

# Modern Slavery Statement

Australian Red Cross Society – 2021/22



## The reporting entity

Australian Red Cross Society (ABN 50 169 561 394) (the **Society**) is a registered charity<sup>1</sup> incorporated by Royal Charter<sup>2</sup> (**Charter**). Australian Red Cross is one of 192 National Society members of the International Federation of Red Cross and Red Crescent Societies (**IFRC**). The IFRC network, together with the International Committee of the Red Cross (**ICRC**), forms the world's largest humanitarian movement.

The Society comprises of two operating divisions, the Australian Red Cross Lifeblood (**Lifeblood**) and the Australian Red Cross Humanitarian Services (**Red Cross**).

The Society is governed by a Council and the Rules of the Society vest governance of activities in the Society Board (**Society Board**). The Society Board delegates day-to-day operation of Lifeblood to a separate board (**Lifeblood Board**). Both the Society Board and the Lifeblood Board are assisted by the Australian Red Cross Lifeblood Advisory Committee.

This Statement refers to the actions of the Australian Red Cross Humanitarian Services known throughout this statement as Red Cross. Lifeblood will submit a separate statement.



Red Cross acknowledges the Traditional Owners of this land, their ancestors and Elders, past and present.

## Acknowledgement of Country

Australian Red Cross (Humanitarian Services Division) (**Red Cross**) acknowledges the Traditional Custodians of the lands on which we operate, live and gather, the First Nations peoples. We pay our respects to Elders, past, present and those of the future. We are deeply committed to working with First Nations peoples in the true spirit of reconciliation. We will continue to learn from the beliefs, customs, culture and history of First Nations peoples; and to draw upon their wisdom, knowledge and leadership to guide us in changing hearts and minds.

*Note: This document may contain the names and/or images of Aboriginal and Torres Strait Islander peoples who are now deceased.*

## Statement Annexure

### Mandatory Criteria

This modern slavery statement (**Statement**) addresses the mandatory reporting criteria of the *Modern Slavery Act 2018* (Cth), in the following sections:

- |   |       |
|---|-------|
| • Identify the reporting entity.  | 2     |
| • Describe the reporting entity's structure, operations and supply chains.  | 4-6   |
| • Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or control.                             | 7-17  |
| • Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes. | 7-17  |
| • Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.   | 18-19 |
| • Describe the process of consultation with any entities that the reporting entity owns or controls.  | 20    |
| • Any other information that the reporting entity, or the entity giving the statement, considers relevant.  | 21-25 |

### Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of the Australian Red Cross as defined by the *Modern Slavery Act 2018* (Cth) on 21 October 2022.

### Signature of Responsible Member

This Statement is signed by a responsible member of the Red Cross as defined by the *Modern Slavery Act 2018* (Cth).

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# Message from the President



Modern slavery is a growing problem. Latest estimates suggest that approximately 50 million people were living in modern slavery in 2021. That is an increase of 10 million people since 2016.

Red Cross continued to develop our program of work to systematically address modern slavery risk in our operations and supply chain across 2021-22. Building on existing work, our actions included:

- Improving our people's understanding of what they can do in their roles to prevent and respond to modern slavery risks, by updating training modules for employees that form part of mandatory induction and compliance training;
- Strengthening our ability to identify and address modern slavery risks, through the expansion of our risk analysis processes;
- Increased collaboration through the establishment of joint supplier risk assessment with other not-for-profit entities;
- Enhancing our management of modern slavery risks by introducing a new 'modern slavery' incident category within our incident reporting framework;
- Supporting others to better understand how to identify and address exploitation, through the establishment of a Labour Exploitation Lived Experience Advisory Group to co-design and review resources for our Work Right Hub.

People who have been exposed to modern slavery are among the most isolated members of our community, facing systemic barriers to identification of exploitation and in accessing services. The nature and breadth of Red Cross operations internationally places our movement in a unique position to address the drivers of modern slavery risk at their root. Red Cross does this through our work in building resilient communities, which serves to reduce factors that increase people's vulnerability, and through our Support for Trafficked People Program. The Support Program adopts a client-directed, strengths-based casework approach to assist in recovery. The feedback from survivors, stated above and throughout this report, provides an understanding of the positive impact of the program.

Eliminating modern slavery is no small challenge: it is very much in operation around us, but often out of sight. Red Cross is committed to putting a stop to human exploitation and supporting survivors.



**Mr Ross Pinney**  
President, Australian Red Cross Society

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**“ It is not a little thing 'cause when you have nothing, and someone says they can help you, it means the world.**

– Feedback from a survivor that received support through the [Red Cross Support for Trafficked People Program](#).

# Our structure, operations and supply chain

The head office for the Society is located at 23-47 Villiers Street, North Melbourne, Victoria 3051.

For further information see the [Humanitarian Services Annual Report](#).

Red Cross operates as two divisions – Humanitarian Services (**Red Cross**) and Lifeblood. Red Cross provides relief in times of crisis and care for people experiencing vulnerability in Australia and around the world. Australian Red Cross Lifeblood provides quality blood products, tissues and related services for the benefit of the community.

## Our operations

Red Cross mobilises the power of humanity to bring people and communities together in times of need and builds on community strengths. Red Cross provides relief in times of crisis and care for people experiencing vulnerability in Australia and around the world.

### Our vision

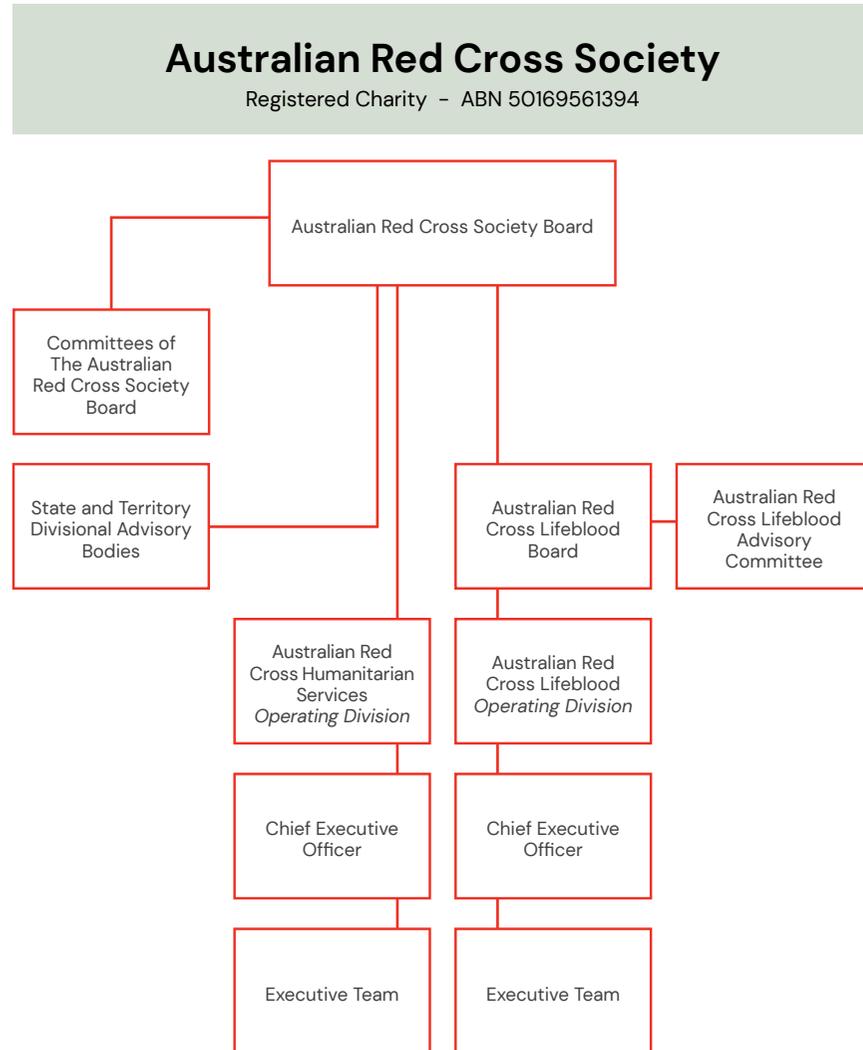
Trusted as the leading humanitarian organisation, making a genuine difference in the lives of people and communities.

