



CORPORATE SOCIAL  
RESPONSIBILITY POLICY

Passion, **Appreciation**, Integrity, **Respect**

## **Managing Director's Corporate Social Responsibility Statement**

At NL Group, we want our business to have a positive impact on the lives of our employees, our candidates, the agency workers who pursue their careers with us, the healthcare customers we serve and their patients and service users. We strive to act both responsibly and sustainably at all levels of our business and at all times for the wider good of society, our local communities and the environment.

As we prepare to celebrate two decades of serving the healthcare sector, Rae McGlone (a trained healthcare professional) and I, as founding directors, continue to work at the forefront of the business, maintaining our clear focus on providing value-for-money services combined with safe and high-quality patient care.

Rae and I are backed by a highly professional management team, who like us are dedicated to delivering excellence and to providing innovative and reliable services around the clock.

This dedication, that drives our company culture, is captured in our Mission Statement and the Core Values which sit at the heart of our business and guide everything we do.

I am now pleased to outline our commitments in the NL Group's Corporate Social Responsibility Policy, focussing on four priority areas:

- Delivering Excellence, Value-for-Money and Socially Sustainable Services
- Optimising Health, Safety and Wellbeing for all our Stakeholders through rigorous compliance
- Bringing Health and Wellbeing to Communities at home and abroad
- Protecting the Environment

Our commitments in these areas are enshrined in the Handbooks and the Code of Conduct to which each of our employees, candidates, agency workers and suppliers are required to adhere. They underpin the policies and standard operating procedures which govern all areas of our business operations.

Progress towards our commitments is ensured through our market-leading compliance with industry standards, codes of practice and regulatory requirements, and is regularly measured through independent third-party audits, verifying that we meet or exceed the most exacting standards.

It is my personal commitment, as Regional Director of the Recruitment and Employment Confederation (REC) since 2005, to oversee NL Group's adherence to the REC standards of practice and I am proud of the professionalism and code of ethics deployed throughout our company.

We annually contract with Neuen, a specialist in compliance audits for temporary agencies across all disciplines within the private and public sectors. Our latest audit provided us once again with a Platinum Status, the highest possible score, of which we are extremely proud. Yet more important to us than our quality accreditations, is our hard-won reputation for excellence, ethics, responsiveness and accuracy reflected in regular feedback from all our stakeholders.

As Managing Director, I take personal responsibility and ownership of our Corporate Social Responsibility commitments and I would like to thank all of our 475 colleagues and agency workers for their hard work in delivering against these objectives in 2019/2020 and in particular for their professional, responsible and dedicated response to the Covid-19 pandemic.

**Mark Hathway**  
**Managing Director NL Group**  
**July 2020**



**Neuven Audit Solutions audit**

Neuven Audit Solutions provide independent compliance audits for users of temporary staffing agencies across all disciplines within the Private and Public sectors. NL Group has received 'Platinum' status in its audits to date.



**REC Audited**

Recruitment is a competitive market. Every agency talks about how they can 'add value' but being able to demonstrate that you are different to competitors is a different matter entirely.

REC Audited is a robust audit package that validates compliance with the Employment Agencies Act and Conduct Regulations 2003 and REC Code of Professional Practice.



**REC Member**

The Recruitment and Employment Confederation (REC) is the professional body dedicated to representing the interests of the UK's £19.7 billion recruitment industry in Parliament, Whitehall, the European Commission and to press and opinion formers.

Representing 3,750 Corporate Members, with more than 7,700 branches, and 5,550 Individual Members within the Institute of Recruitment Professionals.

The REC along with its Accredited corporate members such as NL Group are committed to raising standards and highlighting excellence throughout the recruitment industry and all REC Members must abide by the REC Code of Professional Practice.



**SAFER Jobs**

SAFERjobs is a non-profit, joint industry and law enforcement organisation designed to support job seekers, agency staff, and contractors with any suspected fraud, malpractice, breach of legislation, or poor experience they may encounter. SAFER Jobs is supported by the DWP, BEIS, Metropolitan Police, and other government and industry organisations.



