

Modern Slavery Statement

2023/24

Malaria Consortium supports the Modern Slavery Act 2015 as we recognise the threat modern slavery poses to fundamental human rights. This statement outlines our commitment to ensure that our activities and our decisions do not contribute to modern slavery in any of its forms.

The Modern Slavery Act 2015

The Modern Slavery Act 2015 requires Malaria Consortium to set out the steps taken in the financial year to ensure that modern slavery and human trafficking is not occurring in the supply chain or in the organisation.

Modern Slavery is a term used to encapsulate both offences in the Modern Slavery Act: slavery, servitude and forced or compulsory labour; and human trafficking. The offences are set out in section 1 and section 2 of the Act, which can be found on the links below:

<http://www.legislation.gov.uk/ukpga/2015/30/section/1/enacted>

<http://www.legislation.gov.uk/ukpga/2015/30/section/2/enacted>

Our Supply Chains

Malaria Consortium's mission is to save lives and improve health in Africa and Asia, through evidence-based programmes that combat targeted diseases and promote universal health coverage. The majority of Malaria Consortium's work involves conducting research and providing evidence based technical assistance and capacity building support to relevant departments within Ministries of Health, as well as supporting community volunteers to increase health care access.

In support of these activities we enable, and on occasion manage, the delivery of supplies to local partners or communities. Malaria Consortium either receives supplies (e.g. medicines) from key partners including UN agencies, government donors and national Ministries of Health who source and deliver these supplies through their own verified supply chains; or procures supplies and services (office supplies and equipment, training material and services, vehicle rental, etc.) nationally or internationally and deliver them through Malaria Consortium or national Ministry of Health supply chains.

Malaria Consortium's Policies on Slavery and Human Trafficking

Malaria Consortium maintains the following policies that are designed to ensure Malaria Consortium staff, suppliers, and any other entities that Malaria Consortium works with are aware of Malaria Consortium's stance against slavery and human trafficking, the processes used to prevent this occurring within Malaria Consortium, its partners and in its supply chains, how to report concerns regarding slavery and human trafficking, and how concerns raised should be investigated and reported.

- Anti-Bribery Policy
- Anti-Fraud and Anti-Corruption Policy
- Anti-Money Laundering and Terrorist Financing Policy
- Code of Conduct
- Combatting Trafficking in Persons: Compliance Plan
- Procurement Policy
- Research and Evaluation Ethics Policy
- Safeguarding Policy
- Sub Award Management Policy
- Whistleblowing policy

Due Diligence Processes

Malaria Consortium maintains several due diligence processes as part of our operations, the following of which are designed in part or in full to combat Modern Slavery and Human Trafficking.

ENTITY	SUMMARY OF PROCEDURES USED
Staff and Trustees	For all recruitment processes we request a CV be provided. Recruitment reference checks are conducted covering the previous three years. A minimum of two referees must be provided, with an official work email address as a contact point.
Suppliers	Suppliers are vetted against several different sanctions lists regulated by the UK, EC, US and UN. Where concerns about an organisation or its key staff are raised these are investigated, and where concerns are proven, Malaria Consortium will not work with that supplier. Suppliers are also required to demonstrate that they are legally constituted, and have met registration requirements of the country or countries that they operate in.
Partners	Potential partners are assessed against a range of different criteria, including background checks on the both the organisation and key staff, and checks of policies and procedures in relation to safeguarding. The partner is visited in person by Malaria Consortium representatives to ensure a proper understanding of the partner.

Risk Assessment

The following areas have been identified as risks that Malaria Consortium faces of directly or indirectly contributing to Modern Slavery or Human Trafficking during its operations. Where risks exist, a summary of measures already in place to mitigate these risks have been listed. Where there are remaining actions, these are listed also.