### Our purpose

Bringing people and communities together in times of need and building on community strengths. We do this by mobilising the power of humanity.

### Values

- We aspire
- We respect
- We collaborate
- We stand up
- We deliver



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Over the last year, Red Cross has undertaken significant work to review our organisational strategy and identify where we can have the greatest impact in supporting communities. With the centrality of First Nations in all that we do, our five core program areas have been identified as:

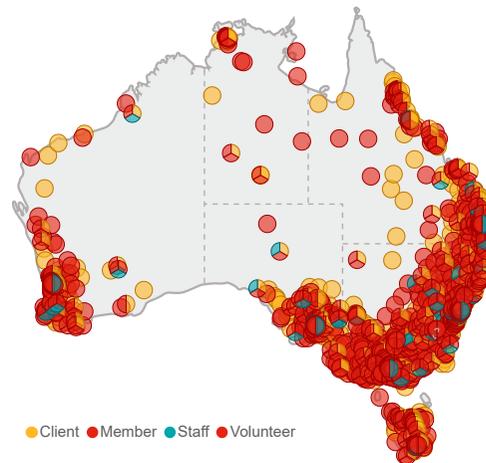
- **Emergencies Services (Australia)** – Red Cross supports communities develop resilience through the capacity to anticipate, respond to and recover well from disasters. This year we responded to 42 emergencies with nearly 1,700 volunteers and employees activated and supported more than 300,000 people before, during and after disasters.
- **Migration** – Red Cross protects and upholds the health, dignity and wellbeing of vulnerable migrants in Australia. We provide support to refugees, people seeking asylum, people in immigration detention and those who are vulnerable because of migration. We also provide services to trace and reconnect families impacted by conflict, war and disaster. Last financial year, over 47,000 people from 165 countries received support.
- **International Humanitarian Law** – Red Cross provides training and education on the laws of war to a variety of audiences, including the Australian Defence Force, civil servants, humanitarian workers, lawyers, journalists, medical professionals and universities.<sup>3</sup> Red Cross offers two training packages on the laws of war and human rights: [War, Law and Business](#) and [Security, Armed Conflict and IHL](#).
- **International Programs** – With a unique position as auxiliaries to public authorities in the humanitarian field we support people in times of war, natural disasters and emergencies and aim to build resilient communities. Red Cross deployed 66 Australian international aid workers

to 25 countries. We supported 9 Red Cross Societies prepare for, respond to and recover from disasters and 13 National Societies across the Asia Pacific in their responses to COVID-19 outbreaks.

- **Community Programs** – Red Cross supported the community with over 60,000 patient transport trips to critical medical appointments, 180,000 meals delivered, over 5,000 people received social support through 225,000+ social support hours, and 1,300 people were supported in the justice system.

By empowering communities and building resilience, Red Cross work aims to address the underlying factors that increase people's vulnerability to exploitation and slavery. The work of Red Cross reaches hundreds of thousands of people across the country, from major cities to remote communities.

#### Location of Red Cross people and clients



Our work is guided by seven fundamental principles (the **Fundamental Principles**) which affect how we operate at every level; providing our foundation, our framework, our philosophy and a benchmark for our work.

- **Humanity** – to prevent and alleviate suffering and protect life and health and ensure respect for the human being without discrimination. To promote mutual understanding, friendship, co-operation and lasting peace.
- **Impartiality** – to be guided solely by need and make no discrimination based on nationality, race, religious beliefs, class, or political opinions.
- **Neutrality** – to ensure we can continue to engage with confidence, we do not take sides in hostilities or engage at any time in controversies of a political, racial, religious, or ideological nature.
- **Independence** – to maintain autonomy to ensure we are always able to act in accordance with the principles of the Red Cross Movement.
- **Voluntary service** – we are not prompted by a desire for gain in any manner.
- **Unity** – there can only be one Red Cross or Red Crescent Society in any one country that is open to all.
- **Universality** – all societies in the International Red Cross and Red Crescent Movement have equal status and share equal responsibilities and duties in helping each other.

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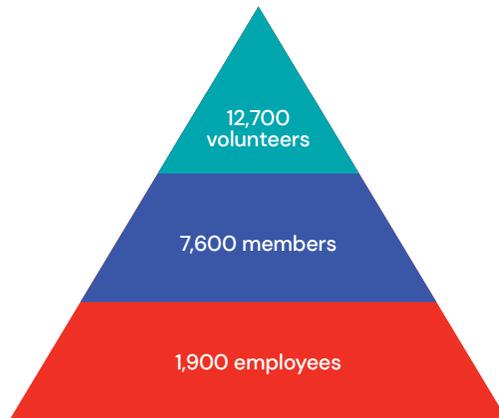
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## Members, volunteers and staff

The power and dedication of Red Cross people underpins our humanitarian activities, drives our immense reach, and enables us to help so many in need.



Red Cross seeks to embrace the diversity of its members, volunteers and employees. A broad diversity of backgrounds and lived experiences enriches Red Cross and positively contributes to its impact. A survey of over 2200 Red Cross employees, members and volunteers revealed:

- **35%** identify as having a lived or living experience of mental health distress
- **25%** identify as culturally and linguistically diverse
- **10%** identify as having a disability
- **9%** identify as neurodiverse
- **8%** identify as part of the LGBTIQ+ community
- **5%** identify as Aboriginal and Torres Strait Islander
- **29%** were born outside Australia from 90 different countries.

## Sites

Red Cross has eight national and state offices across Australia that form the basis of our operations. There are also several sites across the country that are used for community programs, membership and other incidental uses.

## Retail Stores

Red Cross operated 164 Red Cross shops located across Australia.<sup>4</sup> With ongoing temporary closures and lockdown restrictions we also found innovative ways to operate and retain community connection through pop up shops at festivals and events. Every purchase from Red Cross shops contributes funds to support our programs and help people overcome hardship, crisis and disaster.

Our retail stores employed approximately 240 staff (including casual staff) and operate with the generous assistance of around 4,000 volunteers over the year.

Eighty-nine per cent of the goods sold in our retail stores were pre-loved items, however we also sell unsold clothing donated from major retailers, gifts, first aid products and charity gift cards.

### Breakdown of goods sold in retail stores – FY22



New purchased goods are primarily fashion accessories, including sunglasses, hats, socks, candles and diffusers. The goods are purchased through 46 different suppliers who are all based in Australia.



## Partnerships

Red Cross works with a range of generous partners, corporates, philanthropists, trusts, foundations and private ancillary funds who support our programs in a variety of ways, including financial and in-kind support, workplace giving programs, support for specific programs and donation of goods or services.

