



## International Rescue Committee, UK Modern Slavery Statement

Financial Year 2019

### INTRODUCTION

International Rescue Committee, UK (“IRC-UK”) recognises its responsibility and is committed to preventing modern slavery and human trafficking within its organisation, and to ensuring that its supply chains are free from slavery and human trafficking. This statement sets out the steps that we have taken to eliminate, as far as possible, the risk of modern slavery and human trafficking taking place.

Prior to the enactment of the Modern Slavery Act 2015, IRC already had a strong commitment to preventing slavery and human trafficking within its supply chains incorporated into its policies and procedures. Following the enactment of the Modern Slavery Act 2015, IRC has sought to strengthen due diligence, assessment of risk and effectiveness, and training on the prevention of modern slavery, in conjunction with IRC’s efforts to prevent human trafficking and child labour.

The statement is made pursuant to section 54 of the Modern Slavery Act 2015 and is made in relation to the financial year ending 30 September 2019 capturing the steps the IRC-UK has taken during the financial years to ensure that slavery and human trafficking is not taking place in any of its supply chains, and in any part of its own business. It covers the activities of IRC-UK and its wholly-owned subsidiary IRC-UK Trading Limited.

### ORGANISATIONAL STRUCTURE

IRC-UK is a registered charity structured as a private limited company in the UK. The charity has a wholly owned trading subsidiary, IRC-UK Trading Limited. Both companies operate from a London-based office in the UK.

IRC-UK is an affiliate of International Rescue Committee, Inc. (“IRC Inc”), a 501(c)(3) not-for-profit organization with headquarters in New York. A Framework Agreement between IRC-UK and IRC Inc (collectively “IRC”) describes the characteristics and mechanics of the affiliation.

Operational and procurement teams are responsible for meeting IRC’s commitments to preventing modern slavery, with responsibilities embedded in organizational processes. Personnel from across IRC, including Supply Chain, Human Resources, International Programmes, Finance, Legal, and the Executive Director, were involved in developing this statement.

### BUSINESS AND SUPPLY CHAIN

The mission of the IRC is to help people whose lives and livelihoods are shattered by conflict and disaster to survive, recover and gain control of their future. Our vision is to become an operational leader through our work with partners and clients in the humanitarian field, and a thought leader that shapes public and humanitarian policies and practice.

IRC’s supply chain is comprised of external businesses, other not-for-profit organisations, self-employed consultants and contractors, and professional service providers. IRC-UK contracts professional service providers, including consultants, to deliver services and advice for carrying out its mission. IRC-UK also delivers funds to IRC Inc to carry out humanitarian programs.

IRC works in 28 cities across the US and over 40 countries overseas and procures a wide range of goods and services from suppliers around the world, including suppliers, direct or indirect, in countries deemed to be higher risk, based on the Global Slavery Index.

IRC engages in partnerships with communities, government ministries, institutions of higher learning, private business, local civil society organisations, and international non-governmental organisations. Partnering takes different forms, but for the IRC, the different types of partnerships are strategic partnership, capacity building partnership and project-specific partnerships.

As at 30 September 2019, IRC-UK had 132 workers in the UK Its affiliate, IRC Inc, had over 1784 workers based in the US and over 12,203 overseas on 30 September 2019. The majority of workers were directly contracted employees.

## **POLICIES AND PROCEDURES**

The IRC has a comprehensive suite of policies in place to minimise the risk of modern slavery in its supply chains. Key aspects of policies relevant to modern slavery and human trafficking are presented in this section of the statement.

### *A. The IRC Way – Standards for Professional Conduct*

In 2017, IRC updated its Code of Conduct (“The IRC Way). The updated version of The IRC Way emphasises IRC’s four core values: Integrity, Accountability, Service, and Equality (added in 2019) and builds upon them to provide greater clarity on expectations for staff conduct towards each other, and IRC’s clients, partners, donors, and other stakeholders – and identifies resources to guide staff in their decision-making.

