

Annex 5: **MAG POLICIES and Statements**

The Supplier, its suppliers and sub-contractors, shall comply with all the MAG mandatory Policies and Statements for Suppliers and Contractors" stated on <https://www.maginternational.org/accountability/tenders/> under the section named **MAG Suppliers and Contractors: Required Commitments**

A copy of all those documents is compiled in this annex, for reference:

- **MAG's Conflicts of Interest Policy** Pages 2 - 6
Dir POL 001 Conflicts of Interest Policy v8.pdf
- **MAG's Data Protection Policy** Pages 7 - 16
Dir POL 018 - Data Protection Policy v5.pdf
- **MAG's Environmental Policy** Page 17 – 19
5.2 Environmental Policy v13.pdf
- **MAG's Ethical Statement** Pages 20 - 22
Dir POL 004 Ethical Statement v3.pdf
- **MAG's Financial Misconduct and Crime Policy** Pages 23 - 24
Dir POL 005- Financial Misconduct and Crime Policy v7.pdf
- **MAG's Modern Slavery Statement** Pages 25 - 28
Modern Slavery Statement 2021.pdf
- **MAG's Safeguarding Policy** Pages 29 - 37
Dir POL 002 - Safeguarding Policy v2.pdf

DOCUMENT REFERENCE	Dir/POL/001	ISSUE	8	DATE	07/11/2019	REVIEW DATE	07/11/2020
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MAG CONFLICTS OF INTEREST POLICY

POLICY STATEMENT

All staff, volunteers and trustees are expected to avoid any conflict of interest between the interests of MAG and any other personal, professional or business interests. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest¹, even where a conflict of interest may not in fact exist.

All trustees have a legal duty to act only in the best interests of their charity. Under both charity law and company law, trustees of charitable companies must take careful steps to disclose interests and to manage conflicts of interest.

PURPOSE

The aim of this policy is to protect both MAG and the individuals involved from any impropriety or appearance of impropriety. This policy sets out the guidelines for dealing with conflicts of interest.

SCOPE

This policy applies to all MAG trustees, staff (HQ, international and national) and volunteers.

DEFINITIONS

Conflict of Interest: A conflict of interest is any situation in which an individual's personal interests or loyalties could prevent them, or could be seen to prevent them, from making a decision only in the best interests of MAG.

Such conflicts may create problems; they can:

- inhibit free discussion;
- result in decisions or actions that are not in the interests of MAG; and
- risk creating the impression MAG has acted improperly.

Examples of conflicts of interest include:

- Where a member of staff is connected to a party involved in the supply of a service or product to MAG.
- A Board member who is related to a member of staff and there is a decision to be taken on staff pay and/or conditions.
- A Board member who has shares in a business that may be awarded a contract to do work or provide services to MAG.
- A staff member or volunteer's private interests may benefit from his or her work actions.
- A staff member or volunteer's loyalty to MAG conflicts with a loyalty to another body or to a member of their family.

Relevant interests include direct financial interest² or indirect financial interest³; non-financial⁴ or conflicts of loyalties⁵.

Trustees: Charity trustees are the people responsible for the general control of the management of the administration of the charity. In the charity's governing document they may be called trustees, managing trustees, committee members, governors or directors, or they may be referred to by some other title.

If there were any related party transactions concerning Trustees these will be noted in the Annual Statutory accounts.

¹ Some conflicts may only be perceived — an employee or trustee/volunteer's decision could be questioned based on a personal or private interest that may not actually have influenced any decision. One must consider how others could view involvement in a decision or action. Are there risks associated for the individual or MAG?

² When a trustee or staff member obtains a direct financial benefit, for example, the award of a contract to a company with which a trustee or staff member is involved.

³ When a close relative of a trustee or staff member benefits from the charity.

⁴ Where trustees or staff receive no financial benefit but are influenced by external factors; for example, awarding contracts to friends.

⁵ When trustees or staff have competing loyalties between the charity and some other person or entity.

Articles of Association: The Articles of Association are the rules which deal with the Charity's status, and regulate its internal management.

Annual Retirement Meeting: The trustees meeting at which the Annual Report and Accounts and appointment/retirement of trustees and auditors are dealt with annually.

Register of trustees' interests: The charity's internal record of trustee interests that have been declared by trustees to the Board. This will act as proof that trustees have properly declared their interests should the point ever be queried by the Charity Commission or another third party.

Register of HQ and International staff interests: The charity's internal record of interests declared by staff (HQ and International) and volunteers. **Completed National staff forms are maintained on file in the programme by the Senior Manager in Country (SMiC).**

APPLICATION

Staff and Volunteer Responsibilities:

HQ and International staff are required to complete a Declaration of Interests form (Dir/FM/001) at the time of appointment. The HQ HR team will arrange for new staff/volunteers to complete the form. The Management Support Team (MST) maintains completed forms on file in HQ.

National staff members with responsibility for, and providing authorisation of, the procurement of goods or services for MAG and anyone involved in the recruitment of staff are also required to complete the form prior to, or on, their first day of employment with MAG. The SMiC maintains National staff forms on file in the programme.

Following appointment, this form must be reviewed, updated where necessary and re-signed on an annual basis. At HQ, for HQ and International staff, this is coordinated by the MST. In programmes, for national staff, it is coordinated by the SMiC.

The form should also be updated when anything significant changes. New matters should not await an annual declaration before being declared. It is the responsibility of each individual staff member/volunteer to proactively declare any matters which they feel may present actual or potential conflicts, or the perception of such conflicts. Further, any actual or potential conflicts of interest should be declared verbally at any meeting where specific relevant conflicts may arise.

The Leadership Team must also complete a Senior Manager Automatic Disqualification Declaration (Dir/FM/003). This form is used by MAG to ensure that individuals who hold, or who are applying for, a relevant senior manager position are not disqualified from holding that position.

Trustee Responsibilities:

There are five occasions when MAG requires Trustees to declare potential conflicts via the relevant form:

- i) **Pre-selection:** Any prospective trustee is requested by the Company Secretary to complete a 'Contact and Interests Form' (Dir/TEM/003) prior to confirmation of appointment in order that any relevant issues may be taken into account before confirming their appointment. An additional form is required to be completed by all trustees prior to appointment: Trustee Automatic Disqualification Declaration (Dir/FM/002). This form is used by MAG to ensure that individuals who hold, or who are applying for, a trustee position are not disqualified from holding that position.
- ii) **On arrival:** Every new trustee is required to complete a Declaration of Interests form at the time of appointment.
- iii) **Annually:** During each Annual Retirement Meeting, trustees are asked to make statements of interests including any conflict other than those already stated.

- iv) **When anything significant changes:** New matters should not await an annual declaration before being notified. It is the responsibility of each individual trustee to proactively declare any matters which they feel may present actual or potential conflicts, or the perception of such conflicts.
- v) **Verbally:** at any meeting where specific relevant conflicts may arise.

Managing a Conflict:

For **Staff and Volunteers**, if a situation arises where a conflict may develop, this must be disclosed to their Line Manager (HQ and international staff) or member of the programme SMT (National staff) immediately in line with MAG's Policy on Personal Conduct⁶. When a conflict of interest is identified, the Line Manager or member of the programme SMT will determine the best course of action by seeking appropriate advice and guidance⁷. For example, it might be necessary for the person in question to remove themselves from the meeting at which discussions concerning the interest in question occurs, or the person may no longer be able to work on a particular project if the conflict will remain.

If in doubt about any matter, it is always better to make a declaration and seek advice from your Line Manager.

At **Board level**, in the event of a declaration by a trustee, the Articles of Association set out the framework for dealing with trustees' conflicts of interest (Articles 20 and 21). The Articles allow conflicts of interest to be dealt with either by following a procedure set out in the Articles, or by having a conflict authorised by the other trustees subject to certain limitations.

- A conflict should be declared at the earliest opportunity
- A trustee who declares an interest should leave the meeting to allow the other trustees to decide whether his or her absence is necessary or appropriate
- The other trustees should agree how to deal with the conflict, for instance by allowing the conflicted trustee to speak on the matter concerned but not to vote
- The process must be properly minuted

It is a legal requirement that the Charity's Annual report and Accounts must include disclosure of any properly authorised payment or financial benefits to trustees.

Benefits to Trustees:

The Charities Act 2006 introduced a new power for charities to pay their trustees for providing services to the charity (excluding paying a trustee for performing his or her duties as a trustee or allowing a trustee to take up paid employment). MAG's Articles allow for reasonable and proper remuneration of any trustee for any goods or services supplied to the charity, subject to certain conditions being complied with.

Gifts and Hospitality:

Trustees, staff and volunteers must also declare any gifts or hospitality received in connection with their role in MAG. This protects against the accusation that such gifts or hospitality are intended to influence the decisions they take in administering the charity's affairs. Please refer to the Gifts and Hospitality Policy (Dir/POL/012) for further details.