## Supply Chains

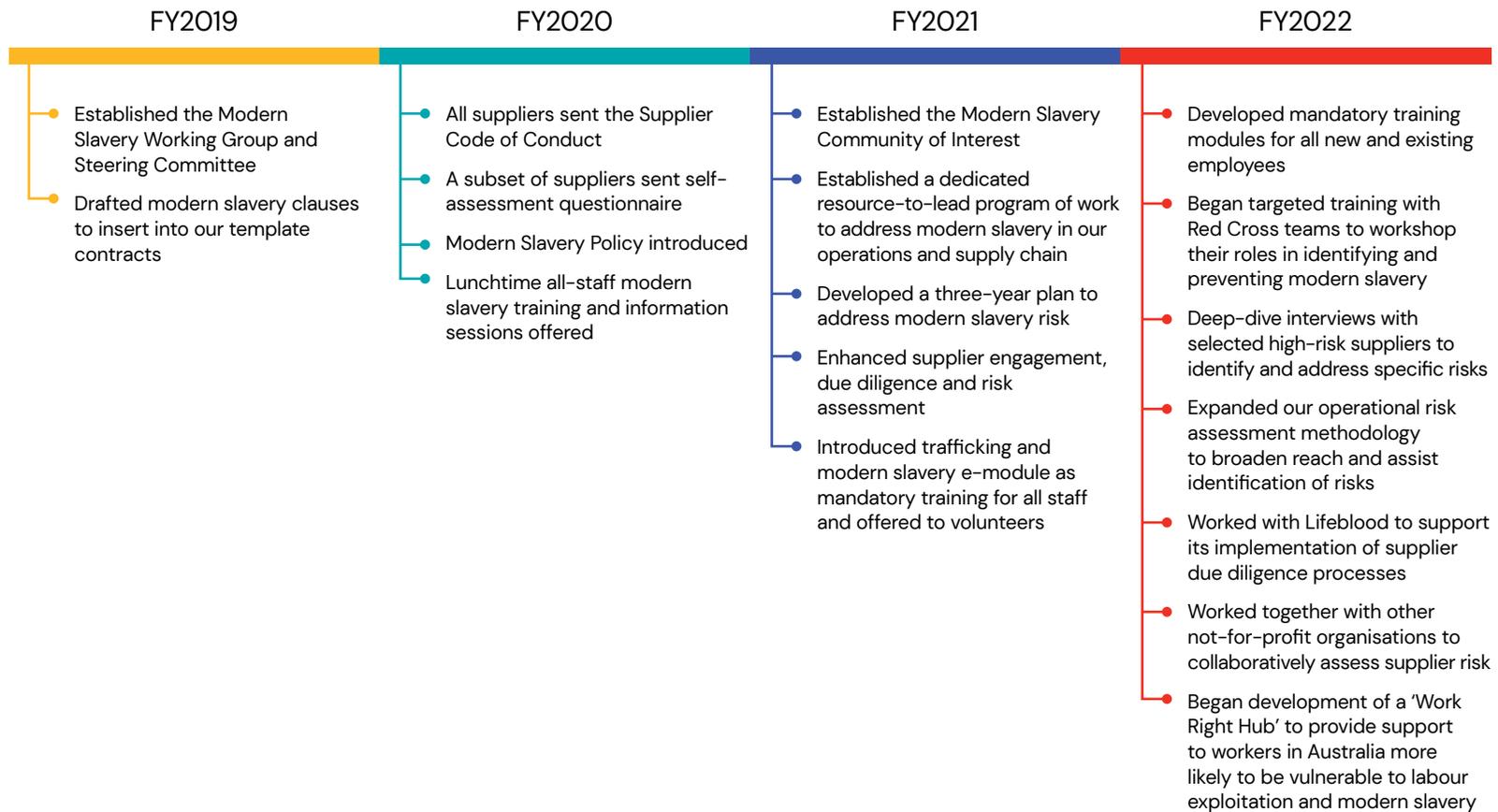
- **1768** direct active suppliers<sup>5</sup>
- **98%** suppliers based in Australia
- We spent less than \$5,000 with **63%** of our suppliers
- We spent over \$100,000 with **5%** of our suppliers.

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# Identifying and addressing modern slavery risks

We have continued to develop our approach to systematically identify and address modern slavery risks.

## Timeline of actions to address modern slavery



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**Optimising our risk response: Integrating lived experience in our work to address modern slavery**

Our work to address modern slavery is informed by our experience in supporting survivors and our work with people that may have heightened vulnerability, particularly migrants. During the reporting period, the Migrant Support Program (MSP) co-designed and implemented a Lived Experience Framework which ensures the voices and experiences of people with lived experience of forced migration, seeking asylum and/or immigration detention, are used to inform Red Cross work and projects, including our work to address modern slavery.

**Governance**

All areas of Red Cross are involved in addressing modern slavery. The Modern Slavery Steering Committee, comprised of key executives, oversaw the strategic direction and the implementation of our three-year rolling strategy. The cross-functional Modern Slavery Working Group drew in subject-matter experts from across the organisation to collaboratively embed actions to address modern slavery. The Lead of our Support Program is a key member of the working group, ensuring we integrate the experience of survivors in all aspects of our work to address modern slavery.



**Australian Red Cross Society Board**

The Board has overall accountability and is responsible for approving our Modern Slavery Statement

**Executive Management Team**

Responsible for managing modern slavery

**Modern Slavery Steering Committee**

Sets strategic direction and oversees the development and oversight of our rolling strategy to address modern slavery

**Modern Slavery Working Group**

Development and implementation of the rolling strategy to address modern slavery

**Modern Slavery Community of Interest**

Provides feedback on the strategy and engagement and advocacy throughout the organisation

**Lifeblood Consultation Committee**

Confirms expectations in meeting modern slavery requirements and provides opportunity to work collaboratively to address modern slavery

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Our governance processes are now well embedded across Red Cross and have provided a platform to build upon our activities.

**Governance groups**

**Modern Slavery Steering Committee**

**Key outcomes:**

- Set the strategic direction;
- Endorsed modern slavery workplan for FY2022;
- Endorsed modern slavery statement for FY2021; and
- Highlighted work to wider Executive Team and Board.

**Modern Slavery Working Group**

**Key outcomes:**

- Prepared modern slavery statement for FY2021;
- Developed workplan for FY2023;
- Led process to identify salient risks;
- Led integration of modern slavery risks into organisational procedures; and
- Stakeholder engagement to encourage whole-of-community approach to addressing modern slavery and the underlying systemic causes.

**Modern Slavery Community of Interest**

**Key outcomes:**

- Reviewed and provided feedback on modern slavery strategy & annual action plan; and
- Raised awareness of modern slavery across Red Cross.

**Lifblood Collaboration Committee**

**Key outcomes:**

- Set clear expectations in relation to addressing modern slavery;
- Collaborated on approach to supplier risk assessment;
- Collaborated on the response to identified risk; and
- Shared ideas and resources.

