



## Sumner Group Health Recruitment (SGHR) Modern Slavery Statement and Policy

### Introduction

This document contains the Sumner Group Health Recruitment Ltd (SGHR) policy and information on modern slavery.

This policy statement is relevant to SGHR itself, our contractors, partners, sub-contractors, suppliers, freelancers, members of the public, and other parties engaged with SGHR's business.

This Modern (Anti) Slavery Policy and Statement is intended for businesses in all countries, especially the United Kingdom.

### SGHR Acknowledgement

SGHR acknowledges that modern slavery is a crime and a violation of fundamental human rights. We understand that it takes various forms, such as slavery, servitude, forced and compulsory labour; and human trafficking—all of which sanction the deprivation of a person's liberty by another to exploit that person for personal or commercial gain. SGHR is building knowledge and competency in this area and understanding what is required to successfully implement the modern slavery act. Most importantly, SGHR aims to be effective in applying these practices through Tier 1 and all other subsequent tiers.

### Structure, Business, and Supply Chains

Sumner Group Health Recruitment (SGHR) is a specialist provider of health care services (i.e., training, resourcing, recruitment, etc.). Our mission is to be a trusted partner to the global health sector, policy makers, and the communities in which they serve, in the coordinated effort to overcome the world's "urgent health challenges" in delivering sustainable health and social care systems. Through this, we aim to become the largest provider of international Healthcare specialists to UK Healthcare sector placing overseas nurses, doctors, and AHPs with quality employers. The scope of our activity extends to candidates across all areas including surgical and medical wards, theatres, critical care, A&E, oncology, paediatrics, outpatients, radiography/imaging, radiology, fertility, midwifery, and clinical practice development.

Driven by our continuous "learning and improvement" philosophy (PDCA), we commit to continually improve our systems to meet our vision, values, and the expectations of those affected by what we do. SGHR will ensure that our responsibilities for modern slavery are clearly allocated, understood, monitored, and fulfilled; and legal requirements will be regarded as the minimum standard to be achieved.

Director: David Sumner

Main services: nurse recruitment

Supplier business relationships: long term, production-based

Number of SGHR employees: 2

Number of SGHR "ecosystem" employees: 40



Locations: Globally diverse workforce (e.g., Far East, Middle East, Europe, the Americas)

SGHR's internal cross departmental senior leadership members for modern slavery: digital strategy and transformation, executive team, finance, operations, and procurement.

Resulting from our business operations, SGHR acknowledges its obligations on modern slavery to our employees, stakeholders, and the communities in which we work.

## Resources

To identify a defined set of modern slavery standards, SGHR referred to the following resources:

1. Ethical Trading Initiative Base Code
2. Dhaka Principles for Migration with Dignity
3. International Labour Organisation's (ILO) 11 Indicators of Forced Labour
4. ILO General Principles and Operational Guidelines for Fair Recruitment
5. UN Guiding Principles on Business and Human Rights
6. OECD Due Diligence Guidance for Responsible Business Conduct
7. The Higg Index

## Policies

Sumner Group Health Recruitment ("SGHR") conducts all of its business in an honest and ethical manner, and in full compliance with the law.

Sumner Group Health (SGHR) has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business dealings and relationships. We are committed to implement and enforce effective systems and controls that ensure modern slavery is not present anywhere in our own business or in any of our supply chains.

We are committed to ensuring transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

As part of our contracting processes, we expect the same high standards from all of our contractors, suppliers and other business partners. This applies to all partners and businesses within the SGHR ecosystem, and all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

This policy is reviewed on an annual basis; however, it may be amended at any time. It does not form part of any employee's contract of employment.

### **SGHR Related Policies include:**

Child Labour Policy Employee  
Code of Conduct Human  
Rights Policy Migrant Workers'  
Policy Procurement Policy  
Recruitment Policy  
Staff Training and Awareness  
Policy Supplier Code of



Conduct

Whistle-blowing and Anonymous Reporting Policy Worker  
Welfare and Living Standards Policy

For additional policy statements on modern slavery, please refer to SGHR's Supplier Code of Conduct.

### **Responsibility for the Policy**

SGHR has the overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with its contents.

SGHR has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries on its contents, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy. Personnel are given adequate and regular training on this policy and the related issues of modern slavery in supply chains.

SGHR personnel are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions, and queries are encouraged and should be addressed to the managing director.

### **Compliance with the Policy**

The prevention, detection, and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

SGHR personnel must ensure that they read, understand, and comply with this policy.

SGHR personnel are required to avoid any activity that might lead to, or suggest, a breach of this policy.

SGHR personnel are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

SGHR personnel must notify their line manager OR a company director OR report it in accordance with SGHR's Whistle-blowing and Anonymous Reporting Policy as soon as possible, if it is believed or suspected that a conflict with this policy has occurred or may occur in the future. SGHR personnel may also send a confidential email to [compliance@sg-recruitment.com](mailto:compliance@sg-recruitment.com).

SGHR personnel should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive, and exploitative work practices in their own business and supply chains.

If any SGHR personnel are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they must bring it to the attention of their line manager or company director.