Bribery Act 2010:

⁶ **Conflicts of Interest: I will uphold MAG's integrity and reputation by performing my duties and conducting my private life in a way that avoids possible conflicts of interest.**

- I will declare to my manager, any financial, personal, family (or close intimate relationship) interest in matters of official business which may impact on the work of MAG – e.g. contracts for goods/services, employment or promotion within MAG, partner organisations, civil authorities, beneficiary groups.
- I will seek permission from my line manager, before agreeing to being nominated as a prospective candidate or another official role for any political party.
- I will not accept any additional employment or consultancy work outside of MAG without prior permission from my manager (this applies only to staff, unless there is a conflict of interest).
- I will not request or accept bribes and significant gifts or any remuneration from governments, communities, donors, suppliers and other persons, which have been offered to me as a result of my employment with MAG.
- I will not abuse my position as a MAG employee by requesting any service or favour from others in return for assistance by MAG.

⁷ Please contact the Company Secretary in MAG HQ for advice

Undeclared conflicts of interest can lead to accusations of corrupt or preferential conduct under the provisions of the 2010 Bribery Act. Please refer to the Financial Crime Policy (Dir/POL/005) for further details.

Record keeping:

A Register of Trustees' interests is maintained by the Company Secretary in accordance with Article 22 of the Articles of Association.

A separate Register of Interests declared by staff (HQ and International) and volunteers is maintained by the MST in HQ. **Completed National staff forms are maintained on file in the programme by the SMiC.**

Any trustee, member of staff or volunteer either knowingly providing false information or withholding relevant information may be subject to disciplinary procedures.

REFERENCES

- **Conflict of Interest Forms – Guidelines for Programmes/National Staff**
- **Policy on Personal Conduct HR/POL/042**
- **Senior Manager Automatic Disqualification Declaration – Dir/FM/003**
- **Trustee Automatic Disqualification Declaration – Dir/FM/002**
- **MAG Declaration of Interests Form – Dir/FM/001**
- **Trustee Contact and Interests Form - Dir/TEM/003**
- **Conflicts of Interest: a guide for charity trustees (Charity Commission):**
<https://www.gov.uk/government/publications/conflicts-of-interest-a-guide-for-charity-trustees-cc29/conflicts-of-interest-a-guide-for-charity-trustees>
- **The seven principles of public life:** <https://www.gov.uk/government/publications/the-7-principles-of-public-life/the-7-principles-of-public-life--2>
- **Companies Act 2006 (Sections 173-174):** <http://www.legislation.gov.uk/ukpga/2006/46/contents>
- **Bribery Act 2010:** <http://www.legislation.gov.uk/ukpga/2010/23/contents>
- **Trustees Handbook:** Available from the Company Secretary
- **MAG's Articles of Association:** Available from the Company Secretary
- **MAG's Gifts and Hospitality Policy (Dir/POL/012):** Available from the Company Secretary
- **MAG's Financial Crime Policy (Dir/POL/005):** Available from the Company Secretary

APPENDICES

Guidelines – Examples of involvement – Annex 1

APPROVAL AND DATES

Board of Trustees – November 2019

This Policy will be reviewed annually and is next due for review in November 2020

POLICY OWNER

Chief Executive

ANNEX 1 – EXAMPLES OF INVOLVEMENT

Example of involvement	Additional guidance/ information
Adviser	Could be paid or unpaid
Advisory Director	May or may not be a member of a relevant organisation but may influence decisions
Chair	
Chief Executive	
Contractor	Responsible for the commissioning of work or services, contracting services or staff
Co-opted member	A member an organisations' board but without voting rights
Consultant	Could be paid or unpaid
Current Salaried Employee	
Director	Governing the affairs of an institution or corporation
Donor	Having made or currently making a financial donation of a substantial sum to an organisation
Elected member	Council member
Former salaried employee	
Governor	
Honorary Officer	Receiving no payment
Member	An individual who belongs to an organisation, association, company, partnership, firm or corporation
Non-Executive Director	Not necessarily a full-time member of an organisation but advises other Directors (paid or unpaid)
Panel Member	
President	
Patron	Of, for example, an institution, event or cause
Professional Service Provider	
Referee	A named referee for an organisation providing assurance and confirmation of character and capacity
Senior Administrator	
Shareholder	
Trustee	Having the general control, management and legal responsibility of the administration of a charity

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DATA PROTECTION & PRIVACY POLICY



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1. Introduction

Data Protection Laws

This Policy reflects the requirements of the EU General Data Protection Regulation 2016/679 ('GDPR'), the UK Data Protection Act 2018 including its applied GDPR provisions ('DPA 2018'), the UK Privacy of Electronic Communications Regulations 2003 (known as 'PECR' and alternatively 'e-Privacy'), and all relevant EU and UK data protection legislation (collectively referred to herein as 'Data Protection Laws'). This Policy may be amended in response to further guidance that may issue once the UK leaves the European Union (e.g., enactment to replace the EU GDPR with a UK GDPR).

Data Protection Laws relate to any information from which an Individual can be identified (directly or indirectly) either on its own or together with other information. The DPA 2018 increased the level of potential fines for non-compliance depending on the nature of the breach, to the greater of GBP 17 million or 4% of global annual turnover.

Our donors and our regulators expect us take information security very seriously

MAG takes information security very seriously and protecting our information and IT systems is a key component of building and maintaining trust. The consequences of not securing information could expose the organisation and our brand to significant legal and regulatory censure, sanctions and fines. Personal information is legally protected and requires specific attention. Our regulators expect us to comply with best industry practice when securing all types of information.

This policy applies to everyone in the organisation who accesses or otherwise handles Personal Data

This policy applies to all Personal Data processed by MAG and is part of MAG's overall programme and approach to compliance with Data Protection Laws. This policy applies to all Personal Data processed by or on behalf of MAG (including where MAG outsources the management or Processing of Personal Data to third parties or other MAG Organisations).

All MAG Personnel (which for the purposes of this Policy includes all MAG employees, trustees, contractors and associates working for or on behalf of MAG) are expected to understand their responsibilities described in this Policy.

Non-compliance and associated data privacy risks must be identified and managed

Compliance with this Policy is mandatory. Failure to comply will not only put MAG's data protection compliance at risk, but could have disciplinary consequences for any MAG employees, associates or contractors found to be in breach, including adverse risk metrics and/or investigation and disciplinary action pursuant to the MAG Disciplinary Procedure, up to and including dismissal. In addition, breaches of Data Protection Laws can give rise to criminal and/or civil liability for the individuals concerned.

Monitoring and policy enforcement

The MAG Data Protection Lead (DPL) is tasked with monitoring the organisation's compliance with this Policy. This Policy (together with all Related Policies) is an internal document and cannot be shared with third parties, donors or regulators without prior authorization from the DPL.

Subject to applicable law or regulation, MAG reserves the right to:

- monitor, review and examine the use of MAG managed IT and information assets
- monitor and remove any software, files or information stored on any MAG managed device
- rescind access, without notice, to MAG networks and the use of MAG IT assets and resources
- discipline any MAG personnel for breaches of laws, regulation or policy

Contact us

For further information, email dataprotectionteam@maginternational.org if you would like to know more or need help with implementing this policy.

Policy ownership and approval

The Data Protection & Privacy Policy is owned by the Director of Governance and Business Transformation. This is version 0.3 and was approved by the Board of Trustees on 29th January 2021

Full document version control and history can be seen on the final page.

2. Definitions

Consent – is the means by which a Data Subject signifies their agreement to the Processing of Personal Data relating to them. Consent must be freely given, specific, informed and an unambiguous indication of the Data Subject’s wishes, and must be expressed by a statement or clear positive action.

Data Controller – means a natural (living) or legal person, public authority, agency or other body which, alone or together with others, determines the purposes and means of the Processing of Personal Data.

Data Processor – means a natural (living) or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller.

Data Subject – means any identified or identifiable natural (living) person. A Data Subject is not a company or other legal person. This Policy may use the term ‘Individual’ as an alternative to the term ‘Data Subject’.

EEA – means the European Economic Area, which is comprised of the 28 countries in the European Union, together with Iceland, Norway and the principality of Liechtenstein.

MAG Personnel – means employees, contractors and associates of MAG.

MAG – we, our, us means ‘Mines Advisory Group’.

Individual – means ‘Data Subject’.

Personal Data – means any information from which, alone or together with other information, an Individual can be identified. Personal Data can be factual, such as names, identification numbers, location information, and one or more identifiers such as IP addresses or cookies. Personal Data can also be an opinion about an Individual’s actions or behaviour, or related to one or more factors specific to the physical, physiological, mental, economic, cultural or social identity of an Individual. Personal Data includes ‘Sensitive Personal Data’.

Processing or Process – means any activity, operation or set of operations that is performed on Personal Data, including collecting, holding, recording, organising, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing by transmission, dissemination or otherwise making available, aligning, combining, restricting, erasing or destroying.

Sensitive Personal Data – means Personal Data that relates to an Individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life or sexual orientation, as well as criminal offences or convictions. Sensitive Personal Data is referred to as Special Categories of Personal Data in the EU General Data Protection Regulation.

3. MAG Requirements for Handling Personal Data

In our role as a charity and an employer, MAG takes data protection very seriously, whether the Personal Data relates to our donors, suppliers, contractors, business associates or current, past, or prospective MAG personnel.

In all cases, we expect MAG Personnel and all third parties Processing Personal Data for us or on our behalf to comply with these data protection principles:

Lawfulness, Fairness, and Transparency

Personal Data must be processed lawfully, fairly and in a transparent manner.

