

## **CONCERN WORLDWIDE MODERN SLAVERY ACT TRANSPARENCY STATEMENT**

This statement is given on behalf of Concern Worldwide, Concern Worldwide (UK) and Concern Worldwide (Northern Ireland) (together "**Concern**").

Concern regards all forms of modern slavery and human trafficking as abhorrent and is committed to ensuring that everyone it deals with is treated with dignity.

We are committed to ensuring that the way we conduct our business and dealings with our suppliers, service providers and contractors ("**Suppliers**") reflects our values. We strive to ensure that the way we run our business prevents and deters any form of modern slavery and human trafficking from occurring anywhere in our business and supply chain. We are also working with our Suppliers to ensure that they uphold the principles in this statement.

### **OUR ORGANISATIONAL STRUCTURE AND OUR WORK**

We are a non-governmental, international humanitarian organisation that strives for a world free from poverty, fear and oppression.

We deliver life-saving and life-changing interventions to the world's poorest and most vulnerable people. From rapid emergency response to innovative development programming, we go to the hardest to reach places to make sure that no-one is left behind.

Concern Worldwide, Concern Worldwide (UK) and Concern Worldwide (Northern Ireland) are each registered charities. We also have branch offices in approx. 25 countries worldwide.

### **OUR STAFF**

Concern employs approximately 3,000 employees worldwide. The dedication and commitment of our staff to our core values is essential to the achievement of our objectives. It is therefore essential that the way we engage with our staff reflects our core values and that we treat people with dignity and respect.

Our Human Resources Department is required to adhere to the highest standards in the recruitment of staff. These standards prohibit the solicitation of a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretences, representations, or promises regarding that employment, charging employees recruitment fees and providing or arranging housing that fails to meet the host country housing and safety standards.

### **OUR SUPPLY CHAINS**

Given the nature of our work, our supply chains can be quite extended involving a broad range of participants such as Suppliers, freight forwarders, transporters, warehousing and distribution personnel.

### **OUR DUE DILIGENCE PROCESSES**

It is essential that we have confidence that our Suppliers and other business partners are working towards meeting the same high standards as we do. In particular we are determined to ensure our Suppliers treat their own employees and workers with dignity and respect in a fair and ethical environment. This is reflected by our requirement that all significant Suppliers must confirm that they have read, understood and will abide by the terms of our policies in all of their activities under a Concern supply or service contract. Additionally they must ensure that:

- They adhere to International Labour Organisation (ILO) labour conventions, particularly international labour standards, social protection and work opportunities for all.
- Employment is freely chosen.
- The rights of staff to freedom of association and to collective bargaining are respected.
- Working conditions are safe and hygienic.
- No exploitation of children is tolerated.
- Wages paid are adequate to cover the cost of a reasonable living.
- Working hours are not excessive.
- No discrimination is practiced.
- Regular employment is provided.
- No harsh or inhumane treatment of staff is tolerated.
- Local labour laws are complied with.
- Social rights are respected.

## **ASSESSING AND MANAGING RISK**

The importance of identifying, assessing, and monitoring any potential areas of risk in relation to our business and supply chains is intrinsic to the way we operate as a business. This includes considering where we are obtaining services from, the nature of those services, the length of the relationship with the relevant Supplier and the nature of what is being supplied.

Our assessment of risk is a core part of the procurement process undertaken with new Suppliers (including those falling within our public procurement obligations). Our standard terms and conditions also expressly commit Suppliers to the standards set out in the bullet points above, as well as binding them to our Programme Participant Protection Policy, Child Safeguarding Policy and Anti-Trafficking in Persons Policy (described in more detail below). Any failure to adhere to these requirements is considered a fundamental breach of the terms of the engagement.

## **OUR POLICIES**

We have implemented a number of policies designed to ensure that the way we work, and the way those working with us behave, is reflective of the principles and standards we hold ourselves to. In that respect we have implemented the following policies:

### ***1. Code of Conduct***

We have implemented a Code of Conduct (the “**Code**”) as a tool for the prevention of harassment, exploitation, abuse and/or inappropriate behaviour by staff. It applies to all those engaged by Concern, including partner organisations engaged on Concern programmes, regardless of location, whether national or international, full or part-time, consultant, interns, contractors or volunteers.

