



Anti Slavery & Human Trafficking Policy

**Clear governance.
Strong practice.
Safe services.**



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1. Purpose

D2 PropCo is committed to preventing modern slavery, human trafficking, forced labour, and exploitation within its workforce, services, and supply chains. Although D2 is not legally required to publish a Modern Slavery Statement under the Modern Slavery Act 2015, the organisation adopts best practice as part of its commitment to safe, ethical, and transparent operations.

2. Scope

This section explains who the policy applies to and the operational environments it covers, ensuring that everyone connected to D2 understands their responsibilities in preventing exploitation. The scope reflects the diverse nature of D2's workforce and supply chain, recognising that modern slavery risks can arise in any part of the organisation's operations, including contracted services and frontline delivery.

This policy applies to:

- All D2 employees
- Agency workers and temporary staff
- Contractors, subcontractors, and suppliers
- Volunteers and consultants
- Any individual or organisation acting on behalf of D2

It covers all operational environments, including housing, maintenance, property services, and workforce practice.

3. Legislation & Regulatory Framework

D2 PropCo operates across England and Wales and aligns with the legislation and statutory frameworks that govern modern slavery, exploitation, safeguarding, and ethical employment. While D2 is not legally required to publish a Modern Slavery Statement under the Modern Slavery Act 2015 (due to turnover below £36m), the organisation adopts the principles of the Act as part of its ethical and safeguarding responsibilities.

UK WIDE LEGISLATION

Modern Slavery Act 2015

The primary UK legislation addressing modern slavery, human trafficking, forced labour, and exploitation. It sets out criminal offences, protections for victims, and expectations for organisations to prevent exploitation within their operations and supply chains.



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Human Rights Act 1998

Incorporates the European Convention on Human Rights into UK law, including the right to be free from slavery, servitude, and forced labour (Article 4).

Immigration, Asylum and Nationality Act 2006

Sets out employer responsibilities for right to work checks and preventing illegal working, reducing vulnerability to exploitation.

National Referral Mechanism (NRM)

The UK's framework for identifying and supporting potential victims of modern slavery. D2 staff escalate concerns through safeguarding routes so statutory partners can make NRM referrals.

Health & Safety at Work etc. Act 1974

Requires employers to ensure safe working conditions. Unsafe or exploitative working environments can be indicators of modern slavery.

Public Contracts Regulations 2015

Public sector commissioners may require suppliers to demonstrate ethical practice, including modern slavery prevention, as part of procurement and contract compliance.

WALES SPECIFIC LEGISLATION & NATIONAL FRAMEWORKS

Social Services and Well being (Wales) Act 2014

The primary safeguarding legislation in Wales. It places a statutory duty on relevant partners to report adults or children at risk, including those experiencing exploitation or modern slavery. It establishes multi agency responsibilities and underpins safeguarding practice across Wales.

Wales Safeguarding Procedures (2019)

The national framework for identifying, reporting, and responding to safeguarding concerns in Wales. Modern slavery is explicitly recognised as a form of abuse and exploitation.

Code of Practice: Ethical Employment in Supply Chains (Welsh Government)

A national code promoting ethical employment, transparency, and the prevention of modern slavery in supply chains. While voluntary, it is widely used in Welsh public sector procurement, and D2 aligns its practice with the principles of the Code.



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Wales Anti Slavery Leadership Group & National Delivery Plan

Wales has a national strategic approach to preventing modern slavery, delivered through the Anti Slavery Leadership Group and regional partnerships. D2 works in alignment with this national framework and cooperates with statutory partners where concerns arise.

Well being of Future Generations (Wales) Act 2015

Requires public bodies to work sustainably and ethically. Preventing exploitation and promoting fair employment contributes to “A More Equal Wales” and “A Wales of Cohesive Communities.”

4. Policy Framework Alignment

This section explains how the Anti Slavery Policy fits within the wider D2 Policy Framework, ensuring a clear line of sight between governance expectations and operational delivery.