We will provide Individuals with clear and relevant information about how we process their Personal Data in order to ensure that the processing meets the requirements of Data Protection Laws.

Data Protection Laws permit processing of Personal Data for specific purposes to ensure data is processed fairly and does not adversely affect the Individual.

MAG must only process Personal Data when it is necessary and meets at least one of these six lawful bases for Processing:

- **Consent** – where the Individual has given their Consent for their Personal Data to be processed. Any processing must be strictly within the purposes for which the Consent is given. Explicit Consent is required in most cases when processing Sensitive Personal Data.
- **Contract** – where the processing is necessary for the performance of a contract with the Individual. This includes the performance of contracts to which the Individual is party or in order to take steps at the request of the Individual prior to entering into a contract.
- **Legal Obligation** – where the processing is necessary to comply with legal obligations to which we are subject.
- **Vital Interests** – where the processing is necessary to protect the vital interests of the Individual or another natural person.
- **Public Interests** – where the processing is necessary for the performance of tasks carried out in the public interest or in the exercise of official authority vested in us. (Public interests must be ‘substantial’ when we are processing Sensitive Personal Data).
- **Legitimate Interests** – where the processing is necessary for our (or a third party’s) legitimate interests provided they do not override the interests and fundamental rights of the Individual. Where we rely on this lawful basis, we may need to perform a legitimate interest assessment (see ‘Privacy Risk Assessments below).

Purpose Limitation

We collect and process Personal Data for specified, explicit and legitimate purposes. We will not process Personal Data in a manner that is incompatible with the originally stated purposes.

Secondary use of personal data will be reviewed and approved by the Data Privacy Office, the DPL or authorised delegate.

Accuracy

We will ensure the Personal Data we process is accurate and, where necessary, kept up to date. Every reasonable step will be taken to ensure Personal Data is accurate, having regard to the purposes for which it is processed.

Security and Confidentiality

We will take reasonable precautions to secure Personal Data against accidental or unlawful destruction or loss, alteration, unauthorised disclosure or access. These precautions include technical, physical and organisational security measures to prevent unauthorised access, as documented in the Related Policies. More information can be found in the Information Security Policy.

Data Subject Rights

Individuals’ Rights. Individuals have the following rights when it comes to the processing of their Personal Data:

- Withdraw their previously given consent at any time
- Request access to their Personal Data
- Object to our processing of their Personal Data for direct marketing purposes
- Request erasure of their Personal Data if it is no longer necessary for the purposes for which it was collected or required to be retained for legal and regulatory purposes
- Request rectification of inaccurate or incomplete Personal Data
- Challenge our processing of their Personal Data where we are exercising our legitimate interests

Responding to Data Subject Rights Requests. Where MAG is the Data Controller (determining the means and purpose of processing the Personal Data), we will ensure that we comply with the following requirements:

- Information – we will ensure Individuals are informed about our privacy policies and their rights in relation to their Personal Data at the point of collection, in easily accessible notices. This includes Personal Data collected on paper, website registration forms, surveys, and telephone and email marketing campaigns.
- Request Forms – we will provide reasonable and accessible means for Individuals to submit their requests by emailing us using the contact information within the Privacy Policy that is available on the MAG website. MAG Personnel must be able to quickly identify a DSAR, which does not have to take any specific form and can be submitted by any method.
- Safeguards – we will confirm the identity of any Individual submitting a DSAR before providing a response.
- Response – within 30 days of validating the identity of any Individual submitting DSAR, we will provide the requested information, or provide legitimate reasons for not complying with their request. In certain limited circumstances, we may need to extend our response time by up to 60 days.

Sensitive Personal Data

In providing our services, we would not usually expect to process sensitive personal data, however, we are likely to process sensitive MAG personnel information, and therefore, we will take additional measures, including applying the MAG Highly Confidential classification and safeguarding it in accordance with Related Policies. Likewise, additional measures should be applied when we are required to process sensitive personal data of MAG personnel. Where MAG acts as an independent Data Controller, we require written notification before donors disclose sensitive personal data to us.

Personal Data used for Marketing Purposes

Our marketing activities will comply with Data Protection Laws. The following direct marketing obligations will apply:

- ePrivacy. At the time we collect an Individual's Personal Data for current or future direct marketing purposes using electronic communications (fax, text, recorded telephone messages, and email), we will obtain an affirmative indication of agreement (opt-in) from that Individual to receive further marketing communications from us. A pre-checked opt-in box (requiring an Individual to opt out) will invalidate the Consent and will be non-compliant.
- GDPR. All invitations for Consent (opt-in) will be clearly written, and easy to find at the point of collection. It will be made clear at the point of collection that Consent can be withdrawn at any time, as well as the effects of withdrawal (including options for opting back in). Relying on legitimate interests for direct marketing profiling is permitted if that fact is disclosed at the time of collection, and it is made clear to the Individual that they can object to such profiling at any time.

GDPR Consent. We will ensure that we can demonstrate:

- when the Individual has consented to the Processing (including the Purposes and Rights described at the time of the collection);
- that Consent was freely given (i.e. that the performance of a
- contract or services was not conditioned on the Consent being given); and
- when Consent was withdrawn (if applicable)

Automated Processing of Personal Data

Where we process Personal Data on a purely automated basis, Individuals have the right to object at any time to our processing of the Personal Data concerning them if it produces legal effects concerning them

or similarly significantly affects them. We will handle such objections through the DSR procedures outlined above.

Data Minimisation

Personal Data will be adequate, relevant and limited to what is necessary in connection with the purpose(s) for which it is processed. If we receive personal data during the course of a donor engagement which is excessive, we will endeavour to apply data minimisation by deleting the information that is not required; or returning the information to the donor and requesting a clean copy.

Storage Limitation

Personal Data will be maintained in a form identifying or rendering the Individual identifiable only for so long as it serves the purpose(s) for which it was initially collected or subsequently authorised, except to the extent permitted or required by applicable law.

Information Transfer and Compliance

We may transfer Personal Data to MAG Organisations and/or third parties on our behalf outside the UK, including to countries outside the EU or the EEA for legitimate business activities in accordance with Data Protection Laws.

Assurances. We will not transfer Personal Data to another country or organisation outside the UK/EU/EEA unless we are satisfied that the Personal Data is adequately protected in accordance with Data Protection Laws, this Policy and our Related Policies. MAG Personnel will ensure that any such transfer of Personal Data is governed by written agreements with third parties that impose obligations that reflect the requirements of Data Protection Laws and this Policy.

If there are no UK 'adequacy regulations' about the country, territory or sector for an information transfer, it should be determined if MAG can make the transfer subject to 'appropriate safeguards'. There is a list of appropriate safeguards in the UK GDPR, such as:

- A legally binding and enforceable instrument between public authorities or bodies
- UK Binding corporate rules ("UK BCRs")
- Standard contractual clauses (SCCs)

Privacy by Design and by Default; Pseudonymisation

We are required to implement Privacy by Design and Privacy by Default by ensuring we have appropriate technical and organisation measures (such as pseudonymisation) to ensure compliance with Data Protection Laws at the outset.

- Privacy by Design. This concept promotes the identification and mitigation of privacy risks at the time a product or service is designed, so that privacy and compliance with Data Protection Laws are applied at the earliest stages of a project involving Personal Data and data protection issues are identified and addressed in advance.
- Privacy by Default. This concept ensures that, by default, Personal Data is safeguarded to the greatest extent possible. MAG will ensure that it processes such Personal Data as necessary for specific purposes of the processing, for the shortest period of time possible and with the most appropriate access controls in place.
- Pseudonymisation and Anonymisation of Personal Data. Data Protection Laws apply to information from which an Individual can be identified. Pseudonymisation and anonymisation are methods by which elements of Personal Data are removed or separated so that they cannot be linked back to an Individual without additional information. These processes require the implementation of technical and organisational measures to mitigate the risks of reversal and re-identification, where applicable.

Privacy Risk Assessments

We will assess potential Personal Data privacy risks when personal data is being processed through a change in existing process or development of a new process and or application, and apply appropriate

mitigation steps depending on the outcome(s) of established processes, beginning with an analysis and applicable assessments outlined herein.

- Privacy Threshold Analysis (PTA). Answering basic questions regarding the processing of Personal Data will become an element of approving a new supplier, process, system or service. Where Personal Data is being processed, a Data Protection Impact Assessment must be completed.
- Data Protection Impact Assessment (DPIA). Completing the DPIA allows us to evaluate how Personal Data will be collected and processed, whether adequate safeguarding measures are in place, and how and when Individuals will be informed. Identified privacy risks will be evaluated and consideration given to how those risks can be mitigated in compliance with Data Protection Laws and this policy.

Where high residual risks remain, the DPL will determine what additional steps are necessary to mitigate the privacy risks identified, including reframing or abandoning the project. A record will be kept of all DPIAs, which will be periodically reviewed and updated with the process or business owners.

- Legitimate Interests Assessment (LIA). Performing LIAs are necessary in circumstances where Personal Data is being processed using the legitimate interest legal basis. The LIA will be carried out and decisions documented to evidence the balancing of legitimate interests and ensure they do not override the rights and freedoms of the Individual.

