MODERN SLAVERY STATEMENT

Organisation

This statement applies to Bromley GP Alliance (BGPA) and covers the financial year 2026/27.

Organisational structure

BGPA is a GP federation established in 2015 to provide primary care and community services in Bromley and its surrounding borough, Lewisham. BGPA employs approximately 160 staff.

BGPA is a company limited by shares, owned by Bromley GP practices. Most services are commissioned by the South East London Integrated Board under the NHS Standard Contract and by the Local Authority. BGPA follows national NHS policies and standards and is a signatory to several agreements with NHS organisations, including One Bromley Partners. Our head office is located at Kelsey Park Farmhouse, with designated clinics in Beckenham and Orpington Health and Wellbeing Centre. BGPA also provides additional services from several GP practices and pharmacies.

BGPA is overseen by a Board of Directors, to whom the Chief Executive Officer reports.

Core activities include the provision of NHS healthcare services, such as GP Access Hubs, Anticoagulation, Denosumab, Dermatology, Headache, Phlebotomy and Vasectomy services. While activity is not seasonal, additional support may be provided during surge periods e.g. winter, vaccination periods or public health campaigns.

All labour supporting BGPA operations is based in the United Kingdom across Bromley and Lewisham.

Definitions

BGPA recognises modern slavery as including:

- Human trafficking
- Forced labour
- Coercive control by employers through abuse or threats
- Dehumanisation or treatment as a commodity
- Physical constraint or restrictions on freedom of movement

Commitment

BGPA acknowledges its responsibilities under the Modern Slavery Act 2015 and is committed to of the prevention of modern slavery and human trafficking in its internal practices and supply chains. BGPA does not engage with any organisation, in the UK or overseas, that knowingly participates in slavery, servitude or forced labour. All labour supporting BGPA services complies with UK employment law, and BGPA aims to meet or exceed statutory minimum standards for its workforce.

Supply chains

BGPA's supply chains primarily relate to clinical consumables, medical equipment and corporate services sourced from UK-based suppliers. Procurement is undertaken directly from UK-based suppliers, including established medical suppliers such as Medisave, Alliance Healthcare and Williams

Medical Supplies. These organisations are expected to operate in compliance with UK legislation and industry standards.

BGPA works with reputable suppliers and ensure that appropriate contractual and ethical standards are maintained.

Potential exposure

BGPA considers its overall exposure to modern slavery risk to be low to moderate, reflecting its UK-based operations but recognising certain areas of potential risk.. Nonetheless, BGPA has taken appropriate measures to prevent modern slavery within its operations and supply chains.

Steps taken

In accordance with section 54(4) of the Modern Slavery Act 2015, BGPA has taken the following steps to ensure that modern slavery is not taking place:

- Incorporated modern slavery and ethical compliance expectations within supplier engagement and procurement processes.
- Sourced goods and services from established UK-based suppliers with recognised market presence
- Ensured that locum and agency staff are engaged through reputable providers and subject to appropriate compliance checks.
- Maintained robust recruitment procedures aligned with NHS Employment Check Standards, including right to work verification.
- Maintained safeguarding and whistleblowing policies to support identification and reporting of concerns

Training and Awareness

BGPA's approach to preventing modern slavery begins with robust recruitment processes, following NHS Employment Checks, Standards and Fit and Proper Person Guidance, including verification of UK address, right to work and appropriate references.

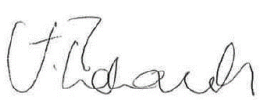
Our safeguarding policies include guidance on modern slavery and human trafficking, outlining staff responsibilities. The Safeguarding Lead, a Board Director and Co-Chair, provides strategic oversight to ensure concerns are effectively identified and managed.

Safeguarding training is mandatory for all staff and includes content on trafficking and modern slavery. Staff are encouraged to report concerns, supported by a trained Freedom to Speak Up Guardian. BGPA's Freedom to Speak Up Policy provides confidential reporting routes for staff, subcontractors and contractors.

Statement Review

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: 01.04.2026

Signed  **Chief Executive Officer**