

BBC GROUP MODERN SLAVERY STATEMENT

FINANCIAL YEAR ENDED 31 MARCH 2023

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes the BBC Group's eighth statement setting out the work undertaken during the financial year ended 31 March 2023 to further prevent, identify and address modern slavery across the organisation and its supply chains.

1. ORGANISATION

The BBC is one of the largest public service broadcasting organisations in the world. Its mission, public purpose, commitments and governance are set out in the Royal Charter and it is regulated by Ofcom, the communications regulator. The BBC uses the income from the licence fee to provide television, radio and online services. The BBC Group comprises the public arm of the BBC, as well as BBC commercial subsidiaries which operate in the UK and internationally-most notably, BBC Studios and BBC Studio Works.

We are committed to ensuring everyone who works for and with us is treated fairly, is able to work safely and has their human rights protected and respected. During 2022/23 there were approximately 22,000 people working for us around the world and thousands more across our global supply chains. Our supply chains are complex, extensive and cover a wide range of products, goods not for resale, and services. We have a responsibility to prevent modern slavery from occurring in any form across our organisation and within our supply chains. We are committed to ensuring our organisational practices and risk-management approach support and facilitate this.

2. APPROACH TO TACKLING MODERN SLAVERY

We have a risk based approach, informed through risk assessment to identify and target ethical issues, including modern slavery, in our organisation and supply chains. During 2022/23, the impact of the conflict in Ukraine, geo-political upheaval, wide ranging industrial action and the cost of living crisis at home and abroad, has been felt both within our organisation and across our supply chains. Whilst this has undoubtedly presented challenges we have ensured that our fundamental approach has remained robust.

In line with our multi-year programme we have structured governance and management arrangements at all levels which are focused on the issue of modern slavery.

- Our work to tackle modern slavery is overseen by our Ethical Trade Working Group, chaired by the Head of Procurement and consisting of stakeholders from key business areas, including those who manage the associated risks on a day to day basis. It drives our multi-year programme and facilitates collaboration and good practice sharing across the organisation.
- The Ethical Trade Working Group is supported by subject matter experts within the business, and external specialists where beneficial.
- The BBC's Audit and Risk Committee receives an annual update on our activities in relation to tackling modern slavery.
- We continue to collaborate with other media companies through active participation in the TV Industry Human Rights Forum, and learn from other organisations focused on tackling modern slavery, such as the Ethical Trading Initiative.

We continued to promote policies which highlight our ethical requirements with our people and suppliers.

- Policies and guidelines across the BBC Group set out our expectations of our people, stakeholders and suppliers. These policies are issued at the point of engagement with the individual or supplier, are accessible on our website, and are reviewed periodically.
- Our Ethical Trading Policy sets out our expectations of our suppliers. It is aligned with the Ethical
 Trading Initiative Base Code, and incorporates key International Labour Organisation conventions
 and recommendations, including clauses covering forced labour. This is referenced in our standard
 Supplier Terms of Trade.
- Suppliers are expected to observe the Ethical Trading Policy's requirements and to demonstrate a similar commitment to an ongoing programme of ensuring, and where necessary, improving ethical practices. During 2022/23 we monitored our Ethical Trading Policy to ensure its inclusion in contracts as well as actively discussing our continuing expectation with already existing suppliers.
- In 2022/23 we launched our new **Code of Conduct,** bringing together our standards, policies and processes for all staff. This document has been updated in line with our BBC Value For All strategy One of our values is to be accountable which includes observing the highest ethical standards with our suppliers and other partners. Through our Code of Conduct we commit to only contracting with parties who reach our standards with regards to labour and working conditions.
- Our Whistle Blowing Policy was updated in July 2022 and confirmed the BBC's commitment to maintaining the highest standards of ethics, honesty, openness and accountability and set out procedures for raising concerns in relation to, amongst other things, acts of abuse or exploitation.

Our approach remained risk-based, targeted to where people are most at risk.

- The BBC's Ethical Trade Risk Assessment is conducted annually by our Ethical Trade and Procurement teams, and aims to assess modern slavery risk in our supply chain in order to better direct our efforts to combat this. It considers where workers are more likely to be at risk of ethical issues, including modern slavery, based on the type of product or service being provided, their geographic location and any known previous issues. For our suppliers, we also considered their relationship with us in terms of scale and type.
- Our risk assessment methodology continued to align with the International Labour Organisation risk categorisations and industry best practice.
- From the completed risk assessment, we identified our risk is greater in our supply chain categories of print and promotional merchandise, couriers, hotel and conference services, private hire taxis, and events and exhibitions. Our due diligence measures described below focused on these areas.
- BBC Studios continued their ethical trading programme which focuses on the risks in their licensing and branded product business. More detail can be found in the BBC Studios 2022/23 Modern Slavery Statement.

Our due diligence processes continued to identify and monitor issues, and work towards their resolution.