4. Reporting a Personal Data Breach

MAG Personnel who suspect or become aware of a Personal Data breach will immediately contact IT and the DPL at DataProtectionTeam@maginternational.org

MAG employees will not attempt to investigate the incident, or contact any relevant donor, until they have reported the matter and have been contacted by the DPL or IT for help.

Where the incident is confirmed to include Personal Data, the DPL or authorised delegate will assist the Investigations Team, monitor and review the incident response process and provide advice regarding any donor communication.

The Data Protection Laws may require data controllers to notify a Personal Data Breach to the appropriate data protection authority and, in certain circumstances, the affected individual. Where appropriate, the DPL or authorized delegate in consultation with the Chief Risk Officer (CRO) will inform the appropriate data protection authority and, if necessary, affected individuals within the statutory notification period (within 72 hours of becoming aware of a breach involving Personal Data.)

5. MAG as Data Controller and Data Processor

MAG as Data Controller

MAG will act as Data Controller in relation to the processing of all MAG personnel Personal Data.

MAG is a Data Controller in most of its donor engagements. This position is supported by guidance issued by the Information Commissioner. In this context we are likely to be co-controllers alongside our donor, also a Data Controller. We will not be joint controllers, which has a specific meaning in Data Protection Laws.

MAG as Data Processor

MAG will only act as a Data Processor where we process Personal Data on behalf of the donor or other relevant party (where they are the Data Controller) and there is little or no discretion as to how the Personal Data is processed by MAG. Where we consider we are a Data Processor, we will act in accordance with the instructions of the Data Controller of the Personal Data.

As Data Processor, MAG will have a duty to help the controller comply with its own obligations under the Data Protection Laws, and the engagement terms will reflect this.

6. Records of Processing Activities

MAG has created and will maintain a register of all Personal Data Processing activities in accordance with our record-keeping obligations under Data Protection Laws. The tool used to register our records of processing activities (whether automated or manual) will be maintained by the DPL. The completeness and accuracy of the information recorded in the register of processing activities will be the responsibility of the heads within each business function.

When we are a Data Processor, we will cooperate with controllers' requests for sight of the register relating to our Processing of their data subject's personal data, subject to confidentiality and other legal and regulatory considerations. Relevant sections of the register must be available to relevant data protection authorities upon request.

7. Training and Awareness

MAG will issue mandatory annual data protection training and periodic privacy awareness communications to MAG Personnel and contractors. Records of training attendance will be maintained and monitored. Non-completion of this mandatory training will be a breach of this Policy. All MAG Personnel are expected to regularly review the systems and processes under their control to ensure their ongoing compliance with this Policy.

8. Data Protection Governance

The DPL is responsible for implementing and maintaining a data privacy management programme to ensure the Processing of Personal Data meets the requirements outlined in this Policy.

The DPL for MAG is responsible for the following:

- Informing and advising MAG Personnel of their obligations under the Data Protection Laws.
- Providing appropriate data protection training to all MAG employees on the Data Protection Laws and their obligations under this Policy, and ensuring a record of training attendance is retained.
- Providing advice on Data Protection Impact Assessments (DPIAs) and monitoring their performance.
- Cooperating with relevant data protection authorities.
- Acting as contact point for the data protection authorities on issues relating to the Processing of Personal Data by MAG, and consulting with them on any other matter where appropriate.
- Keeping the risks associated with the Processing of Personal Data by MAG under review, having regard to the nature, scope context and purposes of its Processing activities.
- Conducting regular audits and compliance reviews to assess compliance with Data Protection Laws and this Policy, along with Related Policies where they relate to the processing of Personal Data.

9. Related Policies

This Policy is being implemented in conjunction with (and relies on compliance with) the following MAG policies ("Related Policies") all of which include additional requirements relating to Processing of Personal Data:

- Information Security Policy
- MAG Third party Security Policy
- MAG Information Classification and Handling Policy

10. Appendix

Document Version Control

Document Ownership	
Document Name	MAG – Data Protection Policy
Document Status	
Policy Owner	Director of Governance and Business Transformation
Required Readers	All MAG Personnel
Permitted Readers	All MAG Personnel
Approved by	Board of Trustees
Date Approved	29/01/2021
Document Location	Sharepoint

Document Review History (most recent first)				
Date	Version	Reviewer	Approval	Summary of changes

Document Review Cycle

This policy is reviewed on an annual basis by the LT lead and every 3 years a formal review and assurance report is provided to the GNRC Board Committee. Significant changes to the organisation (including risk appetite) or the threat landscape may trigger an interim review and could escalate the policy to the Board for re-approval.

DOCUMENT REFERENCE	5.2 Environmental Policy	ISSUE	13	DATE	26/09/2022	REVIEW DATE	26/09/2023
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MAGUK Environmental Policy

Corporate Governance

DOCUMENT REFERENCE :	5.2 Environmental Policy
VERSION NO:	13
DATE OF APPROVAL:	10/09/2021
REVISION HISTORY:	V12 10/09/2021
POLICY OWNER:	CEO
POLICY OWNER SIGN-OFF:	26/09/2021
DATE OF APPROVAL:	24/10/2022
DATE OF NEXT REVIEW:	26/09/2023

Purpose of this Policy

Within the context of the organisation, MAG recognises its role in minimising the impact it has on the environment by working in a sustainable and environmentally friendly manner. The organisation is committed to continual improvement of its environmental performance through compliance with ISO 14001:2015 and all relevant environmental legislation and by implementing the principles laid out in this Policy.

This Environmental Policy is defined by the Board of Trustees and Leadership Team and provides the framework for setting and reviewing MAG's environmental objectives and targets.

As an increasing number of MAG's donors expect delivery agencies be able to demonstrate and maintain conformance to certain standards including ISO 9001:2015 and ISO 14001:2015. In the majority of cases ISO accreditation to both the quality and environmental standards is a precondition of tender and therefore without it MAG would not be able to either bid for or open up new business opportunities across the world.

Implementation of ISO 9001:2015 and ISO 14001:2015 standards enables MAG to:

- better compete in the sector
- achieve its mission and strategic objectives
- prevent costly mistakes from happening
- continually improve performance

Link to Values

This policy aligns with MAG's values, in the following ways.

Determined: We recognise the importance no matter how small, of the impact of our activities on the environment and that there is a need to constantly consider ways in which we can conserve energy and minimise waste in all activities that we undertake.

Expert: The EMS has the full support of the Leadership Team and Board of Trustees, ensuring that activities towards achieving our objectives are controlled in a manner compatible with achieving required obligations effectively.

Integrity: Relevant environmental objectives have been set and are reviewed at Leadership Team meetings throughout the year.

Compassion: We are confident we have the necessary policies, standards and operating procedures in place, to ensure the wellbeing and safety of our staff and the communities we serve.

Inclusive: We encourage active participation and information sharing; this is a critical factor for our success, employees are encouraged to participate in the improvement of the organisation.

Responsibilities

This Policy is applicable to MAG and applies to **MAG Manchester office** only at Suite 3A, South Central, 11 Peter Street, Manchester, M2 5QR, UK. The Policy covers the central management of conflict prevention and recovery programmes. In the future international operations may be considered.

The Policy applies to all MAG Manchester Affiliated, Roaming and Remote staff, the Board of Trustees, representatives and volunteers in MAG Manchester office. The Policy includes all activities, products and services both internally and externally (including external contractors) that are administered and/or used in MAG Manchester premises; for example: Purchasing; Travel; Merchandise sales and facilities management.

This Policy is approved by the Board of Trustees.

The UK Government established Energy Savings Opportunity Scheme (ESOS) to implement Article 8 (4 to 6) of the EU Energy Efficiency Directive (2012/27/EU). The ESOS Regulations 2014 give effect to the scheme. ESOS is a mandatory energy assessment scheme for organisations in the UK that meet the qualification criteria. The Environment Agency is the UK scheme administrator. It is a requirement for businesses and organisations to carry out ESOS assessments and Energy Audits every 4 years. Under the requirements of the scheme organisations must:

- Calculate total energy consumption
- Identify areas of significant energy consumption
- Appoint a lead assessor
- Notify the Environment Agency
- Keep records

Policy statements

MAG shall:

Waste Management

- It is MAG's policy to work with our staff and suppliers to ensure that all waste is disposed of in line with legal and environmental requirements.
- To reduce the amount of waste produced by buying and utilising only what is required for purpose and ensuring the reuse and recycling of resources is managed effectively (as below).

Recycling and use of Recycling Materials

- To utilise, and promote the use of, recycled materials whenever possible, ensuring that materials are disposed of in an environmentally safe manner at the end of their useful life.
- To take into account the environmental impact of purchases, prioritising locally sourced and organically produced goods manufactured from environmentally friendly and recyclable materials where practicable.

Energy Conservation

- Reduce the amount of fossil fuel derived energy required for day to day operations by raising staff awareness and implementing a system of energy efficiency technology.

- Minimise the negative environmental impact arising through logistics and staff transportation; giving focus to alternative transport methods and maximising the efficiency of any fleet vehicles.

Environmental Management Awareness

- We strive to build an environmentally friendly work culture through regular internal communication and stakeholder engagement. We encourage staff involvement in environmental issues through appropriate information, training and participation exercises to ensure competency.
- Induction procedures for new staff will include information on the charity's environmental practices via the Support Services Coordinator.