RISK	MITIGATION MEASURES
Staff are unaware of Malaria Consortium's stance and procedures against Modern Slavery and Human Trafficking	<p>All staff are required to sign the Code of Conduct.</p> <p>A prescribed induction process ensures that all staff are required to have read and are provided training on all MC policies that relate to Modern Slavery and Human Trafficking prevention.</p> <p>Staff receive annual refresher training on the Code of Conduct and Whistleblowing policies.</p> <p>Policies are translated into the languages of the staff that Malaria Consortium works with.</p>
Partner organisations working with Malaria Consortium use bonded labour	<p>All partners are required to pass a standardised assessment prior to being accepted to work with Malaria Consortium. This includes checks to ensure relevant safeguarding policies are in place and meet the standards expected of the partner organisation. Based on the results of the assessment a monitoring schedule is agreed proportionate to the capacity of the partner organisation.</p> <p>Where there are concerns regarding the capacity of a potential partner, an action plan is agreed to address areas of concern, with the partner required to meet required standards prior to the receipt of any funds.</p> <p>Where a partner organisation is engaged by Malaria Consortium, an orientation process is arranged for the partner staff, in part to explain what is expected of them, and to inform them of whistle blowing mechanisms that they can use to raise concerns.</p>
Suppliers working with Malaria Consortium use bonded labour	<p>Suppliers are vetted to ensure that they do not appear on specific sanctions lists.</p> <p>Suppliers are required to demonstrate that they are legal entities and meet all registration requirements they are subject to.</p> <p>Suppliers are contractually required to follow International Labour Organization standards as part of the terms of all purchase orders and contracts. Any breach of these standards would result in termination of the contract.</p> <p>Suppliers providing more than \$20,000 of goods or services are required to agree to Malaria Consortium's Anti-Bribery policy, Anti-Fraud and Anti-Corruption policy and Safeguarding policy, and are required to supply additional information regarding their working practices.</p>
Lack of oversight of management team as to operational realities at programme delivery level	<p>Management team are regular travellers to all Malaria Consortium countries of operation, and this ensures greater visibility of programming.</p> <p>The Malaria Consortium Safeguarding policy has been recently revised, and a dedicated Safeguarding position exists at the Global level to provide oversight of safeguarding within the organisation.</p>
Malaria Consortium staff are paid at a level that is exploitative	<p>Salary surveys are conducted with the support of a third-party provider on a rolling basis to ensure Malaria Consortium pays its staff a living wage</p>
Insufficient resources are available to identify and report awareness or suspicions of Modern Slavery or Human Trafficking	<p>Confidential whistleblowing reporting mechanisms in place for staff to raise concerns. An external reporting mechanism has been created which is not managed by Malaria Consortium. Staff are made aware of donor reporting mechanisms also.</p> <p>Internal investigation function maintained that reports directly to the Board of Trustees.</p> <p>An internal audit function is maintained, reporting directly to the Board of Trustees.</p> <p>A management team position has been created with responsibility for oversight of compliance – including with the Modern Slavery Act.</p>
Attempts to reduce the risk of direct or indirect use of bonded labour are seen as a paperwork exercise, and fail to meaningfully address the issue of Modern Slavery and Human Trafficking	<p>Management team regularly reiterate the importance of safeguarding in monthly meetings.</p> <p>Safeguarding is included as a standing agenda point in senior management meetings to ensure it is considered on a regular basis.</p>
Staff, suppliers, or partners do not feel confident to report awareness or concerns regarding Modern Slavery or Human Trafficking, due to concerns they will not be taken seriously, or they will be put at personal risk if they do report	<p>Malaria Consortium's investigation function operates confidentially as far as is possible, and there are processes in place to protect whistle blowers from recrimination if these are required.</p>

Measuring effectiveness

Measuring the effectiveness of Malaria Consortium's approach to the prevention of Modern Slavery and Human Trafficking is necessarily a subjective exercise as it is not possible to establish an accurate baseline figure of compliance, nor to quantify organisational performance at a point in time. It is also complicated by the lack of generally agreed metrics that should be monitored to allow comparison within and across different industries.

Acknowledging the caveats listed above, the management team of Malaria Consortium believes that the organisation has made progress regarding prevention of Modern Slavery and Human Trafficking in its supply chains in the past year. This is evidenced by the following:

Steps have been taken to appoint a Risk Manager position to oversee a review and improvement of existing risk management procedures, including in relation to Modern Slavery and Human Trafficking.

A commitment has been made to translate all organisational policies into languages accessible to staff; a process that remains ongoing at the time of reporting.

The Sub-Award Policy is in the process of being updated to cover all partnerships to ensure that proper due diligence is done on all partner organisations prior to engagement, suitable training is given as required, and contracts set clear expectations around Modern Slavery and Human Trafficking.

In the reporting period no instances of modern slavery or human trafficking within Malaria Consortium or in our supply chains have been identified.

We cannot say with certainty no instances have taken place, and we remain committed to improving our ways of working to prevent and identify any evidence indicative of modern slavery and human trafficking going forward.

Training for staff

Staff receive training at multiple points of their employment with Malaria Consortium, including:

At induction, where they are trained on all key Malaria Consortium policies that they are required to be aware of, including those policies that are designed in full or in part to prevent Modern Slavery and Human trafficking.

Annually where staff are retrained on the Code of Conduct, Safeguarding and Whistleblowing Policy.

Next Steps

Malaria Consortium is committed to an ongoing review of our policies, processes and training to reduce as far as possible the risk that Modern Slavery and or Human Trafficking plays any role in the activities of our organisation.

James Tibenderana

Chief Executive, Malaria Consortium

04/03/2024

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Malaria Consortium's modern slavery and human trafficking statement for the financial year ending 2023/24