

Australian Red Cross (Humanitarian Division)

Modern Slavery Policy

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Overarching policy	Ethical Framework
Associated policies and protocols	<p>Movement:</p> <ul style="list-style-type: none"> • Movement Policy for Corporate Sector Partnerships (Resolution 10, 2005 Council of Delegates) • 2020-2023 Joint Pledge on Modern Slavery (Pledge by Australia and Australian Red Cross Number: SP330249) <p>Board and Board Sub-Committee:</p> <ul style="list-style-type: none"> • Policy on Migration • Partnership Protocol • Whistleblower Policy <p>Operational (Humanitarian Division):</p> <ul style="list-style-type: none"> • Procurement Policy • Supplier Code of Conduct • Human Resources Policies Overview (HR PLA 02) • Ethical Screening of Investments Guidelines and Procedures (FIN 33)

1. Purpose of policy

This policy affirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.

It is consistent with our Ethical Framework, that expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations. It is also consistent with the Fundamental Principles and broader Movement policies. As a result, this Modern Slavery Policy is part of the Ethical Framework.

This Policy also supports the intent of international conventions, treaties and protocols relevant to combatting modern slavery and the *Modern Slavery Act (Cth) 2018*¹.

2. Context

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. There are an estimated 40.3 million victims of modern slavery globally. Women and girls are over-represented, comprising 71 per cent of victims and nearly two-thirds of modern slavery victims are in the Asia-Pacific region².

As a humanitarian organisation and part of the broader International Red Cross and Red Crescent Movement (Movement), Red Cross fulfils an important auxiliary role to the humanitarian services of public authorities. In accordance with the Fundamental Principles of the Movement including Humanity, Impartiality, Neutrality and Independence, a key priority of Red Cross is to assist people made vulnerable through the process of migration, including people who have been impacted by modern slavery. Our commitment is reflected in the *Red Cross Board Policy on Migration*.

Through working directly with people at risk of or experiencing human trafficking and slavery for more than a decade, Red Cross has direct insight into the global drivers and humanitarian impact of modern slavery. Red Cross has also gained strong insights from our work consulting directly with communities; collaborating with government and community organisations; and undertaking research and education activities.

Red Cross commits to use these insights to contribute to ending all forms of modern slavery, both in Australia and overseas, by ensuring our own supply chains and operations don't contribute to modern slavery practices, and to take appropriate action to respond to the humanitarian impacts of modern slavery.

3. Scope of policy

This Policy applies to all Red Cross People in the Humanitarian Division. Lifeblood has a separate *Corporate Social Responsibility and Modern Slavery Policy*.

¹ <https://www.ohchr.org/EN/ProfessionalInterest/Pages/UniversalHumanRightsInstruments.aspx>

² 2017 Global Estimates of Modern Slavery (ILO and Walk Free, 2017). Available from: https://www.ilo.org/global/publications/books/WCMS_575479/lang--en/index.htm

4. Definitions

Modern Slavery Act 2018 (Cth) being the Commonwealth legislation (the Act) enacted by the Parliament of Australia on 29 November 2018 (and may be amended from time to time).

Modern slavery for the purposes of this policy is defined as including eight types of serious exploitation and outlined in Section 0³.

Operations is defined as activity undertaken by Australian Red Cross Society Humanitarian Division.

Partnership means all relationships between Red Cross and a Partner whereby Red Cross grants the Partner the possibility of using its name, emblem/logo or image in its communication and promotional materials, thereby potentially creating a public association of image between the Partner and Red Cross. This relationship includes arrangements of; sponsorships, cause-related marketing initiatives, and strategic alliances

Risks of modern slavery practices means the potential for Australian Red Cross to cause, contribute to, or be directly linked to modern slavery through its supply chains and operations.

Red Cross is the term used to refer to Australian Red Cross Humanitarian Division, not the broader International Red Cross and Red Crescent Movement or Australian Red Cross Lifeblood.

