

AUGUST 2022

# ADDRESSING MODERN SLAVERY

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WORKING WITH OUR CLIENTS TO END  
MODERN SLAVERY



**SUSTAINABLE  
BUSINESS MATTERS**

# 01

## ASSESSING AND ADDRESSING MODERN SLAVERY

There are approximately 40.3 million men, women AND children in modern slavery, with approximately 2/3 of these victims in the Asian pacific region where there are strong links to Australian businesses.

The uncomfortable truth: there is a high likelihood of modern slavery and labour exploitation in YOUR supply chain.

We work with value-based companies that are passionate about eliminating labour

TAKING ACTION TO END MODERN SLAVERY.  
THIS IS HOW WE WORK WITH OUR CLIENTS.

**Phase One:**

Training, Gap Analysis and Action Planning

**Phase Two:**

Understanding your Modern Slavery Risk (High Level Risk Assessment)

**Phase Three:**

Supplier Engagement, taking action to mitigate risk

**Phase Four:**

Modern Slavery Statement

# 02

## PHASE 1: UNDERSTANDING MODERN SLAVERY (TRAINING), GAP ANALYSIS AND ACTION PLANNING (PLANNING KEY PRIORITIES, NEXT STEPS)

### 1.A Training – Introduction to Understanding Modern Slavery

Understanding Modern Slavery is an important part of any company's strategy and is the first step in mitigating risk.

How do you know how to look for modern slavery in your supply chain if you don't know what it is?

In this session you will learn about:

- The different types of modern slavery
- How modern slavery may occur in your business operations and supply chain
- How your company maybe contributing to modern slavery
- Human rights, labour rights and labour exploitation
- Modern slavery legislation – Modern Slavery Act 2018
- Why is important for your company to be addressing modern slavery
- What your stakeholders expect of you in terms of addressing modern slavery and human rights
- What are the steps involved in meeting legislation requirements

# 03

## PHASE 1: UNDERSTANDING MODERN SLAVERY (TRAINING), GAP ANALYSIS AND ACTION PLANNING (OR PLANNING KEY PRIORITIES, NEXT STEPS)

### 1. B Documentation review and gap analysis

We'll conduct a review/evaluation of your companies, policies and procedures to understand what systems and processes you may have in place that are relevant to addressing modern slavery and labour exploitation.

We will engage with you and your team to understand what is important to your business, your stakeholders and your clients and review client tenders, contracts, and email requests. This will inform your Addressing Modern Slavery Program.

### 1.C Action Plan - Prioritize next Steps

Sustainable Business Matters will develop an action plan to assist your company prioritize next steps.

There is a lot to consider in this process and it can be overwhelming. Rest assured, we will help you map this out in a step by step approach, so we understand what needs to be done, what resources are required and allocate responsibilities and timeframes for completion.

#### Outcome of Phase 1

1. Your team will be clear on the different types of modern slavery
2. Understand what your stakeholders expect of you in terms of tackling/addressing modern slavery and human rights
3. Set the next course of action to meet these expectations

Phase 1 will help you comply with Criteria Four of the Commonwealth Modern Slavery Act 2018.

# 04

## PHASE 2 – UNDERSTANDING YOUR RISK OF MODERN SLAVERY (HIGH LEVEL MODERN SLAVERY RISK ASSESSMENT)

Phase 2 focuses on understanding WHERE the risk of modern slavery maybe occurring in your business operations AND your supply chain.

### **2.A Supply Chain Mapping**

Sustainable Business Matters will help you map your supply chain in detail, so we know:

- what products, materials, goods and services you are procuring
- where these goods/services are made (country of origin)
- your spend/cost of goods and services

We'll take a deep dive into your procurement function which will help us identify WHERE modern slavery maybe occurring in your business.

Please note: This includes all your operational and business-related expenses.

### **2.B High level Risk Assessment**

How do we know how to tackle modern slavery if we don't know where it is?

In this step, we will gather all your data and put it into our data base to determine where in your supply chain your highest risk of modern slavery may occur.

