Modern slavery statement for financial year ending 31 December 2021

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that the Medical Protection Society Limited, including its wholly-owned subsidiary MPI (London) Limited (“MPS”), has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. MPS has a zero tolerance approach to any form of illegal or corrupt business practice, including modern slavery. We are committed to acting ethically, with integrity and transparency in all our business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our business

MPS is the world’s leading protection organisation for doctors, dentists and healthcare professionals. We protect and support the professional interests of more than 300,000 members around the world. Membership provides access to expert advice and support and can also provide, depending on the type of membership required, the right to request indemnity for any complaints or claims arising from professional practice.

Our in-house experts assist with the wide range of legal and ethical problems that arise from professional practice. This can include clinical negligence claims, complaints, medical and dental council inquiries, legal and ethical dilemmas, disciplinary procedures, inquests and fatal accident inquiries.

Our philosophy is to support safe practice in medicine and dentistry by helping to avert problems in the first place. We do this by promoting risk management through our workshops, E-learning, clinical risk assessments, publications, conferences, lectures and presentations.

While MPS operates its business across a number of jurisdictions, the risk of modern slavery or human trafficking in its supply chain is regarded as fairly low as MPS is exclusively a services company. Our primary suppliers are legal firms, accountancy firms and medical and dental associations. Furthermore, the majority of the countries in which we operate are ranked as low risk by the Global Slavery Index.

Our governance structure

MPS seeks to be an ethical company and to act consistently and fairly at all times. All MPS colleagues are expected to put the interests of MPS ahead of their own personal interests when involved in MPS business and to recognise and report unlawful, corrupt or unethical conduct.

Ultimately, MPS’s Council is responsible for ensuring that there are satisfactory processes in place for managing the ethical, risk and reputational matters which affect the MPS business, including issues such as modern slavery and human trafficking.

Management of the day to day activities of MPS is undertaken by the Executive Committee, which includes responsibility for operationalising the processes approved by Council in respect of modern slavery and human trafficking.
Our policies

MPS has a Code of Ethical Conduct (the Code) which applies to all our stakeholders, including Council members, third parties and colleagues. The Code sets out the expectations MPS has of all its people, including any individuals or organisations acting on our behalf, and to demonstrate our commitment as individuals, and as a business, to operating responsibly and to living by the MPS values. Compliance with the Code is ultimately overseen by MPS’s Audit & Risk Committee on behalf of Council.

The Code advocates MPS’s values and - as well as encouraging good business practices - places obligations on colleagues to mitigate the risk of and report bribery, corruption, modern slavery and human trafficking risks. The Code explains how colleagues can identify any instances of modern slavery and where they can go for help. The Code also outlines MPS’s approach to whistleblowing, so that all colleagues understand they can raise any concerns they may have about illegal or improper behaviour without fear of victimisation, discrimination or disadvantage. MPS also maintains a formal Whistleblowing Policy.

In addition, MPS operates a robust recruitment policy including, where appropriate, checks to ensure appropriate eligibility to work in the UK (or elsewhere as relevant) to safeguard against human trafficking or individuals being forced to work against their will.

Our suppliers

MPS strives to work to the highest professional standards to help ensure that we comply with all laws and regulations applicable to the business. All our suppliers are expected to follow the same high standards. In line with our values, we strive to understand our suppliers as well as sharing our business ethos with them.

Initial supplier due diligence enables us to get a high-level understanding of ethical and modern slavery risks posed by our counterparties. We aim to identify, assess and remediate any modern slavery risks within our business. Additionally, we seek to ensure all suppliers (regardless of the jurisdiction in which they operate) contractually commit to comply with the law, including the Modern Slavery Act 2015 and anti-bribery and corruption legislation. Practically, we would seek to terminate a contract with a supplier immediately, and report the supplier to the relevant authorities, should any instances of modern slavery come to light in accordance with our published commitment to zero tolerance.

MPS also mandates a Supplier Code of Conduct which builds upon certain themes in the Code and requires suppliers to act competently and to seek continuous improvement in areas such as quality, cost control, innovation and reliability. The Supplier Code of Conduct also aims to promote ethical behaviours and attitudes amongst MPS’s suppliers.

Training

All colleagues are required to undertake training on the Code upon joining MPS and must complete refresher training each year. Failure to complete this refresher training affects entitlement to performance-related pay.

Effectiveness
No reports were received from colleagues, the public, or law enforcement agencies to indicate that modern slavery practices have been identified in the course of MPS’s business to date.

Approval for this statement

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Council of MPS and signed by a director. It constitutes MPS’s modern slavery and human trafficking statement for the financial year ending 31 December 2021.

Simon Kayll, Chief Executive Officer