Red Cross People include any current:

- Members of a Governance Body (members of the Australian Red Cross Society Board, Divisional Advisory Boards and their Committees)
- Volunteers;
- Employees;
- Members; and
- Contractors.

Suppliers is defined as any organisation or person who provides us with goods or services, including their subcontractors, agents, related entities and consultants.

Supply chains is defined as the products and services (including labour) that contribute to Red Cross' own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

³ Modern Slavery Act (Cth) 2018. Available from: <https://www.legislation.gov.au/Details/C2018A00153>

5. What is modern slavery

Modern slavery is defined by the *Modern Slavery Act (Cth) 2018*⁴ to include eight types of serious exploitation and which can be understood as:

- **trafficking in persons**, which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;
- **slavery**, which is where the offender exercises powers of ownership over the victim;
- **servitude** which is where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work;
- **forced labour**, which is where the victim is either not free to stop working or not free to leave their place of work;
- **forced marriage**, which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
- **debt bondage**, which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;
- **the worst forms of child labour**, which involves situations where children are: exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs; and
- **deceptive recruiting for labour or services** which is where the victim is deceived about whether they will be exploited through a type of modern slavery⁵.

It can also extend to:

- entering into a commercial transaction involving a slave;
- exercising control or direction over, or providing finance for, any commercial transaction involving a slave or act of slave trading;
- conducting a business involving servitude or forced labour (including exercising control over the business or providing finance to it);

⁴ Modern Slavery Act (Cth) 2018. Available from: <https://www.legislation.gov.au/Details/C2018A00153>

⁵ Department of Home Affairs. *Commonwealth Modern Slavery Act 2018: Guidance for reporting entities (2018)*. Available from <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>

6. Red Cross approach to limiting the risk of modern slavery practices

Red Cross will work proactively to reduce modern slavery within our supply chains and operations and we expect all organisations we engage with to do the same.

6.1 Supply Chain

Red Cross Supplier Code of Conduct

We expect all existing and new Suppliers to comply with the principles set out in our Supplier Code of Conduct. Fundamental to the Supplier Code of Conduct is an expectation that all Suppliers operate in full compliance with the laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed.

Suppliers must use best endeavours to ensure that there is no modern slavery in their supply chains and operations. In the event Suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify Australian Red Cross as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

Red Cross' contractual terms

Our contractual terms reflect Supplier obligations outlined in the Supplier Code of Conduct, including compliance with Australian modern slavery laws and those foreign modern slavery laws that apply in the location(s) in which they operate.

Supply chain mapping and risk assessment

We encourage our suppliers to complete a Corporate Social Responsibility questionnaire which contains questions relevant to modern slavery. Answers to this questionnaire will provide us with a greater understanding of the risk of modern slavery within a supplier's supply chains or operations and enable us to work with a supplier to reduce the risks identified. We will actively and progressively improve our understanding and oversight of all tiers of our supply chains.

6.2 Operations

Modern Slavery Policy

Red Cross maintains a Modern Slavery Policy (this Policy) outlining our approach to reducing the risk of modern slavery practices within our supply chains and operations. The Policy provides guidance on the steps Red Cross takes to work with suppliers to reduce risks and the range of supports available for when a Red Cross person becomes aware that someone is at risk of or affected by modern slavery practices.

Incorporating modern slavery into other policies

When existing policies undergo policy review or new policies are under development, policy owners are required to identify existing modern slavery commitments that can be enhanced, or where modern slavery protections can be incorporated.

Ethical Investments

The Ethical Screening of Investments Guidelines and Procedures (FIN33) seeks to ensure that the investment of Red Cross funds is consistent with the Fundamental Principles of Red Cross. As such, no investment should knowingly be made in companies who engage in activities or services which could be directly viewed as considerably compromising these Fundamental Principles.

Human Resources

We are committed to ensuring the health, safety and wellbeing of our workforce and we maintain a suite of policies that are informed by and compliant with Australian workplace and

occupational health and safety law. We ensure that our volunteers are engaged on a truly voluntary and non-exploitative basis.

