

Modern Slavery Statement 2021/22

Introduction

This is the second Modern Slavery Statement made by 2gether Support Solutions Ltd (“2gether” or “the Company”) under Section 54, Part 5, of the Modern Slavery Act (MSA).

2gether is committed to preventing Modern Slavery and Human Trafficking and recognises the role it has as a service provider within the facilities and healthcare sectors with social values at its core. This also means remaining committed to taking swift and robust action in the event that any evidence relating to Modern Slavery is identified.

The statement relates to the previous financial year from 1 April 2020 to 31 March 2021. At the time of preparing this statement there were no known issues regarding Modern Slavery and Human Trafficking and no incidents were reported during the course of the year.

Structural Organisation

2gether is a wholly owned subsidiary of East Kent Hospitals University NHS Foundation Trust (EKHUFT). EKHUFT is one of the largest hospital trusts in England, with five hospitals and community clinics serving a local population of around 695,000 people. They also provide some specialist services for a wider population, including renal services in Medway and Maidstone and a cardiac service for all of Kent based at William Harvey Hospital, Ashford, which is one of the largest NHS Foundation Trusts in the UK.

EKHUFT has a contract in place with 2gether to provide an operated healthcare facilities service. The services provided by 2gether include: catering & retail; cleaning; switchboard; procurement; residential & student accommodation; portering; security; logistics; laundry; estates & property maintenance; managed equipment services and health and safety.

2gether is also contracted by EKHUFT to procure clinical and non-clinical consumables; agency staff; contract work and large equipment and services with an approximate annual spend of £40m.

Activity from 1 April 2020 to 31 March 2021

The following action was taken during the year to mitigate the risk exposure:

- 2gether published its first Modern Slavery Statement
- Modern Slavery Working Group was formed (see below)
- Speak Up (Whistleblowing) Policy approved by the Board that encourages all employees, agency workers and contractors to report any concern without fear of retaliation and has specific references to Modern Slavery.
- Talent Team created to bring recruitment in-house and to strengthen recruitment processes and controls.
- Supply Chain Risk Assessment undertaken to identify high risk suppliers.
- CPD accredited training session delivered to the Procurement Category Leads in September 2020 (also attended by key members of the People Team). The training was delivered by Unseen UK (an anti-slavery charity founded in 2008 to work towards a world without slavery).

Modern Slavery Group

The Modern Slavery Group is led by the Head of Corporate Governance with representatives from the People Talent team and Procurement and is responsible for undertaking a regular risk assessment of modern slavery and human trafficking risk across the business and ensuring that

effective action is taken to mitigate the level of risk exposure. The Group meets quarterly to review the Modern Slavery Action Plan to monitor compliance with the MSA.

Risk Assessment

2gether has identified two key risk areas:

1. People - the employment and provision of labour

Full Time Employees

- Contracts of employment are not entered into with new employees unless the candidate has been vetted appropriately with their qualifications verified (as required) and references obtained.
- The Compliance Team undertake frequent checks of employment records for new joiners to ensure all such checks have been undertaken.
- 2gether follows the NHS employers' guidance that identifies designated roles as requiring DBS checks. There is the same requirement in place for permanent employees and agency workers. All team members within the Compliance Team have undertaken certified DBS training.

Agency Personnel

The Procurement Team is responsible for the appointment of reputable employment agencies that are then required to maintain the same level of compliance standards and checking as for full time employees.

The recruitment of all agency personnel is managed centrally by the People Team who always verifies the practice of any new agency before agency workers are accepted.

2. Procurement - the supply chain

The Procurement Team within 2gether undertakes procurement on behalf of 2gether as a Company and to provide a contract procurement service to EKHUFT and the supply chain includes a combination of distributors and direct supply arrangements.

2gether's Procurement Strategy includes a commitment to the Company's obligations under the MSA. This commitment includes the action that will be taken to ensure that effective controls are in place to identify and mitigate Modern Slavery risk when procuring goods and services on behalf of 2gether or as part of the procurement service delivered to EKHUFT.

Where a distributor (e.g. NHS Supply Chain) or procurement hub (e.g. NHS Commercial Solutions) contracts for goods and services on behalf of 2gether an obligation is placed on them to monitor compliance with the MSA.

When 2gether has a direct supply arrangement then it retains direct responsibility for undertaking effective due diligence to identify and mitigate Modern Slavery risk.

NHS Terms and Conditions apply for all non-clinical procurement and the NHS Standard Contract apply for all clinical procurement. Both sets of terms and conditions require suppliers to comply with all relevant legislation.

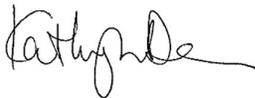
Review of Effectiveness

2gether intends to take further steps to identify, assess and monitor potential risk areas of during this financial year (2021) as outlined below:

- Ensure there is reference to Modern Slavery and Human Trafficking risk as part of all 2gether's induction material. (Expected to be completed by End Q1).
- Ensure that Level 1 training on Modern Slavery risk is included as part of induction training for all Facilities' personnel delivered by Team Leaders. (Expected to be completed by End Q2).
- Develop the People Compliance Plan to include oversight of agencies and that appropriate checks are being undertaken for agency staff before taking up any form of employment with 2gether. (Expected to be completed by End Q2).
- Implement a programme of regular risk assessment across 2gether's direct supply chain to monitor the level of risk and appropriate level of assurance required as part of the tender and selection process. (Expected to be completed by End Q2).
- Increase transparency in the supply chain by evaluating new suppliers with regard to their Modern Slavery policy and practices before they enter 2gether's direct supply chain. Work began on this during the previous financial year but progress was delayed due to the impact of Covid-19). (Expected to be completed by end Q3).
- Introduce a specific Modern Slavery clause to be included in all new supplier contracts and included as a revision to all contracts due for renewal going forward. (Expected to be completed by end Q4).

The above Statement has been approved by the Board.

Signed

A handwritten signature in black ink, appearing to read 'Kathryn Dean', written in a cursive style.

Kathryn Dean
Interim Managing Director

Further Enquiries:

If you have any questions or would like any further information regarding this second statement please contact our Head of Corporate Governance using the following email address:
simone.wray@nhs.net.