**ISO 9001**

ISO 9001 is the internationally recognised standard for the quality management of businesses. ISO 9001 applies to the processes that create and control the products and services an organisation supply prescribes systematic control of activities to ensure that the needs and expectations of customers are met is designed and intended to apply to virtually any product or service, made by any process anywhere in the world. NLG Certificate Number: 4304



**ISO 27001**

ISO 27001 is the internationally recognised standard for the quality management of businesses. ISO 27001 is a specification for an information security management system (ISMS). An ISMS is a framework of policies and procedures that includes all legal, physical and technical controls involved in an organisation's information risk management processes. NLG Certificate Number: 4302

# CORPORATE SOCIAL RESPONSIBILITY POLICY

## What we do

NL Group is one of the UK's leading healthcare and homecare recruitment agencies, specialising in providing medical, nursing and other healthcare staff to NHS Trusts and private sector providers.

This includes the supply of staff to:

- NHS Hospitals
- NHS Trusts and Foundation Trusts
- NHS Mental Health Trusts
- Nursing and Medical for the Prison Services
- Private Hospitals Staffing
- Public and Private Nursing
- Nursing and Care Homes Staffing

The NHS accounts for 88% of the NL Group's total staff placements (including complex homecare). In addition, we supply staff to the private sector, private hospitals, public bodies and councils.

We have a track record of excellence going back to 2001 and are committed to engaging, recruiting and providing only the best healthcare professionals, each of whom are supported to provide excellent care.

## Corporate Social Responsibility

NL Group's Corporate Social Responsibility programme is about being responsible towards all our stakeholders, always delivering high quality services whilst being committed to acting ethically and sustainably. We strive to achieve excellence through market-leading compliance whilst delivering value-for-money solutions and optimising the health, safety and wellbeing of all of our stakeholders.

We follow business principles with the ethical, social, and economic impact of our activities in mind. We seek to be a sustainable business, taking action to minimise our impact on the environment. We invest in the development of our employees, candidates and agency workers and contribute to our local community and wider economic development.

Our Corporate Social Responsibility approach is captured in the provisions of our Employee Handbook, Candidate Handbook and Code of Conduct, which embed our [Core Values](#) and set clear standards for expected and acceptable behaviours. It is summarised in this policy which is reviewed and approved annually, with targets and expenditure being set by the Directors.

NL Group communicates the CSR policy within all levels of the business and publishes it on the NL Group website.

## **Delivering Excellence, Value for Money and Socially Sustainable Services**

NL Group is steadfast in ensuring the provision of care services is never disrupted, that healthcare staff and service users are protected from risk and that our solutions generate sustainable and demonstrable savings, allowing our customers to focus on their wider corporate objectives.

We believe in offering solutions that have tangible benefits for customers, driving down their operating and resourcing costs whilst increasing efficiency and productivity via innovative, integrated systems and automation wherever and whenever possible.

### **Good Governance, Quality Assurance and Continuous Improvement**

Achievement of the NL Group's Corporate Social Policy commitments is supported by the implementation of good corporate governance principles and adherence to a full set of policies and standard operating procedures across all parts of the business.

We regularly evaluate our processes to ensure continuous improvement in the delivery of our services and undergo regular internal and external audit processes.

NL Group has held ISO 9001 accreditation since 2004. ISO 9001 is an internationally recognised standard for the quality management of businesses. It applies to NL Group's processes that we use to manage the services that we provide, ensuring that these meet the needs and expectations of our customers. As part of our accreditation, we demonstrate commitment to developing and continuously improving our services.

### **Value for Money**

The health care industry is a specialised area, and NL Group has a proven track record across the UK of succeeding in meeting the specialist needs of the NHS where other agencies have failed. We have done this through competitive pay rates and value for money charge-rates. NL Group is fast becoming one of the fastest growing health and medical recruitment agencies in the UK.

As an approved agency under various new, national staffing frameworks, including London Procurement Partnership (LPP), Crown Commercial Services (CCS), Health Trust Europe (HTE) and National Clinical Staffing Framework operated by North of England Commercial Procurement Collaborative (NOECPC), we acknowledge the Government's Supplier Code of Conduct and are committed to supporting our public sector clients to deliver better public services, behave ethically and treat end users of services, employees and subcontractors fairly and with respect.