Legal Requirements

- We monitor and comply with legal requirements as laid out in the EMS Compliance Register and also taking into account sector minimum equipment standards and contractual commitments, if applicable.

Continuous Improvement

- We monitor, and review our environmental performance by measuring the carbon footprint of our Manchester headquarters each year.
- Environmental objectives and targets are set and monitored by the Support Services Coordinator.

MAG's mission is to save lives and build safer futures.

MAG's vision is a safe future for women, men and children affected by violence, conflict and insecurity.

MAG's ambition is to have the maximum positive impact on the maximum number of people by delivering the highest quality programmes and being the most influential mine action organisation.

MAG values lay out the fundamental beliefs and principles we abide by at MAG, they inspire and guide our actions and reflect our true aspirations, supporting a positive, inclusive culture whilst helping to set out how we expect MAG and its people to behave. We aim to ensure our values are inclusive, relevant, authentic and aspirational.

Monitoring

To ensure the organisation maintains its awareness for continuous improvement, the environmental management system is regularly reviewed and is subject to annual external audit and three yearly reassessment against the requirements of the ISO 14001:2015 standard

References

BS EN ISO 14001: 2015 Standard.

Modern Slavery Statement

Compliance register

Procurement Policy and Handbook

Travel Policy

Fundraising procedures (any applicable relating to sales)

The Energy Savings Opportunity Scheme (ESOS) Regulations 2014

MAG Strategic Direction 2018-2022 (updated)

Contacts

Queries in relation to this policy can be addressed to Support Services Coordinator or Company Secretary.

DOCUMENT REFERENCE	Dir/POL/004	ISSUE	3	DATE	15/07/2022	REVIEW DATE	15/07/2023
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ETHICAL STATEMENT PART 1

Corporate Governance

DOCUMENT REFERENCE :	Dir/POL/004
VERSION NO:	3
DATE OF APPROVAL:	15/07/2022
REVISION HISTORY:	V1 14/02/2014 V2 07/11/2019
POLICY OWNER:	CEO
POLICY OWNER SIGN-OFF:	29/06/2022
DATE OF APPROVAL:	15/07/2022
DATE OF NEXT REVIEW:	15/07/2025

VISION, MISSION AND VALUES

MAG has a vision of a world where there is a safe future for women, men and children affected by violence, conflict and insecurity. We aim to achieve this through our mission to save lives through the removal of mines and ERW, and reduce the impact of SALW and ammunition on people and communities.

MAG's values are that we are principled, agile, determined, expert, professional and enabling.

PURPOSE

The purpose of MAG's Ethical Statement Part I is to protect the organisation from engagement in relationships that have the potential to have a negative impact on MAG's perceived or actual integrity or reputation. Such relationships are those which MAG judges to be in conflict with MAG's achievement, fulfilment or adherence to its stated vision, mission and values and the activities which institutions and individuals fund MAG to undertake.

To achieve our vision, MAG must maintain a broad base of different funding sources and financial support while ensuring that this is in line with the vision, mission and values of the organisation. MAG must take reasonable steps to undertake due diligence on providers of services and individuals and organisations providing financial and in-kind support. Decisions on new relationships will be treated on a case-by-case basis and on their merits, according to this Ethical Statement.

Governments provide significant funding to MAG's work, and may be engaged in the development and/or manufacture of arms. As an independent NGO, MAG seeks to exercise positive influence at all levels as relevant to its mission (sector, local, national and international), including on development and implementation of international treaties such as the Mine Ban Treaty. MAG may enter into contracts, partnership and funding agreements in pursuit of its charitable purposes, with institutions and agencies of governments, inter-governmental and multi-lateral bodies recognised by the United Nations.

The Ethical Statement Part 1 below sets out MAG's minimum ethical expectations of clients, suppliers, investors, companies, organisational and individual donors. MAG will carry out reasonable due diligence steps to satisfy itself that each partnership complies with the MAG Ethical Statement. Steps taken by MAG may include *inter alia*, open source business intelligence information, seeking discussion with or advice from informed third parties and/or a contractually binding requirement to confirm a commitment to and actual compliance with the spirit of this ethical statement.

This statement will be followed by the Ethical Statement Part II which will set out more MAG's values and culture in relation to ethical and behavioural issues and what is expected of all MAG staff, Trustees and volunteers.

RESPONSIBILITIES

This Ethical Statement Part I applies to all staff (Manchester Office International & National), volunteers, consultants and trustees.

The Board of Trustees approves this Ethical Statement.

POLICY STATEMENTS: MAG ETHICAL STATEMENT PART I

MAG shall not knowingly

- a. enter into relationships and partnerships with;
- b. accept donations of a monetary or in-kind nature from;
- c. receive goods or services from; or,
- d. enter into contract to supply goods or services to;

any individual, organisation or company directly or indirectly involved in

- (i) the illicit arms trade;
- (ii) the development and/or manufacture and use of mines, cluster munitions, SALW and ammunition, their means of delivery, parts and components;
- (iii) activities which might reasonably be expected to bring the reputation and integrity of MAG into question;
- (iv) activities considered illegal under the laws of England and Wales and the countries in which MAG operates.

DEFINITIONS

ERW – Explosive Remnants of War

SALW – Small Arms and Light Weapons

REFERENCES

- MAG's Procurement Policy
- MAG's Modern Slavery Statement
- MAG's Conflict of Interest Policy
- MAG's Gifts and Hospitality Policy
- MAG's Financial Crime Policy
- MAG's Risk Management Policy
- MAG's Treasury Management Policy
- MAG's Partnership Policy
- MAG's Contract Development Process and associated documents
- MAG's Articles of Association and Charitable Purposes

CONTACTS

MAG CEO

DOCUMENT REFERENCE	Dir/POL/005	ISSUE	V7	DATE	01/02/2021	REVIEW DATE	01/02/2024
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MAG FINANCIAL MISCONDUCT AND CRIME POLICY

1. POLICY STATEMENT

Acts of financial misconduct and crime threaten funds donated to MAG which are intended to save lives and help build safer futures for MAG’s beneficiaries. MAG is committed to the highest ethical standards and has zero tolerance of financial misconduct, financial crime and all other forms of criminality.

2. SCOPE

MAG’s Financial Misconduct Policy (“**Policy**”) sets out MAG’s mandatory requirements to prevent, deter, detect, report and investigate financial misconduct and acts of criminality.

This Policy applies to MAG’s trustees, employees, contractors, consultants and partner organisations acting on MAG’s behalf, interns and volunteers, and accompanying partners and family members of international staff (collectively “**MAG Staff and Associates**”).

The MAG Financial Misconduct and Crime Policy Handbook (“**Handbook**”) provides the procedures supporting the application of this Policy. Part A of the Handbook provides guidance for all MAG Staff and Associates on raising concerns about financial misconduct or crime. Part B of the Handbook describes MAG’s required procedures for the conduct of financial misconduct and crime investigations.

3. DEFINITIONS

Financial misconduct

Non-conformance with MAG’s ethical standards and internal financial policies, controls and procedures, whereby such behaviour would risk the loss, misappropriation or misreporting of MAG’s and donors’ assets and funds.

Conflicts of interest can also lead to financial misconduct.

Financial crime

Acts which break national or international laws and regulations and involve intentional illegal and dishonest activities to misappropriate, redirect and / or wrongfully gain assets and funds. Illegal acts which constitute financial crime are:

- theft, embezzlement, extortion;
- fraud, false accounting, forgery;
- bribery, corruption and money-laundering;
- terrorist financing and violation of economic sanctions;
- tax evasion.

Further explanations of the above financial crimes are provided in the Financial Misconduct and Crime Policy Handbook.

4. REQUIREMENTS

MAG Staff and Associates shall:

- protect MAG’s and its donors’ funds, property and assets, acting appropriately to ensure that they are not misappropriated, misdirected, lost, misused or damaged;

- ensure that all financial transactions are properly authorised, recorded, reported and archived as required by MAG’s financial framework and relevant laws, regulations and donor requirements;
- abide by all relevant laws against financial crime;
- report immediately any suspicion of financial misconduct, crime or non-compliance with this Policy, following the guidance in the Handbook and MAG’s *Reporting Malpractice & Raising Concerns (“Whistleblowing”) Policy and Procedure*;
- complete all MAG required training for the prevention of financial misconduct and crime.

MAG’s management shall:

- investigate all suspicions of financial misconduct and financial crime in accordance with the Handbook’s procedures;
- reserve the right to search all MAG property and review all data stored on MAG systems if there are reasonable suspicions of financial misconduct or crime;
- report suspicions of financial crime and misconduct to MAG’s Audit and Finance Committee, MAG’s Board, its donors, the UK Charity Commission and national authorities when required;
- inform and work collaboratively with local and / or international law enforcement bodies in relation to any related investigations and prosecutions;
- take proportionate action against those who commit financial misconduct or crime, up to and including dismissal of MAG Staff and Associates and termination of contracts with partners and third parties;
- seek to recover any losses wherever viable.

5. REFERENCES

- | | |
|--|--|
| • MAG Policy on Personal Conduct | • MAG Sanctions Policy |
| • MAG Procurement Policy | • MAG Conflicts of Interest Policy |
| • Reporting Malpractice & Raising Concerns (“Whistleblowing”) Policy and Procedure | • MAG Finance Framework and Finance Policies |

6. APPROVAL AND DATES

Approved by MAG’s Board of Trustees on 29 January 2021.

