

# Modern Slavery

Guidance Note

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## **What is Modern Slavery?**

"Modern slavery" describes situations where coercion, threats or deception are used *to exploit victims and undermine or deprive them of their freedom*. It encompasses:

- Slavery;
- Human trafficking;
- Slavery like practices (such as forced labour, forced marriage, servitude, debt bondage, and deceptive recruiting for labour or services); and
- The worst forms of child labour.

Modern slavery describes serious exploitation – it does not include practices such as underpayment of workers or substandard working conditions on their own (although these harmful practices may be present in some situations of modern slavery).

## **What causes modern slavery?**

Modern slavery crimes persist due to a range of root causes and drivers including:

- poverty;
- underemployment and unemployment;
- displacement, including because of conflict or natural disasters;
- discrimination and marginalisation, including gender inequality;
- weak rule of law upheld by governments and authorities;
- lack of education, opportunities and access to resources; and
- workplace conditions.

Modern slavery is also exacerbated by:

- COVID-19: The impacts of COVID-19 and corresponding public health measures have increased the isolation of individuals in or at risk of modern slavery, particularly forced marriage. COVID-19 has also increased the vulnerability of workers to criminal labour exploitation due to loss of work and income.
- Technology: The rapid increase in technological advancements and social media has also provided perpetrators with new avenues to target, recruit, and exploit victims online. Technology can increase the scale and speed with which modern slavery crimes are committed.
- Gender norms that continue to limit girls' and womens' empowerment and human rights.



Although modern slavery can occur anywhere in SBS's operations and supply chains, the highest modern slavery risks generally arise for suppliers either because they:

- are located in a country considered to have a high risk of modern slavery or have overseas suppliers in a country considered to have a high risk of modern slavery, such as Philippines, Thailand, Pakistan, China or Bangladesh (the [Global Slavery Index](#) provides a helpful guide);
- operate in a sector considered to have a high risk of modern slavery, such as textiles and fashion, electronics, cleaning, hospitality/food and beverages, construction and fishing); and/or
- provides products that are considered to have a high risk of modern slavery, such as cotton, cocoa, electronics, timber or bricks (see the [Global Slavery Index](#) for more information).

### **What is the Modern Slavery Act 2018?**

- The Australian Government introduced the *Modern Slavery Act* in 2018 (the **Act**).
- Who it applies to: Commonwealth government organisations (including SBS) and private sector entities with an annual consolidated revenue over \$100 million who carry on business in Australia.
- What is the purpose of the Act: "To reduce occurrences of, and improve awareness of, modern slavery in Australian business."
- Requirements under the Act: An organisation subject to the Act is required to report annually to the Australian Government on the risks of modern slavery in its operations and supply chains (including the supply chains of its suppliers), and to identify the actions it is taking to address those risks.
- Voluntary Reporting: Any Australian entity or foreign entity carrying on business in Australia can provide a voluntary statement despite not meeting the thresholds for mandatory reporting as outlined above. However, once an entity has volunteered to report and the related reporting period commences, such entity will be bound as though they are a mandatory reporting entity.
- Modern Slavery Statements: The Australian Border Force manages the Australian Government's Online Register for Modern Slavery Statements. The Register houses Modern Slavery Statements provided by reporting entities: <https://modernslaveryregister.gov.au/>.

### **What SBS is doing to combat modern slavery**

SBS's commitment to the communities it was established to serve is central to all that it does. As the multicultural and diverse fabric of Australia continues to evolve, SBS continues to invest in initiatives, inspired by the SBS Charter, to deepen its connections with communities, to increase respect and understanding within society as a whole, and to contribute to a cohesive society.

SBS's commitment to addressing any modern slavery risks in its operations and supply chain is wholly consistent with the objectives of its Charter. SBS recognises that its purchasing power can be used to



contribute to positive social changes in Australia and globally, and it welcomes the opportunity to contribute to the eradication of abhorrent modern slavery practices.

SBS has submitted its Modern Slavery statements for the periods ending 30 June 2020 and 30 June 2021 to the Department of Home Affairs. These statements can be accessed [here](#).

Key steps SBS has taken to combat modern slavery to date include, amongst others:

- scoping, reviewing and assessing SBS's operations and supply chains to ascertain any modern slavery risks;
- conducting due diligence and further enquiries with any relevant suppliers deemed to carry risk, both directly and through reviewing their published information;
- adding new modern slavery clauses to SBS's agreement templates, including its commissioning agreements; and
- ensuring allegations of modern slavery in SBS's supply chain can be reported safely and securely via an independent whistleblowing platform (details below).

### **How can I report suspected modern slavery in SBS's supply chain?**

If you suspect modern slavery is occurring at SBS, in SBS's supply chain from an SBS contractor or supplier, or within the supply chains of an SBS contractor or supplier, you can report your concerns confidentially and anonymously for further investigation to SBS's independent external whistleblowing service, **YourCall**: via telephone on **1300 798 101** or registering via the website <https://secured.yourcall.com.au/report>, and quoting Organisation ID: SBSC1975.

### **What can you do?**

- **Consider submitting a voluntary report.** If you are unsure about whether to report voluntarily on a formal basis, you could consider preparing a voluntary statement and making it available on your website (clearly identified as a voluntary statement not formally submitted to the Australian Border Force).
- **Review your own supply chain and operations** to identify and address any modern slavery risks and **consider where you source products and services from** to maintain responsible and transparent supply chains.
- **Educate your staff and personnel on Modern Slavery.** Some initial resources on Modern Slavery can be found here:
  - The Department of Home Affairs: <https://www.homeaffairs.gov.au/criminal-justice/Pages/modern-slavery.aspx>
  - Global Slavery Index: <https://www.globalslaveryindex.org/>
  - Anti-Slavery Australia: <https://antislavery.org.au/>
  - Identifying and Assessing Modern Slavery Risks e-learning module: <https://modernslaveryregister.gov.au/static/elearning/identifying-and-assessing-modern-slavery-risks/index.770ac25e416b.html#/>