NL Group is one of the most competitively priced nursing agencies for supply of NHS nursing staff in the UK. We aim to provide a quality service that is value for money to the NHS. This is achieved by our relatively small commission rates when compared to some nursing agencies.

Our pricing structures are designed to ensure we can compete at the highest level in the industry and allow us to build long-term collaborative and trusting relationships with NHS Trusts providing continuity of staff and thus maximising patient care to its highest level.

Our aim is to offer contracts with a sustainable value throughout their duration.

### **Social Sustainability**

NL Group ensures that its recruitment follows good recruitment practice and demonstrates a sound ethical approach. We rely on social media and job boards to attract candidates and advertise within the UK.

NL Group does not directly approach potential candidates, recognising that this may have a detrimental effect on the permanent workforce within the NHS, social care or overseas.

### **Confidentiality, Data Protection and Cyber Security**

NL Group operates in accordance with Data Protection Act and GDPR guidelines. We share information on a *need-to-know* basis and with appropriate consent obtained. We handle all information with due sensitivity and confidentiality.

We have implemented procedures to ensure the integrity and security of our IT systems and have held the Cyber Essential Plus Certificate since 2017, which confirms compatibility and compliance of our systems with relevant standards and guidance. In addition, NL Group has held ISO 27001 accreditation since 2018. This is an internationally recognised standard for an information security management system (ISMS). An ISMS is a framework of policies and procedures that includes all legal, physical and technical controls involved in an organisation's information risk management processes. NL Group has therefore undertaken a risk management process to identify and mitigate or minimise risk associated with its ISMS.

### **Optimising Health, Safety and Wellbeing for Stakeholders**

At NL Group, people are our business, whether they work as part of our team, as agency workers or candidates, partners or suppliers- their wellbeing matters to us. We are committed to patients and service users receiving excellence of care delivered through our temporary workforce and the candidates that we place, and we will always prioritise patient safety.

## **Health and Safety and Wellbeing at Work**

As an employer, NL Group recognises its moral and legal obligation to protect our employees, agency workers and service users and take the responsibility for their occupational health and safety. The provisions of the Health and Safety at Work Act, associated Codes of Practice and Directives including but not limited to Agency Workers Regulations 2010 and Working Time Directive 2003 have been adopted as required standards within our company.

We conduct all necessary Risk Assessments.

We aim to provide all our employees with a safe and healthy environment by making sure that everyone has the knowledge and ability to work safely.

We provide our employees and agency workers with access to all necessary facilities and appropriate PPE when required.

## **Safeguarding**

NL Group Healthcare aims to ensure that all staff operate within a safe environment for children and vulnerable adults within healthcare. In accordance with our Safeguarding Policy, all our staff, candidates and agency workers attend mandatory training on Safeguarding and know what to do in the event of any concerns.

Patient and service-user safety is paramount and as a result we take seriously any allegations of abuse by staff working through us. If we receive complaints against an agency worker, they will not be reassigned until a full investigation has been performed.

More generally, our agency workers undergo regular appraisals and ongoing training and professional development and we systematically monitor all end of shift and end of assignment feedback to ensure that the services they deliver are of a consistently high standard and level of safety.

## **Equal Opportunities and Accessibility**

We are an equal opportunities employer who recognises each individual's personal merit. Through adherence to our Equal Opportunities Policy at all levels of our business, we promote equal opportunities in all areas particularly in communicating our expectations, recruitment and selection, training, benefits and terms and conditions of employment. We review our working arrangements and make reasonable adjustments to accommodate accessibility requirements. Our ground floor offices are fully accessible to wheelchair users.

We take every possible step to ensure that no person working for NL Group, seeking employment, or using our services will receive less favourable treatment or will be

disadvantaged. We actively encourage diversity to maximise achievement, creativity, innovation, and good practice to bring benefits to individuals and communities.

We encourage all people who work with us and for us to contribute to an environment in which people feel comfortable in expressing how they feel and what they need, knowing they will be treated with respect and that their contribution will be valued.

We embrace equal opportunities as outlined in our equal opportunities policy and the spirit and intentions of legislation that outlaws discrimination and promotes equality and diversity.

