that genuine concerns will be taken seriously, investigated as appropriate and raised without fear of detrimental treatment. It applies across the Lifeways Group and includes permanent, fixed-term, sessional, casual and bank team members, agency workers, self-employed contractors and other third parties.

Responsibility for oversight is shared across HR, Quality, Procurement, and operational leadership. Safeguarding activity is overseen through the Safeguarding Governance Group, which reviews serious or complex cases, trends, lessons learned, training effectiveness and recommendations for organisational improvement.

Due Diligence and Supply Chain Management

Lifeways recognise that purchasing decisions can influence labour standards throughout the supply chain. We therefore operate a risk-based approach to supplier engagement and undertake proportionate due diligence to identify, prevent, and mitigate modern slavery risks.

As part of our supplier onboarding and contract management processes, suppliers may be required to:

- Demonstrate compliance with the Modern Slavery Act 2015 and applicable employment and human rights legislation.
- Confirm that appropriate controls are in place to prevent slavery, servitude, forced labour, and human trafficking.
- Provide a copy of their Modern Slavery Statement where applicable or evidence of equivalent controls and practices.
- Notify Lifeways of any investigations, concerns or regulatory action relating to modern slavery.
- Flow appropriate anti-slavery requirements through their own supply chains where relevant.

To maintain ongoing assurance, key suppliers may be asked to confirm continued compliance with anti-slavery legislation, participate in supplier review activities, and cooperate with additional due diligence where elevated risks are identified. Where a supplier cannot provide satisfactory assurance, Lifeways may require corrective action and reserves the right to review its ongoing business relationship with that supplier.

For labour providers and other higher-risk suppliers, our proportionate assurance approach should include checks on recruitment practices, subcontracting, right-to-work processes, worker pay arrangements, complaint, and grievance routes, and whether workers have paid recruitment fees or incurred recruitment-related debt. Where concerns are identified, Lifeways will prioritise protection and remediation for affected people before considering suspension or termination of the commercial relationship.

Managers are instructed to use approved agency and procurement routes. Our awareness campaigns reinforce that agency workers should only be sourced through approved providers that have been checked to ensure lawful employment practices.

Risk Assessment and Management

Lifeways maintains systems and controls designed to identify, assess, and mitigate potential modern slavery risks. Particular consideration is given to suppliers and activities where there may be an increased risk of exploitation, including:

- Sectors historically associated with higher modern slavery risks.
- Extensive subcontracting arrangements.
- The use of temporary, agency, migrant or low-paid labour.
- Goods or services sourced from regions where labour rights concerns have been identified.

Procurement and contract management team members collaborate with operational teams to identify, assess, and respond to any concerns identified through supplier reviews, safeguarding processes, or whistleblowing reports.

Technology and Operational Controls

Lifeways use technology to strengthen employment and payroll controls and reduce the risk of exploitation. This includes the use of electronic right-to-work verification processes and electronic payroll systems that help ensure required checks are completed appropriately and consistently.

These controls support the integrity of our recruitment and employment practices and form part of our wider approach to safeguarding workers and preventing exploitation.

Our HR Customer Relationship Management (CRM) system and HR Service Desk provide a central route for team members and managers to contact HR. The system gives users visibility of ticket status, maintains ticket history, and uses service-level arrangements to support prioritisation and timely resolution. This creates a clearer, auditable route for employment, pay, right-to-work and other HR concerns that may reveal indicators of exploitation. Case-management and safeguarding matters continue to be managed through the appropriate specialist process where required.

Safeguarding concerns and outcomes are recorded through Radar, Lifeways' organisational reporting and governance system. This supports oversight, trend analysis, learning, and follow-up of actions. Safeguarding alerts, incidents, concerns, and complaints with potential safeguarding implications are recorded, monitored, and analysed.

Right-to-work controls are supported by electronic verification and renewal arrangements. Payroll and rostering records provide additional information that can be reviewed for anomalies such as unexplained deductions, irregular payment patterns or working hours that may warrant further enquiry.

Training and Awareness

Lifeways is committed to ensuring that team members understand the risks of modern slavery and human trafficking and are equipped to identify and report concerns.

Training and awareness activities include:

- Procurement is centralised and we train and encourage our Managers to use our procurement platform which uses only fully vetted supply chains.
- Promoting awareness of safeguarding responsibilities and whistleblowing arrangements.
- Lifeways operate robust recruitment procedures, including right to work verification, employment checks and payroll controls designed to reduce the risk of exploitation.
- Supporting managers to apply fair recruitment and employment practices.
- Reinforcing our commitment to equality, dignity, and respect for all workers.
- During our induction process, new Team Members are trained to identify signs of modern slavery, exploitation, and grooming. We reinforce this each year with a campaign regarding Modern Slavery.

We encourage all team members to report concerns relating to modern slavery, exploitation or unethical practices and ensure that concerns can be raised without fear of detriment.

Measuring Effectiveness

Lifeways seeks to measure the effectiveness of its approach to preventing modern slavery and human trafficking through a range of measures, including:

- Monitoring concerns reported through safeguarding and whistleblowing processes.
- We review our supply chain annually to check that no supplier has raised an issue or complaint with regards to modern slavery and we do this again at the renewal of any contract or new supplier.
- Reviewing supplier compliance for all suppliers that we deal with directly.
- Reviewing any identified breaches of relevant policies and the actions taken in response.

- Periodic review of procurement processes and supplier assurance arrangements.

These measures help Lifeways identify opportunities for continuous improvement and strengthen our controls against modern slavery risks.

Ongoing Commitment

Lifeways remains committed to preventing modern slavery and human trafficking in all areas of its business and supply chains. We will continue to review and strengthen our policies, processes, training, and supplier assurance arrangements to ensure that we meet our legal obligations and uphold the highest standards of ethical conduct.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes the Lifeways Group Modern Slavery and Human Trafficking Statement.

Theresa Hyde
Head of HR

Date: 17th September 2026