

MAG MODERN SLAVERY STATEMENT

Introduction

Global statistics demonstrate beyond dispute that slavery and exploitation is a reality in our world. Modern Slavery is the term commonly used to refer to illegal exploitation of people for personal or commercial gain. Victims often find themselves trapped, against their will, in situations of domestic servitude, sexual exploitation, forced marriage, forced criminality and forced labour often as the result of coercion, bribery, deceit or human trafficking.

At MAG, we value not only our own people, but those whom we serve; our beneficiaries and their communities, and so must be vigilant in both our recruitment, partnership arrangements and supply chains.

Our response to modern day slavery embodies our Values. We will:

- raise awareness across our teams to support and encourage the reporting of any concerns about our supply chain activities
- ensure our employment and remuneration practices are fair and transparent across all territories
- promote and enforce ethical standards with our suppliers and be vigilant that suppliers don't engage in any practice that could undermine any aspect of human dignity

1. Organisation Structure and supply chains

MAG is a charity limited by guarantee and is governed by a non-executive Board of Trustees, operating from a head office in Manchester and currently delivering activities in countries across Europe, Africa, the Middle East, South and South East Asia and Central America. We directly employ over 5,000 staff, 95% of whom are local nationals. We work in partnership with 6 international organisations and 12 national organisations to deliver our work.

Our work has helped more than 16 million people in conflict-affected communities in over 40 countries since 1989, giving them greater safety and the opportunity to rebuild their lives, livelihoods and futures. We provide landmine and unexploded ordnance clearance, risk education, emergency response, training and education, arms management and destruction (AMD) and contribute to the international mine action and AMD policy arena. Our income for the year ended 30th June 2019 was a little over £85 million.

Given that the majority of our work is delivered by our directly employed staff on the ground, with relatively small scale supply chains, we believe that the risk of slavery, human trafficking or exploitation having a connection with our business is relatively low, however, the policies and procedures outlined below further mitigate this risk, to the point that we are satisfied that we are compliant with the Modern Slavery Act 2015:

2. Policies in relation to slavery and human trafficking

- Recruitment and Selection Policy:** this policy ensures that all recruitment decisions are made fairly and transparently; that processes are free from all types of unlawful or unfair discrimination and bias to ensure that equality of opportunity is maintained for all candidates and prospective candidates. Recruitment and selection initiatives will be carried out in line with relevant legislative obligations and best practice and appointments will only be made on the basis of the skills, experience and aptitudes required for the role.
- Remuneration Policy:** seeks to ensure that we pay our people in line with the respective laws, cultures and market conditions of the relevant country context. MAG aims to provide remuneration packages that:
 - attract, develop and motivate the calibre and mix of people required
 - are fair, transparent and non-discriminatory
 - are legally compliant with national legislative requirements, and in the UK are in line with the real living wage
 - are competitive and comparable with organisations of a similar nature

- are affordable to the organisation and ensure accountability to our donors.
- iii) **Financial Crime Policy:** MAG is committed to the highest ethical standards and requires all staff, consultants, trustees, contractors, partners, agents and other associates to be familiar with and comply with both the detail and the spirit of this policy. We have established a 'zero tolerance' culture across the organisation to financial crime and all forms of corruption and criminality, including slavery, human trafficking and exploitation.
- iv) **Safeguarding Framework:** MAG is committed to safeguarding the health, wellbeing and human rights of all staff, partners and beneficiaries, and to providing a safe and trusted environment for anyone who comes into contact with our work. Within the Safeguarding Framework, there are a number of policies, procedures and guidelines in place to ensure all individuals who are involved with, or affected by our work come to no harm, distress, abuse and neglect caused by MAG. Policies relating to the Safeguarding Framework were reviewed in 2019. They are:
- a) **Reporting Malpractice (Whistleblowing) Policy:** encourages employees and others who come into contact with our work who have serious concerns to voice those concerns. MAG is committed to ensuring that genuinely held concerns will be thoroughly investigated and those who raise them will be protected against victimisation and discrimination.

