
MannionDaniels

Modern Slavery Policy

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Approved by:	MannionDaniels' Directors
Responsible Owner:	Director, Head of Operations
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Version	1

Introduction

1. MannionDaniels works for a more healthy, equitable, inclusive, safe and sustainable world. We partner with communities and clients worldwide to provide advice and support in strategic planning, policy governance, and programme management, with a particular focus on international health and social care. Much of our work focuses on reaching poor and vulnerable people, especially in fragile and conflict affected states.
2. Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour. It is a heinous crime and violates fundamental human rights. MannionDaniels is committed to tackling modern slavery and human trafficking within our operations and supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We recognise the importance of credibility, integrity and trustworthiness to our success as a business and the significance of promoting the highest ethical principles in every aspect of what we do and how we do it.
3. This policy applies to all persons working for MannionDaniels, including employees at all levels (whether permanent, fixed-term or temporary), directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, sponsors and business partners.

General Principles

4. At MannionDaniels, we take a zero-tolerance approach to modern slavery and implement and enforce effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our own business or in any of our supply chains. We also develop and monitor key performance indicators relating to our business operations and modern slavery. In order to adhere to our commitments, we and everyone working with us or on our behalf abide by the following principles and measures to safeguard against modern slavery:
 - Prevent, detect, and report modern slavery and human trafficking in any part of our operations or supply chain
 - Apply an evidence-based assessment of the capability and capacity of our supply chain, and a structured and proportionate methodology to identify and assess risks
 - Evaluate the merits of writing to suppliers requiring them to comply with our Business Code of Ethics, which sets out the minimum standards required to combat modern slavery and trafficking or determining whether the circumstances warrant the inclusion of specific prohibitions against the use of modern slavery and trafficked labour in our contracts with third parties
 - Raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage
 - Notify a senior responsible officer as soon as possible if there is a belief or suspicion that a conflict with this policy has occurred, or may occur in the future or report it in accordance with the MannionDaniels' Whistleblowing Policy as soon as possible
 - If it is unclear whether a particular act, the treatment of workers more generally, or their working conditions within our supply chains constitutes any of the various forms of modern slavery, raise it with your manager.

Responsibility

5. MannionDaniels' Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

6. The Head of Operations has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. He reports annually to the MannionDaniels Directors and Leadership Team on the key performance indicators in relation to our modern slavery and our business operations. The Head of Operations is supported in this role by the Compliance Manager.
7. Line managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
8. All persons working for or on behalf of the MannionDaniels Group must read, understand and comply with this policy, report any concerns and assist with investigations.

Communication and Awareness

9. Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training is provided as necessary. Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter. All parties are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Head of Operations.

Breach of this policy

10. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with consultants, contractors, partners, suppliers and associated third parties who breach this policy.

Review of policy

11. The MannionDaniels Group will review this policy annually to reflect new legal and regulatory developments and ensure good practice. This statement was approved by the MannionDaniels Directors on 12 February 2018 and is due for review on February 11 2019.