



This statement has been prepared and published on behalf of BBC Studios Ltd for the financial year ended March 31st 2020, in accordance with the UK Modern Slavery Act 2015. It is the fifth such statement from the company; links to previous statements can be found at the bottom of this page. The statement's publication has been delayed for a short time in order to align with our other statutory reporting obligation under the Australian Modern Slavery Act 2018.

(For the **BBC Group** statement, [\[see here\]](#).)

Introduction

[\[BBC Studios Ltd\]](#) is a wholly owned subsidiary of the **BBC**, the UK's publicly funded broadcaster. We produce and distribute world-class content that informs, educates and entertains, strengthening the BBC both creatively and financially through our commercial activities.

We embody the values associated with our parent company and we have a strong commitment to ethical trading and corporate human rights. **BBC Studios General Counsel** has executive ownership of ethical trading for the company and we have a dedicated team of three subject matter experts who manage our activities in this area.

Quarterly oversight is provided by the **BBC Studios Compliance & Risk Committee**, a group of the company's most senior executives. Additionally, the entire **BBC Studios Executive Committee** is given an annual update on our areas of risk and how we mitigate them.

Wherever possible, we take a collaborative approach to tackling modern slavery and other forms of labour exploitation, including as a founding member of the **TV Industry Human Rights Forum** and through our membership of the [\[Ethical Trading Initiative\]](#). We are also a member of [\[Sedex\]](#), with our Head of Ethical Policy currently elected to the Sedex board.

Our business

Our commercial activities are divided into two lines of business: **Production & Distribution** and **Branded Services**.

Production & Distribution (P&D) is the value chain responsible for the creation of programmes commissioned by the BBC and other broadcasters & content platforms, and the subsequent commercial sale of titles in the UK secondary window and international market. It also includes the licensing of intellectual property of our content to specialist third party companies who produce live events and consumer products based on our programmes.

The Branded Services line brings these programmes to international audiences through broadcast on BBC branded channels and services and to UK audiences through our **UKTV** subsidiary.

Some of our activities in the UK are managed through subsidiary companies, including **BBC Studios Production Ltd, BBC Studios Distribution Ltd, UK Programme Distribution Ltd, BBC Grafton House Productions Ltd, 2 Entertain Ltd & UKTV** and we hold shares in a number of independent production companies.

Our Head Office is in London, with further regional offices across the UK. Our global businesses are managed through a number of international subsidiaries, with offices in Australia, North America, South America, Europe, Asia and Africa.

Our operations and supply chains

The supply chains for our operations and commercial activities are varied and complex. For example:

- Within our offices, we use contractor companies for key services such as cleaning, catering and security.
- Within Production, we rely on the services of freelance staff to help make our programmes, supported by contractors such as riggers, stagehands, caterers and security (among others), as well as post-production houses for the editing of the finished programmes.
- In Distribution, we use the services of post-production houses to deliver our content to UK and international broadcasters. For our live events business we work with licensees who contract with venues for our shows, who in turn often contract with labour service providers.
- Within consumer products, we work directly with DVD and CD manufacturers and distributors, though the vast majority of our consumer products are produced by licensees who source from manufacturers across the globe, with China still the most significant country of origin.

Our approach to assessing this large variety of suppliers is based on where the greatest risk of labour exploitation may be found; for more on this, see *Due diligence and risk management through our ethical trading programme* below.

Our policies in relation to modern slavery and forced labour

Central to the way in which we do business is our **Ethical Trading Policy**, which has been in place since 1999. It is modelled on the ETI Base Code and references key **ILO Conventions & Recommendations**, in addition to key legislation and frameworks such as **UK and Australian Modern Slavery Acts** and the **UN Guiding Principles on Business & Human Rights**.

It is a public document that can be viewed on our website and it forms part of all contracts with suppliers and licensees. It is reviewed on an annual basis and updated as necessary, with version 3.1 published in 2019.

The policy sets our requirements on labour standards within the supply chains of our licensees and suppliers and includes the requirement for appropriate remedy where workers' rights have been breached.

It is prefaced by a list of minimum standards that suppliers must meet, the first of which relates to forced labour.

Due diligence and effective risk management through our Ethical Trading Programme

While the inclusion of the Ethical Trading Policy in our contracts is an important part of our risk mitigation, we also operate an Ethical Trading Programme to assess its implementation.