Our Code stresses that any form of inappropriate behaviour is incompatible with Concern's fundamental belief in the human dignity of all people, and with our core values.

For Concern employees a failure to comply with the Code may result in disciplinary action up to and including dismissal, and for our partners it may result in the suspension or termination of our agreement with them.

The Code specifically highlights the requirement that individuals' conduct is in-keeping with Concern's beliefs, values and mission. It also requires them to avoid any engagement in activities which are illegal, contravene human rights or compromise the work of Concern, as well as refraining from any form of bullying, harassment, discrimination, abuse, intimidation or exploitation.

Staff are required to bring to our attention any potential incident, abuse or concern that they are witness to, made aware of or suspect which appears to break the standards of the Code.

The Code is supplemented by three specific policies:

***(a) Programme Participant Protection Policy***

Acceptance of this policy is a precondition of working with any partner organisation or consultancy. It requires those third parties to adhere to relevant standards of behaviour and conduct, including by disseminating the policy to their staff and those working on their behalf, as well as training all staff members on it and our Code of Conduct.

Our policy stresses particularly the importance of being aware of, and mitigate against, the potential for abuse of power. Specifically it requires that no individual staff member can create a situation where he or she alone is perceived to be the sole and final authority responsible for allocating benefits.

We expressly reserve the right to terminate any partnership or consultancy if breaches of, or serious doubts arise as to compliance with, the policy occur.

***(b) Child Safeguarding Policy***

Actions to safeguard the wellbeing of men, women, boys and girls and prevent harm, abuse or exploitation is at the core of what we do. The safeguarding of children is a key element of our Code and it seeks to ensure that Concern staff and programmes integrate robust mechanisms to prevent and mitigate the risk of harm to and abuse of children.

***(c) Anti-Trafficking in Persons Policy***

Concern strongly condemns trafficking in human beings and our policy prohibits all individuals with whom, and entities with which, Concern works from engaging in any form of trafficking in human beings.

All Concern staff in any programmes operated by Concern will be informed about this policy and its trafficking related prohibitions, the reporting system, and the consequences for violating the policy.

***2. Purchasing Policy***

We have also put in place a specific policy which applies to the way in which we engage with our Suppliers. It ensures that all those working at Concern are clear about the standards which are expected of those with whom we contract and reflects our recognition of the safety, health,

environmental and ethical impacts of all supply decisions and involves our Supplier in addressing issues that may arise.

The central message underlying our policy is that we seek to purchase goods and services which are produced and delivered under conditions that do not involve the abuse or exploitation of any persons.

We guarantee that all procurement activities are fully and transparently documented, and that all employees involved in procurement will comply in all respects with laws that apply to their purchasing activities. This includes a requirement to comply with both the letter and spirit of the law of the countries in which they operate.

Potential Suppliers will be considered ineligible if (amongst other things) they have engaged in any corrupt, fraudulent, collusive or coercive practices.

Our policy also makes clear that we will seek alternative sources where the conduct of Suppliers violates basic human rights, or where companies anywhere in the supply chain are involved in the manufacture of arms or the sale of arms to governments which systematically violate the human rights of their citizens.

### **3. Whistleblowing policy**

We are committed to the highest possible standards of openness, transparency and accountability in all our affairs. We have implemented a whistleblowing policy so that all staff, volunteers, partners, consultants or contractors (engaged by Concern Worldwide or any of its subsidiaries and affiliates) can, and are encouraged to, raise or disclose concerns at an early stage.

We operate a designated whistleblowing helpline as well as making clear our commitment that no one raising concerns in good faith are subject to any harassment or victimisation as a result.

#### **TRAINING**

It is important to us that our employees are aware of the issues surrounding modern slavery and support our values. All employees are required to adhere to our Code of Conduct and the values and principles contained in it. We regularly work with all staff to help them to understand and comply with their obligations.

#### **LOOKING AHEAD**

Compliance with the Modern Slavery Act is an ongoing commitment. As an organisation we are continuing to develop the way we work to ensure that slavery and human trafficking play no part in our business or supply chain.

As part of this we are actively reviewing the DFID Supply Partner Code of Conduct to consider what changes may be sensible to make to our existing policies and practices.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes Concern's slavery and human trafficking statement for the financial year ending 31 December 2019.

**This statement was approved by Concern's Board of Directors.**



**Signature of Trustee of Concern Worldwide**