



# Modern Slavery Act and Human Trafficking Statement

31st December 2022

## 1. Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 with respect to BMJ Publishing Group Limited's ("BMJ(s)" / "we" / "our") financial year ending 31 December 2022 and sets out the steps we have taken to prevent modern slavery and human trafficking from occurring in our business operations and in our supply chains.

## 2. Who we are and what we do

We are a global healthcare knowledge provider with a vision for a healthier world. We share knowledge and expertise to improve health outcomes.

As a global healthcare knowledge provider, we publish one of the world's most cited general medical journals, *The BMJ*, and over 65 specialty journals. We also offer digital professional development courses and clinical decision support tools to help health professionals improve the quality of healthcare delivery.

*The BMJ* has an impact factor of 96.216 (JCR 2021) and is ranked fourth among all general medical journals worldwide. *The BMJ's* website ([bmj.com](http://bmj.com)) saw the number of active users grow to 49 million last year.

We have more than 9.8 million users worldwide: clinicians, nurses, students, academic institutions, hospitals, ministries of health, patients, commercial companies, governments and healthcare organisations. We publish in many languages and produce specialist publications for countries, including the United States, India, Brazil, Australia, New Zealand, China and the Middle East.

Our total revenue in 2022 was over £80 million, with more than half of revenues coming from outside the UK, and about 70% coming from digital products and services.

## 3. Organisational structure

BMJ is a wholly owned subsidiary of the British Medical Association. The following companies form part of our group:

- BMJ Publishing Group Limited (incorporated in England)
- BMJ Publishing Inc. (incorporated in California, USA)
- BMJ Group India Private Limited (incorporated in India)

- Medelect Limited (dormant, not trading)
- BMJ (Beijing) Medical Science and Technology Co., Ltd (incorporated in China)
- Ying Yi Hui Tong (Beijing) Information Technology Co., Ltd. (via contractual control)

In addition to our office in London in the UK, we also have offices in New Jersey (USA), Mumbai and Noida (India), and Beijing (China).

#### **4. Our policy on modern slavery and human trafficking**

We have a zero-tolerance approach to modern slavery and human trafficking in our business and in our supply chains. This position reflects our top-level commitment to acting ethically and with integrity in all our business relationships and implementing and enforcing effective systems and controls to prevent slavery and human trafficking from taking place anywhere in our business and supply chains.

Our position and the steps we have taken align with our values, and in particular, our value of being “transparent, open and trusted”. Our values are intrinsic in giving us the focus and direction we need to deliver solutions that improve health outcomes and feed into everything we do.

#### **5. Our supply chains**

Our principal supply chains are global and include:

- technology services, including the provision of cloud storage and websites;
- editorial services;
- scientific and medical societies;
- venues for events and conferences.
- online publication platform providers;
- printing, delivery and related services;
- intermediaries reselling content.

Whilst we consider the sector within which we operate to be generally low risk, we remain alert to any risks in our business and supply chains.

We take all steps we deem necessary to detect and eliminate any incidence of modern slavery or human trafficking in our supply chains, with particular focus on high risk areas. In the event any such incident arises, we will take appropriate remedial action.

#### **6. Our commitment**

The key steps undertaken to prevent modern slavery and human trafficking from occurring in our business and supply chains are as follows:

##### **a. Areas of risk and management:**

We have continued to identify and assess the most critical areas of risk across the business

and record those risks together with any mitigating actions in a risk register. This forms part of our ongoing Enterprise Risk Management process, ensuring that risks are reviewed regularly, and key risks reported to our Executive Committee and Board. We also review and assess those risks which are most relevant to each of the offices from which we operate.

## **b. Our due diligence processes:**

We have continued to identify and assess potential risk areas in our supply chains including:

- reviewing all suppliers to identify and prioritise those which are considered high risk based on industry sector and geography;
- reviewing individual key suppliers and assessing any potential risk of slavery and human trafficking being present by reference to internal and external knowledge of the supplier's geographic location, the sector it operates in and any other relevant factors;
- reviewing the purchase of imports identified as "high risk"; and
- issuing due diligence questionnaires for completion by material, high risk suppliers, to ensure their practices are of an acceptable standard.

All our suppliers must comply with BMJ's Modern Slavery and Human Trafficking Policy. If a supplier breaches those obligations, we will take appropriate action which may include terminating that supplier's contract with us.

In response to Covid-19, we adapted our monitoring of our supply chains by developing a blended virtual and onsite approach.

## **c. Our business and employees**

The prevention of forced, bonded and trafficked labour is integral to how we do business and a key element of our policies. In addition to our [Anti-Slavery and Human Trafficking Policy](#), these values are also enshrined in the following BMJ policies:

### **Whistleblowing**

All our employees receive access to an independent whistleblowing helpline to allow them to report any suspicions of modern slavery or human trafficking in our business. If a report is made, we will investigate the concerns raised and take steps we deem appropriate in the circumstances.

### **BMJ Code of Conduct**

Our Code outlines the requirements which all our supply chain associates must adhere to in relation to their own employees and throughout their own supply chains. Our Code includes, amongst other standards, the following requirements: how to raise a concern of grievance; ensuring that employees who raise a concern are not subjected to any form of retaliation or victimisation; guidelines for ethical decision making; safeguarding when interacting with children or adults at risk.

## **BMJ Diversity and Equal Opportunities Policy**

The active stance we take on supporting social justice translates beyond our people into the work we do with customers and partners. We understand our role in creating a more positive, equitable, diverse and inclusive environment and creating a safe space at BMJ in which everyone can share thoughts and experiences about important issues. By empowering our workers, our intention is to reduce the risk of modern slavery and ensure that everyone who works for us feels they can voice any concerns they may have.

### **Commitment to training**

We provide training to all our staff to ensure they receive a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business.

#### **d. Monitoring our impact**

In 2021 we implemented our first impact review, measuring the outcomes of our work and providing us with a framework for benchmarking going forward. The results of this annual report helps to inform us where further improvements can be made. We continue to review our reward processes and grading structures to ensure fairness; evaluate our hiring practices and workplace environment to ensure access to equal opportunities; tackle conscious and unconscious bias in the workplace; and highlight gender pay gap issues. By continuing to monitor and assess the success of these initiatives going forward we continue to reduce the risk of modern slavery and inequality in our business.

## **7. Looking ahead**


We will continue with the approach we have taken to combating modern slavery and human trafficking so far and shall:

- continue to review and assess those risks which are most relevant to our business and to each of the offices from which we operate, including by way of site visits by our staff;
- continue to require all our suppliers adhere to our Modern Slavery and Human Trafficking Policy;
- update our procurement processes and monitor the outcomes to ensure our systems and processes are effective;
- continue to review our hiring practices and implement any improvements as may be appropriate;
- continue to review our employee training requirements and implement any further training on the topic of modern slavery and human trafficking as may be appropriate;
- continue to remain vigilant and, should we discover or be alerted to an incident of modern slavery or human trafficking in our business or supply chains, we shall take appropriate action.

This statement was approved by the Board of BMJ Publishing Group Limited on the date indicated below.

Signed:

Date: 13/4/2023

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**Chris Jones**

Chief Executive Officer