The programme incorporates principles of due diligence and risk management, using independent data sources to help us identify the areas of our operations and supply chains where risks of exploitation may be greater. These risks will often depend on the geographical region and/or sector where our activities are taking place and so we manage our response accordingly.

Our core focus has generally been on the supply chains for our licensed consumer products businesses. The wide range of products made by our licensees are sourced from manufacturers all over the world, often in countries where the risk of poor labour practices may be higher. While the licensing model means we do not select the factories ourselves, we nevertheless work closely with our licensees to assess their chosen factories and identify areas of concern.

Our approach is to promote continuous improvement, acknowledging that not all supplier or licensee factories will immediately be able to meet our standards in full. However, we take a zero-tolerance approach to the most serious rights abuses and so we set out minimum standards that must first be met before we can approve a site.

This on-going assessment is based on the review of independent ethical audits for higher risk countries and sectors. In recent years, we have also introduced employment profile assessments for sites in lower risk territories, in order to identify any risk indicators for forced labour or other serious issues.

All first tier manufacturing sites must go through the assessment process and our product approval system is linked to our ethical policy database; if a site is not approved then final approval for manufacture cannot be granted. This comprehensive approach helps drive the effectiveness of our programme, as licensees and suppliers are incentivised to make real improvements to working conditions within their supply chain.

We also measure the effectiveness of our policy and programme through the use of secondary forensic assessments on a sampling basis. See the section *Our actions in the last financial year* for more on this.

We have recently expanded our due diligence and risk management processes to parts of the business that rely on labour suppliers, including our own operations, our live events and our TV production business; again, see below for details.

Training

We provide extensive guidance documents and ethical sourcing training, including on-line modules, for all staff involved in the licensing or sourcing of branded products.

In addition to the on-line modules, we provide face-to-face training as necessary. In October 2019, we ran a modern slavery and ethical trading workshop for members of our Business & Legal Affairs division, highlighting the areas in our supply chains where forced labour and other rights abuses may be found and explaining how we address them. We plan to present the workshop again to a wider audience across the company when our normal office operations resume.

Our actions in the last financial year

In 2019/20, we undertook the following actions to further mitigate the risks of exploitation within our operations and supply chains:

Industry collaboration

We remain committed to identifying and tackling exploitation in collaboration with our broadcasting and production peers within the **TV Industry Human Rights Forum (TVIHRF)**.

Unlike other sectors, there is little public data on risks within the labour supply chains for TV production. We therefore jointly commissioned a research project with other members of

the TVIHRF, working with an independent expert consultant to help us understand where there might be areas of concern.

We consulted with a number of stakeholders, including production colleagues, representatives of trade unions and contractor staff themselves. The findings of this research will inform the TVIHRF's priorities for the coming year and we will continue to report on developments in future statements.

Assessments of labour providers in other areas

We also worked with internal and external stakeholders on assessing labour risks within our operations and our live events business, focusing on particularly on areas where agency labour providers were involved.

These assessments will help us develop due diligence processes that may be applied to other areas where labour services are provided.

Forensic assessments and remedy guidance

In addition to the ethical audits outlined above, we commissioned a number of forensic assessments of licensing facilities in Malaysia, Singapore and Indonesia, carried out by local labour standards experts and accompanied by our Head of Ethical Policy.

These assessments helped us understand first-hand the risks around the hidden use of recruitment fees in the region and how these fees can potentially lead to a situation of forced labour for migrant workers.

As a result, we have updated our general due diligence procedures for suppliers that meet the same risk profile and we have established remedy procedures and guidance for cases where recruitment costs have been paid by migrant workers.

Looking ahead

The on-going Covid-19 health crisis will inevitably require us to take a flexible approach to our actions in the coming year and will certainly affect our staff's ability to participate in assessments. Additionally, we will need to prioritise our efforts in ensuring that all suppliers provide safe working conditions for their workers, whether in consumer product or labour service supply chains.

We are committed, however, to rolling out a general introduction to our modern slavery policies and mitigation practices as part of an overall Code of Conduct training module, which will sit alongside the targeted training for sourcing and licensing staff. The module will be mandatory for all staff and will further embed this key policy within company culture.

We will also build on the findings of the TVIHRF research and explore opportunities for a collective response by members wherever possible.

This statement has been approved by:

Martyn Freeman

General Counsel, BBC Studios
on behalf of the BBC Studios Executive Committee.
16 December, 2020