As a resource for employees to guide them in making good decisions, the IRC Way:

- Provides Q&A sections highlighting questions/issues that employees may encounter and advice on appropriate responses and actions;
- Directs employees to relevant policies and other resources that can assist them on a variety of issues and topics;
- Contains specific advice in each commitments section on how to uphold the IRC Way, what to avoid, and what to report;
- Advises employees on “how to spot an ethical dilemma”;
- Reinforces the duty of staff to speak up and advises how, when and where to seek assistance or report a concern.

The undertakings relevant to prevention of modern slavery are listed below:

- Protect clients from all forms of abuse, including sexual exploitation and human trafficking activities;
- Exercise special care to safeguard children;
- We also affirm and enforce human rights consistent with the U.N. Universal Declaration of Human Rights, the Convention on the Rights of the Child, and the UN Secretary General’s Bulletin on the Protection from Sexual Exploitation and Abuse of Beneficiaries.

### *B. Combating Trafficking in Persons Policy*

The IRC’s core values are entirely opposed to the worldwide phenomenon of trafficking in persons. The IRC considers trafficking in persons as a fundamental and grave violation of human rights and is opposed to it in all forms. The Combating Trafficking in Persons Policy and associated compliance plan affirm the IRC’s commitment to safeguard its operations and ensure that its staff are not victims of or engaged in the crime of trafficking and compliance with statutes and regulations aimed at combatting trafficking in persons, including the United States Government’s Combating Trafficking in Persons policy as set out in FAR 52.222-50.

Pursuant to this Policy, the IRC prohibits the following:

- Engaging in trafficking;

- Procuring commercial sex acts while performing work for or in the employment of the IRC;
- Using forced labour in the performance of any work for the IRC;
- Denying access to an employee to his/her identity documents;
- Misleading employees about the nature and terms of employment during the recruiting process;
- Using recruiters that do not comply with local labour laws;
- Charging employees recruitment fees;
- Failing to provide return transportation for expatriates brought to the country for the purpose of working for the IRC;
- Providing or arrange housing that fails to meet host country housing/safety standards; and
- Where the law requires, failing to provide a written contract of employment.

Violations of the above commitments by the IRC's staff will be subject to disciplinary action, up to and including termination of employment.

The IRC further commits to the following:

1. Recruitment and Wage Plan
  - a. The IRC will only contract with recruiting companies with trained staff;
  - b. No recruitment fees shall be charged to employees by the IRC or any recruiting agency it engages;
  - c. Wages will meet host-country legal requirements;
  - d. Potential employees may not be intentionally misled about the nature and terms of employment during the recruiting process;
  - e. Upon the completion of an assignment, the IRC will pay for the return transportation of its staff from a foreign country;
  - f. When the IRC is working in a country where the law requires that the citizens of that country be provided a written employment contract the IRC will provide employees with this agreement; and
  - g. The IRC will review identity documents for employment purposes, but will not take possession of the original documentation or deny employees access to their own identity documents.
2. Housing Plan
  - a. For all workers for whom the IRC provides or arranges housing, housing will be, at a minimum, in compliance with host-country standards;
  - b. IRC staff are required to report any activity that is inconsistent with the commitments described in this Policy.

#### C. Supply Chain Manual and Procedures

The IRC's Procurement Manual for International Programs places a high value on ethical procurement. The IRC endeavours to purchase goods and services from ethical suppliers under conditions that are not abusive or exploitative of any persons.

The IRC shall not conduct business with companies or individuals determined to be exploiting child labour, or directly or indirectly abusing the basic social rights of its employees or the IRC's beneficiaries. Nor will the IRC conduct business with companies or individuals that are not providing safe and reasonable working conditions for their employees.

The IRC conducts due diligence in supplier selection to ensure that the IRC's suppliers do not conduct business in a manner which may be harmful to the IRC or our beneficiaries. The IRC's Supplier Restricted Standard Operating Procedures requires that suppliers are restricted and may not be awarded a procurement contract if they are found to be in violation of international child labour laws and/or ethical standards.

