

## Modern slavery policy

Department: Legal

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Applicable: BMA in England, Scotland, Wales and Northern Ireland

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## 1 Introduction

- 1.1 Modern slavery is a violation of fundamental human rights and a criminal offence under the Modern Slavery Act 2015 (the “Act”). It is an umbrella term which encompasses slavery, servitude, forced and compulsory labour as well as human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.
- 1.2 We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.3 This policy does not form part of any employee’s contract of employment and we may amend it at any time to conform with changes or updates in legislation.

## 2 How is it relevant to us?

- 2.1 We recognise our statutory obligations and we are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Act. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 2.2 With this in mind, we need to pay particularly close attention to:
  - (a) The suppliers we use and how they deal with their suppliers;
  - (b) Any outsourced activities, particularly to jurisdictions that may not have adequate safeguards;
  - (c) Cleaning, maintenance and catering suppliers, especially those using casual labour;
  - (d) Corporate hospitality providers and/or co-organisers; and
  - (e) Recruiting through agencies, short term workers, temporary engagements and general recruitment affiliates.
- 2.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

## 3 Responsibilities under the policy

- 3.1 We all have responsibilities under this policy.
- 3.2 The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 3.3 The BMA’s Director of HR has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

- 3.4 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains. There is Modern Slavery training via the Learning and Development Hub ([L&D Hub \(sabacloud.com\)](https://sabacloud.com)).
- 3.5 Whatever your role or level of seniority is, you must:
- (a) keep your eyes and ears open – if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see ‘Reporting slavery’ at Paragraph 5, below);
  - (b) follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated; and
  - (c) tell us if you think there is more we can do to prevent people from being exploited.

#### 4 Identifying Slavery

- 4.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.
- 4.2 It is not a prerequisite under the Act that the person who commits the offence actually knows that the victim is held in slavery, servitude or forced labour. The Act only requires that the offender ought to know those circumstances.
- 4.3 However, the following key signs could indicate that someone may be a slavery or trafficking victim:
- (a) the person is not in possession of their own passport, identification or travel documents;
  - (b) the person is acting as though they are being instructed or coached by someone else;
  - (c) they allow others to speak for them when spoken to directly;
  - (d) they are dropped off and collected from work;
  - (e) the person is withdrawn or they appear frightened;
  - (f) the person does not seem to be able to contact friends or family freely;
  - (g) the person has limited social interaction or contact with people outside their immediate environment.
- 4.4 This abovelist is not exhaustive.
- 4.5 Remember, a person may display a number of the trafficking indicators set out in paragraph 4.3 but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person’s circumstances which may indicate something is not quite right.
- 4.6 If you have a suspicion, report it.

#### 5 Actions to report modern slavery or human trafficking

- 5.1 You must ensure that you read, understand and comply with this policy.
- 5.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You

are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- 5.3 You must notify your manager who will liaise with the Director of HR, (Procurement & Contracts Manager and the Director of Legal Services, if required) as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.
- 5.4 If you think someone is in immediate danger, dial 999.
- 5.5 If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your manager or report it in accordance with our Whistleblowing Policy: [Policies - BMA Whistleblowing policy - Legal \(sharepoint.com\)](#) as soon as possible.
- 5.6 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager - who will liaise with the Director of HR, (Procurement & Contracts Manager and the Director of Legal Services, if required) – or, through the whistleblowing helpline, please refer to the Whistleblowing Policy: [Policies - BMA Whistleblowing policy - Legal \(sharepoint.com\)](#)
- 5.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting, in good faith, their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found on the Loop.

## 6 Communications and awareness of this policy

- 6.1 Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.
- 6.2 Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- 6.3 The BMA will:
  - (a) maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation;
  - (b) be clear about our recruitment policy;
  - (c) check our supply chains;
  - (d) lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc. to ensure we know who is working for us;
  - (e) ensure we have in place an open and transparent grievance process for all staff; seek to raise awareness so that our colleagues know what we are doing to promote their welfare; and

- (f) make a clear statement that we take our responsibilities to our employees and to our members seriously: <https://www.bma.org.uk/modernslaverystatement>.

#### 6.4 Management will:

- (a) listen and be approachable to colleagues;
- (b) respond appropriately if they are told something that might indicate a colleague, or other individual, is in an exploitative situation;
- (c) remain alert to indicators of slavery;
- (d) 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
- (e) use their experience and professional judgement to gauge situations.

## 7 Breaches of this policy

- 7.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 7.2 We may terminate our relationship with other individuals and organisations working for us or on our behalf if they breach this policy.

