



# Anti-Slavery and Human Trafficking Statement 2021/22

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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 overview 2021/22

Our improvement plan provides robust and effective action planning and underpins our Anti-Modern Day Slavery Statement (AMDS). Our improved plan is based on our understanding of our own supply chains and identified associated risks.

We prepared our plan in 2019, based on in-depth reviews of six key departments:

- One high risk area is within Construction where labourers are used.
- Five medium risk areas in Care & Support; Strategic Procurement; Business Support/ Commercial; Property Services and Housing, where consultants, specialist agencies, contractors and third party agencies are used.
- All other departments were deemed low risk, with no further action was required.

The plan comprises projects across training, awareness, recruitment, procurement, collaboration and safeguarding. The plan is reviewed annually - at year end 2021/22, progress is as set out below:

Department	Projects identified through in-depth reviews	Projects completed as at March 2022	Projects where identified action is complete and is ongoing/ business as usual	Projects that are underway/ to complete in 2022/23
Construction	5	3	1	1
Strategic Procurement	2	1		1
Commercial/ Business Support	1		1	
Property Services	2	2		
Care & Support	5	3	2	
Housing Services	2		2	
<b>Total projects</b>	<b>17</b>	<b>9</b>	<b>6</b>	<b>2</b>

Increasingly, actions and processes have become incorporated into business as usual and operational delivery, so that our report sees more of the activities normalised into operations, awareness, training and procurement processes. This means that there are fewer new and specific actions to undertake to complete the plan. This is illustrated by the number of actions which have moved into the 'business as usual' (yellow) column above. Some highlights from our ongoing work are detailed below.

### Corporate and HR

- We have referenced anti-modern day slavery within our refreshed Corporate Plan 2020-25 and within our new Equality, Diversity & Inclusion Strategic Plan.
- AMDS training has been rolled out and is mandatory for all colleagues. 85% 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.

### Construction

- We 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.
- For contractors procured via the A2D contractor framework, the 'rights to work' and 'modern slavery statement' requirements are included within the pre-qualification questionnaire
- All our current construction staff have received modern day slavery training. New starters will be included as part of their induction process.
- We continue to include anti-modern day slavery on the agenda of toolbox talks to all operatives on our construction sites.

### Strategic procurement and supply chain

- We 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.
- We ensure contractors are subject to Procurement's tender terms & conditions including the requirement to produce a modern day slavery annual statement if needed.
- We are compliant with our estate services contractors who have provided their modern day slavery policies as part of the new procurement.
- We have included a section regarding compliance with section 54 of the Modern Slavery Act 2015 on our New Supplier Registration form.
- Our due diligence on supply chain slavery statements are included within the tender process.

### Property services and Housing services

- All identified actions were completed in 2020/21 and our AMDS work is incorporated into business as usual work across operations, for example contractor checks, training and work with contractors (particularly environmental services)

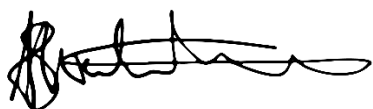
### Care and support

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

## 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 2022.

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 2022.



Anne Waterhouse  
Interim Chief Executive

22<sup>nd</sup> June 2022