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Our commitment to addressing modern slavery is expressed in many of our policies. Our policies outline our expectations and drive organisational behaviours. Some of the key policies that outline our expectations in relation to modern slavery include:

Policy/Protocol	Purpose
<a href="#">Modern Slavery Policy</a>	Confirms our commitment to contribute to ending all forms of modern slavery and our approach to reducing modern slavery risks within our operations and supply chain.
Supplier Code of Conduct	Outlines our baseline expectation that suppliers comply with the laws and regulations and must not be complicit in any human rights abuses and must use best endeavours to ensure that there is no modern slavery in their operations or supply chain.
Procurement Policy	Requires people to engage suppliers that act consistently with Ethical Framework and satisfy our modern slavery and corporate social responsibility requirements.
<a href="#">Whistle-blower Policy</a>	Provides platform for people (including people working in our supply chain) to confidently raise concerns.
<a href="#">Safeguarding – Protecting Children and Adults</a>	Red Cross is committed to improving the wellbeing and safety for all people we interact with, particularly anyone experiencing vulnerability or depending on Red Cross support and services. Our policies and related documents that help guide us in protecting the safety and wellbeing of everyone we engage with can be found <a href="#">here</a> .
Partnership Screening Protocol	Provides a framework to ensure we engage with partners that support our vision and fundamental principles.
Investment Guidelines	Ensures our investments are consistent with the Fundamental Principles. All investments are monitored to ensure continued alignment with the Investment Guidelines.
Complaints, Concerns & Feedback Policy	Recognises the importance of feedback in supporting continuous improvement and sets out the principles that govern our response to complaints, concerns or feedback. The policy applies to people external to Red Cross and to extends to Red Cross staff in specific circumstance.
Risk Management Policy	Provides a structured and consistent approach to managing risks across Red Cross and requires all Red Cross people to identify and proactively manage risks.

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### In Focus – Red Cross Ethical Framework – Guiding our work

**Australian Red Cross Ethical Framework** – The work we do at Red Cross is often complex and challenging; we support people experiencing extreme vulnerability and stress, we work in severe emergency and disaster situations, and we work with a multitude of partners, organisations and communities. How we do things is just as important as what we do, and it can sometimes be difficult to know what that looks like. The Australian Red Cross Ethical Framework is a practical, positive tool to support all Red Cross people –staff, members and volunteers. It provides a clear, shared understanding of the values and principles according to which we all, as Red Cross People, commit to upholding, and to which we all hold ourselves and others accountable. An e-learning module guides our people on how to apply the Ethical Framework in common situations they may face at Red Cross and what to do if they are concerned behaviours may not align with our fundamental principles. The Ethical Framework is key to ensuring our people, processes or systems do not cause or contribute to modern slavery.

## Operations

### Our workers

Our recruitment and selection policy ensures selection decisions are made based on merit and the principles of equity, fairness and transparency. All employees are covered by the appropriate modern award (**Award**) and can choose whether they join a trade union.

As reported in previous statements, in 2018 a review of our remuneration framework revealed that some employees of Red Cross were historically not paid the correct rates of pay, allowances and other entitlements. Since identified, the organisation has updated its remuneration framework and payroll system, enhanced staff training, and strengthened its compliance framework.

In November 2021, Red Cross entered an Enforceable Undertaking with the Fair Work Ombudsman to address the issue of underpayment of current and former employees, and to avoid future underpayment. The Enforceable Undertaking contains a number of legal obligations that we must satisfy, including employee training, communication to affected current or former employees, establishment of an independent hotline, an independent assessment of the remediation payments, and three annual audits.

In March 2022 the organisation completed the final round of employee pay history reviews, notifications and payments.

All people affected have now either been repaid or are ready to be repaid (pending bank or superannuation details being provided).

Red Cross is in the process of remitting the remaining funds to the Commonwealth's unclaimed monies fund, where it will be held until claimed.

### Work health and safety

We want all Red Cross people to work in an environment that protects them from physical and psychosocial injury and illness. To support this, during the past year we have focused on building the knowledge, skills and behaviours of Red Cross people around safety risks, health and wellbeing. We also launched a 12-week program which aims to engage employees in wellbeing activities that work for them. More information on our work health and safety programs can be found in our [Annual Report](#).

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## Salient operational risks

The Red Cross modern slavery operational risk assessment helps identify risks of modern slavery. During the reporting period, we expanded the scope of the assessment and extended the reach across Red Cross. The assessment considered several issues including:

- engagement in partnerships and collaborations;
- purchasing practises;
- whether people were involved in assisting clients secure or finalise employment;
- the use of volunteers;
- the use of temporary, seasonal or agency workers of labour hire agencies;
- contact with people who may be in vulnerable situations; and
- confidence in mitigating and responding to modern slavery.

We defined “risk” in terms of the likelihood of the risk occurring, the potential scale and scope of the consequences if the risk did occur.

With the Ethical Framework guiding all decisions, the risk of Red Cross causing or contributing to modern slavery is very low. However, there is a risk that we may be directly linked to modern slavery through partners. Our key risks, along with our key mitigation strategies, are outlined below.

## Program delivery risk: Economic participation

Creating opportunities for people to become financially independent is woven into many of our programs. Economic stability promotes improved health, wellbeing and self-esteem and we equip many of our clients with the tools and skills to enter training, education and employment, thus giving them the chance at a better life. We achieve this through a variety of mechanisms, including employment matching and job placement.



Built the capacity of over 550 migrants in transition to overcome barriers to employment and build capacity.



Teams partnered with 40+ employers across Australia to build understanding of how to make workplaces culturally safe for migrants.

However, the vulnerable situations of many of our clients gives rise to a heightened risk of exposure to exploitative labour practices in employment. We manage this risk through heightened governance and oversight of placements. Working with program managers across the country, we developed a suite of tools to enhance our risk assessment of prospective employers, outline our expectations of employers and provide guidance for our program managers. Tools included:

- Economic participation ethical guidelines – outlines the role of program officers and helps them guide clients to secure/participate in dignified employment consistent with established Australian labour laws.
- Employer charter – outlines our commitment to working with employers that treat their employees with dignity and respect and comply with Australian legal obligations.
- Employment due diligence checklist – assists program officers to systematically assess risks of labour exploitation before recommending roles to clients.
- Template Memorandum of Understanding – outlines our expectations of employers that we engage with on an ongoing basis.

We also launched a [Step-by-Step Guide to Modern Slavery](#) to support organisations we work with to understand modern slavery.

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## Economic Participation – Employer Charter

Australian Red Cross Society is committed to working with employers that embody the principles set out in this Charter. Namely, employers who:

### 1. Treat their employees with dignity and respect

- **Fair treatment and equal opportunity:** Employees should not be discriminated against or exploited, including, but not limited to, on the grounds of protected characteristics under law.
- **Respectful workplace:** Workplaces should be free from bullying, harassment, victimisation and abuse, and have appropriate processes in place to address such behaviour.
- **Coercive and disciplinary behaviours:** Employers should not engage in coercive or threatening behaviour or pressure their employees in any way, including holding a worker's identity documents, preventing a worker from leaving a workplace after their shift or forcing a worker to work to pay off a debt. Employers should also ensure that wage deductions are not used as a disciplinary measure.

### 2. Comply with their legal obligations

- **Sham contracting:** Employers should not engage workers as independent contractors or subcontractors if they know (or are reckless as to whether) those workers are in fact employees.<sup>1</sup>
- **Entitlements:** Employers should comply with all laws relating to, amongst other things, wages and payment of wages, working hours, workers' compensation insurance, and ensure that all employees receive minimum wages, benefits, superannuation, overtime remuneration, leave entitlements, breaks and time off required by law.
- **Right to work:** Employers should ensure that all workers are documented and have a right to work legally. Employees should not be required to pay recruitment fees.

