

This statement is made as part of MSI Group Limited's ("MSI Group") commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 ("the Act"). It summarises how MSI Group operates, the policies and processes in place to minimise the possibility of any problems, any risks we have identified and how we monitor them, and how we train our staff.

This statement is published in accordance with section 54 of the Act, and relates to the financial year January 2021 to December 2021. It was approved by the board of directors on 11<sup>th</sup> January 2022.



Phil Wareham  
CEO

## Our Business

MSI Group is a limited company operating in the healthcare, pharma and education recruitment sector. We supply temporary workers to the NHS and other Healthcare organisations and act as a neutral and master vendor.

MSI Group is an independent business.

## Who we work with

All the temporary workers we supply are identified by our staff. Some of these work-seekers operate through their own limited companies.

As a "neutral vendor", we work with other businesses to supply workers to hiring companies. All of the workers we supply are hired directly by other businesses, and we facilitate supplying them to the hiring companies. Some of these workers operate through their own limited companies.

As a "master vendor", we work with other businesses to supply workers to hiring companies. We hire some of the workers directly, who are directly recruited by our staff. Other workers are hired directly by other businesses. Some of these workers operate through their own limited companies. We facilitate supplying a mix of these workers to the hiring companies.

The hiring companies that we work with are located in throughout the UK. The workers we supply live throughout the UK.

## Other relationships

As part of our business, we also work with the following organisations:

- NMC, GMC, HCPC, GDC amongst other professional bodies.
- DBS
- the Recruitment and Employment Confederation ([www.rec.uk.com](http://www.rec.uk.com))

## Our Policies

MSI Group has a modern slavery policy which is available on request.

In addition, MSI Group has the following policies which incorporate ethical standards for our staff.

- Anti-bribery / corruption policy, and
- Raising concerns policy (whistle-blowing).

## Policy development and review

MSI Group's policies are established by compliance director, based on advice from HR professionals, industry best practice and legal advice, and in consultation with the board of directors. We review our policies on a regular, or as needed to adapt to changes.

## Our Processes for Managing Risk

In order to assess the risk of modern slavery, we use the following processes with our suppliers:

- When engaging with suppliers, we ask for evidence of their processes and policies, including commitments around modern slavery, human trafficking, forced labour, human rights, and whistle-blowing.
- We conduct audits before entering into a commercial relationship with any business where there is the potential for risk. These audited businesses form the basis of our preferred supplier list.
- We review the potential for risk at regular intervals, including the possibility of re-auditing a supplier or conducting spot checks.

After due consideration, we have not identified any significant risks of modern slavery, forced labour, or human trafficking in our supply chain. However, we continue to be alert to the potential for problems.

- We reserve the right to conduct spot-checks of the businesses who supply us, in order to investigate any complaints.
- We require the businesses we work with to publish a modern slavery statement, if appropriate.
- We collaborate with our suppliers in order to improve standards and transparency across our supply chain.
- Only senior members of staff who have undergone appropriate training for assessing modern slavery risks in the supply chain are authorised to sign contracts and establish commercial relationships in any area where we have identified the potential for risk.
- We ensure that all of our suppliers are members of appropriate industry bodies and working groups.

Our staff are encouraged to bring any concerns they have to the attention of management.

## Our Performance

As part of monitoring the performance of MSI Group, we track the following general key performance indicators:

- The level of compliance and transparency we have within our established supply chain.
- The speed in which we investigate related complaints.

Based on the potential risks we have identified, we have also established the following key

performance indicators, which are regularly assessed by our board of directors:

- the percentage of suppliers who sign up to an appropriate code / provide their own modern slavery statements.
- the percentage of candidates supplied from audited businesses / our preferred supplier list.
- the effectiveness of enforcement against suppliers who breach policies.
- the amount of time spent on audits, re-audits, spot checks, and related due diligence
- the level of modern slavery training and awareness amongst our staff

We carefully consider our indicators, in order to ensure that we do not put undue pressure on our suppliers that might increase the potential for risk.

## Our Training

All of our staff receive training and support that is appropriate to their role. In particular:

- All of our staff receive awareness-raising information around issues involving modern slavery and human trafficking, so that they can bring any concerns they have to the attention of management.

As part of this, our staff are encouraged to discuss any concerns that they have. Training is refreshed regularly.