



## Modern Slavery Statement

International Medical Corps UK (the “Charity”) is committed to preventing modern day slavery and human trafficking within its organisation, its partners and its supply chains. As part of the charity sector, International Medical Corps UK recognizes its fundamental responsibility to take a robust approach to slavery and human trafficking. This statement applies to the financial year ended on 30 June 2020 and outlines the steps that the Charity has taken to address and eliminate, as far as possible, the risk of modern slavery and human trafficking.

### Organisational Structure and Business

The Charity is an international humanitarian non-governmental organisation with headquarter in London. The Charity is an independent affiliate of International Medical Corps, a U.S. registered non-profit organisation that shares the same mission. Through an Administrative Services Agreement, International Medical Corps UK engages International Medical Corps in the delivery and implementation of its programmes in over twenty-two countries in accordance with the terms and conditions of its grants. The Charity is governed by four trustees who are also directors of the company for the purposes of the Companies Act. The day-to-day management of the Charity is delegated to the Charity’s Managing Director, who makes operational decisions in coordination with a team of senior staff. In the year ended 30 June 2020, the Charity provided assistance to vulnerable populations in twenty-two countries:

Afghanistan	Jordan	Somalia
Burundi	Lebanon	South Sudan
Cameroon	Libya	Sudan
Central African Republic	Mali	Syria
Chad	Nigeria	Turkey
DR Congo	Pakistan	Yemen
Ethiopia	Palestinian Territory	
Iraq	Republic of Guinea	

Humanitarian programs in these countries are implemented by the Charity's U.S. affiliate and their project activities are conducted from decentralized sites determined by the humanitarian needs of affected populations.

The Charity works in six main areas:

- Building health capacity
- Emergency response
- Mental health and psychosocial support
- Women and children's health
- Clean water, sanitation, and hygiene
- Nutrition

Neither the Charity nor its US affiliate enter into business with any organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to the Charity in its own work is obtained by means of slavery or human trafficking. The Charity strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the above-listed countries and in many cases exceeds those minimum requirements for its employees. Both the Charity and its implementing affiliate have assigned officers to monitor the implementation of Safeguarding and Anti-Slavery/Anti Human Trafficking policies. The Charity and its U.S. affiliate have not received any allegations in the reported period related to slavery or human trafficking.

## Supply Chain

In order to fulfil its humanitarian mission, the Charity funds programs that utilize goods procured from a variety of suppliers. The Charity's US affiliate's main supply chains include suppliers of:

- Medical commodities (pharmaceuticals, medical supplies and medical) equipment and Laboratory supplies and equipment
- Nutrition food and micronutrients (for therapeutic and supplementary feeding of children)
- Food items (cereals, pulses, oil, sugar, salt etc.)
- Non-food items (such as hygiene kits, shelter materials, household supplies, clothing and footwear, WASH equipment and supplies etc.)
- Non-medical supplies and equipment (such as vehicles, power supply equipment, communication equipment, and IT/database equipment etc.)
- Construction and works (such as rehabilitation or construction of hospitals/health centres)

## Potential Exposure

The Charity understands that, due to its extensive work and related procurement in countries where human rights protections may be limited, it is exposed to the risk of doing business with an entity that facilitates, supports, or engages in modern slavery and/or human trafficking. The Charity and its U.S. affiliate actively and continuously works to eliminate the risk to the extent possible.

## Policies, Procedures, and Training Related to Modern Slavery and Human Trafficking

The Charity and its U.S. implementing affiliate have the following policies and procedures that set forth its commitment to preventing modern slavery and human trafficking:

- Code of Conduct and Ethics
- Safeguarding policy encompassing trafficking and policy against sexual exploitation and abuse;
- Anonymous or confidential Hotline Reporting Mechanism (EthicsPoint)

New employees are informed about these organisational policies by the human resources function during the on-boarding orientation. Additionally, all employees are provided with discrete annual trainings about the prevention of both trafficking in persons and sexual exploitation and abuse. Related information is made available to employees on the organisation's intranet, as well as through posters and informational sheets that are displayed in all field and headquarters offices.

International Medical Corps has a variety of reporting mechanisms that allow individuals—including beneficiaries, staff, volunteers, and donors—to confidentially report any cases of misconduct, policy violations, or any other practice inconsistent with International Medical Corps' values. One mechanism is a confidential or, if the reporter so wishes, an anonymous reporting phone (available in some locations) and web hotline called EthicsPoint. This is hosted by a third-party service provider, NAVEX Global, which can be accessed at: [www.internationalmedicalcorps.ethicspoint.com](http://www.internationalmedicalcorps.ethicspoint.com). The hotline information together with details on how to access a Trafficking in Persons hotline is available on our intranet and posted in all offices. In addition, we provide email reporting mechanisms at: [report@internationalmedicalcorps.org](mailto:report@internationalmedicalcorps.org).