#### D. IRC Contract Template and Supplier Code of Conduct

The IRC's standard contract terms and supplier code of conduct require suppliers to sign that they agree to maintain high ethical and social operating standards during the term of the agreement, including:

- Working conditions and social rights: Avoidance of child labour, bondage, or forced labour; assurance of safe and reasonable working conditions; freedom of association; freedom from exploitation, abuse, and discrimination; protection of basic social rights of its employees and IRC's beneficiaries; prohibition of trafficking in persons.
- Transport and cargo: Not engaged in the illegal manufacture, supply, or transportation of weapons; not engaged in smuggling of drugs or people.
- For suppliers in the UK: compliance with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including but not limited to the Modern Slavery Act 2015

In addition, the supplier must declare as part of the IRC Conflict of Interest and Supplier Code of Conduct that that the Supplier and Supplier's employees and subcontractors, if any, shall abide by and follow all established written policies of IRC related to work conduct, including, but not limited to, The IRC Way: Standards for Professional Conduct (IRC's Code of Conduct), and IRC's Combating Trafficking in Persons Policy.

#### *E. Adult Safeguarding Policy*

Safeguarding the adults we encounter in the course of undertaking out work, including our clients, is of paramount importance to the IRC. The IRC strives to ensure that adult clients who receive our services are free from misconduct and abuses of power by all IRC workers, visitors, and sub-grantees/suppliers/vendors/implementing partners. This policy covers actions taken by such persons both during and outside of working hours. It applies to conduct in one's home, with family or community members, and other forms of personal relationships outside of their working relationship with the IRC.

#### *F. Child Safeguarding Policy*

The purpose of the IRC's Child Safeguarding Policy is (1) to ensure that IRC projects, workers, or others working with or on behalf of the IRC do no harm to children and (2) to ensure that safety risks and cases of misconduct are identified, reported, and addressed in an appropriate and timely manner.

#### *G. Global Reporting Guidelines and Anti-Retaliation and Reporter Protection Policy (Whistleblower Policy)*

In accordance with the IRC's Global Reporting Guidelines, the IRC requires all staff to report direct knowledge and reasonable suspicion or concerns of conduct that is inconsistent with The IRC Way or breaches of IRC Organizational Policies, including the Combating Trafficking in Persons Policy.

The IRC will not retaliate against an employee, potential employee, or former employee who, in good faith, makes a complaint or report of prohibited conducts or participates in the investigation of such a complaint or report. The IRC similarly prohibits retaliation by employees against any individual who reports prohibited conductor participates in an investigation of such reports.

#### *H. Fiscal Integrity Policy*

The IRC expects its employees, interns and volunteers to maintain the highest standards of ethical conduct and to ensure their and the IRC's compliance with all applicable laws and accounting principles. Any accounting fraud or other fiscal impropriety is strictly prohibited.

#### *I. Anti-Bribery Policy*

IRC is subject to anti-bribery laws, rules and regulations related to its international business activities and transactions. IRC is committed to full compliance with the laws referenced in the policy and all other relevant laws and regulations. Accordingly, IRC has adopted an Anti-Bribery Policy which sets out the responsibility of those working for and with IRC in observing and upholding our zero-tolerance policy on bribery and corruption.

#### *J. Economic Sanctions and Anti-Terrorism Policy*

IRC is committed to full compliance with the laws and regulations related to its international business activities and transactions. This includes sanctions programs as well as related anti-terrorism laws and regulations. Accordingly, IRC has adopted this Economic Sanctions and Anti-Terrorism Policy.

## **DUE DILIGENCE PROCESSES**

IRC has robust due diligence processes in place for working with suppliers and partners to ensure integrity, accountability and ethical conduct.

### *A. Working with Suppliers*

IRC undertakes a risk based approach when conducting its due diligence on potential suppliers. Where IRC is procuring goods or services in countries where there is a heightened risk of human trafficking and other criminal activity, IRC undertakes enhanced due diligence on the potential supplier, including global and on-the-ground inquiries to prevent IRC doing business with any person or entity engaged in criminal activity such as slavery and human trafficking.

### *B. Working with Partners*

Working in partnership with local and national civil society organisations and government agencies enables the IRC to pursue its objectives, and results in more effective, responsive and durable assistance that reaches more people and produces better outcomes for the people we serve.