- **Protection of employees:** Employers should safeguard workers' information as required under law and comply with all workplace health and safety law, and integrate sound health and safety management practices, including providing training to their staff in this regard.

### 3. Recognise and respect the rights of their employees

- **Collective bargaining:** Unless prohibited by law, employers should recognise and respect the rights of their workers to associate freely and to organise and bargain collectively.
- **Freedom of employees:** Employees should also be free to leave employment, and their movement or communications should not be unduly or unlawfully restricted.

### 4. Educate and evaluate themselves, and enable reporting

- **Education and evaluation:** Employers should continuously educate themselves about their obligations under law,<sup>2</sup> and provide relevant training for employees. Employers should also have and maintain processes to identify, manage and control relevant risks associated with their operations.
- **Reporting:** Employers should have procedures in place to enable workers to report any concerns they have about how they are treated in the workplace.

1. For more information on sham contracting, please refer to: Independent contractors – Fair Work Ombudsman.

2. For more information on employers' obligations, please refer to: National Employment Standards, Fair Work Ombudsman website, Employment conditions – Fair Work Ombudsman, JobWatch and Legal Help | West Justice.

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## Partnerships

Eighty-three per cent of respondents to our operational risk assessment said they engage with external parties as part of their work. These partnerships range from large, formalised partners to smaller community groups. Formalised partnership screening is a requirement for engagement in formal partnerships and 97% of people engaging in partnerships said they did some form of screening before collaborating with partners. However, consistent with our commitment to work with partners that support our values, we continued to improve and expand our screening processes to identify issues and work with partners to address any issues.

To raise awareness and understanding of modern slavery risks amongst community partners we developed a [Community Partner – Modern Slavery Toolkit](#).

Red Cross receives significant donations of unsold clothing from over 80 different suppliers. Some of these are ongoing relationships with large well-known retailers including Country Road, Zara, GlamCorner, Sportscraft and MJ Bale. Others are ad hoc donations based on supply. Given the risk of modern slavery in the apparel industry, Red Cross began work to improve the assessment and governance processes specific to these partners.



## Use of volunteers

Volunteers are essential to our work. They are on-the-ground helping during emergencies and disasters and support our day-to-day activities. Sixty per cent of respondents to our operational risk assessment reported that they rely on volunteers to deliver their programs. We create position descriptions for volunteers, setting out clear parameters of the role and ensuring they are genuinely voluntary arrangements. We also developed a checklist that could be used by teams reviewing volunteer position descriptions to ensure the descriptions are accurate and comply with the Red Cross requirements.

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### Temporary, agency or seasonal workers

Our operational risk analysis found that 20% of respondents use temporary, agency or seasonal workers to carry out their programs. Workers involved in fundraising were identified as a specific risk area. We require our fundraising agencies to ensure all workers providing fundraising services to Red Cross are engaged on an employment basis. This prevents fundraising agencies from engaging workers as independent contractors and paying them only on commission. It ensures they receive at least the minimum wage and have access to appropriate workforce entitlements. Red Cross has a right to audit its fundraising suppliers to verify compliance with those requirements.

### International programs

Our work with partners, particularly in the Asia-Pacific region where the incidence of modern slavery is higher, can lead to a risk of being directly linked to modern slavery. We are committed to adopting practices to support our international partners to identify and mitigate risks. During the reporting period we began strengthening contractual agreements with our international partners to include modern slavery clauses and developed a framework to identify risks. We have engaged Red Cross employees who work internationally to build their understanding of modern slavery, the indicators of modern slavery and appropriate response.

### Investment Activities

We do not invest in companies involved in the manufacture of arms, adult entertainment or gambling. Our Investment Policy and Ethical Investment Guidelines (**Investment Guidelines**) ensure our Australian equities investments are in

organisations that have a minimum independently assessed positive ESG rating. In addition, we have chosen not to invest in companies that earn more than 10% of their revenue from fossil fuels, alcohol or tobacco.

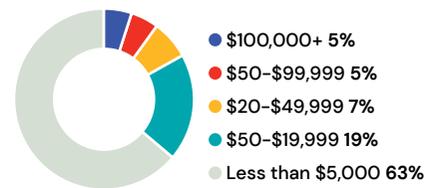
### Supply chain

We continue to evolve our supplier due-diligence process to identify salient risks and engage with suppliers to address risks.

The diversity and nature of our programs means we rely on many small businesses throughout rural and regional Australia to provide services to our clients.

In 2021-22 we spent less than \$5,000 per annum with 63% of our suppliers. Many of these low-value transactions are one-off purchases to support clients' needs including things like counselling and psychological support, access to medical services, training and skills development, and the provision of basic needs such as temporary accommodation and household goods.

Percentage of suppliers by spend level



A supply chain comprised of many low-value transactions presents an ongoing challenge to managing our modern slavery risk. These smaller organisations often have less understanding of, or the resources to address, modern slavery risks.

To increase our impact in this area we began working together with some other not-for-profit entities as part of the 'Purpose' collaboration, to

collaboratively assess modern slavery risk and increase understanding of modern slavery risks amongst suppliers.

### In Focus – collaboration across not-for-profit organisations to assess and address modern slavery

Addressing modern slavery in supply chains requires collective effort. Working together we can more effectively understand and address modern slavery risks in our supply chain. Red Cross was instrumental in establishing a not-for-profit group to collectively assess and address supply chain risk through the Purpose collaboration. The Purpose collaboration allows suppliers to complete one modern slavery self-assessment questionnaire and share their results with other members of the group. The platform also provides resources to support suppliers' understanding of modern slavery and provide guidance on requirements to address risk.



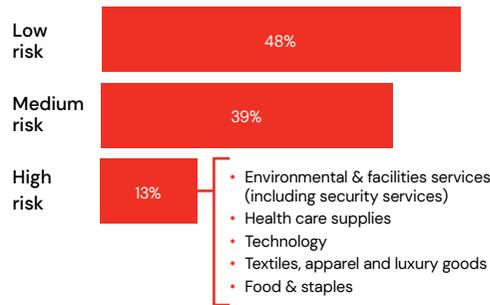
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We conducted a risk screen of all suppliers based on country and industry to identify where risks of modern slavery in our supply chain were most significant.



Although 98% of our direct suppliers are based in Australia, 13% were classified as high-risk because of their industry.

**Modern Slavery Risk in Supply Chain**



We asked all high-risk suppliers with a spend of over \$5000 to complete our modern slavery self-assessment questionnaire as part of the Purpose Collaboration. The questionnaire allows us to better understand the specific risks associated with these suppliers and the governance structures to address those risks. The questionnaire asked suppliers to provide information about their supply chain, including the main products and services sourced through their supply chain, and the percentage of goods and services sourced from outside Australia and the source countries. This allowed us to begin to assess modern slavery risks beyond tier one of our supply chains.

We also closely monitored international policy and assessment tools that are designed to improve supply chain integrity including the US Customs Withhold and Release Orders and cross-referenced this information to help us identify suppliers or specific supply areas that may be at increased risk.

Focussing our actions on the areas where we have greatest leverage, we identified suppliers that were high-risk and high-spend. We have begun systematically working with our high-risk supplier groups to understand their risks, governance processes and develop targeted action plans based on their level of understanding and maturity in relation to modern slavery.