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- b) **Policy on Personal Conduct:** sets out the expectations that MAG has of all employees (including trustees, consultants, volunteers) as well as providing examples of behaviours and actions that will always be unacceptable. The basis of this Policy is to ensure that professional and personal action does not bring the organisation into disrepute and to ensure that a positive working environment exists, which enables work of the best quality to be completed. This policy also creates an obligation to report any concerns about the behaviour of other staff members. All concerns will be treated with urgency, consideration and discretion. All new staff are required to sign to say they understand the Policy on Personal Conduct.

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- c) **Protection of Children and Vulnerable Adults Policy:** any form of abuse towards children or vulnerable adults by MAG representatives or other parties will not be tolerated. The Protection of Children and Vulnerable Adults Policy recognises that all MAG representatives have a duty of care to protect children and vulnerable adults from harm. We have measures in place to prevent and minimise the risk of abuse, protect staff and safeguard the reputation of the organisation. This policy creates a strict obligation on all staff to report any concerns they may have which involve children and/or vulnerable adults. Anyone who is found to have deliberately or accidentally withheld information or prevented full and thorough reporting to have taken place could face disciplinary action.

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- d) **Dignity at Work Policy:** all staff should be free to carry out their work with dignity and respect in an environment that is free from discrimination, intimidation, harassment and bullying. In this policy, MAG sets out that it will take a zero-tolerance approach to any behaviours which compromise these basic rights.

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- v) **Procurement Policy (Transparency in Supply Chains (TISC) clause):** We are committed to ensuring that all procurement activities adhere to the principles of value for money, transparency and fair and open competition. We will not trade with any suppliers, which we have good reason to believe exploit people. Our procurement policy is clear that suppliers must comply with local laws and regulations and that all procurement activities are in accordance with MAG's Ethical Statement and Financial Crime Policy.

MAG's Supplier Registration Questionnaire is used to collect all information that enables us to perform key checks on whether our suppliers are linked with terrorist organisations or financial crimes. All suppliers working with MAG are asked to confirm in writing that they will adhere to and respect MAG's policies. This allows MAG to immediately suspend a relationship with a supplier that breaches our ethical and professional standards. Whenever a supplier's behaviour relates to a criminal offence against applicable legislation, MAG will raise the issue with the competent authority and co-operate to provide information that might be needed for an investigation

. These standards are in line with the principles and values of the Inter Agency Procurement Group (IAPG) and specifically with the Suppliers' Code of Conduct for IAPG Agencies:
<http://www.iapg.org.uk/vendors/>.

- vi) **Ethical Statement:** This protects MAG from engagement in relationships that have the potential to have severe negative impact on our perceived or actual integrity or reputation. Such relationships are those which we judge to be in conflict with our achievement, fulfilment or adherence to our stated vision, mission and values and the activities which institutions and individuals fund MAG to undertake. We take reasonable steps to undertake due diligence on providers of services and individuals and organisations providing financial and in-kind support. The Statement sets out our minimum ethical expectations of clients, suppliers, investors, companies, organisational and individual donors. We ensure reasonable due diligence steps to satisfy ourselves that each partnership complies with our Ethical Statement.

3. Due diligence processes

- i) **MAG's Background Checks Policy:** sets out the checks required for all new employees, trustees, volunteers and consultants, before they engage with MAG. This policy was introduced in 2019 and MAG plans to provide training on it to HR teams and senior managers throughout the organisation. Key elements of this related to modern slavery include:
- References
 - Criminal record checks
 - Identity and right to work checks

- ii) **MAG's Partnership Policy:** defines the organisation's approach to selecting and formalising partnerships. This approach mitigates the financial and reputational risks to MAG, and maximises the benefits of the partnership for both parties.

MAG has three types of partnerships: contracted partnership, sub-contracting partnership and association partnership. Our due diligence process ensures that MAG does not enter into partnerships with organisations with a vision, purpose or mission that stand at odds with MAG's own. It also mitigates – although does not eliminate the – financial and reputational risks. Any partnership concept should meet basic criteria: the partner and goal of the partnership is compatible with MAG's mission and vision; and that the partnership is unlikely to pose a reputational or financial risk to MAG. MAG will only formally pursue a partnership if these criteria are met.

