Slavery and human trafficking statement

Introduction from Keith Ward, CEO of BMA
The BMA (British Medical Association) is committed to integrity, high ethical and moral standards and professionalism. In line with these values the BMA has a zero-tolerance approach to slavery and human trafficking. Slavery and human trafficking often have serious health consequences for its victims who consequently come into contact with the healthcare services - our members therefore play a vital role in spotting and supporting victims.

The BMA campaigned extensively on ethical trade within the NHS, and from this position, also lobbied extensively for ‘Transparency in Supply Chains’ to be incorporated. It has also been working with the Home Office Modern Slavery Unit and is dedicated to continuing the improvement of its practices so as to prevent acts of modern slavery and human trafficking from occurring within the organisation and its supply chains, and impose the same high standards on its suppliers.

Organisation structure
The BMA is the trade union and professional body for doctors in the UK. As a trade union, it serves its members’ in a number of ways including with regard to employment issues, training, lobbying and providing its members with legal and financial services. The BMA has around 159,000 members and its annual turnover for 2016 was £58.9 million. The BMA operates predominantly in the UK but also has an office situated in Brussels and it employs approximately 500 people (which includes 2-3 members of staff in Brussels). For more information about the BMA please click here: https://www.bma.org.uk/

The BMA Group is comprised of a number of subsidiaries, namely:
– BMA Law – this is an independent law firm established by the BMA, offering expert, cost effective legal advice operating on a not-for-profit basis
– BMA Investments Ltd – this is a wholly-owned subsidiary of the BMA that holds investments on behalf of the BMA;
– BMJ Publishing Group Ltd (BMJ) – this is a wholly-owned subsidiary of the BMA involved in seeking to advance healthcare by sharing knowledge and expertise, and also assists doctors in finding employment. BMJ has wholly owned subsidiaries, including in the US, India and China.

The following information relates only to the BMA. Further information on the BMJ’s supply chains and policies, along with its statement, can be found at www.bmj.com

Our supply chains
We work with a wide range of suppliers, primarily from the UK. Our supply chains include: professional services and advisors, office support services (stationery, cleaning, IT equipment and software), catering and hospitality.

We do not consider that we operate in high risk sectors or locations because of the nature and UK base of the majority of our supply partners.

As part of our initiative to identify and mitigate risk we intend to do as follows.
– We will ask our suppliers to complete and return to us a questionnaire about modern slavery, following which we categorise and weight risk and take appropriate steps accordingly.
– We ensure that all new contractual documentation includes an obligation on suppliers to comply with the Modern Slavery Act 2015 (and all other relevant modern slavery legislation) and, where we can, we also ask the supplier to pass this obligation down the contractual chain to its suppliers.
– We are preparing and intend to formally adopt the BMA Modern Slavery and Human Trafficking Policy during the course of this financial year and communicate it through the organisation.
We are assessing the key areas of risk in our supply chains and will continually increase our vigilance in making decisions regarding our suppliers and potential suppliers by seeking confirmations and commitments as to the absence of these practices in their businesses.

We will withdraw from existing contracts (where we may lawfully do so), or decline to enter into or renew a contract with a supplier or potential supplier, if our counterparty is unable to give us sufficient confirmations and commitments.

We will report incidents of slavery and human trafficking and do all that we can to protect whistle blowers.

We also ensure that all of our suppliers that have staff working on our sites are contractually obligated to pay, as a minimum, the national living wage.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no slavery or human trafficking in our supply chains or in any part of our business. We commit to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We do not use or accept forced, bonded or involuntary prison labour or child labour.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Anti-slavery policy: this sets out the organisation’s stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Whistleblowing policy: all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

We have prepared and hope to formally adopt a new code of conduct policy which will apply to staff and members.

The BMA also operates a robust recruitment process, which includes conducting checks on eligibility to work in the UK.

Training

We invest in educating our staff and members to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our policies, employees and members are encouraged to identify and report any potential breaches of the organisation’s anti-slavery and human trafficking policy. Employees and members are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

Our Procurement has already engaged in specific Chartered Institute of procurement and Supply (CIPS) training on ‘Ethical Procurement & Supply’. Going forward, we aim to provide dedicated training to the human resources team. We also aim to roll out media training to raise awareness of slavery, including identifying the signs, to all employees within the organisation. Our members are also encouraged to pass on their knowledge and awareness to other healthcare workers such as nurses.

Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we aim, by the end of this financial year, to complete our supplier audit and to be able to begin providing KPI’s on how we are meeting our objectives.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2016.

Keith Ward, chief executive
13 April 2017

British Medical Association