

# Modern Slavery Statement

Australian Red Cross Society – 2020/21



## Australian Red Cross Society

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). The Society comprises two operating divisions, Australian Red Cross Humanitarian Services Division (Red Cross) and Australian Red Cross Lifeblood (Lifeblood). Lifeblood was previously called Australian Red Cross Blood Service until 15 November 2019. The Society is governed by a Council and the Rules of the Society vest governance of activities in the Society Board (Society Board) and the Lifeblood Board (as defined below). The Society Board delegates day-to-day operation of Lifeblood to a separate board (Lifeblood Board) who in turn delegates responsibility to the Lifeblood Chief Executive and Executive Management team. The Lifeblood Board reports to the Society Board. Both the Society Board and the Lifeblood Board are assisted by the Australian Red Cross Lifeblood Advisory Committee.

This Statement describes the actions of Red Cross to assess and address risks of modern slavery in its operations and supply chain. Activities to address modern slavery by Lifeblood is covered in Lifeblood's modern slavery statement. Red Cross consulted with Lifeblood in the preparation of this Statement. This is described more fully in the section on consultation.



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 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) (the **Modern Slavery Act**), in the following sections:

- |  |               |
|--|---------------|
| • Identify the reporting entity  | 2             |
| • Describe the reporting entity's structure, operations and supply chains  | 4-9           |
| • Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls                            | 15-16 & 18-19 |
| • 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 | 10-24         |
| • Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks   | 25-26         |
| • Describe the process of consultation with any entities that the reporting entity owns or controls  | 29            |
| • Any other information that the reporting entity, or the entity giving the statement, considers relevant.   | 30-33         |

### Principal Governing Body Approval

This Statement was approved by the principal governing body of Red Cross as defined by the Modern Slavery Act on 26 November 2021.

### Signature of Responsible Member

This Statement is signed by a responsible member of Red Cross as defined by the Modern Slavery Act:

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# Message from the President



In this, our second modern slavery statement, I would like to start by sharing the story of one of the brave and determined survivors of forced labour in Australia.

*Flynn (name changed to protect privacy) came to Australia as a student with support from his family and lived with a family member already in Australia. Unfortunately, Flynn was exploited by the family member he lived with who forced him to work with no pay. He was entirely dependent on the family member who denied him food and access to a phone. When he was allowed access to a phone, his family back home didn't believe the things he told them about his circumstances.*

*After another relative went through a similar experience, Flynn made a report to the Australian Federal Police about the abuse he experienced and was connected with Red Cross for casework support.*

*After 14 months of support, Flynn has secure housing and is extremely proud to have recently become an Australian citizen. He runs his own successful business and is a testament to how with support, people like Flynn can thrive.*

Unfortunately, Flynn's experience is not unique. During the reporting period Red Cross supported 181 survivors of modern slavery across Australia. You can read some of the stories of survivors [here](#).

Modern slavery is a significant humanitarian issue. Globally, an estimated 40.3 million people are currently subject to modern slavery; seventy-one per cent of victims are women and nearly two-thirds are in the Asia-Pacific region. Australia is not free of modern slavery. Various estimates have found that between 1,500 and 15,000 people may be subject to modern slavery in Australia each year. Our supply chains for both imports and exports are at risk of including modern slavery.

Red Cross is committed to ending modern slavery and supporting survivors. We work to build community strengths, empower people to help themselves and each other, and to address the systemic causes that make people vulnerable to exploitation. The COVID-19 pandemic continued to impact people across the country, making vulnerable people more vulnerable. We supported communities and helped build the resilience to live with the challenges of COVID-19. We provided over 700,000 people with information on the risks of modern slavery through our emergency relief portal.

We are also committed to eliminating any risk of modern slavery in our operations and supply chain. We recognise this requires a commitment from senior management and a progressive approach, continually building on our systems and processes to identify and address modern slavery in our operations and supply chain. This year we expanded our modern slavery governance structure by establishing a 'Modern Slavery Community of Interest', providing an opportunity for anyone within the organisation (staff and volunteers) to contribute to our strategy and raise concerns. We also continued to map our supply chain to identify high risk areas and increase

our engagement with suppliers. Many of our suppliers are smaller local Australian companies that are often essential to our work supporting communities. We see an opportunity to work with these suppliers to increase awareness of modern slavery and develop processes that support fair and ethical labour standards.