As a Tier 2 Operational Policy, this Policy translates the organisation’s strategic commitments into practical requirements for staff and contractors. This Policy aligns with and is governed by the following D2 Policy Pillars:

- Safeguarding
- HR Governance
- Whistleblowing
- Risk Management

5. Organisational Commitment

This section sets out D2’s overarching commitment to preventing modern slavery and ensuring ethical practice across all areas of operation. D2 PropCo adopts a zero tolerance approach to modern slavery and commits to:

- Acting ethically and with integrity in all business relationships
- Ensuring there is no modern slavery or human trafficking in its operations or supply chains
- Conducting proportionate due diligence on contractors and suppliers
- Providing safe reporting routes for staff and residents
- Training staff to recognise and respond to indicators of exploitation
- Working with statutory partners where concerns arise



**Our Purpose is Shelter.
Our Values are Strength.
Our Promise is Dignity.**

6. Roles and Responsibilities

This section clarifies the responsibilities of leaders, managers, staff, and contractors to ensure that modern slavery risks are identified, reported, and addressed effectively. Preventing exploitation is a shared responsibility across all levels of the organisation.

Board & Managing Director

- Provide oversight through the Tier 1 Policy Pillars
- Ensure modern slavery risks are included in organisational risk management

Senior Management Team

- Implement this policy across operational areas
- Ensure due diligence is completed for suppliers and contractors
- Monitor compliance through audits, contract reviews, and performance reporting

Managers & Supervisors

- Ensure staff understand and follow this policy
- Respond to concerns and escalate safeguarding issues
- Monitor contractor compliance

All Staff

- Remain alert to signs of exploitation
- Report concerns immediately
- Follow safe recruitment and verification processes

Contractors & Suppliers

- Must comply with this policy and the Contractor Code of Conduct
- Must confirm they do not engage in modern slavery or human trafficking
- Must cooperate with any due diligence checks

7. Recruitment & Employment Practices

This section outlines the employment practices that help prevent exploitation and ensure that all workers engaged by D2 are treated fairly and lawfully. D2 ensures:

- Right to work checks are completed for all staff
- No recruitment fees are charged to workers
- Agency labour is sourced only from reputable providers
- Employment terms are transparent and fair
- Staff are free to leave employment with appropriate notice



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8. Supply Chain Due Diligence

This section describes how D2 manages risks within its supply chain, recognising that exploitation can occur in contracted services such as repairs, maintenance, and cleaning. Proportionate due diligence includes:

- Contractor declarations confirming compliance with the Modern Slavery Act
- Checks on high risk sectors (e.g., construction, cleaning)
- Reviewing concerns raised through whistleblowing or safeguarding routes
- Terminating relationships where non compliance is identified

9. Identifying Signs of Modern Slavery

This section provides staff with an understanding of the indicators that may suggest someone is being exploited. Staff must be alert to indicators such as:

- Individuals who appear fearful, withdrawn, or controlled
- People without access to their own documents or finances
- Signs of overcrowded or unsafe living conditions
- Workers transported to and from sites in groups
- Individuals working excessively long hours or for little/no pay

10. Reporting Concerns

This section explains the routes available for raising concerns and reinforces D2's commitment to safe, confidential reporting. Concerns may be raised through:

Safeguarding Routes

For any suspected exploitation of residents, staff, or contractors.

Whistleblowing

For concerns about unethical practice within D2 or its supply chain.

Line Management

For operational issues requiring immediate action. All concerns will be recorded, investigated, and escalated appropriately through local mechanisms.



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11. Training & Awareness

This section sets out D2’s commitment to ensuring staff and contractors are equipped to recognise and respond to modern slavery risks. D2 will ensure:

- All staff receive induction training on modern slavery indicators
- Managers receive additional training on due diligence and escalation
- Contractors are provided with clear expectations through the Contractor Code of Conduct.

12. Monitoring & Review

This section explains how D2 monitors compliance and uses learning to strengthen practice. The Senior Management Team will monitor compliance through:

- Contract reviews
- Supplier checks
- Incident and safeguarding reports
- Audit findings
- Staff feedback

This policy will be reviewed annually or sooner if legislation or best practice changes.

13. Policy Approval & Version Control

Policy Owner:	Managing Director
Approval:	Senior Management Team
Date:	09/04/2026
Tier:	2 – Operational Policy
Linked Policy Pillars (Tier 1):	Safeguarding HR Governance Whistleblowing Risk Management
Review Cycle:	Annual

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