

Agenda item:	14
Report title:	Modern slavery
Report by:	Gordon Duffus , Head of Procurement, Resources and Quality Assurance, gduffus@gmc-uk.org , 0161 923 6632
Action:	To note

Executive summary

The Modern Slavery Act came into force on 29 October 2015, and places an obligation on us to develop a policy and publish an annual statement on the activities that we have performed to eliminate modern slavery in our business and supply chains.

This paper sets out a proposed policy on Modern Slavery, and a plan of activity to meet these objectives in 2016.

Recommendations

The Performance and Resources Board is asked to note:

- a** The draft policy on Modern Slavery.
- b** The proposed steps for 2016 for mitigating the risks.

Modern Slavery Act 2015

- 1 Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and 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.
- 2 The nature of our business means that the risk of modern slavery in our business and first line of our supply chain is very low. Our relationships generally don't extend further down in to our supply chains, so it would be difficult for us to gain assurance on the practices of those suppliers further down the chain who provide goods and services to our suppliers. Therefore the focus of our approach will be to ensure that modern slavery is absent from our business and our first line suppliers. In addition, we will amend our standard terms and conditions to require our first line suppliers to enforce similar policies further down the supply chain. Inevitably this will require a degree of self-regulation by our suppliers.
- 3 The Act places an obligation on us to publish an annual statement on the steps we have taken to eliminate modern slavery in our business and supply chains.

Modern slavery policy

- 4 Our draft policy is based on the principle that:
 - a We have a zero-tolerance approach to modern slavery.
 - b 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 businesses or those of our suppliers.
- 5 The draft policy is at Annex A.
- 6 Our existing processes already provide significant protections against modern slavery being present in our business and supply chain:
 - a Robust pre-employment checks for staff substantially reduce the risk of us directly employing individuals that would fall within the scope of modern slavery. For indirect staff, agencies are required to conduct similar checks for temporary roles and we are able to audit these checks.
 - b Our Whistleblowing Policy provides a means for individuals that are being subject to modern slavery to raise an alert.

- c** Our standard terms and conditions require our suppliers to pay their staff the living wage as a minimum.
- 7** In implementing our policy, it is reasonable for our actions to be proportional to the risk faced. In 2016 we propose that:
 - a** By the end of July we will have reviewed and updated our standard terms and conditions to strengthen our assurance that no slavery or human trafficking is taking place in our suppliers' businesses or supply chains.
 - b** By the end of September we will have completed a review of any potential exposure to modern slavery and trafficking, and then, if necessary, plan targeted investigations into high risk areas.
 - c** We will ensure that suppliers are questioned about their approaches to slavery and human trafficking as part of our regular quarterly contract management meetings.
 - d** By the end of December we will ensure that all of our staff have been provided with guidance or training, highlighting:
 - i** what modern slavery is
 - ii** how to identify it, and
 - iii** where to report concerns that it may be occurring.

Publication

- 8** The Modern Slavery Act places an obligation on us to publish an annual statement on the steps we have taken to eliminate modern slavery in our business and supply chains. The requirement to publish a statement comes into effect from the financial year ending 31 March 2016 onwards. Our first statement will therefore be published in early 2017, in respect of our year ending 31 December 2016.
- 9** We are required to place a link to our annual statement on our website's homepage.

14 – Modern slavery

14 – Annex A

Modern Slavery Policy

What is Modern Slavery?

- 1 Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and 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. This document sets out our policy with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

GMC's Policy on Modern Slavery

- 2 We have a zero-tolerance approach to modern slavery. 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 businesses or those of our suppliers.
- 3 The nature of our business means that the risk of modern slavery in our business and first line of our supply chain is low. We have a zero tolerance approach, to ensure that modern slavery is absent from our own business and that of our first line suppliers. We require all our suppliers to enforce similar policies further down the supply chain.
- 4 If a supplier is found to be accepting of slavery in their business or supply chain we will terminate the contract at the earliest opportunity.

How will GMC ensure that Modern Slavery is not occurring in our business and supply chain?

- 5 Staff will receive training and guidance explaining what modern slavery is, how to identify it, and how to log concerns.
- 6 We will regularly conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that interventions can

be focused on those areas to mitigate GMC being inadvertently involved in modern slavery.

- 7 Our contracts with suppliers will place obligations on them to apply the principles of the Modern Slavery act in their business and supply chains, and we will be able to assure ourselves that they are complying with this.
- 8 We will regularly engage with our suppliers both to convey to them our Modern Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses, or supply chains.

How do I raise a concern that modern slavery is occurring in the GMC or our supply chain?

- 9 In line with the GMC Whistleblowing Policy, concerns must be raised without malice and you must reasonably believe that the information disclosed and any allegations contained in it are substantially true.
- 10 In the first instance, you should normally raise the concern with your manager or Head of Section or if the issue concerns the manager or Head of Section, with any director. If it concerns a director or the Senior Medical Adviser and Responsible Officer, you should raise your concerns with the Chief Operating Officer. If the issue concerns the Chief Operating Officer you should raise it with the Chief Executive. If it concerns the Chair of the Medical Practitioners Tribunal Service you should raise it with the Chair of Council. Concerns about the Chief Executive or the Chair of Council should be raised with the Chair of the Audit and Risk Committee and the Chair of the Remuneration Committee.

Publication

- 11 The Modern Slavery Act places an obligation on us to publish an annual statement on the steps on the activities that we have performed to eliminate modern slavery in our business and supply chains. The requirement to publish a statement comes into effect from the financial year ending 31 March 2016 onwards. Our first statement will therefore be published in respect of our year ending 31 December 2016, in early 2017. The statement will be updated annually.
- 12 A link to our annual statement will be placed on our website's homepage.