This policy shall be reviewed every three years by MAG’s Leadership Team.

7. POLICY OWNER

Director of Finance

MODERN SLAVERY STATEMENT of the Mines Advisory Group

Introduction

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 and work with; our beneficiaries and their communities, and so must be vigilant in our recruitment, partnership arrangements and supply chains.

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

- Raise awareness and understanding across our programmes and teams to support and encourage the reporting of any concerns about our supply chain activities
- Understand our exposure to modern slavery risk and put in place appropriate controls
- ensure our employment and remuneration practices are fair and transparent across all territories; and
- 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 the Americas.

We employ over 5,500 staff, 95% of whom are local nationals. We work in partnership with many different types of organisations to deliver our work, including other international NGOs, local and national NGOs, academic institutions, and state institutions.

Since 1989, MAG has helped over 20 million people in 70 countries rebuild their lives and livelihoods after war. We find, remove, and destroy landmines, cluster munitions and unexploded bombs from places affected by conflict. MAG also provides education programmes, particularly for children, so people can live, work, and play as safely as possible until they clear the land. In addition, we work in communities to reduce the risk of armed violence through weapons and ammunition management programmes which keep guns and munitions safe and secure. Our income for the 12-month period ended 31st December 2021 was £75.0m.

2. Key initiatives

Some of the key initiatives that MAG has in progress that contribute towards addressing modern slavery are:

- Enhancing supplier due diligence
- Supplier management training
- Embedding safeguarding practices across the organization

A summary of progress against actions planned for 2021 are described in **Annex A** to this statement

3. Risk Management

MAG systematically considers our exposure to the risks of modern slavery across the organization within our risk management framework. Working across a wide range of geographical locations and using a mixture of local and international supply chains there is a level of complexity that MAG needs to consider ensuring that we are compliant with the principles of the Modern Slavery Act 2015. To navigate through this complexity

MAG has a range of control and mitigation measures in place to minimise any possible occurrences of modern slavery.

4. Risk control and mitigation

The policies and procedures outlined below are some of the key control measures that MAG has in place to reduce the likelihood and impact of modern slavery in our organization. Through the implementation of these control measures MAG is satisfied that we are compliant with the Modern Slavery Act 2015.

- i) **Recruitment and Selection 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.
- ii) **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.
- iii) **Financial Misconduct and 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 misconduct and crime and all forms of corruption and criminality, including slavery, human trafficking, and exploitation.
- iv) **Safeguarding Policy:** 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. The Safeguarding Policy, sets out our approach and refers to a suite 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. This Policy was reviewed in March 2021 and the associated policies are:
 - a) **Reporting Malpractice and Raising Concerns (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.
 - 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. This policy also creates an obligation to report any concerns about the behaviour of other staff members. All new staff are required to sign to say they understand the Policy on Personal Conduct.
 - c) **Protection of Children and Vulnerable Adults Policy.** This policy recognises that all MAG representatives have a duty of care to protect children and vulnerable adults from harm. Any form of abuse towards children or vulnerable adults by MAG representatives or other parties will not be tolerated. 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.
 - 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.
- v) **Procurement Policy:** MAG is 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 Misconduct and Crime Policy.

- vi) **Ethical Statement Part I:** 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.

5. 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. Key elements of this relate to modern slavery and include: Reference checks, Criminal record checks, Identity and right to work checks
- ii) **MAG's Partnership Policy:** This policy sets out our due diligence process to ensure that MAG does not enter into partnerships with organisations with a vision, purpose or mission that are at odds with our own. The due diligence MAG carries out checks to ensure partner organisations and key partner staff are not included on any US or EU list of individuals and organisations involved in supporting or financing terrorist activities or being involved in international crimes.
- 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. MAG has a proportional approach in managing suppliers' related risk, for which the level of vetting 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.

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 for all staff on safeguarding and in local languages. Training is also conducted on effective and safe recruitment practises.

7. 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 31st December 2021. It has been approved by our trustees, who will review and update it annually.

Julia Palca
Chair
April 2022

ANNEX: Summary of Progress

Planned actions to 31 st December 2021:	Actions taken:	Planned actions to 31 st December 2022:
<p>Enhanced due diligence process for MAG International Suppliers:</p> <p>Any new international supplier will go through full-enhanced on-boarding process, including engagement on ethical and sustainable business practices.</p>	<p>Due diligence process for international supplier is strengthened and all suppliers provide contractual engagement to key MAG Policies.</p>	<p>No planned actions.</p>
<p>Develop and deliver training on suppliers' management (ethics/safeguarding, etc.). Target: First pilot finalized, and second pilot arranged for Procurement & inventory roll-out, this contains the practical procedural and process changes within suppliers mgmt. area. The roll-out will continue progressively into 2022 across all priority programmes (high volume procurement).</p>	<p>Due to incapacity to deploy to Programmes throughout 2021 there has been no roll-out at Programmes level. The project has been reviewed and the priority in the short term is to set minimum standards across all Programmes, including enhanced suppliers due diligence and new standard contract templates.</p>	<p>By December 2022 the objective is to have top 10 MAG Programmes in terms of procurement volume to adopt new global minimum standards and use new contract templates.</p>
<p>Assess Suppliers Management Process in MAG and identify gaps.</p> <p>Target: First pilot finalized and second pilot arranged for Procurement & inventory roll-out, this contains the practical procedural and process changes within suppliers mgmt. area. The roll-out will continue progressively into 2022 across all priority programmes (high volume procurement).</p>	<p>Gap is identified, but strategy to fix the issue is divided in several steps to allow programmes adoption in a combined approach of remote-field deployed support.</p>	<p>By December 2022, the objective is to have top 10 MAG Programmes in procurement volume adopting standard supplier database and contracts follow up tool, increasing visibility on Programme-contracted Suppliers and allowing enhanced verifications and analysis.</p>
<p>Further embed, and continue to develop, our Safeguarding Strategy and work plan, taking into consideration the recommendations of the recent independent, expert external review. Continued focus on lessons learnt, and continual improvement within our Safeguarding framework.</p> <p>Review our complaints mechanisms, to ensure that anyone who encounters our work can raise a complaint, and it's dealt with appropriately. Ensure that we have appropriate systems for monitoring complaints at an appropriate level, generating useful management information.</p> <p>Continue to develop in-country Safeguarding units where possible, creating a network of experts within the organisation.</p>	<p>Work continued throughout 2021 to embed best practice on safeguarding throughout the organisation.</p> <p>This included implementing improvements to our incident reporting register and reporting mechanisms, a review of policies, continuous training and revision of our safeguarding standards.</p> <p>We have robust systems in place for dealing and reporting of concerns or complaints and we continuously review our practice.</p>	<p>MAG's current safeguarding workplan is in place for 2022 and will continue to embed safeguarding policies and best practice across the organisation to ensure we reach the highest of standards. Our safeguarding work will be alongside our work on Equity, Diversity and Inclusion and embedding our new set of values that will work towards creating safe work environment. This year we also intend to review our recruitment procedure and practice, alongside our induction process.</p>
<p>Ensure that MAG remains up to date on safeguarding best practise, through attendance at training, networking etc.</p> <p>Continue to train staff on areas related to modern slavery, including safeguarding, reporting and safe recruitment, either through induction or on-going annual training.</p> <p>Further embed our background checks policy, ensuring that it is included in national staff handbooks and in-country HR processes. Provide support and training to in-country teams on its implementation.</p>	<p>MAG continues to participate in sector wide initiatives such as the Disclosure of Misconduct Scheme and the sharing of best practice across the section.</p> <p>Our induction and refresher training refers to the areas that relate to modern slavery; all new staff receive an induction session and all existing staff are expected to attend refresher training once a year.</p> <p>MAG has implemented a thorough background checks process including references, anti terrorism and, criminal records checks, as part of its recruitment process.</p>	<p>See above.</p>

DOCUMENT REFERENCE	DIR/POL/002	ISSUE	2	DATE	01/01/2023	REVIEW DATE	01/01/2026
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SAFEGUARDING POLICY

Duty of Care

DOCUMENT REFERENCE :	DIR/POL/002
VERSION NO:	2
DATE OF APPROVAL:	21/10/2023
REVISION HISTORY:	V1 08/04/2021 V2 01/01/2023
POLICY OWNER:	Director of People & Culture
POLICY OWNER SIGN-OFF:	10/10/2022
DATE OF APPROVAL:	21/10/2022
DATE OF NEXT REVIEW:	01/01/2026

Purpose of this Policy

MAG believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, from sexual exploitation, abuse, bullying and harassment. MAG will not tolerate exploitation, abuse or bullying and harassment by staff or associated personnel and applies a zero-tolerance approach to any breach of this and associated policies.

MAG further defines safeguarding as a set of standards, policies and procedures that are intended to safeguard everyone who works in, or comes into contact with the organisation. The scope of this includes behaviour or any act that involves one person using their power or influence over another person; ensuring staff, operations and programmes, do no harm, or expose individuals to sexual exploitation, abuse or neglect, whilst protecting staff from inappropriate behaviour such as bullying and all forms of harassment. All relevant policies are detailed in associated policies.