Environmental and facilities services are considered high risk of modern slavery in Australia. Our facilities management was aggregated under a master services contract during the 2021 financial year. This reporting period, we worked directly with the master supplier to understand the governance processes in place to ensure people were not exposed to modern slavery in their supply chain.

Suppliers of new purchased goods for our retail stores were identified as a high-risk. Although all our suppliers of new purchased goods are based in Australia, they often source through high-risk countries creating a risk of forced labour in their supply chain. Our due diligence processes have allowed us to identify specific risks by suppliers and we are working with those suppliers to address any risks.

Suppliers of health care consumables and personal protective equipment (PPE) are considered high-risk. We began a detailed due diligence program engaging with individual suppliers to understand their risks and governance processes and assigned specific actions targeted to risk areas and level of maturity in addressing modern slavery.

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## In Focus – RAT Tests and PPE Suppliers

Red Cross, like many other organisations that deliver support services to groups in vulnerable circumstances, relied heavily on rapid antigen (RAT) tests and other personal protective equipment (PPE) to continue services during the pandemic. During the early part of 2022 these tests and materials were difficult to procure with significant pressure on suppliers to deliver amidst a global shortage. Recognising the risks associated with delivery pressure and in the industry generally, we specifically engaged with our RAT test providers to better understand their supply chain and processes to assess and address modern slavery risk. We continue to work with this group of suppliers.

Specific action was taken to assess modern slavery risk when entering large contracts. Each instance was assessed on a case-by-case basis considering the nature of the risks in the industry involved, the suppliers and their relationship with Red Cross. Formal tenders included an assessment of suppliers' environmental, social and governance risks (including modern slavery). New contracts included modern slavery clauses that required contractors to cascade modern slavery requirements to any sub-contractors.

Red Cross has decentralised procurement processes. Seventy-three per cent of respondents to our operational risk survey reported purchasing goods on behalf of the organisation, and of those 87% reported doing some form of due diligence before engaging a supplier. Modern slavery risk was a factor that prompted due diligence for 15% of respondents. Ensuring people consider modern slavery risk at supplier selection is essential to reducing risk in a decentralised environment. We plan to conduct targeted training for people making purchasing decisions in FY23.

## Grievance mechanisms

Red Cross is committed to maintaining a workplace that encourages collaboration, trust, cooperation and communication, and where all behaviours are consistent with the [Australian Red Cross Ethical Framework](#). The Red Cross Complaints and Grievance process aims to ensure that staff, volunteers and members feel comfortable to speak up and confident that any concerns will be handled in an appropriate, fair, transparent and timely manner.

Our Board updated our whistle-blower policy during the reporting period, extending it to include specific reference to modern slavery and to ensure it covered people in our supply chain and their relatives.



## Education and training

Ensuring Red Cross people understand modern slavery and know how to respond is essential to addressing modern slavery risks across the organisation.

We launched a "Step-by-Step Guide to Modern Slavery for Red Cross people" on our intranet site to assist our people to identify and respond to modern slavery risks. The site includes guidance materials and common scenarios that people may come across in their roles to guide them in appropriate responses.

We expanded our modern slavery training program by developing:

- An e-module that will form part of mandatory annual compliance training for all staff; and
- An e-module that will form part of mandatory induction for all new staff.

We also began targeted workshops with groups within Red Cross, focusing on how to identify and respond to modern slavery safely and what they could do to mitigate modern slavery risks in their roles.

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# Effectiveness of Actions

We mapped the maturity of our actions against leading practice to identify our strengths and areas for improvement. Supporting our maturity framework, we developed a set of 12 internal qualitative and quantitative indicators that make up the framework and have benchmarked our actions against each in terms of compliance, good practice and leadership. The measures draw on feedback from internal and external sources, to understand if our policies are being implemented optimally, whether we are responding effectively to identified impacts and to drive continuous improvement.<sup>6</sup> These measures will continue to evolve consistent with our maturity and aim to move towards measuring the impact of our activities. Some of the quantitative measures tracked are documented in the table below.

## Maturity of our actions



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## Assessing the effectiveness of our action

	Objective	Status	What's working well	Effectiveness measures
<b>Governance &amp; policy commitment</b>	Commitment to address modern slavery that is reflected in our strategy, policies and processes and supported by good governance processes.		<ul style="list-style-type: none"> <li>Commitment from Board and Executive.</li> <li>Established governance and management systems involving cross-functional groups.</li> <li>Publicly available commitment and policy to address modern slavery.</li> </ul>	<ul style="list-style-type: none"> <li>Effective governance process focussed on outcomes.</li> <li>Commitment to modern slavery reflected in our policies and processes.</li> </ul>
<b>Risk assessment</b>	Understand and address modern slavery risks in our supply chain and operations.		<ul style="list-style-type: none"> <li>Systematic process to assess risk in operations &amp; supply chain.</li> <li>Collaborative supplier risk assessment with sector.</li> <li>Targeted process to address salient risks.</li> </ul>	<ul style="list-style-type: none"> <li>Percentage of active suppliers screened for modern slavery risk – 100%.</li> <li>Percentage of high-risk suppliers that have engaged in Modern slavery risk assessment – 36%.</li> <li>Percentage of respondent to operational risk assessment that conduct risk assessment before collaborating with partners – 97%.</li> <li>Modern slavery considered as part of organisation wide risk assessment processes.</li> </ul>
<b>Act &amp; remediate</b>	Ensure people are not exposed to modern slavery through our operations or supply chain. Adopt a survivor-centred approach to response and remedy.		<ul style="list-style-type: none"> <li>Staff understanding of modern slavery.</li> <li>Red Cross Ethical Framework that drives culture &amp; behaviours.</li> <li>Began linking supplier capacity building to risk assessment.</li> <li>Targeted engagement with high-risk suppliers.</li> <li>Targeted programs to address salient risks in operations.</li> </ul>	<ul style="list-style-type: none"> <li>Percentage of staff that have completed at least one of our e-modules on trafficking &amp; slavery – 56%.</li> </ul>
<b>Stakeholder engagement &amp; grievance mechanisms</b>	Ensure people have accessible, easy-to-use mechanisms to voice concerns.		<ul style="list-style-type: none"> <li>Extensive engagement with a broad range of stakeholders to address systemic issues and support survivors (including labour exploitation lived experience advisory group to co-design Work Right Hub resources).</li> <li>Whistle-blower process expanded to include modern slavery.</li> <li>Modern slavery incorporated as a specific incident in incident reporting.</li> </ul>	<ul style="list-style-type: none"> <li>Effective engagement with government and sector to provide input based on our work with survivors and vulnerable groups – see pages 22-24.</li> <li>Number of modern slavery complaints or incidents reported – 0.</li> <li>Number of consultation sessions with people involved in the design of the Work Right Hub – 22.</li> </ul>
<b>Reporting &amp; measurement</b>	Assessment of the effectiveness of our actions in addressing modern slavery and transparent reporting.		<ul style="list-style-type: none"> <li>Measurement framework to support maturity analysis and identify program gaps.</li> <li>Beginning to integrate compliance/measurement findings into organisational processes.</li> </ul>	<ul style="list-style-type: none"> <li>Regular reporting to Executive, Audit &amp; Risk and Board on our modern slavery maturity pathway.</li> </ul>

# Consultation

Red Cross consulted with Lifeblood during the reporting period on its actions to assess and address modern slavery and in the preparation of this Statement. Our established cross-functional group including Procurement, Legal, Partnerships and Strategy, includes members of both divisions. The group consults and collaborates on the requirements of the Modern Slavery Act and the approach of both divisions to addressing the requirements and preparing the statements. In addition to formal meetings, the Red Cross Modern Slavery Lead regularly consulted with Lifeblood on an informal basis.

