



Anti-Slavery and Human Trafficking Statement 2019/20

Our anti-slavery and human trafficking statement reflects our commitment to acting ethically and with integrity in all our business relationships.

We have responsibility under the Modern Slavery Act (MDS) 2015 to ensure transparency in the provision of all our goods and services. This statement outlines the actions and steps taken by A2Dominion. We will seek to ensure slavery and human trafficking is not taking place anywhere in our business or supply chains.

Supply Chain

A2Dominion procures services and products directly and through our partnerships and contractual relationships with other suppliers and agencies. These are sourced from the UK, Europe and beyond. A2Dominion does not wish to support or deal with any business that is knowingly involved in slavery or human trafficking in any part of its operations.

To that extent, A2Dominion continues to include within its tender documentation, a requirement for potential suppliers to provide a statement of assurance regarding its procedures and practices around modern slavery.

A2Dominion will continue to review its procurement policies regarding tenders and contracts to ensure they reflect best practice and to mitigate against the risk of modern slavery.

Employees

We are committed to ensuring that our employees and workers are not subject to any form of servitude, forced, compulsory or bonded labour. Employees will have the freedom to leave freely and without threat to themselves or their family.

All our employees will be treated fairly and equally. We regularly review all our terms of employment to ensure that they comply with all relevant legislation.

As an employer we are committed to paying the national living wage as a minimum and regularly review our terms of employment to ensure they comply with all relevant legislation. Employees are provided with clear and transparent information about rates of pay, hours worked and legal deductions.

Policies

Sustainable and Ethical procurement is very important to A2Dominion and this begins by producing a Sustainable & Ethical Procurement policy and an Ethical Supplier Code of Conduct, which sets out our targets and ambitions to minimise our negative impacts and enhance the positive environmental, social and economic impacts.

All our policies are reviewed on a regular basis to ensure that they reflect anti-slavery and human trafficking best practice and to mitigate against risks. Relevant key policies include, but are not limited to:

- Corporate Code of Conduct
- Procurement Manual
- Recruitment & Selection
- Safeguarding Adults
- Safeguarding Children
- Whistleblowing.

Performance

Completed actions in 2019/20

Since the last statement, we:

- promoted our newly acquired MDS helpline to all our staff;
- carried out in-depth review of business areas identified by the initial risk assessment in July 2019, which is now supported by an improvement plan;

- have nominated a MDS champion within the construction department who will be implementing best practices and work protocols, with the aim of preventing instances of forced labour in our business and supply chains;
- rolled out industry recognised 'Stronger Together' training tackling modern day slavery in the construction sector to staff from Construction, Technical, Commercial, Governance and Compliance, Safeguarding and Business Planning teams;
- continued to include MDS on the agenda of toolbox talks to all operatives on our construction sites.
- ensured all tenders over £50,000 value which are executed through Strategic Procurement are required to produce an MDS annual statement;
- ensured agency staff working within Care & Support have undergone safeguarding training and that DBS checks have been carried out when requesting worker profiles;
- continued to train staff on safeguarding which includes an introduction to MDS awareness;
- we have drafted a new Supplier Code of Conduct and Sustainable & Ethical Procurement policy, requiring key suppliers to adhere and operate to a set of sustainable and ethical values.

Future actions for 2020/21

We will be implementing year one of our MDS Improvement Plan, which includes embedding MDS improvement activities across the Group's high and medium risk areas (i.e. Property Services, Commercial, Care & Support, Procurement, Housing and Construction) and within the new Corporate Plan 2020-25.

Training & Awareness

- continue to review our safeguarding training module to make anti-MDS more robust;
- rollout additional phases of the Industry recognised 'Stronger Together' training tackling MDS in the construction sector;
- rollout regular briefings to our Pyramid Plus operatives on MDS how to detect it in the resident homes they access and to raise awareness of how to recognise and report hidden exploitation;

Recruitment

- our Care & Support teams will ensure agencies conduct their business in a way that is consistent with our MDS statements;
- external resources such as the 'Responsible Recruitment Toolkit' will be shared with construction staff;

Procurement and Supply Chain

- we will finalise and implement our new ethical Code of Conduct for suppliers and our new Sustainable & Ethical Procurement policy;
- we will continue checks on contractors, who are subject to Procurement's tender terms and conditions, including the requirement to produce a MDS annual statement if needed;
- continue to review tenders where rates are well below market range and check 'Right to Work' status of sub-contractors and agency labour.

Collaboration

- we will adopt and sign-up to the Construction Protocol by Gangmasters & Labour Abuse Authority (GLAA);
- Work collaboratively with other labour providers, suppliers and contractors through the GLAA.

Declaration

This statement is made under section 54(1) of the Modern Slavery Act 2015. It constitutes our Group's slavery and human trafficking statement for the financial year ending 31st March 2020.

This statement is reviewed and updated on an annual basis and has been approved by A2Dominion's Group Board. It applies to A2Dominion Housing Group Ltd and its relevant subsidiaries, including Green Man Lane LLP (joint venture with Real Ealing Ltd), Keybridge House LLP (joint venture with Mount Anvil) and A2Dominion Developments Ltd, all of which have a turnover in excess of £36m for the year to 31st March 2020.



Darrell Mercer
Group Chief Executive

4 June 2020