SGHR aims to encourage openness and support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers



any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If any SGHR personnel believe that they have suffered any such treatment, they should inform their line manager immediately. If the matter is not remedied, and, as an employee, it should be raised formally using our Grievance Procedure, which can be found in the current employee handbook.

## **Risk Assessment, Prevention and Mitigation**

Before publication, SGHR's modern slavery risk register is reviewed by the Board, and SGHR will continue to review quarterly.

SGHR, in keeping with the Department of Health and Social Care (DHSC) Code of Practice, adheres to modern slavery codes and provisions for the international recruitment of health and social care personnel, as noted below:

- 1. Ethical Recruitment Principles:** The code outlines ethical recruitment principles that emphasize the importance of fair and transparent recruitment practices. These principles include commitments to respect human rights, prevent exploitation, and prohibit modern slavery in the recruitment process.
- 2. Recruitment Agency Standards:** The code sets standards and requirements for recruitment agencies involved in the international recruitment of health and social care personnel. These standards include guidelines on responsible recruitment practices, ensuring that agencies avoid engaging in or facilitating modern slavery.
- 3. Due Diligence Measures:** The code requires recruitment agencies to conduct due diligence to identify and mitigate modern slavery risks within their operations and supply chains. This involves measures such as conducting risk assessments, monitoring subcontractors, and implementing robust recruitment procedures to prevent and detect any instances of exploitation.
- 4. Compliance and Monitoring:** The code establishes mechanisms for monitoring and ensuring compliance with its provisions. This involves regular audits, inspections, and reviews of recruitment agencies to verify adherence to the code's standards and identify any potential modern slavery concerns.
- 5. Collaboration and Partnerships:** The code encourages collaboration between the DHSC, recruitment agencies, and other stakeholders to collectively address modern slavery issues. Collaborative efforts involving sharing information, best practices, and resources to strengthen efforts against modern slavery within the health and social care recruitment sector.
- 6. Worker Protection and Support:** The code emphasizes the importance of protecting the rights and welfare of health and social care personnel. Including provisions that ensure workers have access to information about their rights, channels for reporting grievances, and support services to address instances of exploitation.

Processes to provide oversight of modern slavery risk across the SGHR supply chain include:

### **New Market Sustainability Risk Assessment**

All potential new retail and production markets are assessed using a risk-based approach before deciding to set up operations. The sustainability risk assessment includes both an environmental and a social



perspective. For high-risk markets, stakeholders (global and local) are consulted and involved in reviewing the findings, providing additional input, and helping guide us in actions to address critical issues.

### **Supply Chain Management and Monitoring**

SGHR focuses on building strong long-term relationships that are based on trust and transparency.

To ensure that our requirements are met, including the absence of child and forced labour, and to enable us to monitor the implementation of these requirements in our “Supplier Code of Conduct,” it is crucial for us to know where the sourcing/production/manufacturing of our products takes place.

### **Due Diligence Process**

Furthermore, to expound our due diligence approaches, over the next 12 months through 2024, SGHR commits to the Key Steps/Smart Objectives for 2023/2024, as noted below:

#### **Key Steps/Smart Objectives for 2023/2024**

1. SGHR commits to conducting a social audit (e.g., Amfori, SMETA, etc.) on our high-risk country suppliers for Tier 1.
2. SGHR commits to complete risk assessments on our Tier 1 suppliers and to implement mitigation plans on the highest risks.
3. SGHR commits to work with organizations that will provide transparency on our supply chain.
4. SGHR commits to complete Tier 2 mapping.
5. SGHR commits to establish core KPIs for tracking progress on modern slavery best practices.
6. SGHR commits to develop a modern slavery working group that includes our internal teams and our suppliers across the supply chain.
7. SGHR commits to strengthening competencies and heightening staff awareness on modern slavery “focused” topic areas for global and local SGHR personnel.

### **Effectiveness**

Please refer to “Key Steps/Smart Objectives for 2023/2024” – Line item 5. Establishing core KPIs on establishing modern slavery best practices.

### **Training**

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us. Updates are provided using established methods of communication between the business and SGHR personnel.

SGHR employees are trained continuously in our policies, including those related to human rights, and our company values. Specific e-learning courses on sustainability-related themes are available to our employees via web-based platforms, including e-learning modules on modern slavery and its various elements (e.g., child labour, collective bargaining, debt bondage, forced labour, freedom of association, human rights, working hours, etc.).

In addition, training courses are customised for different roles and functions. In-depth training on the resources, such as those listed above on modern slavery principles and implementation (e.g., International Labour Organisation’s (ILO) 11 Indicators of Forced Labour, UN Guiding Principles on Business and Human Rights, etc.) and the implementation of SGHR’s Human Rights Policy is customised for key roles and

functions within the group.

Please refer to “Key Steps/Smart Objectives for 2023/2024” – Line item 7. Strengthening competencies



and heightening staff awareness on modern slavery “focused” topic areas for global and local SGHR personnel.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors, and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **Breaches of this policy**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. SGHR may terminate relationships with other individuals and organisations working on our behalf if they breach this policy.

Signed by David Sumner on behalf of Sumner Group Health Recruitment Limited – 21<sup>st</sup> July, 2023