

## **2gether Support Solutions Modern Slavery Statement 2020**

### **Introduction**

This statement sets out 2gether Support Solutions actions to understand all potential Modern Slavery risks related to its business and to ensure that there is no slavery or human trafficking in its own business and its supply chains. This statement relates to actions and activities during the financial year 1 April 2020 to 31 March 2021.

As part of the facilities management sector and as a business with social values at its core, 2gether Support Solutions recognises that it has a responsibility to take a zero tolerance approach to slavery and human trafficking.

2gether Support Solutions is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

### **Aim**

2gether Support Solutions is committed to equality of opportunity and we believe there is no place in our society for modern slavery and human trafficking. As an organisation we have a zero-tolerance approach to modern slavery and breaches in human rights. We have established business and organisation practices internally and with our partners and suppliers externally, to identify, address and prevent this issue. The Board of Directors has considered and approved this statement and will continue to support the requirements of the legislation.

### **What is modern slavery?**

Slavery is a violation of a person's human rights. It can take the form of human trafficking, forced labour, bonded labour, forced or servile marriage, descent-based slavery and domestic slavery. A person is considered to be in modern slavery if they are:

1. forced to work through mental or physical threat;
2. owned or controlled by "an employer", usually through mental or physical abuse;
3. dehumanised, treated as a commodity or sold or brought as "property";
4. physically constrained or has restrictions placed on their freedom of movement.

### **2gether Support Solutions structure and supply chains**

This statement covers the activities of 2gether Support Solutions:

- 2gether Support Solutions is a wholly owned subsidiary company of one of the largest NHS Foundation Trusts in the UK, East Kent Hospitals University NHS Foundation Trust (EKHUFT). 2gether Support Solutions provides an operated healthcare facilities service to EKHUFT as well as providing facilities management to other organisations. The services carried out include:

- catering & retail, cleaning, switchboard, procurement, residential & student accommodation, portering, security, logistics, laundry, estates & property maintenance, health & safety, managed equipment services.

2gether Support Solutions and our parent company EKHUFT, has a supply chain that is a combination of distributors and direct supply arrangements. 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 Support Solutions, 2gether Support Solutions places the obligation for monitoring compliance with the Modern Slavery Act on this organisation. 2gether Support Solutions retains responsibility for all its suppliers.

2gether Support Solutions undertakes the majority of purchasing on behalf of EKHUFT, in the order of £40m per annum, this includes clinical and non-clinical consumables, agency staff and contract work, as well as large equipment and services.

#### *Countries of operation and supply*

2gether Support Solutions operates in the United Kingdom only and has assessed whether or not particular activities are high risk in relation to slavery or human trafficking:

2gether Support Solutions has initially evaluated the risks associated with slavery and human trafficking and has identified them as:

1. Lack of clarity in supply chain
2. Lack of awareness of staff
3. Maturity of procurement partners processes to undertake supply chain assessments on 2gether Support Solutions' behalf.

As a social value business 2gether Support Solutions should be at the forefront of this work both in the services we supply and the purchasing we undertake for ourselves and for our customer. 2gether Support Solutions will be taking a proactive approach to training our staff and undertaking robust risk assessments during 2020/21 to address these potential areas of concern.

#### *High-risk activities*

The following outsourced activities are considered to be at high risk of slavery or human trafficking:

- Construction services
- Window cleaning services
- Pest control services
- Provision of agency workers in areas such as laundry by sub-contracted employment agencies via our master vendor arrangement with Cohesion.

## *Responsibility*

2gether Support Solutions anti-slavery initiatives are as follows:

- **Policies:** Adhering to the Diversity & Inclusion policy (Group company policy), Safeguarding Policies (Group company policies agreed and reviewed by EKHUFT)
- **Risk assessments:** During 2020 2gether Support Solutions will develop a risk assessment process for human rights and modern slavery and Finbarr Murray will take the lead for this at the Board of Directors.
- **Investigations/due diligence:** The Associate Director of Procurement and Managed Equipment Services is responsible for due diligence and investigations into human trafficking and modern slavery within the NHS Supply Chain. The Head of People is responsible for due diligence and investigations into human trafficking and modern slavery in regards to employment and the supply of workers. Concerns in regard to Safeguarding of patients will be raised and investigated via EKHUFT's safeguarding leads.
- **Training:** In March 2020 all 2gether Support Solutions staff will receive a leaflet setting out responsibilities in regard to safeguarding, based on our parent company's guidance, and providing details of how to escalate concerns and issues. In addition, a training programme for the Procurement and People team members will take place in quarter one allowing further plans to be developed on training during 2020/21. 2gether Support Solutions intranet includes an ethical procurement training module which is available to managers and staff members working in procurement.

- **Adult Safeguarding**

2gether Support Solutions has adopted EKHUFT's Equality and Safeguarding policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking across all areas of activity.

Human Trafficking and Modern slavery guidance is included in our parent company's Safeguarding Adult, People at Risk Policy 2015, which is referenced in the safeguarding leaflet to be shared with all staff.

Our response to Human Trafficking and Modern Slavery is coordinated with EKHUFT's safeguarding adult and/or safeguarding children processes. The Police are the lead agency and staff are directed to the Home Office website for further information.

- **Recruitment and use of Agency workers** 2gether Support Solutions use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

## Relevant policies

2gether Support Solutions operate the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations;

- **Through our parent company's Raising Concerns (Whistleblowing) policy and procedure** 2gether Support Solutions encourages all its workers, and customers to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The 2gether Support Solutions whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees and customers can access EKHUFT Freedom to Speak Up Guardians at [ekhuft.freedomtospeakupguardian@nhs.net](mailto:ekhuft.freedomtospeakupguardian@nhs.net) or can complete an online datix incident form.
- **Procurement policy** A Supplier self-declaration on Modern Slavery is contained in the Supplier Assessment Questionnaire. 2gether Support Solutions and our parent company's procurement strategy and policies includes a commitment to our obligations under the Modern Slavery Act (2015) and the actions it will take in its procurement processes. When procuring goods and services, we additionally apply NHS Terms and Conditions (for non-clinical procurement) and the NHS Standard Contract (for clinical procurement). Both require suppliers to comply with relevant legislation.

## Due diligence

2gether Support Solutions, through NHS Supply Chain Ltd, undertakes due diligence when considering taking on new suppliers, and is reviewing its existing suppliers. 2gether Support Solutions undertakes these reviews by:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier is part of a more general human rights assessment;
- conducting supplier audits or assessments through NHS Supply Chain Ltd's Labour Standards Assurance System (LSAS) which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular NHS Supply Chain Ltd's Supplier Code of Conduct and Labour Standards Assurance System (LSAS);
- using LSAS where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and



- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship as evidenced by the NHS Supply Chain Ltd Supplier Code of Conduct.

### **Performance indicators**

2gether Support Solutions has reviewed its key performance indicators (KPIs). As a result, the organisation is:

- requiring procurement and HR professionals to have completed training on modern slavery by July 2020;
- developing a local system for supply chain verification expected to be in place by April 2020, whereby 2gether Support Solutions evaluates potential suppliers before they enter the supply chain; and
- reviewing its existing supply chains expected to be completed by April 2022, whereby the 2gether Support Solutions evaluates all existing suppliers. 2gether has over 5,000 suppliers, a significant proportion of which will be reviewed according to the NHS Supply Chain and Category Tower timescales which are outside our influence.

### **Board approval**

This statement was approved on 27 February 2020 by 2gether Support Solutions Board of Directors, who review and update it annually.