During the reporting period, Lifeblood was notified that the United States Customs and Border Protections (U.S. CBP) had issued

Withhold Release Orders (WRO) against one of its independent third-party manufacturers on the grounds of “information that reasonably indicates the use of forced labour in that entity’s manufacturing operations.” Lifeblood has been actively working with the supplier to understand and address the risks. The supplier advised that they were aware of non-compliances which they had identified through their third-party audit program and were working closely with their independent third-party manufacturer on remediation plans. The supplier maintains that they require all their independent third-party manufacturers to comply with their supplier code of conduct, prohibiting poor labour practices, and that all their suppliers must demonstrate compliance through undertaking independent

audits of their operations. The supplier has planned an independent audit for late 2022 and the outcomes will be shared with the U.S. CBP with the view to having the WRO case lifted. Lifeblood will continue to have ongoing discussions with our supplier until these are resolved.

Lifeblood reported the WROs to Red Cross as soon as it became aware of the issue and has kept, and will continue to keep, Red Cross briefed on this issue and its resolution. Red Cross has been in regular contact with Lifeblood through our formal and informal process and worked to support Lifeblood to act consistently with the United Nations Guiding Principles on Business and Human Rights.

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# Other information

## Continuing our work

We reviewed and updated our three-year strategy to address modern slavery in our operations and supply chain and promote a whole-of-community approach to addressing systemic causes.

Human rights due diligence area	Status	Planned actions for FY23
Policy commitment & governance processes	<span style="color: #008080;">●</span>	Continue strong cross-functional governance processes and collaboration with Lifeblood.
	<span style="color: #4169E1;">●</span>	Develop and implement modern slavery response policy.
	<span style="color: #4169E1;">●</span>	Host modern slavery awareness week to raise understanding of modern slavery across the organisation.
	<span style="color: #008080;">●</span>	Review modern slavery policy.
Assessment of risk	<span style="color: #4169E1;">●</span>	Pilot process for assessing modern slavery risks of suppliers during the onboarding process.
	<span style="color: #008080;">●</span>	Continue to develop our supplier due diligence process as part of the Purpose Collaboration and increase engagement with suppliers.
	<span style="color: #008080;">●</span>	Continue detailed due diligence with high-risk, high-leverage suppliers and high-risk industry groups.
	<span style="color: #4169E1;">●</span>	Formalise process for engaging high-value suppliers to ensure modern slavery and other ESG impacts are considered in supplier selection and management.
	<span style="color: #008080;">●</span>	Continue to develop and expand our partnership screening processes.
Act & remediate	<span style="color: #4169E1;">●</span>	Roll out mandatory modern slavery induction and compliance training for all staff.
	<span style="color: #008080;">●</span>	Continue targeted modern slavery workshops with teams across Red Cross prioritised based on risk.
	<span style="color: #4169E1;">●</span>	Develop training targeted for staff making procurement decisions on how to understand and mitigate modern slavery risks.
	<span style="color: #008080;">●</span>	Increase engagement and capacity building with suppliers and partners.
	<span style="color: #008080;">●</span>	Expand corrective action plans based on supplier risk and segmentation.
	<span style="color: #4169E1;">●</span>	Launch the 'Work Right Hub' (a labour exploitation prevention online platform) to provide information, tools and resources to, and take enquiries from, migrants, community stakeholders, businesses and civil societies.
Stakeholder engagement & grievance mechanisms	<span style="color: #4169E1;">●</span>	Launch a Speak Up campaign to encourage people across the organisation to speak up about any concerns including modern slavery.
	<span style="color: #008080;">●</span>	Continue engagement with the Labour Exploitation Lived Experience Advisory Group to develop and review resources for the Work Right Hub.
	<span style="color: #4169E1;">●</span>	Prepare submission for the Modern Slavery Act Review incorporating the perspectives of those with lived experience of modern slavery and other not-for-profit organisations.
	<span style="color: #008080;">●</span>	Provide input into the National Roundtable on Human Trafficking and Slavery, particularly from a lived experience perspective.
Reporting & measurement	<span style="color: #008080;">●</span>	Continue development of framework to track and measure the effectiveness of our efforts and integrate effectiveness measurement into relevant internal processes.

● Continuing our work    ● New initiative

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# Our work to prevent and respond to modern slavery in the community

Red Cross fulfils an important auxiliary role to public authorities in the humanitarian field and [has pledged to collaborate with the Australian Government](#)<sup>7</sup> to respond to modern slavery. We aim to increase awareness of modern slavery and build the capacity of businesses, frontline workers, and regional, local and migrant communities, to identify indicators of modern slavery and understand pathways for support.

**Cross-sector Capacity Building:** Red Cross consulted with migrant communities in every state and territory on the design of an online 'Work Right Hub'. This Hub aims to empower migrants and communities to prevent and combat criminal labour exploitation by strengthening their capacity to identify signs of exploitation, understand how to access advice and support, and take measures to prevent future exploitation. The Work Right Hub will be launched in 2023.



## In Focus – The Support for Trafficked People Program

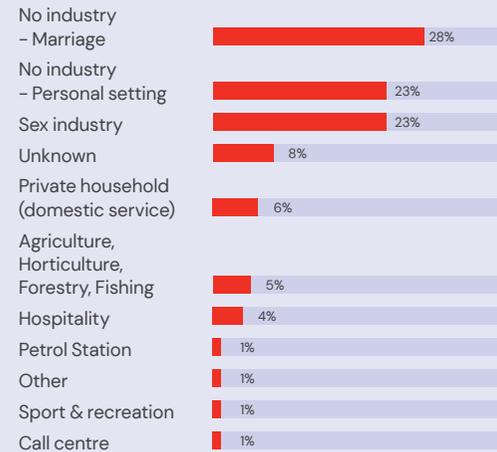
Red Cross works with the Australian Government to enhance Australia's response to modern slavery and provides individualised casework support for people impacted by modern slavery in Australia through the Support for [Trafficked People Program \(Support Program\)](#).

Since 2009, Red Cross has supported 566 clients referred for different types of modern slavery in different industries. This financial year, 175 people were supported through the Support Program, but this likely represents only a small portion of the people exposed to modern slavery in Australia.

### Type of Exploitation Experienced by People Supported since 2009



### Perpetuating Industry of People Referred to the Support Program since 2009



**“ The support was very helpful, have become a better person cos [sic] of people who supported me, at times when in a bad space you need people that bring out the positive not negative in you, for me the outcome is good.”**

– Feedback from a survivor supported by the Support Program.

