

# Modern Slavery Statement 2021/22

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 improve lives in Africa and Asia through sustainable, evidence-based programmes that combat targeted diseases and promote child and maternal health.

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. drugs) 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 Fraud and 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 a number of 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.

<b>Entity</b>	<b>Summary of procedures used</b>
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. Malaria Consortium does not employ volunteers
Suppliers	Suppliers are vetted against a number of 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 in the course of its operations. Where risks exist, a summary of measures already in place to mitigate these risk 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 ILO 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</p>
Lack of oversight of management team as to operational realities at programme delivery level	<p>Management team have historically been regular travellers to all Malaria Consortium countries of operation, and this ensures greater visibility of programming. However, travel has been impacted in the last year due to Covid.</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	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>	<p>Confidential whistleblowing reporting mechanisms in place for staff to raise concerns</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>
<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>	<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>
<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>	<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.<sup>1</sup>

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

- An increased focus on safeguarding within the organisation, including greater emphasis on the training of staff, and standing safeguarding agenda points included in key organisational meetings to ensure our responsibilities to our staff and those that we work with are considered regularly
- The adaptation of the structure of the management team to increase oversight of organisational compliance, including compliance with requirements under the Modern Slavery Act
- The organisation has committed to undertake a review of how it does due diligence on stakeholders that it interacts with.

### 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 Whistle Blowing Policy.

<sup>1</sup> [https://www.ilo.org/wcmsp5/groups/public/---dgreports/---inst/documents/publication/wcms\\_632120.pdf](https://www.ilo.org/wcmsp5/groups/public/---dgreports/---inst/documents/publication/wcms_632120.pdf)

To ensure training given is accessible to staff across our working locations, training materials are made available in English, French, Portuguese and Khmer, as well as being translated into other languages where necessary for comprehension.

### 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.

A handwritten signature in black ink, appearing to read 'Charles Nelson', with a long horizontal flourish extending to the right.

Charles Nelson  
Chief Executive, Malaria Consortium  
9<sup>th</sup> March 2022

*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 2021/22*