- We continue to incorporate a standard set of ethical trade questions into our tender processes.
 Where there is an increased risk identified through our risk assessment, a further specific question relating to ethical trade is included to evaluate potential suppliers' ethical trade processes and controls.
- We engaged both new and existing suppliers based on our assessment of their responses to our questions relating to ethical trade and modern slavery.

We employed measures to monitor the on-going effectiveness of our programme.

- These measures have been used to monitor compliance with our policies which include a zero tolerance of modern slavery. They include ensuring all contracts reference our Ethical Trading Policy, ensuring relevant tenders include questions on ethical trade (KPIs measure performance in this area) and monitoring the engagement of key suppliers.
- During 2022/23, an internal audit of Ethical Sourcing was conducted which sought to provide
 assurance over the effectiveness of the controls in place which support BBC in meeting its ethical
 sourcing responsibilities. The audit made suggestions for improvement and the relevant
 stakeholders are working to ensure these are actioned.

We have raised further awareness across key internal and external stakeholders.

- We continued to engage directly with key teams and suppliers to help raise their awareness and understanding of the risks associated with modern slavery and the expectation the BBC has in managing these.
- During 2022/23, we delivered a bespoke training session for our International Bureaux Managers.
 BBC News Group has 74 news bureaux around the world and bureaux managers are responsible for
 all aspects of day to day running of the bureaux, including appointing local suppliers. The training
 highlighted the risks associated with modern slavery within the BBC's operations globally and
 guidance was given on compliance with our ethical trading policy. Alongside training, we developed
 an Ethical Trade Checklist which aims to equip bureaux managers with assessing ethical trade
 issues when taking on suppliers.
- We have a dedicated Modern Slavery area on our intranet where we have published awareness materials alongside communication channels for queries. These pages were reviewed and updated during 2022/23.
- Our Whistleblowing Policy was updated in July 2022 with an accompanying awareness raising
 programme including videos, animations and further information. All supporting information is
 available to staff on the BBC's intranet. There were no issues relating to modern slavery raised via
 whistleblowing over the last year.
- Our Code of Conduct, which sets out our expectations of ethical conduct, was relaunched in October 2022 and communicated widely across the business through news articles on our intranet.

3. FUTURE PLANS AND PRIORITIES

We appreciate the significance of our role in helping to identify, prevent and help eradicate modern slavery. We are committed to continuously improving and evolving our practices in relation to operating a responsible organisation, sourcing products and services ethically, and helping to raise standards across the industry.

In line with our multi-year programme, during the next year we will:

- Continue to manage our activity via our Ethical Trade Working Group, and will collaborate with key
 partners and peers through channels such as the TV Human Rights Forum, to continually enhance our
 approach.
- Take a risk based approach and revisit our ethical risk assessment annually, we will review the methodology of this risk assessment to ensure it is accurately capturing the relevant risks.
- We will continue to ensure our supplier relationships contain adequate procedures that comply with our ethical trading policy and all relevant legislation and best practice.

- We will update the international bureaux Compliance self-assessment questionnaires, with additional categories including ethical trade.
- Enhance measures used to ensure effectiveness of our ethical trade programme.

This Statement was approved by the Board of Directors on 20 June 2023.



Tim Davie
Director-General
(on behalf of the BBC Board)
BRITISH BROADCASTING CORPORATION
27 June 2023

Footnotes

¹ The year 2022/23 refers to the reporting year 1 April 2022 to 31 March 2023.

Further information

- Previous BBC Group Modern Slavery Statements
- https://downloads.bbc.co.uk/aboutthebbc/reports/pdf/bbcmsa2022.pdf
 http://downloads.bbc.co.uk/aboutthebbc/reports/pdf/bbcmsa2021.pdf
 http://downloads.bbc.co.uk/aboutthebbc/reports/pdf/bbcmsa2020.pdf
 http://downloads.bbc.co.uk/aboutthebbc/reports/pdf/bbcmsa2019.pdf
 http://downloads.bbc.co.uk/aboutthebbc/reports/pdf/bbcmsa2018.pdf
 http://downloads.bbc.co.uk/aboutthebbc/reports/pdf/bbcmsa2017.pdf
 http://downloads.bbc.co.uk/aboutthebbc/reports/pdf/bbcmsa2016.pdf
- BBC Studios Modern Slavery Statement (https://www.bbcstudios.com/modern-slavery-statement/)
- BBC Group's businesses and operations (http://www.bbc.co.uk/aboutthebbc/)
- BBC Group's supply chains (http://www.bbc.co.uk/supplying/)
- BBC Group Code of Ethical Policy (http://downloads.bbc.co.uk/supplying/pdf/BBC_Ethical_Policy.pdf)
- The Ethical Trading Initiative Base Code (https://ethicaltrade.org/eti-base-code)
- BBC Group Terms of Trade (https://www.bbc.co.uk/supplying/working-with-us/terms-of-trade/)
- BBC Group policies (https://www.bbc.com/aboutthebbc/reports/policies/)