

Slavery and human trafficking statement

s. 54(1) of the Modern Slavery Act 2015 (MSA)

Introduction from Tom Grinyer, Chief Executive Officer.

The British Medical Association (BMA) is the trade union and professional body for doctors and medical students in the UK. As a trade union, we serve our members in a number of ways including, with regard to employment issues, training, lobbying and providing our members with legal and financial services. The BMA membership includes around 156,000 doctors together with 19,000 medical students. In 2018 BMA's turnover was £57.8 million. The BMA operates predominantly in the UK though we also have an office in Brussels.

The BMA is committed to integrity, high ethical and moral standards and professionalism. In line with these values we have a zero-tolerance approach to modern slavery and human trafficking. We implement and enforce effective systems and controls to try to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

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.

For more information about the BMA please click here: bma.org.uk

Organisation structure

The BMA is the parent company for a number of subsidiary companies including:

- **BMA Law Ltd**: this is an independent law firm established by the BMA, offering expert, cost effective legal advice for members operating on a not-for-profit basis;
- **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 members in finding employment. BMJ has offices/subsidiaries in the US, India and China; and,
- **BMA Investments Ltd**: this a wholly-owned subsidiary of the BMA holds investment for and on behalf of the BMA.

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.



Due diligence process for slavery and human trafficking

As part of our initiative to identify and mitigate risk we:

- **ask** all potential or new suppliers to provide information about modern slavery, their approach and compliance with this legislation, following which we categorise and weight risk and take due consideration in our decision making prior to any contract award;
- **ensure** that all new contractual documentation includes an obligation on suppliers to comply with the MSA (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; and,
- **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; and,
- **protect** whistle blowers and those who speak up.

We have a zero-tolerance attitude to slavery and human trafficking. We encourage staff and members to speak up or call the Modern Slavery Helpline on 08000 121 700 if they have concerns or suspicions. We have an effective whistleblowing policy to support staff who wish to raise concerns on a confidential basis.

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, our staff and members are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. BMA staff 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 team has already engaged in specific CIPS training on 'Ethical Procurement & Supply', and, going forward, we aim to provide dedicated training to the human resources team.

We are reviewing current awareness training and how best to deliver training to all BMA staff, including via the induction process and subsequently through a compliance platform. Our members are also encouraged to pass on their knowledge and awareness to other healthcare workers such as nurses.

Wider Impact

We are committed to acting ethically and with integrity in all our business dealings and relationships.

We campaigned extensively on ethical trade within the NHS, and from this position, also lobbied extensively for 'Transparency in Supply Chains' to be incorporated. We have also worked with the Home Office Modern Slavery Unit. We are dedicated to continuing the improvement of processes and practices so as to prevent acts of modern slavery and human trafficking from occurring within our own organisation and our supply chains and seek to impose the same high standards on our suppliers.

Our effectiveness in combating slavery and human trafficking

We regularly review and update our policies and procedures. We have taken proactive steps in the monitoring of high-risk suppliers. We report as follows:

- **General activities:** we have updated the embedded questions in our supplier procurement questionnaire and invitation to tender documentation so that all potential suppliers, regardless of size are obliged to answer questions about their approach to modern slavery and human trafficking;
- **Perceived high risk service areas:** we carried out an audit against two key BMA suppliers (catering / hospitality services and building maintenance). We were satisfied both were able to demonstrate that strong policies and procedures were in place;
- **Additional service areas reviewed:** we also reviewed the arrangements that were in place with two further suppliers who provide, separately, print and warehousing

services to the BMA. Notwithstanding both suppliers fell under the threshold regarding the provision of a statement, both had appropriate policies in place to ensure the recruitment of staff (temporary and permanent) reflected legal requirements under the MSA; and,

- **Additional information:** between Q4 of 2018 and Q1 of 2019, we reviewed the BMA House cleaning services contract. Cleaning services are perceived to present with a higher risk profile for BMA. Our review included an examination of the policies and procedures of all bidders against MSA requirements.

We continue to review our procurement policies and assessment documentation.

You can also read how we did against our 2016 and 2017 targets [here](#).

Further steps

We are fully committed to the MSA and have identified some areas of improvement for the next financial year – many of which we are working on already. For example, we are:

- continuing to review existing policies, procedures and forms which address combatting slavery and human trafficking;
- rolling out slavery and human trafficking awareness training to all staff and encouraging member engagement; and,
- exploring new ways to measure the effectiveness of BMA policies and procedures and how best to report those findings on our website.

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 2018.

Tom Grinyer, Chief Executive
British Medical Association