



Modern Slavery Statement

International Medical Corps UK (the “Charity”) is committed to preventing modern day slavery and human trafficking within its organisation 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 to end on 30 June 2018 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 headquartered 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 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 Executive Director, who makes operational decisions in coordination with a team of senior staff. In the twelve month period to end on 30 June 2018, the Charity provided assistance to vulnerable populations in over twenty countries:

Afghanistan	Iraq	Somalia
Cameroon	Jordan	South Sudan
Central African Republic	Kenya	Sudan
Chad	Lebanon	Syria
DR Congo	Libya	Turkey
Ethiopia	Mali	Yemen
Haiti	Nigeria	Caribbean Islands

Humanitarian programs in these countries are managed 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

The Charity does not 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.

Supply Chain

In order to fulfil its humanitarian mission, the Charity must procure goods from a variety of suppliers. The Charity's main supply chains include suppliers of:

- Medical commodities and equipment (including pharmaceutical, medical, and laboratory consumables)
- Non-food items (such as hygiene kits and blankets) and food items (such as therapeutic food)
- Non-medical supplies and equipment (such as vehicles, mobile phones, and IT equipment)

Potential Exposure

The Charity understands that, due to its extensive work with its affiliate procurement in these 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 actively and continuously works through its affiliate 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
- Combating Trafficking in Persons Policy
- Combating Human Trafficking Compliance Plan
- Policy Against Sexual Exploitation & Abuse
- Anonymous Hotline Reporting Mechanism (EthicsPoint)
- Guidance for Responding to Suspected Fraud and Other Illegal Conduct

New employees are informed about these organisational policies by the human resources function during their 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.

The Charity's US affiliate 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 IMC's values. One mechanism is an anonymous reporting phone and web hotline called EthicsPoint. This is hosted by a third-party service provider, NAVEX Global, and which can be accessed at: 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, including those overseas. In addition, we provide email reporting mechanisms at: seareport@internationalmedicalcorps.org and seafocalpoint@internationalmedicalcorps.org.

The Charity's US affiliate's PSEA and safeguarding case management mechanisms include an HQ-based PSEA & Safeguarding Case Management Team comprised of inter-departmental senior managers responsible for receiving safeguarding complaints (including those of modern slavery and Human Trafficking), overseeing investigations and facilitating survivor assistance. Additionally, PSEA focal points are assigned at both the HQ and country levels.

Moreover, in March 2018, International Medical Corps established a dedicated internal PSEA & Safeguarding Unit to consolidate and better coordinate actions related to PSEA and broader safeguarding, including sexual harassment. Reporting to the COO, the Unit is headed by the Vice President for Domestic and International Affairs and the Senior Director of Human Resources and is charged with reviewing and strengthening IMC's 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 at the HQ level, who are charged with reviewing and updating our safeguarding policies and training tools, strengthening case reporting and notification systems, and reinforcing our investigation capacity.

The Charity's US affiliate also stood up a time-bound PSEA & Safeguarding Vetting Task Force comprised of members of the executive management team to ensure timely reporting and response to incoming requests for information from donors and other external parties. Data regarding PSEA and safeguarding allegations is reported to the Compliance Committee of our Board on a quarterly basis.

The Charity's US affiliate is also strengthening prevention efforts through utilizing a Protection Advisor to work with the international programs and Monitoring & Evaluation teams to better ensure protection elements are integrated into the design and implementation of programs to reduce the risk for SEA and other safeguarding violations.

To support the HQ-based PSEA and Safeguarding Case Management Team, International Medical Corps recently completed a four day training program for 20 cross functional colleagues in PSEA and Safeguarding Investigations. In addition a full time PSEA & Safeguarding Investigator has been recruited.

These policies and procedures embody the Charity's commitment to ethical standards in all of its 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 its work or its supply chain. In addition, the Charity's affiliate has a 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 affiliate carries out due diligence to ensure that modern slavery and/or human trafficking does not take place in its organisation or its supply chains. To this end, both the Charity and its U.S. implementing affiliate have implemented the following processes:



- To register all suppliers that supply over \$1,000 of goods or services and require agreement to our standard terms and conditions that include a ban on any activities that violate international laws prohibiting corruption, sexual exploitation, trafficking, 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).
- To require subcontracts to contain & flow down a provision prohibiting the conduct described above.
- To require suppliers to endorse a "Vendor Code of Conduct" that prohibits child labour and human trafficking.
- To screen all suppliers that meet our risk-based thresholds through a third-party *prohibited party* screening database & conduct enhanced third-party due diligence checks on the highest risk suppliers.

- To include compliance with ethical requirements in its selection of suppliers & evaluation of supplier performance.

The Charity and its affiliate have not, to their knowledge, conducted any business with another organisation that has been found to be involved in modern slavery and/or human trafficking. The Charity's affiliate's audit, legal, and compliance teams are involved in ensuring the Charity's systems work effectively and monitor them regularly, adapting as necessary to changing circumstances and needs.

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes International Medical Corps UK's modern slavery and human trafficking statement for the financial year ending 30 June 2018.

Signature: 
Andrew W Géczy
Chair, International Medical Corps UK
Date: 

Handwritten signature and text in blue ink, possibly including a name and a date or reference number.