- iii) **Vendor Due Diligence Process:** MAG performs a vetting process to ensure that suppliers are not included in any US or EU list of individuals and organisations involved in supporting or financing terrorist activities or being involved in international crimes. Additionally, for suppliers with whom a significant financial volume is expected to be engaged, an additional review of financial sustainability is performed. MAG has a proportional approach in managing suppliers' related risk, for which the level of controls performed is directly proportional to the overall expected financial volume being potentially engaged and / or the level of potential risk related to the type of goods and services being sourced.

4. **Risk assessment and management**

MAG maintains a Corporate Risk Register, co-owned by our Leadership Team and the Board of Trustees, through Board sub-committees, our Audit and Finance Committee, Governance, Nomination and Review Committee (GNRC) and our Health, Safety, Security and Safeguarding Committee (HSSC).

The Risk Register is reviewed regularly by the Leadership Team, and on a quarterly basis by Trustees. Safeguarding, including our approach to modern slavery, is included in this risk register and is reviewed and assessed by the GNRC and HSSC. This monitors the controls and monitoring processes MAG has in place.

Risks associated with modern slavery are managed through the suite of policies set out above and MAG's wider HR and Procurement policy frameworks.

5. **Key performance indicators to measure effectiveness of steps being taken**

Continual improvement is a key part of MAG's operating ethos. Monitoring and KPIs are present in a number of key areas:

Monthly Management Information Reports

All MAG overseas locations complete a monthly MMR. This is reviewed by senior managers on a monthly basis and provides a *BRAG* rating for key management areas, including but not limited to Human Resources, Safeguarding and Procurement & Logistics.

HR Quality Assurance Reviews

MAG's Human Resources team, when conducting visits to MAG programmes, reviews programme HR performance and systems against our compliance standards, assigning a compliance level of either 'basic HR administration', 'basic HR management', 'effective HR management' or 'strategic HR management'. These visits identify any areas for improvement within HR systems, processes and procedures, and develop action plans for them to be addressed.

Safeguarding Framework Monitoring Dashboards

These are completed in all overseas programmes and are currently quarterly activities. They provide a *BRAG* rating for the implementation of MAG's Safeguarding Framework and enable MAG's

Safeguarding Lead, and our HQ HR Managers, to monitor and, where necessary, support the effective implementation of our Safeguarding Framework, including the elements which tackle modern slavery.

6. Training on modern slavery and trafficking

All new staff undergo an induction programme when they join MAG. This includes a briefing on the key policies that are listed above and training on MAG's other policies, procedures and processes including the Modern Slavery Statement. MAG runs refresher training each year on safeguarding and in local languages. Training is also conducted on effective and safe recruitment practises.

7. Year on year progress

During the period, July 2018 to June 2019, MAG has developed its approach towards combating modern slavery. We have:

- reviewed and updated all policies that fall under the Safeguarding Framework; written the Background Checks Policy and the Partnership Policy. We have also reviewed our Disciplinary and Grievance Policies and Procedures.
- held briefings and ongoing training has been provided to our HQ and international managers on recruitment and safeguarding and we have continued the training on, our Safeguarding Framework for all staff globally.
- conducted an independent review on MAG's Safeguarding Culture and Practice and recommendations have informed the Safeguarding Strategy and work plan.
- we have appointed a Safeguarding Lead and Safeguarding Trustee Focal Point.

During the period, July 2019 to June 2020, MAG will:

- implement its Safeguarding Strategy and work plan, encourage reporting and continuously review learning from its handling of cases.
- hold regional workshops on safeguarding and will be replicated in each programme. The background checks policy will be launched and training will also be conducted on how to implement it.
- review and strengthen its procurement management system by developing an enhanced approach to the management of procurement operations and promoting a systemic approach to suppliers' management. A new procurement policy and handbook will also be launched and introduced to all programmes.
- throughout 2020, develop specific training for MAG staff on the procurement function and management of suppliers' related risks; and for MAG suppliers, to ensure they gain a better understanding of the key ethical and professional standards they are required to have, in order to do business with MAG.
- pilot on-line fraud training this business year and role it out across HQ and country finance teams in quarterly workshops.
- launch the new Partnerships Policy and revised due diligence process and introduce it across MAG.

8. Our Commitment

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes MAG's slavery and human trafficking statement for the financial year ending 30th June 2019. It has been approved by our trustees, who will review and update it annually (and within six months' of the end of the financial year).

Karen Brown
Chair
September 2019