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## Sector collaboration

Red Cross provides a meaningful contribution to Australia's response to modern slavery based on our experience working with victims and survivors. Red Cross participated in numerous forums and consultation processes seeking to bring forth the experience of survivors to inform and improve the Australian response to modern slavery, including:

- **National Roundtable on Human Trafficking and Slavery** – Red Cross is a member of the National Roundtable and chaired the Support for Trafficked People Program Additional Referral Pathway Working Group of the Roundtable. The Working Group considered the limitations of relying solely on AFP for referral and designed an additional referral pathway model as a potential solution that was presented to government for their consideration. An additional referral pathway has the potential to significantly reduce barriers to seeking support and assistance and ultimately expand the number of people identified and supported.
- **Australian Border Force (ABF), Forced Marriage Protection Orders Consultation Group** – Red Cross joined the ABF led Forced Marriage Protection Orders Consultation Group in March 2021 to contribute to the development of a Forced Marriage Protection Order model.
- **Modern Slavery Mapping and needs analysis** – ABF partnered with ThinkPlace to undertake a Modern Slavery Training Mapping and Needs Analysis. Red Cross provided feedback on existing training programs, resources, and associated initiatives available in Australia.
- **'Speak Now': A Forced Marriage Education and Prevention Project** – Anti Slavery Australia invited Red Cross to participate in consultations for the Speak Now Project relating to engagement with families when

preventing and responding to forced marriage and domestic servitude, including feedback on a Front-Line Worker Guide and participation in the online training course.

- **Good Shepherd 'Safe and Empowered Families Project'** – Red Cross delivered training to the Good Shepherd practitioners on identifying and responding to forced marriage. Red Cross also contributed to consultation workshops on the model of support for a pilot on prevention of forced marriage in Australia.
- **Establishment of a National Minimum Data Set** – Red Cross provided initial feedback on data collection given our administration of the Support Program to the Australian Institute of Criminology to assist in the development of a Human Trafficking Minimum Data Set.
- **Supporting the National Action Plan to combat Modern Slavery Communication actions** – Red Cross assisted in the stocktake, mapping and strategic assessment of existing initiatives, and identifying gaps and needs, as part of the development of the National Action Plan.

Red Cross engages with a range of stakeholders in each State and Territory, who each play an important role in the sector. Our work includes outreach to regional areas of Australia and awareness raising activities with frontline responders, based on the needs of each State and Territory. Red Cross also co-chairs, or actively participates in, State and Territory forced marriage and anti-trafficking networks which aim to build community and sector awareness and capacity.

Red Cross undertook engagement activities with frontline responders and vulnerable communities to increase awareness about indicators of modern slavery, referral pathways and ways to incorporate survivor voice in the program of work to address modern slavery, including:

- **Lived experience and Survivor Inclusion** – Red Cross organised training with Survivor Alliance, a UK-based organisation, on survivor inclusion and the importance of allyship with survivors in the anti-trafficking sector.
- **Connected Women NSW, Tas, ACT and NT** – Red Cross facilitates peer-support programs for women from migrant backgrounds, including those impacted and at risk of forced marriage. These groups are client led and strengths based; with the women contributing to the delivery of community events and resources.
- **Work Right Hub** – As part of the National Action Plan to Combat Modern Slavery 2020–25, Red Cross received funding from the Australian Government to develop the Work Right Hub, an online platform to prevent and respond to labour exploitation. Consultation sessions were conducted across the country with migrant communities and over 150 different stakeholders.
- **Free to Choose, Empowered to Respond** – Victorian Forced Marriage Capacity Building Project – Red Cross delivered this project from 2017–2022, working alongside communities to identify and develop ways to prevent and respond to forced marriage.

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## Research and policy

Red Cross undertakes research projects and prepares submissions to identify gaps in Australia's modern slavery response and inform policy developments. Highlights from our research and policy activities during the reporting period include:

- [Submission to the Australian Human Rights Commission National Anti-Racism Framework](#) - Red Cross made a submission and offered a humanitarian perspective on the proposed guiding principles, national outcome areas, and key actions and strategies of the *National Anti-Racism Framework*. It was recommended that including the voice of lived experience (including voices of youth and children) was essential in ensuring that the Framework makes a genuine difference in the lives of people and communities. It was also acknowledged that actions must start at home and recognised the work that we are undertaking internally to ensure our systems and processes are inclusive.
- [Submission to the inquiry into the International Labour Organization Protocol of 2014 to Forced Labour Convention 1930 \(No. 29\)](#) - Red Cross supported the ratification of the International Labour Organization Protocol of 2014 to Forced Labour Convention 1930 (No. 29) and recommended that the Australian Government incorporate all relevant standards from this international instrument into our domestic legal and policy framework.
- **Consultation on the National Action Plan to End Violence Against Women and Children** - Red Cross made a submission to the Department of Social Services highlighting the need for recognition of system and structural factors that heighten risks for people experiencing violence, the need for community centred, lived-experience led solutions, and recognition of the importance of intersectionality in any response.

### Current research projects include:

- **Supporting the Dependents of Human Trafficking and Forced Marriage Survivors** - This project aims to better understand the support needs of dependents of people impacted by modern slavery in Australia; the way these needs are considered and met in the current support services structure (including specifically within the Support Program and support services outside of the Support Program); the way the support needs of dependents impacts on the recovery journey of survivors; and the barriers to supporting dependents.
- **Understanding and addressing the needs of people who have experienced sexual exploitation in Australia** - Red Cross and Project Respect have partnered with the Australian Institute of Criminology (AIC) to build a qualitative picture of the support and service needs over time of people who have experienced sexual exploitation, particularly in a commercial setting. The project is led by the AIC and will contribute to an improved understanding of service and systemic gaps.

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# Resources

Red Cross has developed a range of resources to support individuals, businesses and governments to better understand the humanitarian issue of modern slavery, including:

- [Community Partner: Modern Slavery toolkit](#) – a guide to addressing modern slavery for our community partners.
- [A Step-by-Step Guide to Understanding Modern Slavery](#) – to assist businesses and partners.
- [A suite of multilingual material for community members and frontline](#) – workers developed in August 2019, thanks to a grant from the Department of Home Affairs.
- [Support for Trafficked People Program Data Snapshot: 2009-2019](#) – this report details data gathered from our work supporting people affected by human trafficking and slavery in Australia through the delivery of the Support Program between 2009-2019.
- [Addressing Modern Slavery – A Guide for Australian Businesses](#) – developed in January 2020 in conjunction with students from Ducere Global Business School.
- [IFRC, COVID-19 Impact on Trafficking in Persons – Factsheet](#) – a quick reference tool describing how the COVID-19 global pandemic may place communities at increased risk of trafficking and provides advice on practical actions that can be taken to respond to and mitigate risks.
- [IFRC, COVID-19 Impact on Trafficking in Persons – Technical Guidance note](#) – this document explains why there is an elevated risk of trafficking in persons during the Covid-19 pandemic, who is likely to be the most affected, and what operational approaches can be adopted to prevent, mitigate or respond to trafficking in persons by Movement actors.



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1. Registered with the Australian Charities and Not-for-profits Commission on 3 December 2012.
2. Article (iv), Royal Charter, 28 June 1941. Prior to incorporation, the Society was an unincorporated Society formed in 1914 as a Branch of the British Red Cross Society.
3. For more information, see [International Humanitarian Law Program](#).
4. Number of Red Cross stores as of 30 June 2022.
5. Direct active suppliers are those that we purchased from during the reporting period. Direct active suppliers excludes spend via credit cards or petty cash. Supplier data is based on 1 April 2021 to 31 March 2022 to enable us to conduct supplier due diligence.
6. United Nations Guiding Principles on Business and Human Rights, Principle 20, p 22-3.
7. International Red Cross and Red Crescent, 33rd International Conference, International Statutory Meetings Pledges, [Modern Slavery](#).
8. Red Cross acknowledges the Australian Government Department of Social Services (DSS) for funding and supporting the delivery of the Support for Trafficked People Program and welcomes its flexibility in responding to the individuals' needs.

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