The way in which we work, train and learn reflects both the mission and objectives of NL Group.

### **Modern Slavery, Child Labour, Inhumane Treatment and Human Rights**

We do not perceive risks related to modern slavery, child labour, inhumane treatment and human rights as high within this business due to the nature of the work undertaken and the highly qualified individuals being placed by the agency.

Nevertheless, we have thorough recruitment and compliance policies, procedures and control measures in place. Robust recruitment practices include immigration checks, document control and clearance requirements. Staff interviewing potential agency workers are trained to be aware of the potential for modern slavery and human trafficking throughout the Recruitment Process. Our policies not only raise awareness of the issue but also help to identify and address potential threats. Any concerns or issues would be reported to the Directors who would act as necessary.

NL Group will not engage with any business arrangement with any person, company or organisation which fails to uphold the human rights of its workers or which breaches the human rights of those affected by the organisation's activities, in compliance with the Modern Slavery Act 2015.

### **Employees, Employee Relations, Policies and Procedures**

We believe that people are our greatest asset and we strive for high standards both as an employer and as a provider of services.

We are committed to recruit and retain the best staff by recognising their achievements and rewarding their efforts. How we motivate and develop our employees and agency workers reflects our culture and business ethos.

NL Group has policies and procedures in place that ensure a fair and professional approach in our dealings with any HR related issues.

We are committed to fair, equal pay and benefits and we seek to provide employees with secure employment, avoiding the use of zero hours contracts. We consider requests for flexible working and allow adjustments where possible. Staff receive benefits including subsidised gym membership, to encourage health and wellbeing.

NL Group's employees are contracted to work 40 hours per week and may be required to work occasional overtime. Working hours are generally between 0800 hours and 1800 hours, with one hour for lunch. The recruitment team also operate on a shift basis, with on-calls providing a support service to clients 24-7, 365 days a year.

We actively encourage Continuing Professional Development and promote the development of the skills, expertise and competence of our staff as well as ensuring the effectiveness of their training. NL Group endeavours to provide development opportunities whenever possible.

We establish Key Performance Indicators for staff and set down the specific objectives which we want to achieve as an organisation. These are reviewed as part of annual appraisals.

### **Remuneration**

We pay employee remuneration in compliance with all applicable wage regulations including those related to minimum wage, overtime and legally mandated benefits. We do not facilitate any unlawful deductions.

We ensure that all employee remuneration is paid in a timely manner in accordance with contractual obligations and we will not withhold any funds unnecessarily.

### **Protection of Temporary Workers**

We recognise that income security for agency workers is an important issue and balance the needs of our agency workers and clients. Many of our agency workers seek the flexibility provided by agency work and for those that require longer term assignments, we work collaboratively with our clients to arrange longer, fixed term assignments and these can be for 1, 2, 6 or even 12 months.

In addition, NL Group provides permanent recruitment services and therefore will help place workers who are looking for a permanent career change.

All agency workers are provided with a one-page Key Information Document upon joining NL Group. This provides a clear illustration of payrates and what the agency worker might expect to receive.

### **Customers, Suppliers and Partners**

NL Group takes our responsibilities towards our customers, suppliers and partners very seriously. At all times, our activities are carried out by adequately complying with fiscal and legal obligations and responsibilities. We have a deep commitment to legal compliance and ethical business practices. We adhere to tax obligations including but not limited to IR35 and ITEPA legislation and avoid any tax evasion practices.

We act in accordance with the principles of integrity, transparency, and prudence.

NL Group has multiple channels and tools for facilitating communication, participation and dialogue with our customers, suppliers, and partners. These ensure successful cooperation and prompt and adequate handling of any complaints or disputes.

We support fair trading, ethical conduct, anti-corruption and fair competition practices and to ensure compliance with these, we have implemented numerous Quality and Compliance Standards and hold REC Accreditation.

We expect our suppliers and partners to be transparent and to have input in place sufficient systems to operate in accordance with legal obligations and responsibilities. We expect them to adhere to anti-corruption laws, including but not limited to the Bribery Act 2010 and anti-money laundering regulations.

