

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. In line with our corporate safeguarding policy and process, the People Team should be notified of any safeguarding concerns of this nature. You can find more information on how to do this via [our Safeguarding Hub on the Intranet](#).

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.

Last reviewed 11/2024