

Modern Slavery Statement

Modern Slavery Statement

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Definition

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation.

It is a crime under the Modern Slavery Act 2015 and includes holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

Statement

This statement is made in accordance to Section 54(1) of the Modern Slavery Act 2015 and sets out how National Locums Ltd operates and the steps taken to minimise the potential risk of modern slavery in our business and supply chains.

Our policy is that we do not tolerate any individual, group or organisation who subjects workers to modern slavery in their operations.

We work with organisations such as the NHS to ensure that we conform to regulations set out in legislation and are subject to numerous audits throughout the year ensuring that we meet our legal and contractual compliance standards.

About National Locums Ltd

National Locums is one of Britain's leading and fastest-growing specialist medical recruitment agencies. We supply locum Doctors, Nurses and AHPs to the NHS and independent hospitals throughout the UK. Our family values sets us apart from the rest.

Established by David, Glenn and Jenny Cook in 2009, National Locums is a part of Cook Recruitment Group, has a reputation as a trusted medical locum agency, passionate about placing high calibre healthcare professionals to provide the best quality of care to our loved ones.

As a trusted locum agency, we're here to uphold our reputation by focusing on our core values:

- **Family** – Our diverse family are our difference, it's their dedication, warmth and pursuit of excellence that sets us apart.
- **Excellence** – We strive to deliver excellence across all our services, going above and beyond, making a real difference to every life we impact
- **Integrity** – We only work with people who we would trust to care for our own families, acting with integrity and honesty when they are needed most.

Our Board of Directors and Senior Leadership team oversee our full end-to-end operations, with each member specialising in key areas of our business with a common goal of ensuring company policies and processes are followed.

We have our Headquarters in Milton Keynes, with satellite offices in Scotland and Ahmedabad, India.

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We meet stringent standards required by our Framework supplier status and membership of the Recruitment and Employment Confederation. We are governed and audited to exceptionally high standards to ensure we meet our legal and contractual obligations.

National Locums are committed to treating every individual with the highest respect, promoting equality of opportunity and diversity for all our workers and employees.

Our Directors have a zero-tolerance policy to modern slavery, human trafficking, bribery, corruption, and any indirect association with such criminal acts and will ensure that we only engage with those who share our values and approach including our supply chain partners, by ensuring they remain accountable and transparent.

We will ensure we work collaboratively to eradicate human trafficking and modern slavery.

How we Source our Staff?

National Locums are an Equal Opportunities Organisation and we welcome candidates and internal staff via online job searches, referrals and recruitment campaigns. Recruitment campaigns invite those with an interest to meet us and have an informal discussion about their expectations and plans. Candidates and staff are then welcome to begin their registration.

We are governed by The Recruitment & Employment Confederation (REC) for which we recently passed their compliance audits. Full policies on our recruitment processes are available upon request.

Our Modern Slavery and Human Trafficking Policy

We are committed to ensuring our business and our supply chain partners do not tolerate modern slavery, forced labour or human trafficking under any circumstances. Our candidates are fully vetted by our expert Compliance Team in accordance with recruitment guidelines for right to work documentation, working closely with the Home Office when verification is required.

Throughout the year, we are regularly audited to ensure our compliance standards are met and maintained to ensure we remain on our framework agreements, and to meet our contractual and legal obligations.

Risk Assessment and Management

We are committed to identify and eradicate risk and undertake due diligence across our supply chain to ensure we request their statements and policies in line with the Modern Slavery Act 2015.

We are a multi-framework agency and our recruitment process follows government procurement standards including:

- Workforce Alliance (Crown Commercial Services and Collaborative Procurement Partnership combined)
- Health Trust Europe

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- HSC Northern Ireland
- NHS Scotland
- Care Inspectorate (Scotland)
- Regulation and Quality Improvement Authority (RQIA Northern Ireland)
- NHS Pre-employment Check Standards

As an Employment Agency, we are legally governed by the Employment Agencies Act 2003 and its subsequent amendments, and in complying with this legislation we carry out our recruitment processes in line with the prevailing acts, statutes and laws including, but not limited to:

- Equality Act 2010
- Agency Worker Regulations 2011
- Working Time Regulations 1998
- Data Protection Act 2018 (General Data Protection Regulation (GDPR))
- Employment Rights 1996
- Employment Agencies Act 2003
- Employment Rights Act 1996
- The Employment Act 2008
- Conduct Regulations

We are corporate members of the Recruitment and Employment Confederation (REC) and adhere to the Code of Professional Practice, ensuring that our practices and processes meet the required higher ethical standards to remain a member. We are audited and assessed every 2 years to ensure we meet our obligations and to ensure we can renew our membership.

