

Modern Slavery Statement

Introduction

This is the third 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 2021 to 31 March 2022. At the time of preparing this statement there were no known issues regarding Modern Slavery and Human Trafficking.

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.

Incidents Reported during the Year

Supply of Solar Panels

2gether had a contract with Breathe, to supply and fit solar panels as part of capital projects and other estates works, who is a supplier appointed under the NHS National Procurement Framework.

On 25th April 2021 Breathe escalated an article published in the Guardian to 2gether that reported on the use of forced labour to produce polysilicon (which is a key component of Solar panels). The article also reported up to four in ten of the UK's existing solar farms were built using panels from the companies named in the report.

One of the companies implicated, JA Solar, had provided solar panels for an array installed in 2020 at the Queen Elizabeth and Queen Mary hospital, Margate. An installation was also scheduled for William Harvey Hospital, Ashford. Action was taken by 2gether's Procurement team to put this on hold and alternative panels were sourced from a supplier in South Korea where the manufacturer was signed up to the industry's international agreement to not source any products from suppliers implicated in the use of forced labour.

JA Solar is no longer a sub-contractor to Breathe Energy.

2. Procurement - the supply chain

The Procurement team undertakes procurement on behalf of 2gether as a Company and provides a contract procurement service to EKHUFT. 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 includes the action that will be taken to ensure that effective controls are in place to identify and mitigate Modern Slavery risk when procuring all goods and services.

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.

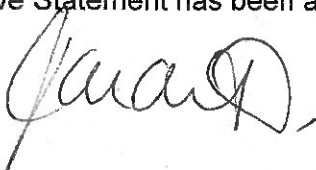
Review of Effectiveness

2gether intends to continue to take further steps to identify, assess and monitor potential risk areas of during this next year as outlined below:

	Q1 22	Q2 22	Q3 22	Q4 22
People	On-going development of the People Compliance Plan to maintain oversight of agencies and ensure appropriate checks are being undertaken for agency staff before taking employment with 2gether.	Review of pre-employment checking process and create a process map to identify any concerns re MSA People Compliance Undertake an agency audit to ensure compliance with MSA as required.	Refresher training for key stakeholders on Modern Slavery.	Series of WebEx sessions focusing on line managers to highlight the Modern Slavery Act and what signs to look out for. Follow up with a revised guidance document.
Procurement	Progress the evaluation of new suppliers through a programme of risk assessment across 2gether's direct supply chain. Obtain appropriate assurance as part of the tender and selection process.	Increase transparency in the supply chain by evaluating new suppliers with regard to Modern Slavery policy and practices before they enter 2gether's direct supply chain.	Introduce a specific Modern Slavery clause for new supplier contracts and as a revision to all contracts due for renewal going forward.	

The above Statement has been approved by the Board.

Signed



Jackie Churchward-Cardiff
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