



Anti-Slavery and Human Trafficking Statement 2020/21

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 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 2020/21

Since the last statement, we have carried out a number of actions in line with our previous year's improvement plan:

Strategy and governance

- we have referenced anti-modern day slavery within our Corporate Plan 2020-25 and within our new Equality, Diversity & Inclusion Strategic Plan.
- have monitored and reported on our improvement plan and completed year one of implementing our plan.

Procurement and supply chain

- continue to ensure all tenders over £50,000 value which are executed through Strategic Procurement are required to produce an anti-modern day slavery annual statement.
- ensure contractors are subject to Procurement's tender terms & conditions including the requirement to produce a modern day slavery annual statement if needed.
- are compliant with our estate services contractors who have provided their modern day slavery policies as part of the new procurement. have included a section regarding compliance with section 54 of the Modern Slavery Act 2015 on our New Supplier Registration form.
- Due diligence on supply chain slavery statements included within the tender process.

Colleague training and awareness

- promoted our anti-modern day slavery helpline to all our staff.
- have rolled out modern day slavery training across the organisation. Training is mandatory for all colleagues, and 69% of colleagues have completed the training and associated test. The training supports awareness and ensures staff and teams conduct business that is consistent with our statement and Safeguarding Strategy.
- held virtual workshop sessions to staff from high risk areas, such as Construction, Care & Support, General Needs and other departments. For all staff, online e-learning has been rolled out.

Construction specific

- have in place an anti-modern day slavery champion within the construction department who has implemented best practices and work protocols, with the aim of preventing instances of forced labour in our business and supply chains.
- are able to report that all our current construction staff have received modern day slavery training. New starters will be included as part of their induction process.
- continued to include anti-modern day slavery on the agenda of toolbox talks to all operatives on our construction sites.

Care and support

- ensured agency staff working within Care & Support have undergone safeguarding training and that DBS checks have been carried out when requesting worker profiles.

Future actions for 2021/22

We will be implementing year two of our anti-modern day slavery Improvement Plan, which includes embedding anti-modern day slavery improvement activities across the Group's high and medium risk areas (i.e. Property Services, Commercial, Care & Support, Procurement, Housing and Construction).

Colleague training & awareness

- continue to rollout our safeguarding training module to make anti-modern day slavery more robust;
- continue to rollout anti-modern day slavery training in the construction sector;
- continue to rollout regular briefings to our Pyramid Plus operatives on Anti-Modern Day how to detect it in the resident homes they access and to raise awareness of how to recognise and report hidden exploitation;
- share external resources such as the 'Responsible Recruitment Toolkit' with staff via posters and communication.

Recruitment

- our Care & Support teams will ensure agencies conduct their business in a way that is consistent with our anti-modern day 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 an Anti-Modern Day 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.
- Sign off and implement Sustainable & Ethical Procurement Flexible Framework.

Collaboration

- adopt the Construction Protocol by Gangmasters & Labour Abuse Authority (GLAA);
- we will continue to work collaboratively with other labour providers, suppliers and contractors through the GLAA, this includes sharing information to help stop and prevent the exploitation or abuse of workers.

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 2021.

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, Keybridge House LLP, Keybridge House 2 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

2nd June 2021