Working with partners is a risk area for modern slavery and human trafficking. The policies that the IRC has in place for working with partners are designed to reduce the risk as far as possible. The IRC requires a comprehensive due diligence review of all potential partners prior to entering into any formal relationships to ensure that the IRC has a strong understanding of the organisation's history, relationships, past performance, reputation, and capacity. The pre-award due diligence process enables the IRC to identify and appropriately manage or avert any significant risk associated with a proposed sub-award partnership, including the risk of causing harm to the communities we serve; the financial, administrative and programmatic risks of non-compliance with IRC and donor rules and regulations; and the reputational risk to the IRC.

IRC provides training, coaching, technical assistance to partners in addition to building technical skills required for successful implementation of projects.

The IRC Pre-Award Assessment procedure for partnerships requires that all potential partners undergo due diligence to assess their capacity and compliance with local legislation. This includes sections on HR, procurement and governance, in which the IRC reviews how a potential partner embraces and adheres to internationally recognised codes of ethics.

## **STAFF TRAINING**

Recognising the importance of combatting modern slavery, including human trafficking, IRC has a range of trainings in place for supply chain staff. In addition, all IRC staff across the world participate in annual IRC Way (Code of Conduct) training annually which includes discussion of IRC's key policies.

IRC Way Day Training provides staff with time to focus on the Code of Conduct and re-commit to our commonly held Values, Guiding Principles, Shared Responsibilities, and Policies as employees of IRC. It is a chance for our teams across the globe to unite in educational activities that explore IRC's Code of Conduct and policies.

In 2019, the IRC Way Day had three focus areas: Preventing Fraud & Corruption, Combating Trafficking in Persons and Safeguarding. The training included case studies and expert guidance to provide staff with a deeper understanding of human trafficking, how to identify and avoid it and what to do if one suspects a case of human trafficking.

## IRC'S RESPONSE

### Recognising the Risk

Many of the countries in which IRC operates are affected by conflict, weak governance, poverty and migration. These environments present an elevated risk of modern slavery in IRC's supply chains. IRC recognises this risk and has specifically addresses the risk of modern slavery and human trafficking occurring in its operations or in its supply chains through the procedures outlined in this statement.

### Addressing the Risk

IRC's supply chain and human resources procedures largely mitigate the risk, and the residual risk is managed through monitoring by country-level teams, Internal Audit and external statutory and project audits.

In addition, IRC's due diligence processes ensure policies related to slavery and human trafficking and IRC's position of zero tolerance of such offences is well-understood. Compliance with anti-trafficking requirements is monitored for all awards over \$500,000, by requiring that each sub-awardee certify that it has implemented a compliance plan to ensure that it engages in no practice that violates US human trafficking directives. In addition, all sub-awards explicitly set out sub-awardees' responsibility to report to the IRC any credible information that a violation has taken place and on steps taken to remediate violations. The IRC vets sub-awardees in accordance with its established Fiscal Integrity, Anti-Bribery, and Economic Sanctions and Anti-Terrorism Policies.

Our due diligence process ensures we verify the physical business and suppliers' legitimacy, tracking incidents and conducting follow-up investigations.

IRC raises awareness of slavery and human trafficking through training. As part of its annual IRC Way Day training for all staff and as part of IRC's staff onboarding process, the IRC informs all employees about the commitment to combating trafficking-related activities, what actions by individual employees are prohibited, and the penalties for violations. In addition, IRC ensures that workers in the most pertinent departments (supply chain, human resources, and senior organisational leaders) are aware of and actively monitor the implementation of the above commitments.

In order to effectively respond to complaints against staff, partners and suppliers, including allegations related to modern slavery, IRC has a single point of contact for persons wanting to report such allegations anonymously or otherwise. This contact point is an independent, third-party reporting conduit. EthicsPoint which may be accessed at any time on the internet at [www.ethicspoint.com](http://www.ethicspoint.com) (follow directions to "file a report") or by phone to (in the U.S.) +1 866 384 4277 or (outside the U.S) to 1+ 503 352 8177.

### Ongoing prevention

Over the next year IRC will continue to monitor its effective compliance with its policies combatting modern slavery. One additional due diligence measure to be introduced from July 2020 will be a Disclosure and Barring Service check on all new employees at IRC UK.

Approved by the IRC-UK Board of Trustees on 20 October 2020.



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Signed on the Board's behalf by Sir John Holmes, Chair of the Board