We will determine risk associated with each of the below categories:

- High risk countries
- High risk products and materials
- High risk goods and services
- COVID 19 related human rights risks
- What 'worker types' have a higher prevalence of modern slavery

This process will help you understand which 'type of modern slavery' (e.g. forced labour, debt bondage) maybe prevalent in your supply chain.

# 05

## PHASE 3: TAKING ACTION TO MITIGATE RISK

### **3.A Supplier Engagement**

We develop a supplier engagement strategy which includes key considerations around:

- your expectations and requirements around modern slavery
- supplier communication methods
- feedback channels
- supplier leverage
- supplier capacity building

The objective is to understand issues better and to support and bring suppliers on-board to bring about change.

This typically includes the development of a Suppliers Code of Conduct.

### **3.B Evaluate individual suppliers.**

There is where we take targeted action on suppliers that have been deemed 'high risk' from the High-Level Modern Slavery Risk assessment (Phase 2).

We send Supplier Self Assessment Questionnaires to your suppliers to understand what processes, policies, certifications etc they have in place so we can understand if they are classified as high risk.

We conduct a detailed analysis and evaluation of suppliers and set individual Supplier Action Plans if required or conduct remediation if we have any concerns with modern slavery exploitation.

### **3.C Policy Development**

Develop a Human Rights Policy which outlines your company's commitment (approach) to Human Rights based on international human and labour rights principles, standards and guidelines.

### **3.D Remediation Procedure**

A Remediation Procedure outlines the steps to be taken when modern slavery is detected in your business operations and supply chain.

# 06

## PHASE 3: TAKING ACTION TO MITIGATE RISK (RISK MITIGATION)

### **Outcome of Phase 3**

The work we do in phase 3 will educate you on how to work with your suppliers to get the best possible results.

Supplier engagement can be tricky, challenging AND rewarding. We want them to get involved and to participate.

The outcome we want for your business is for all suppliers to be involved, however, at times this is not always possible. We can help you figure out the best way to do this.

All going well at the end of phase 3 you will understand individual supplier risk and we can work with you determine if further action is required for your suppliers.

Phase 3 will help you meet Criterion 4 of the Modern Slavery Act.

# 07

## PHASE 4: MODERN SLAVERY STATEMENT (REPORTING)

Develop a Modern Slavery Statement in line with the seven mandatory reporting requirements set out in the Modern Slavery Act (2018).

This is where all the hard work, dedication, commitment pays off – it's your time to shine!

We will develop in collaboration with your company a comprehensive/meaningful modern slavery statement (report) which demonstrates your company has strong social and ethical values and takes this matter seriously.

This is not a box ticking exercise - it's real, transformational change that you can be proud of.

### **Outcome of Phase 4**

A meaningful modern slavery statement in line with the Commonwealth Modern Slavery Act's seven mandatory criteria.

We can also explore/undertake a human rights risk assessment in conjunction with a Modern Slavery risk assessment.

### **Discovery Call**

After all that detail, do you have any other questions about modern slavery in your business?

If you're curious about this process and you'd like to chat, we offer an obligation-free discovery call.

You can ask us anything you'd like to know about the process.

**Our Principal, Libby Staggs** can be contacted on:

Call us: 0448 026 508

Email us: at [libby@sustainablebm.com.au](mailto:libby@sustainablebm.com.au)



# 08

## ABOUT SUSTAINABLE BUSINESS MATTERS

### SUSTAINABILITY LEADER - LIBBY STAGGS

A committed advocate for sustainable business, with a passion for bringing positive change to industry, Libby is an active and influential member of the eco-labelling and 'green' community and was a participant on the GBCA's expert reference panel for human rights.

Libby's a regular contributor to Amnesty International, the Australian Conservation Foundation and Police Citizen Youth Clubs (PCYC). What's more, as a Green Building Council of Australia (GBCA) Green Star Associate since 2006, she's been keeping up to date with all the industry's latest developments. Indeed, she is continually developing her knowledge through ongoing training with the GBCA and other industry relevant organisations

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