

ID Medical Group Modern Slavery Statement

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Modern Slavery Statement

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Version Number	Date	Reviewed By	Comments (details of changes)
V5	07/04/2020	Jo Cross	Policy reviewed and amended
V6	25/10/2021	Jo Cross	Policy annual review
V7	25/10/2022	Jo Cross	Policy annual review
V7.6	09/10/2023	Jo Cross	Policy Annual review and amended
V7.7	29/11/2023	Mike Baldwin	Scope defined to include all IDM Group Holding Ltd companies

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Introduction

Modern Slavery is the recruitment, movement, harbouring, or receiving women, children or men through the use of force, coercion, abuse of vulnerability, or deception for any purpose of exploitation.

With Modern Slavery still happening across the country and affecting an estimated 13000 victims of trafficking, The Modern Slavery Act was designed to seek out and eliminate such horrendous crimes of human trafficking, slavery and compulsory labour.

The Modern Slavery Act came into force on the 29th October 2015.

Statement

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

ID Medical Group Holding Ltd comprises: ID Medical Group Ltd, The Locum Consultancy, Locum24 and Nursing24. All companies are included by reference to ID Medical.

ID Medical's policy is that it does not tolerate any individual, group or organisation who subjects workers to modern slavery during their operations.

Working with government-run organisations, such as the NHS, ensures that ID Medical conforms to regulations set out in legislation directly and as such is subject to many audits throughout the year ensuring all compliance standards are met.

About ID Medical Group

ID Medical is the UK's leading and award-winning multi-discipline healthcare recruitment agency. It was established in 1999 and has since maintained its enviable position within the medical recruitment market as the leading locum agency for the recruitment of Doctors, Nurses, AHPs and Primary Care staff for the NHS and private medical sectors. It provides short- and long-term staffing solutions and permanent jobs across the UK and internationally.

Its board of Directors and Company Secretary oversee each and every aspect of the business specialising in specific areas within the business, however, everyone is responsible for ensuring company policies and procedures are followed.

From its headquarters in Milton Keynes, as well as its two smaller remote divisions in London and Scotland, and a further overseas Office in Pune, India; ID Medical provides practical, cost-effective and innovative workforce solutions, supplying over 5 million hours to the NHS per annum. Within each of its professional divisions, ID Medical has dedicated client and candidate teams covering the multitude of medical specialties and roles to ensure each customer receives a premier level service, ultimately ensuring patient safety is paramount.

An award-winning Framework Agency, we are governed by contracts and legislation.

ID Medical supports and nurtures a belief in the value of working within the NHS, embedding the 6Cs and providing a complete medical staffing solution to its valued partners, forming part of the NHS.

We are committed to treating every individual with the highest respect and we promote equality and diversity for all workers, employees and applicants.

The Directors of ID Medical have a zero tolerance policy to modern slavery, human trafficking, bribery, corruption, and any indirect association with such criminal acts.

ID Medical will ensure that it will only engage with those with the same values including, supply chains, by remaining transparent and accountable.

By working together, we are one step closer to eradicating heinous acts of crime such as human trafficking and modern slavery.

How do we source our staff?

As an Equal Opportunities Organisation, we welcome candidates and internal staff via online job searches, referrals and recruitment drives. Our recruitment drives are held nationally and internationally by a carefully selected team who will hold open days, inviting those with an interest to come along and have an informal discussion about their expectations and plans. Candidates and staff are then welcome to begin their registration.

As a recruitment agency, we are governed by The Recruitment & Employment Confederation (REC) for which we recently passed their compliance audit.

Full policies on our recruitment processes can be obtained on request.

Our Policies on Modern Slavery including Human Trafficking

As the leading recruiter in our field, ID Medical is committed to ensuring that our business and chain of suppliers do not tolerate modern slavery, forced labour or human trafficking in any sense. All of our candidates are vetted accordingly with recruitment guidelines for right to work documentation and working closely with the Home Office when verification is required.

ID Medical is committed to ensuring compliance standards are met and maintained by auditing our suppliers and being audited by affiliated framework agreements and the NHS alike.

Due Diligence

To ensure our continued initiation to identify and eradicate risks, ID Medical ensures our chain suppliers submit their own statement on the Modern Slavery Act as part of their tender.

As a major multi Framework agency, our recruitment processes follows government procurement standards including but not limited to:

- Crown Commercial Service
- Health Trust Europe
- London Procurement Partnership
- NHS Pre Employment Check Standards
- Core Skills for Health
- Care Inspectorate (Scotland)

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:

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

We are also members of the Recruitment and Employment Confederation (REC) Code of Professional Practice (REC code) and adhere to all aspects of this quality mark, ensuring our practices conform to basic statutory compliance as well as higher ethical standards. We are assessed every two years to ensure we retain and can renew our membership.

All agency workers must be taken through the rigorous pre-screening, registration and interview process.

Candidates are always informed of the steps taken to register. Each of those stages forms part of the legal and contractual requirements under NHS Employer Standards that ID Medical adhere to, including the requirements of the Equality Act 2010.

Those stages are:

- CV receipt
- Application form completed
- Formal face-to-face interview
- Identity checks
- Right to work check
- Employment history & reference checks
- Professional registration and qualifications checked with the GMC/NMC or other regulatory body
- Work health assessment checks
- English language competency checks
- Safeguarding check through the Disclosure and Barring Service (DBS)/PVG
- Statutory and mandatory and clinical/core skills training checks
- Handbook declaration
- Appraisal and revalidation, where required

Contractually, we adhere to the criteria set out in all Framework Agreements and Call-off Contracts held, and all Tier structures and SLAs that are put in place.

Whilst working in partnership with the NHS and other governing bodies, our processes are regularly audited, gaining ongoing confidence in our processes and practices.

As a Framework agency, ID Medical is committed to ensuring our supply chains and further business activities are free from ethical and labour standard abuses.

ID Medical's Policies, procedures, governance and legal arrangements are robust, ensuring that our pre-employment and ongoing checks are applied in our standard employment procedures to ensure compliance with current legislation.

Processes in place include but are not limited to:

- 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
- Confirming identities of all employees, workers and agency staff on an ongoing basis
- Confirming the right to work for each individual
- A dedicated Resolutions department, where individuals are encouraged to raise concerns
- 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 Nurse who has direct engagement with Nurses and the NMC

Equal Opportunities and Safeguarding

ID Medical 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 to ensure such concerns are investigated properly and dealt with efficiently and effectively.

ID Medical's transparent approach ensures that all candidates are treated equally and fairly. Pay rates are consistent and are not dependent on background, gender or ethnicity.

ID Medical has systems in place to:

- Identify and assess potential risk areas in our supply chains
- Protect whistleblowers
- Encourage and welcome ongoing audits
- Training and education for identifying risks and potential victims
- A dedicated Continuous Improvement team
- A dedicated Governance team
- Dedicated Recruitment Consultants for individual candidates

As an employer dedicated to education and safeguarding, ID Medical has a specialist learning and development team whose sole aim is to keep our workforce updated and educated to potential risks and threats alongside legislation changes.

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 31st March 2022.



David Newton
Managing Director
9th October 2023