

# Modern slavery statement

## 2022/23

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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:

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

## Overview of 2019-23 action plan

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.

Department	Projects identified	Projects completed as at March 2022	Projects complete and is ongoing/ business as usual	Projects completed during 2022/23
Construction	5	3	1	1
Strategic procurement	2	1		1
Commercial business support	1		1	
Property Services	2	2		
Specialist housing	5	3	2	
Homes and communities	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.

## 2022/23 focus

At the start of 2022/23, almost all projects had been completed or mainstreamed into business as usual. Two key areas for progression and completion during 2023 are below:

- **Construction:** Affiliation with the UK government's Gangmasters and Labour Abuse Authority's construction protocol, as set out below
- **Procurement:** Improvements to procurement approach

### **Construction: Gangmasters and labour abuse authority (GLAA) construction protocol**

The Gangmasters and Labour Abuse Authority (GLAA) is an arm's length body of the Home Office. It is authorised under the Modern Slavery Act to investigate and prosecute offences of exploitation within the labour market. Only the GLAA, National minimum wage team and Employment standards agency, outside of the police, are authorised to 'police' and regulate the UK labour market.

The construction protocol is an agreement for those involved to work collaboratively with the GLAA to share information that will help stop or prevent the exploitation or abuse of workers. Membership is free for anyone within the construction centre and provides access to quarterly meetings, updates from the GLAA and access to knowledge, as well as a link into the Home Office Modern Slavery Unit and partners. We have joined this protocol in order to benefit from affiliation.

### **Improvement to procurement approach**

During 2022/23 procurement progressed actions around the following:

#### **New supplier requirements:**

- Large contracts (above Public Contracts Regs threshold): process complete, as the pre-qualification stage gives us the right to reject companies without a modern-day slavery statement
- Smaller contracts: we ask companies to supply either proof of compliance with section 54 of the Modern Slavery Act 2015 (if the act applies to them) or what safeguards they have in place. Smaller companies are not required to comply with section 54 of the modern day slavery act, and so we do not have this assurance and need to manage on a case by case basis.

## Terms and conditions and code of conduct

- A2D's standard terms and conditions refers to supplier's obligation to comply with the 2015 act. These T&C's are on A2D website.
- Code of Conduct being introduced into future tenders as appropriate.
- The refresh code of conduct is drafted but not yet had EMT approval. Pending this the NHF Code of Conduct will be applied where relevant.
- Early stages of implementation underway with training and guidance regarding the framework having been developed.

## Framework and accreditation

- We have reevaluated this action and achieved the Chartered Institute of Procurement Supply: Corporate ethical procurement and supply accreditation. This will be renewed in Autumn 2023

## Refresh in 2023/24

During 2023/24 we will refresh and overhaul our plan and statement, in line with government guidance. Our statement will be structured around the following:<sup>1</sup>

1. Organisation structure and supply chains
2. Policies in relation to slavery and human trafficking
3. Due diligence processes
4. Risk assessment and management
5. Key performance indicators to measure effectiveness of steps being taken
6. Training on modern slavery and trafficking

## Overview of ongoing/business as usual activities

### 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.
- Safeguarding, slavery and human trafficking (or equivalent as the training has been updated) training has been rolled out and is mandatory for all colleagues (a new joiner requirement). 98% of eligible 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.

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<sup>1</sup> <https://www.gov.uk/guidance/publish-an-annual-modern-slavery-statement#what-to-include-in-a-modern-slavery-statement>

## 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 homes and communities

- 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)

## Specialist housing

- We have ensured agency staff working within Specialist Housing 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 2023.

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.