

British Medical Association bma.org.uk Slavery and human trafficking statement
s. 54(1) of the Modern Slavery Act 2015 (MSA)

Introduction from Tom Grinyer, Chief Executive Office

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, with employment issues, training, lobbying and providing our members with legal and financial services. The BMA membership includes around 159,000 doctors together with 19,000 medical students. In 2020 BMA's turnover was £57.8 million. The BMA operates predominantly in the UK though we also have an office in Brussels. We are committed to high ethical and moral standards, integrity, and professionalism.

As organisation we have always advocated the highest standards of human rights in healthcare both internationally and in the UK and have implemented our "BMA procedures for human rights interventions" which were drawn-up seeking the advice of [Amnesty International](#) and [The International Committee of the Red Cross](#).¹ Moreover, for over a decade the BMA has campaigned for fair medical trade and ethical procurement across the healthcare industry.

In line with these values we have a proactive zero-tolerance approach to modern slavery and human trafficking. Slavery and human trafficking have serious health consequences for its victims who consequently may use healthcare services and come in contact with medical professionals. As commercial entity BMA implements and enforces effective systems and controls that are reviewed and updated regularly and attempt to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

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

Organisation structure

The BMA is the parent company for several subsidiary companies including:

- 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 and subsidiaries in the US, India and China;
- BMA Investments Ltd: this a wholly owned subsidiary of the BMA holding investments for and on behalf of the BMA; and
- 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.

Our supply chains

We work with a wide range of suppliers, primarily from the UK. The services BMA acquires range from intellectual or professional services requiring higher education (e.g. consultancy services, IT services and other professional services such as legal advisors) to manual labour (e.g. security and

¹ <https://www.bma.org.uk/what-we-do/working-internationally/our-international-work/human-rights> (6 April 2021)

reception services, cleaning services, catering and hospitality). We also procure a number of goods required to maintain our organisation (e.g. stationary, IT equipment and other office supply).

The vast majority of our goods and services suppliers are located in the UK and thus directly subject to the stipulations of the Modern Slavery Act 2015 but regardless of whether located in the UK or abroad, all suppliers are dealt with applying the required duty of care.

Our Modern Slavery Policy

BMA has enacted a modern slavery policy², reiterating our high ethical standards and zero-tolerance approach and laying out activities that we believe should be subject to particular scrutiny. The policy applies to all persons working for us or on our behalf in any capacity, including employees and other workers at all levels, such as directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

Whilst our Board of Directors has overall responsibility for ensuring that our Modern Slavery Policy complies with our legal and ethical obligations, our Modern Slavery Policy also attributes day-to-day responsibilities to specific roles (e.g. to our Procurement & Contracts Manager). Our management at all levels are responsible for ensuring that those reporting to them understand and comply with this policy.

Our Modern Slavery Policy also contains information on how to identify modern forms of slavery and what to do in cases of suspected or actual modern slavery. To facilitate employees and other worker speaking up the policy makes the commitment that BMA's management will

- listen and be approachable to colleagues;
- respond appropriately if they are told something that might indicate a colleague, or other individual, is in an exploitative situation;
- remain alert to indicators of slavery;
- raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do; and
- use their experience and professional judgement to gauge situations.

Due diligence process for slavery and human trafficking

As part of our pro-active approach to identify and mitigate the risk of any form of modern slavery in our supply chains we:

- ask all potential or new suppliers to provide information about their approach modern slavery and their compliance with the Modern Slavery Act 2015, following which we categorise and evaluate any given risk;
- duly consider all identified risks before making and/or communicating the decision to award a contract;
- ensure that all new contractual documentation includes not only an obligation on suppliers to comply with the Modern Slavery Act 2015 (and all other relevant modern slavery legislation), where we can, asking the supplier to pass this obligation down the supply chain to its suppliers but also contractual remedies for BMA to intervene in cases of breach of this obligation (e.g. termination of contract);

² <https://www.bma.org.uk/media/1581/bma-anti-slavery-policy-2017.pdf?la=en> (6 April 2021)

- ensure that all 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, including the option to report any concerns anonymously.

Additionally, our employees, other workers and members are encouraged to speak up and informed about the option to call the Modern Slavery Helpline on 08000 121 700 if they have any concerns or suspicions. We have an effective whistleblowing policy to support staff who wish to raise concerns on a confidential basis.

An important part of our zero-tolerance attitude towards modern slavery is to ensure that as organisation and employer we create an environment that creates trust in employees, other workers and members that all reports on suspected or actual forms of modern slavery are encouraged, appreciated and duly acted upon.

Training

We introduced education and training for our employees and members to be aware of the risks of modern slavery and human trafficking in supply chains and will continue to develop and further improve these.

Through our policies, our staff and members are encouraged to identify and report any potential breaches of our modern 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 modern slavery and human trafficking from our supply chains. Our procurement team has already engaged in specific training on 'Ethical Procurement & Supply' provided by the Chartered Institute of Procurement and Supply. We are constantly considering how best to deliver training to all BMA staff, including via the induction process and other means (e.g. compliance platform, mandatory ongoing training).

Wider Impact

BMA is committed to acting ethically and with integrity in all our business dealings and relationships. We have campaigned extensively on related issues such as human rights and ethical trade within the NHS and the healthcare sector, both internationally and in the UK and from this position also used our efforts to lobby for the implementation of 'Transparency in Supply Chains'. We have also worked with the Home Office's Modern Slavery Unit.

BMA as organisation is fully aware of its outstanding position as leading voice of the medical profession and strives to lead by example.

Our effectiveness in combating slavery and human trafficking

We are dedicated to continuing the improvement of processes and practices 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.

In relation to the calendar year 2020 BMA has conducted in March 2021 a mandatory inquiry throughout the organisation to not only review BMA's compliance with the Modern Slavery Act 2015 but to actively identify weak points in our strategy and drive the continuous improvement of our processes in this regard. The inquiry required unit heads/managers to

- review suppliers they use;

- assess the individual unit's risk of potential exposure to modern slavery;
- report any cases of potential or actual exposure to modern slavery;
- provide information on how they ensure that employees or other workers in their unit are aware of and have access to relevant policies; and
- report any other concerns, feedback, or suggestions in relation to modern slavery.

This inquiry has shown that in the year 2020 all our unit heads/managers and their reports were well aware of BMA's stance against modern slavery, our policies in this regard and their duties and responsibilities thereunder. We are satisfied that in the year 2020 our policies were effectively applied by our employees and other workers.

No case of potential or actual modern slavery in our supply chain was reported and risk assessment results have shown that despite BMA's low risk of exposure to modern slavery unit heads/managers remain vigilant, acknowledging the risks stemming from unknown factors.

Further steps

We are fully committed to compliance with the Modern Slavery Act 2015 and have identified some areas of further improvement for the calendar year 2021.

To strive for continuous improvement, we will

- continue to review and update existing policies, procedures and forms to make sure that they are in line with latest developments in relation to modern slavery;
- further formalise our modern slavery and human trafficking training, considering the introduction of regular mandatory compliance training, involving a test that must be passed;
- further raise the awareness of all employees and other workers, considering additional training or learning sessions provided externally (e.g. by charities active in this regard);
- explore further ways to encourage our members to contribute to BMA's fight against modern slavery and human trafficking; and
- continue to improve the effectiveness of BMA's policies and procedures and strive to achieve full transparency in this regard with the intention to continue leading by example.

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 2020.

Tom Grinyer, Chief Executive

British Medical Association