Partnership Screening

The [Partnership Protocol](#) requires Red Cross People to complete a partnership screening tool before entering into a partnership with another organisation.

Prospective partners automatically disqualify from public association with Red Cross if they are knowingly or deliberately engaged in activities running counter to:

- The Movement's objectives and Fundamental Principles;
- Principles of International Humanitarian Law;
- Internationally recognised standards of human rights, labour rights and protection of health; and/or
- Are involved in the manufacture or sale of arms, ammunition, tobacco or pornography.

6.3 Communications, Engagement and Training

Red Cross People will be provided communications and training opportunities to enhance their understanding of the causes and humanitarian impact of modern slavery, the Modern Slavery Policy and our approach to limiting the risk of modern slavery within our supply chains and operations.

Red Cross People with high purchasing responsibilities are provided additional training on the Red Cross Supplier Code of Conduct, Corporate Social Responsibility tool, Red Cross contractual terms, and supporting suppliers to undertake due diligence.

Red Cross People who initiate and/or periodically review relationships with third parties are provided with training to apply the central and whole of organisation due diligence tool and processes.

Informed by our experience working directly with people affected by human trafficking and slavery within Australia, Red Cross also provides training and education resources for Suppliers, Government and Community Organisations on the humanitarian impacts of modern slavery.

6.4 Continuous improvement approach to reducing the risk of modern slavery

We are committed to applying a continuous improvement approach to how we reduce the risk of modern slavery practices within our supply chains and operations.

We will seek feedback from Red Cross People, Suppliers, Partners and other parties in regard to the success or otherwise of the actions we have taken to reduce the risk of modern slavery.

By 31 December each year we will publish a *Modern Slavery Statement* that outlines the steps we have taken over the financial year to identify where our supply chains and operations may be contributing to modern slavery practices, and the actions we have taken to minimise these risks.

7. Reporting Concerns of modern slavery

7.1 Reporting unethical or unlawful conduct

A key part of supporting ethical standards is enabling Red Cross People and Other People (including Suppliers and Partners) to feel free and safe to speak up when there are reasonable grounds to suspect that Red Cross or Red Cross People are not acting ethically or in accordance with laws and obligations.

Concerns about compliance or ethical issues or illegal or unethical activities are to be reported to *STOPline*, our whistleblower hotline run by an external and independent third party.

It is possible to make a report to *STOPline* via the following ways:

- Phone: 1300 30 45 50 if within Australia, or +61 3 9811 3275 if overseas;
- Email: redcross@stopline.com.au;
- Website: redcross.stoplينerreport.com;
- Post: C/O THE STOPLINE LOCKED BAG 8 HAWTHORN VIC AUSTRALIA 3122;
- Fax: ATTENTION: CASE MANAGER C/O THE STOPLINE +61 3 9882 4480; or
- App: Search for Stopleveline in the iTunes App Store or Google Play to download the free app and submit a disclosure.

Reports of unethical or unlawful conduct are responded to in accordance with the [Australian Red Cross Whistleblower Policy](#).

7.2 Responding to concerns of modern slavery practices

The often hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report. It is important to respond in a way that is safe, ethical and respects the dignity and rights of the person at risk or affected by modern slavery practices.

There are a range of supports available for when a Red Cross person becomes aware that someone is at risk of or affected by modern slavery practices, regardless of if this occurs within Red Cross supply chains and operations or in the broader community.

The Red Cross Support for Trafficked People Program can be contacted for further information, advice and options available when a person is at risk of affected by modern slavery practices via [National STPP@redcross.org.au](mailto:National_STPP@redcross.org.au).

In Australia, the Australian Federal Police is responsible for investigating suspected cases of modern slavery and can be contacted on 131 237 to discuss or report a suspected case. Contact can be made anonymously.

In an emergency and if someone is in immediate danger, please call Triple Zero (000) for police assistance.