



## International Rescue Committee, UK

### Modern Slavery Statement

Last Updated: 20/03/2018

#### 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.

#### 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, self-employed consultants and contractors, and professional service providers. 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 2017, IRC-UK has 101 workers in the UK and its affiliate, IRC Inc, has over 600 workers based in the US and over 11,000 overseas. The majority of workers are directly contracted employees.

## Policies and Procedures

The IRC has 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.

### Supply Chain Policies

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 Debarment Standard Operating Procedures requires that suppliers are debarred 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.

### Contract Template and Supplier Code of Conduct

The IRC's standard contract terms and 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.

### 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.

#### The IRC Way – Standards for Professional Conduct

In 2017, IRC updated its standards for professional conduct. This new version of The IRC Way continues to emphasise IRC's three core values: Integrity, Accountability, and Service, and builds upon them by providing greater clarity on expectations for our conduct towards each other and our stakeholders – and identifying resources to guide staff in their decision-making.

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

- 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 our duty to speak up and advises where to go for assistance or to 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.

#### Global Reporting Guidelines

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.

### 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.

### Transactional Compliance Policy

IRC is subject to anti-bribery laws (both the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act of 2010), economic sanctions programs administered by the U.S. Office of Foreign Assets Control ("OFAC") and anti-terrorism programs, export controls, and anti-boycott provisions.

IRC is committed to full compliance with the above-referenced laws and regulations. The Transactional Compliance Policy applies to all IRC offices, staff and program activities worldwide regardless of the source of program funding. Violations of the policy are met with appropriate disciplinary action, which may include employment termination and referral to law enforcement.

### Policies for Working with Partners

Working with partners is a high 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 vetting 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.

## IRC's Response

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 operations. However, 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.

The IRC undertakes due diligence processes to ensure policies related to slavery and human trafficking are being implemented effectively. 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 transactional compliance policy.

The IRC strives to not do business with criminal suppliers. 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 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.

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes IRC-UK's modern slavery and human trafficking statement for the financial year 1 October 2016 to 30 September 2017. It covers the activities of IRC-UK and its wholly-owned subsidiary IRC-UK Trading Limited.

Approved by the Board on 20<sup>th</sup> March 2018.

A handwritten signature in black ink, appearing to read "John G. Holmes". The signature is written in a cursive style and is positioned above a horizontal line.

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