We follow a rigorous registration process for our workers meeting all legislative, best practice and contractual requirements for pre-screening, registration and interview. Our workers are informed upon registration of the steps in our process and the requirement to meet NHS Employer Standards, including those required under the Equality Act 2010.

Our recruitment process follows the below key stages:

- Receipt of CV
- Completion of application form
- Identity checks
- Right to Work checks
- Face-to-face formal and clinical interview
- Employment History and Reference checks
- Professional registration and qualifications checked with the GMC/NMC or other regulatory body
- Work health assessment checks
- English language competency checks
- Safeguarding checks through Disclosure and Barring Service, PVG and AccessNI
- Statutory and mandatory and clinical/core skills training checks
- Handbook declaration
- Appraisal and revalidation, where required

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We adhere to the contractual requirements of our various framework agreements and local variations (Scotland, Wales and Northern Ireland), call off contracts, SLAs and Tiering agreements we have in place.

Our processes, policies and adherence to the required standards are regularly audited during the year by NHS or HSC approved external auditors, which we pass at a high level each year. This demonstrates our commitment to the required processes and ensures we meet our obligations.

As part of our commitment to eradicating modern slavery and human trafficking, our supply chain also undertake a due diligence process to confirm adherence.

We are confident that our processes, policies and governance are robust and that pre-employment and ongoing screening checks applied in our standard employment practices comply with current legislation and our contractual obligations. We continuously monitor the risks of modern slavery and human trafficking across our business and supply chain, underpinned by our robust processes and policies.

Our processes include, but are not limited to:

- Confirming identities of all employees, workers and agency staff on an ongoing basis
- Confirming the right to work for each individual
- Standard set rate of pay for skill sets and role for all employees, workers and agency staff which is currently set above the national living wage
- A dedicated Governance and Complaints handling team, where individuals are encouraged to raise concerns in line with our Whistleblowing policy
- Ongoing training for our agency workers and key individuals within the business
- Ongoing training updates, ensuring that best practice is shared and work to support the identification of modern slavery within the recruitment business.
- Building ongoing professional relationships with immigration officials
- Protection of whistleblowers
- Ensuring our supply chains follow our policies and processes as laid out above
- Undertaking regular audits on supply chains to confirm compliance
- A Responsible Officer who has direct engagement with both Doctors and the GMC
- A Clinical Complaints Team who have direct engagement with Nurses and the NMC

Monitoring and Feedback

National Locums encourages anyone, including colleagues, suppliers, candidates and clients, to report any issue or concerns about potential unethical business practices, such as fraud, bribery, slavery or human trafficking, and will work with the local authorities and our charity partners are Unseen to ensure such concerns are investigated properly and dealt with efficiently and effectively.

We strive to work transparently and ensure all workers are treated equally and fairly. Our pay rates are no dependent on background, gender or ethnicity and are consistent across our organisation.

Our process and systems are robust to ensure we:

- Identify and assess potential risk areas in our supply chains
- Protect whistleblowers

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- Training and education for identifying risks and potential victims
- Provide a dedicated governance and compliance team, focusing on continuous improvement
- Providing a dedicated Recruitment Consultant and Compliance Officer for each worker
- Undertake on-going audits and fostering a culture of quality improvement under our ISO9001:2015 standard and continuous improvement

Training

We ensure that our workers and staff receive comprehensive training and education in understanding modern slavery and identifying risks and potential victims. We provide e-learning modules and work with partners and our governing bodies to ensure we are up to date with legislative requirements and best practice guidelines across our sector.

Summary

We firmly believe our practices, policies and processes demonstrate our commitment to eradicating and identifying modern slavery and human trafficking risks and ensure we continuously educate and support our entire workforce. Our governance team are dedicated to educating our workforce of potential threats and keeping us updated with legislative changes to ensure our continued compliance.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our organisation's slavery and human trafficking statement for the financial year ending 28th February 2025.

David Cook

Managing Director

National Locums Ltd

20th May 2025