We have procedures in place within our Quality Management System to fully assess our supply chain and partnerships ensuring that they meet our compliance standards. This due diligence is carried out using Supplier Questionnaires and regular audits. Different levels of supplier questionnaires are issued according to the nature of the supplier thereby ensuring that the requirements incumbent on a window cleaning firm, for example, are less onerous than those imposed on an umbrella company.

When undertaking detailed reviews of all potential umbrella companies that our agency workers may use, we review their compliance with all relevant IR35, tax and general legislative obligations.

Supplier due diligence falls in the first instance within the remit of our Purchase Ledger function however ultimate approval rests with the Managing Director to the system.

### **Payment of Suppliers and Agency Workers**

We have implemented and adhere to fair and reasonable payment practices.

NL Group pays all suppliers promptly within 30 days or within the suppliers' terms if these are within shorter timescales.

Payments to agency workers and umbrella companies are made on a weekly basis following receipt of appropriately approved timesheets. Payment is usually made within two days of receipt of timesheets.

NLG is developing a mobile app which will enable agency workers to obtain approvals and submit their timesheets more easily and therefore potentially will enable even faster payment. The app is scheduled to go live in August 2020.

## **Protecting the Environment**

NL Group is committed to considering environmental issues at every level of its business and endeavouring to reduce our environmental impact. Whilst we are not a large organisation and the nature of our work does not inherently have a high environmental impact, we are nonetheless conscious of the difference even small actions can make to the future of our planet.

### **Environmental Sustainability**

NL Group's Environmental Policy, drawn up to meet the requirements of ISO 14001, outlines how the Company will manage its impact on the environment.

We encourage our employees to use all resources (water, energy) as responsibly as possible both at work and at home.

Currently, 75% of NL Group employees live within a 5-mile radius of their workplace and we support Cycle to Work schemes and provide secure bike storage facilities to encourage more sustainable ways of commuting to work.

We aim to conduct online meetings where appropriate to limit unnecessary travel.

We encourage use of recycled products and materials and minimise the production of waste within our offices and processes, for example by supporting paperless documentation circulation and the reduction of colour printing by setting all printers to default to black and white printing. We strongly support recycling schemes and mixed recyclates are separated for recycling through our local recycling scheme.

## **Bringing Health and Wellbeing to Communities at home and abroad**

NL Group is a people-focussed business. We commit to enhancing and having positive impacts on the health, physical and mental wellbeing and the improved life outcomes of people whether inside our business, in the communities in which we work and place our candidates, or further afield.

### **Community Engagement and Social Responsibilities**

To achieve this commitment, NL Group supports its employees' in their community engagement initiatives whether through providing paid leave to take part in charity related events and/or match-funding funds raised. We closely monitor to ensure that charitable donations, contributions, or sponsorship genuinely benefit the intended causes.

For many years, NL Group directors have taken a top-down approach to actively encourage staff to get involved in community projects.

For example, since NL Group was established in 2001, we have been actively supporting the operations of [OPSA](#) – a charity which organises annual Cleft Camp programmes in Pakistan. We provide both financial assistance, office space for meetings and staff time and expertise to the charity. Our Director Rae McGlone flies to Pakistan annually to provide her operating theatre expertise.

With our health division located in Hull, we are committed to promoting health and wellbeing in our local community. To this end, NL Group has become a continuous supporter of the Hull Homeless Project. In 2019, our CEO led the way by taking part in a sponsored sleep-out raising £1,500 for this charity. In addition to attracting funding, NL Group provides on-going social media support.

NL Group acknowledges the value of sports and physical activity and their contribution to mental, physical and community wellbeing. As a result, we are pleased to sponsor a local cricket team and two local children's football teams.

## **Social Value**

NL Group, as an employment agency, is committed to upskilling workers (home care staff in particular) and to promoting training and excellence within the existing healthcare workforce.

We recognise the need to attract increasing numbers of young people to the healthcare sector. As a result, our Managing Director, Mark Hathway, delivers regular talks in schools and colleges and as an organisation we will continue to take every opportunity to promote the healthcare sector by attending careers open days and events organised by the University of Hull.

We offer regular apprenticeship opportunities within our business, providing excellent training and workplace experience for young people and attend a number of jobs fairs each year.