

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 and supply chains.

Our Values are to be Determined, Expert, Professional, Enabling and Responsive and our response to modern day slavery lives out these values by:

- Raising awareness across our teams to bring forward any concerns about our supply chain activities
- Ensuring our employment and remuneration practices are fair and transparent across all territories
- Challenging and supporting our suppliers to lead the fight against slavery and exploitation

Our Structure and business

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 3,800 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 turnover for the year ended 30th June 2018 was a little over £65 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:

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 is in line with the modern living wage

- are competitive and comparable with organisations of a similar nature
- are affordable to the organisation and ensure accountability to our donors.

Financial Crime Policy: We recognise that financial crime in all its forms is contrary to MAG Values of professionalism, transparency, accountability and can undermine organisational effectiveness. We are committed to the highest ethical standards and require all staff, consultants, trustees, contractors, partners, agents and other associates to adhere to similar standards and make themselves aware of, and comply with, this policy. We have established a 'zero tolerance' culture across the organisation in which financial crime and all other forms of corruption and criminality, including slavery, human trafficking and exploitation are unacceptable.

Safeguarding Framework: MAG is committed to safeguarding the health, wellbeing and human rights of all staff, partners, and beneficiaries and to provide a safe and trusted environment for anyone who comes into contact with our work. Within the Safeguarding Framework, MAG has a number of policies, procedures and guidelines in place to enable all individuals who are involved with or affected by our work to live free from harm, distress, abuse and neglect.

Our Safeguarding Framework was reviewed and updated in the period from February to May 2018. This included the review and update of the majority of the policies, procedures and guidelines that form part of it. Additions and amends were made to bring the policies in line with INGO best practice. Following this update, implementation and socialisation across the organisation included training sessions, which are currently being delivered to all staff in their local languages.

Reporting Malpractice (Whistleblowing) Policy: MAG will always strive to maintain the highest standards of openness, integrity and accountability in its work. The Reporting Malpractice (Whistleblowing) policy and procedure 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. This policy was updated in 2018, with the new version implemented in May 2018. Training on it is currently being provided to all staff, across the organisation.

Policy on Personal Conduct: Employees (to include trustees, consultants, volunteers and accompanied persons) are required to abide by MAG's policies and procedures, terms and conditions of employment, and to ensure that their personal conduct is in keeping with MAG's Aims and Values. By following the Policy on Personal Conduct, all staff should be aware what is expected of them and make the greatest contribution to achieving MAG's Mission and Vision. The Personal Conduct Policy sets out the expectations that MAG has of all employees, 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.

In particular, it requires staff to agree with the following statements:

- I will treat all people inside and outside of the organisation fairly, with respect and dignity
- I will not engage in any forms of humiliating, degrading or exploitative behaviour.
- I will refrain from any form of harassment, discrimination, physical or verbal abuse, intimidation or exploitation.
- I will not engage in any exploitative, abusive or corrupt behaviours or relationships during my employment with MAG.
- I will avoid involvement in any criminal activities, activities that contravene human rights or those that compromise the work of MAG.
- I will not knowingly participate in any illegal activities.

In addition, this policy creates an obligation to report any concerns about the behaviour of other staff member. Any concerns will be treated with urgency, consideration and discretion. This policy was updated in 2018, with the new version implemented in February 2018. Training on it is currently being provided to all staff, across the organisation.

Protection of Children and Vulnerable Adults Policy: It's recognised that during the course of their work, MAG representatives may come into contact with children and vulnerable adults. MAG is committed to safeguarding these individuals from harm. 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. We will meet its commitment to protect children and vulnerable individuals from abuse through Awareness, Prevention, Reporting and Responding.

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. This policy was updated in 2018, with the new version implemented in February 2018. Training on it is currently being provided to all staff, across the organisation.

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. This policy was updated in 2018, with the new version implemented in April 2018. Training on it is currently being provided to all staff, across the organisation.

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 identify any companies who do not meet our Code of Conduct for Suppliers and Ethics which includes the requirement to pay fair wages and the requirements to provide working conditions which are safe and hygienic and free from harsh or inhumane treatment. 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/>.

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.

Training: In addition to the training on the MAG Safeguarding Framework, which is currently being delivered to all current staff in their local language as part of the implementation of our revised and

updated Safeguarding Framework, as part of a comprehensive induction process, all new staff are given training on MAG policies and procedures, and are required to sign up to the Policy on Personal Conduct.

Future Developments

During the period from July 2018 to June 2019, MAG plans to further develop its approach toward combating modern slavery. Our plans for this period include:

- Reviewing and updating our Equal Opportunities Policy
- Reviewing and updating our Grievance Policy and Procedure
- Reviewing and updating our Recruitment Policy and Framework
- Providing further and ongoing training to our HQ and international managers on recruitment and Safeguarding
- Continuing the implementation of, and training on, our updated Safeguarding Framework for all staff globally.

In addition to these commitments, due to high profile reports about historical failings within the INGO sector, the Board and Global Leadership Team have agreed on the need to ensure that MAG is genuinely building a safeguarding culture and meeting the highest standards in this area. We have therefore commissioned an external review of MAG's policies and procedures by independent safeguarding experts. The Independent Safeguarding Review will assess current culture and practices. It will do this with a view to strengthening the framework and ensuring that a safeguarding environment of the highest standard is in place.

The review will cover the policies that are included in MAG's Safeguarding Framework, and engage with staff and communities, through a range of opportunities to determine how safeguarding is working in practice and how this can be strengthened.

The objectives of the independent review are to:

- Assess levels of awareness, understanding, attitudes and approaches towards safeguarding in the past and at present.
- Recommend how MAG can build a culture which sets and adheres to the highest standards of awareness, behaviour, investigation and sanction as well as documentation with respect to safeguarding across the organisation.
- Recommend how MAG amends its processes and procedures immediately and over the longer term, whilst taking into account other sector wide (humanitarian development sector) and sector specific (HMA/AMD) initiatives.
- In the event of specific unreported incidents being identified, recommend whether further investigation is required and to make recommendations to MAG management.

The review will be completed by September 2018 and its recommendations will form a key part of our workplan in this area through 2019.

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.

Karen Brown
Chair
31 July 2018