This policy addresses for MAG the following areas of safeguarding:

- Protection from sexual exploitation and abuse
- Bullying and harassment
- Adult safeguarding
- Child safeguarding

MAG commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

The purpose of this policy is to protect people, particularly children, vulnerable adults and communities in receipt of assistance, from any harm from sexual exploitation, abuse and neglect that may be caused due to their coming into contact with MAG. It also includes harm caused by bullying and harassment in the workplace. Harm in this policy may arise from:

- The conduct of staff or personnel associated with MAG
- The design and implementation of MAG's programmes and activities

This policy lays out the commitments made by MAG and informs staff and associated personnel¹ of their responsibilities in relation to safeguarding.

This policy does not cover:

Safeguarding concerns in the wider community not perpetrated by MAG or associated personnel

Link to Values

MAG's vision is a safe future for women, men and children affected by violence, conflict and insecurity; our mission is to save lives and build safer futures.

We recognise that our behaviour has an impact on others and on MAG. By adopting our values – determined, expert, integrity, compassion and inclusive, and following the Policy on Personal Conduct, we can all contribute towards MAG's vision and mission.

Responsibilities

This safeguarding policy applies to:

- All staff contracted by MAG
- Associated personnel whilst engaged with work or visits related to MAG, including but not limited to the following: consultants; volunteers; contractors; programme visitors including journalists, celebrities and politicians

Definitions

What is safeguarding?

Safeguarding broadly means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. MAG understands safeguarding to mean protecting children and

¹ See 'Responsibilities' for definition of associated personnel

adults, from harm that arises from coming into contact with our staff, operations or programmes. MAG defines safeguarding as 'any behaviour or act that involves one person misusing their power or influence over another person'. MAG aims to protect everyone who comes into contact with us from:

- i. Misuse of power or influence over another person
- ii. Harm from sexual exploitation, abuse, bullying and harassment
- iii. Inappropriate, exploitative or degrading behaviour

Further definitions relating to safeguarding are provided in the glossary below.

Policy statements

MAG Safeguarding Approach

Our approach to safeguarding is survivor centred, within an organisational culture that aims to prevent harm and abuse from occurring, but which responds quickly and thoroughly when it does happen. We will learn from experience and share good practice throughout the organisation.

We will work towards:

Survivor support and enhanced accountability

- Protecting the dignity and safety of the people our work serves
- Ensuring survivors are central to our safeguarding response
- Being transparent and sharing progress
- Ensuring rigorous, accessible, and inclusive reporting and complaints processes

Cultural change

- Driving cultural change and addressing structural inequalities from the top
- Ensuring consistency in approach
- Collaborating to improve employment practice

- Applying our own standards (see below) international human rights law, alongside internationally recognised UN standards and sectoral best practice
- Collaborating with others in our sector to advance global safeguarding practice
- Ensuring policies and practice address the needs of vulnerable groups

Organisational capacity and capability

- Improving and sharing expertise of staff, partners and agencies with whom we work /collaborate
- Equalise relationships between organisations delivering and receiving assistance

Standards based approach

MAG has developed and will apply 6 standards to safeguarding:

1. **Safe culture:** *the organisational culture for safeguarding MAG's workplace is built on respect, tolerance, diversity and inclusion that delivers a respectful environment for all staff, and supports staff to create a safe environment in which to deliver the organisation's work.*
2. **Safe People:** *recruitment, induction, training, staff conduct and equal opportunities. MAG's HR policies, processes and systems set out, and implement, organisational responsibilities around the employee lifecycle. Ensure staff with responsibilities for safeguarding are appointed and skilled to undertake their roles*
3. **Safe programmes:** *risk assessments are conducted and partnership agreement are in place and are designed to prevent harm and abuse to the people with whom we work and the communities in which we work. National context is understood and reporting mechanisms are clear.*
4. **Safe communications:** *use of information and images in MAG's communications activities feature appropriate images and stories of communities and children and ensure that they are not exposed to harm and abuse.*
5. **Safe response:** *MAG treats any allegations related to safeguarding extremely seriously. We strive to learn and identify areas in which we could improve, and welcome feedback from any stakeholders. We commit to respectfully listening and supporting individuals who want to raise a concern or make a complaint. We will also ensure that genuinely held concerns will be thoroughly investigated.*

6. **Safe Governance:** *MAG's governance is based on our values, and promotes transparency, probity and accountability*

Roles and responsibilities

The Safeguarding Policy places a number of responsibilities on various groups of people involved in MAG's work. These are as follows:

MAG's Board of Trustees: have a duty of care to ensure that appropriate policies and procedures are in place to prevent abuse from taking place and to appropriately manage any concerns.

They also have a responsibility to ensure that all appropriate issues are reported in line with best practice and to appoint a Safeguarding Trustee Focal Point who will provide subject matter expertise and has delegated responsibility on behalf of the Board for ensuring that MAG maintains effective safeguarding policies, procedures and practices.

The Board of Trustees also have responsibility for reporting to the Charity Commission and any other relevant regulatory body in the UK or other location.

Board Committees:

Delegated responsibility rests with the following board sub-committees in relation to safeguarding:

The **Governance Nominations and Review Committee (GNRC)** maintains oversight of MAG's incident reporting to the Charity Commission and any other relevant regulatory bodies. The committee will ensure that incident reporting practice is in line with the Commission's expectations and with sector good practice.

The **Health, Safety, Security and Safeguarding Committee (HSC)** provides strategic oversight for all aspects of safeguarding at MAG and will ensure that policies and procedures are up to date, effective, appropriate and fully implemented. The Chair of the HSC and the Safeguarding Trustee Focal Point will review the Safeguarding Register and will ensure that appropriate action is taken in relation to any issues.

The Chair of both GNRC and HSC will be notified immediately of any potentially serious incidents as soon as they are reported through appropriate channels. This will enable the GNRC to ensure that all reporting to the Charity Commission takes place within recommended timescales. The HSC will be responsible for fulfilling any further reporting requirements including responding to requests for information.

MAG's Leadership:

The Leadership Team will ensure:

- Build a culture of openness to enable issues and concerns about safeguarding to be raised and discussed
- Build a sense of accountability between staff so that potential poor or abusive behaviour can be challenged
- Maintain a reputation of robust standards and high standards of working

MAG's Safeguarding Lead reports to the Director of People and Culture, who in turn reports to the Chief Executive.

Management responsibilities: all managers have a particular responsibility to uphold the standards within each policy and to set an example ensuring that a culture of dignity and respect is maintained. Managers should encourage an open and transparent way of working that facilitates a strong safeguarding culture within and between teams.

As well as upholding standards themselves, managers are expected to ensure that all staff understand the provisions clearly and challenge any unacceptable behaviour. In addition, managers must ensure that any reports or complaints are taken seriously and investigated promptly and thoroughly. All MAG programmes have a responsibility for ensuring that standards contained within each policy are upheld in each location and policies are translated into the relevant local language and understood by all.

All individuals: creating a safe working environment at MAG is everyone's responsibility and failure to act on concerns or disclosures relating to sexual harassment, abuse and exploitation is not an option.

MAG recognises that often employees will be the first to know when there is cause for concern. All staff and partners have a responsibility to act with due care and attention to safeguard the wellbeing of every person, specifically those who are vulnerable. All individuals should remain vigilant, be prepared to take action and understand what to do in the event there is a concern to raise. Therefore, all MAG representatives should understand and abide by the standards set out within this policy.

All MAG employees are obliged to report any suspicions of sexual exploitation, abuse or harassment of others. Failure to report suspicion of abuse relating to someone else to a relevant person is a breach of MAG's policy, and could lead to disciplinary action being taken. If necessary, this report can be made anonymously. Although we strongly encourage reporting through the available channels, for the avoidance of doubt, there is no obligation placed on any individual to report any incident that has happened to them. However, where there is a clear legal requirement placed on MAG to report, the decision will be made by MAG in consultation with the alleged subject of abuse.

Additionally, MAG staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by a staff member or associated personnel (and where necessary the actions of non MAG staff, where there is concern and where it relates to MAG)

Prevention

MAG will:

- Ensure staff and personnel associated with MAG are given every opportunity to become aware of the standards and expectations that we have set ourselves
- Design and undertake all its programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with MAG.
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel
- Ensure staff receive appropriate training and support on safeguarding – all staff will receive further information during their induction and will attend an annual refresher training
- Provide clear systems on how to report concerns as soon as they are identified or suspected
- Comply with international standards in relation to safeguarding

Reporting and Response

MAG will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.

MAG recognises that the standards outlined in each policy can only be upheld if strong reporting channels exist and are understood by all. As such, each policy outlines how concerns should be raised and what action may be taken where incidents or concerns arise. For further information refer to policies listed below.

The Policy on Personal Conduct states that it is the duty and responsibility of all managers, employees and representatives to report any suspicions or incidences of inappropriate behaviour. All MAG employees are obliged to report any suspicions or incidences of inappropriate behaviour towards others. This can be done without sharing details of cases where information has been shared in confidence. Failure to report suspicion of abuse relating to someone else to a relevant person is a breach of MAG's policy and could lead to disciplinary action being taken. Although we strongly encourage reporting through the available channels, for the avoidance of doubt, there is no obligation placed on any individual to report any incident that has happened to them. However, where there is a clear legal requirement placed on MAG to report, the decision will be made by MAG in consultation with the alleged subject of abuse.