International Medical Corps' Safeguarding management mechanisms include an HQ-based Safeguarding Case Management Team comprised of inter-departmental senior managers responsible for reviewing safeguarding complaints (including those of modern slavery and Human Trafficking), overseeing investigations and facilitating survivor assistance. Additionally, Safeguarding focal points are assigned at the country level, with support and guidance from the Safeguarding Unit based from Headquarters.

Additionally, in March 2018, International Medical Corps established a dedicated internal Safeguarding Task Force to consolidate and better coordinate actions related to PSEA and broader safeguarding, including sexual harassment. Reporting to the Chief Operating Officer, the Task Force is headed by the Vice President for Humanitarian Leadership and Partnerships and the Senior Director of Human Resources and is charged with reviewing and strengthening International Medical Corps' efforts around three work streams: 1) knowledge management, 2) case management (including investigations) and 3) policy, training, and support to country offices on their country-level work plans for PSEA. The work streams are led by dedicated staff of International Medical Corps at the HQ level, who are charged with reviewing and updating safeguarding policies and training tools, strengthening case reporting and notification systems, and reinforcing investigation capacity. Investigative capacity has been strengthened over the past two years with the appointment of three specialist safeguarding investigators.

More than seventy Safeguarding Focal Points have been identified at country level. Safeguarding Focal Points are nominated by the Country Director in accordance with a standardized TOR. Training resources, materials and support—including regular orientation calls, expanded terms of reference, planned extensive trainings and a resource library on our intranet—have been implemented and acted upon over the past six months. Safeguarding Focal Points' responsibilities include training, program support as related to Safeguarding (e.g. proposal development), coordinating with the Headquarters Safeguarding Taskforce, and liaising with other focal points from partner agencies and working groups.

International Medical Corps has updated its sub-awardee manual to include additional criteria for evaluating and providing capacity building around safeguarding for sub-awardees.

These policies and procedures and structures embody the Charity's and International Medical Corps' commitment to ethical standards in all of their work and to comply with those standards by implementing and enforcing effective systems and controls to eliminate, as far as reasonably practicable, the risk of modern slavery and human trafficking in their work and supply chain. In addition, the Charity has a Safeguarding Officer who also serves as the Slavery Compliance Officer to whom all concerns regarding modern slavery are required to be addressed.

### **Due Diligence Processes to Combat Modern Slavery and Human Trafficking**

The Charity and its US affiliate carry out due diligence to ensure that modern slavery and/or human trafficking does not take place in their organisation or supply chains. To this end, both the Charity and its U.S. implementing affiliate have implemented the following processes:

- Registration for all suppliers that supply over \$1,000 of goods or services and require agreement to our standard terms and conditions and Vendor Code of Conduct that

include a ban on any activities that violate international laws prohibiting corruption, sexual exploitation, trafficking, child labour, forced labour and other abuse of persons or facilitate or support trafficking in persons in any form (including sex trafficking or the recruitment, harbouring, transportation, provision or obtaining of a person for labour or services through the use of force fraud or collusion). Violation of any of above “constitutes a breach of an essential term of the Purchase Order/Contract” leading to revoking vendor’s registration with IMC, cancelling orders and inclusion of the company in IMC watch list maintained by our Compliance & Ethics department

- Requirement for subcontracts to contain a provision prohibiting the conduct described above.
- Screening all suppliers that meet our risk-based thresholds through a third-party *prohibited party* screening database. High value procurements undergo additional enhanced due diligence checks.
- Procurement staff must observe and report any noted signs of modern slavery including human trafficking, child labour, forced labour and other unethical behaviour issues, when performing vendor physical verification.
- Include compliance with ethical requirements as part of supplier’s performance evaluation.
- In 2019, additionally new guidance & recommendations was provided to all our country teams to conduct annual physical due diligence visits & ethical checks on our suppliers wherever feasible.

The Charity has not, to its knowledge, conducted any business with another organisation that has been found to be involved in modern slavery and/or human trafficking. International Medical Corps’ audit, legal, and compliance teams are involved in ensuring that the systems described above work effectively and, in addition to management, monitor them regularly, adapting as necessary to changing circumstances and needs.

## **Future Plans**

The Charity and its implementing affiliate are planning to undertake the following activities over the next twelve months to improve our processes and procedures in respect of Modern Slavery Act

- Continue monitoring of violations and banning work with businesses with alleged or proven misconduct and marking them and their products as ineligible for procurement or receipt as donation (i.e. temporary ban of Top Glove Corporation Bhd.)
- Improving Vendor Code of Conduct with statement specifically related to forced labour.
- Ensure IMC staff have access and take training related to vendor eligibility also addressing vendor’s conduct in relation to Modern Slavery.

## Safeguarding Officers

The Charity and its implementing affiliate have assigned officers to whom concerns regarding modern slavery should be addressed, who will then undertake relevant actions

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This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes International Medical Corps UK's modern slavery and human trafficking statement for the financial year ended 30 June 2020 as approved by the Board on *16 December 2020*.



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Andrew W Géczy  
Chair, Board of Trustees  
International Medical Corps (UK)