MAG recognises that not all complainants may be willing to reveal their identity. This does not necessarily have any bearing on the truth of the complaint, but may be an indication of fear of reprisal. Anonymous complaints will be treated as seriously as complaints where the identity is known. The substance of the allegation should still be reported to the SMiC along with the identification of the alleged perpetrator, if known. The wish for anonymity only applies to the complainant and not to the subject of the complaint.

In addition, rumours must not be left unchecked and may be an early warning of a greater problem. MAG will take rumours seriously and they must be reported and investigated.

Support for Survivors: MAG will always offer support to survivors, regardless of whether a formal internal response is carried out (such as an internal investigation). Support can include specialist psycho-social counselling, and/or access to other specialist and appropriate support as needed (medical and where possible legal). Survivors can choose if and when they would like to take up the support options available to them. On hearing a complaint or concern, the priority is to ensure and check if the complainant is in need of mental or physical support. All further action will only be taken with the survivor's agreement or consent unless they are a child or vulnerable adult.

Raising a complaint: anyone can raise a concern or make a complaint to MAG about something they have experienced or witnessed. Reporting/complaints mechanisms are encouraged at all levels of the organisation. Complaints or concerns can be made in any language and arrangements will be made for a confidential translation. In addition, anonymous complaints are accepted and MAG will investigate as far as is reasonably possible.

Safeguarding Focal Points: MAG's global network of Safeguarding Focal Points support MAG to prevent and respond to sexual harassment, abuse and exploitation by receiving concerns and forwarding these to the team, raising awareness and promoting best practice. Focal points are not required to investigate concerns or complaints themselves.

Community complaints: communities will be informed of how they can make a complaint or raise a concern if necessary. Arrangements will vary between each programme.

Complaints about partners: if MAG receives a complaint about a partner organisation, it will expect the partner to respond quickly and appropriately. MAG will assist the partner to ascertain its obligations under local law to refer the matter to the police or other statutory authorities for criminal investigation. Where appropriate, MAG will work with the partner to address the issue through an appropriate independent investigation. If the outcome is that abuse has occurred, ongoing work with the partner cannot involve the individual(s) concerned. If there is reason to believe that an allegation of abuse has been dealt with inappropriately by a partner then they risk withdrawal of funding or ending the relationship (including networks and consortia).

Complaints from outside of MAG: can be sent in writing to reporting@maginternational.org or directly to the Leadership Team or anyone on the Board of Trustees. This can include someone in receipt of MAG's assistance (beneficiaries); other people directly affected by MAG policies, actions or our staff; partners and their staff (humanitarian partners and contractors); MAG staff or any visitor to a MAG site or office. The email address is monitored by the Company Secretary and the email received will be forwarded to the appropriate people with oversight by whoever the email was addressed to.

Statutory and external reporting: the decision about whether to refer an allegation to local police or statutory authorities is made by the person who it is alleged has been the subject of abuse ("the victim/survivor" - who may or may not be the complainant). MAG will support the victim/survivor and/or complainant regardless of whether they wish to report to local police/statutory authorities or not. However, MAG's approach will always be to comply with reporting obligations under local law. Where there is a clear legal requirement placed on MAG to report, this decision will be made by MAG in consultation with the alleged subject of abuse. If someone's life is in danger or the matter relates in any way to a child or adult at risk, then some decisions may have to be taken by MAG (for example, to contact the police or statutory authority).

The principle of 'survivor led' must be balanced against risk and protection of vulnerable groups in every instance. If the victim/survivor is a child or adult at risk, then decisions about their welfare may have to be made by others. However, as far as is possible and appropriate they will be engaged in the conversation about their own welfare.

Regulatory and donor reporting: MAG's regulatory authorities and donors have different reporting mechanisms in relation to safeguarding incidents. All incidents that involve national, international staff or partners, must be reported immediately to the Regional Director and HQ HR who will be able to advise accordingly.

Implementation of the safeguarding policy will be supported by:

- **Staffing** – a senior level full time safeguarding position will be in place, safeguarding focal points will be recruited across the organisation, safeguarding responsibilities will be included in job descriptions. All staff with responsibility for implementation will receive training.
- **Prevention** – safeguarding will be integrated into all aspects of MAG's work and systems, including awareness raising from application stage and continuous throughout an employee's employment at MAG. Risk assessment will be considered at all levels including when working with partners, when designing new programmes and setting up new operations at local and national level.
- **Reporting and responding mechanisms** – steps for raising or reporting safeguarding concerns will be known to all, investigation and incident management procedures are clear and understood: duties and responsibilities are clear for those who have safeguarding responsibilities, in particular managers, HR teams and focal points
- **Implementing, maintaining, reviewing and monitoring** the safeguarding policy – training and capacity building of staff and partners, monitoring and reporting and continuous review of the policies
- **Budget** – will be available to support with organisation wide safeguarding activities.

Monitoring

To ensure this policy remains relevant and appropriate, it will be reviewed every three years, alongside the associated policies. Progress on implementation will be reported to the Board sub-committees and Board every quarter. Programmes report to HQ on safeguarding activities twice a year. All case management is monitored and reported as appropriate to Trustees through the SIR log. The Safeguarding Trustee Focal Point and Safeguarding Lead will meet monthly.

References

Internal

This Policy must be read in conjunction with: *Gender Statement; Policy on Personal Conduct; Protection of Children and Vulnerable Adults Policy; Dignity at Work Policy; Recruitment and Selection Policy; Disciplinary and Grievance Policy, Reporting Malpractice Policy (Whistleblowing) Policy; Complaints Policy plus guidance on local customs and national legal requirements in the country of operation.*

External

- IASC Core Principles on PSEA
- UN Secretary General's Bulletin: Special Measures for protection from sexual exploitation and sexual abuse, 9 October 2003
- UN Convention on the Rights of a Child - https://downloads.unicef.org.uk/wp-content/uploads/2010/05/UNCRC_summary.pdf?_ga=2.101087496.849048267.1554717839-1023692847.1554717839
- The Core Humanitarian Standard (including the PSEA index)
- FCDO's Enhanced Due Diligence Checklist

Contacts

For more information on this policy please contact safeguarding@maginternational.org

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Appendix: Glossary of terms

TERMINOLOGY	DEFINITION	SOURCE
Adult abuse	Adult abuse can happen to anyone over the age of 18 years. Adult abuse is not specifically defined by the UN but can be defined as the violation of human rights that results in significant harm to an individual. Adult abuse can happen in any relationship and includes (but is not limited to) physical, emotional, sexual and financial abuse, neglect and gender-based violence.	Not specifically defined by UN. General definition
Associated personnel	A person who is engaged with work or visits related to a MAG including but not limited to the following: consultants, volunteers, contractors, programme visitors including journalists, celebrities and politicians	UN
Bullying	Seek to harm, intimidate, or coerce (someone perceived as vulnerable).	Dictionary
Child	A person below the age of 18	UN
Child Abuse	Mistreatment of a child, either intentional or unintentional that may result in harm to the child's physical, emotional and psychological welfare. This could be a result of physical, emotional, sexual abuse and / or neglect	WHO
Elder abuse	Elder abuse can be defined as "a single, or repeated act, or lack of appropriate action, occurring within any relationship where there is an expectation of trust which causes harm or distress to an older person". Elder abuse can take various forms such as financial, physical, psychological and sexual. It can be the result of intentional or unintentional neglect	WHO
Exploitation	Exploitation includes, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs	UN
Emotional abuse	Including but not limited to humiliating and degrading treatment such as bad name-calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation. Includes coercive control.	General
Emotional abuse	Including but not limited to humiliating and degrading treatment such as bad name-calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation. Includes coercive control.	General
Gender based violence	Gender-Based violence refers to harmful acts directed at an individual based on their gender. It is rooted in gender inequality, the abuse of power and harmful norms. Gender-based violence (GBV) is a serious violation of human rights and a life-threatening health and protection issue.	UN

Harassment	Harassment is any improper and unwelcome conduct that might reasonably be expected or be perceived to cause offence or humiliation to another person. Note: further definitions for harassment are contained within the MAG dignity at work policy.	UN Women
Neglect	Neglect is a form of abuse where the individual, who is responsible for caring for someone who is unable to care for themselves, fails to do so. It can be a result of carelessness, indifference, or unwillingness and abuse.	General
Physical abuse	Intentional use of force that results in bodily injury, pain, or impairment. This includes, but is not limited to, being slapped, burned, cut, bruised or improperly physically restrained.	General
Sexual abuse	Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.	UN
Sexual exploitation	Any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.	UN
Sexual harassment	Sexual harassment is unwanted behaviour of a sexual nature which: violates your dignity makes you feel intimidated, degraded or humiliated. Creates a hostile or offensive environment.	UN
Vulnerable adult	Once a person passes the age of 18, they are an adult	UN
Victim	Victim is a person who is or has been sexually exploited or abused	UN
Survivor	The person who has been harmed. The term survivor is often used in preference to victim as it implies strength, resilience and the capacity to survive. It is an individual's choice to identify themselves.	UN