No organisation can be sure that they are not linked to modern slavery and, based on this understanding, we aim to clearly identify and disclose where our risks are and provide practical examples of what we are doing to address them. However, our work to-date is the beginning of a process of continuous improvement and there is significantly more to be done.

This Statement is made pursuant to the Modern Slavery Act. There are two major divisions of the Society, Lifeblood and Red Cross (Humanitarian Services). This Statement refers to Humanitarian Services. It was approved by the Board on 26 November 2021.



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

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# Our structure

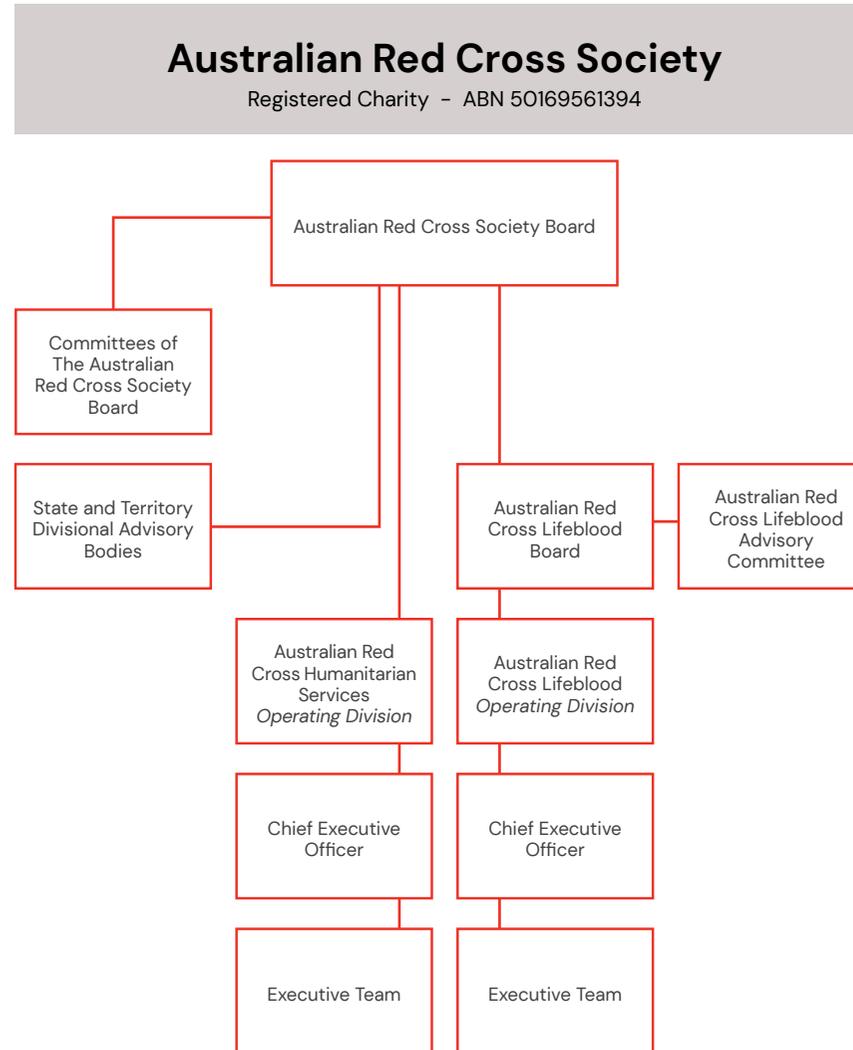
The Society is part of the world largest humanitarian movement. The movement is comprised of the International Federation of Red Cross and Crescent Societies (IFRC), the International Committee of the Red Cross (ICRC) and 192 National Societies. We act for humanity; we are advocates for peace and we are first responders when crises hit in times of war and conflict and in times of peace. We lessen human suffering, working alongside people to support immediate needs and drive long-term systemic change and build resilience.

Our work is guided by seven fundamental principles (the **Fundamental Principles**) that guide how we operate at every level; providing our foundation, framework, 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 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.

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

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



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# Our operations and supply chain

## What we do

Red Cross supports and empowers people and communities experiencing vulnerability. Our activities are primarily in Australia, but we have a relationship with the IFRC and ICRC and support international programs. We support people in need, no matter who they are or where they live. Our programs include:

### Help in Emergencies

Red Cross helps Australians prepare for, respond to, and recover from, [emergencies or disasters](#). In the past year, demand for our humanitarian services increased in ways we had rarely experienced. We assisted thousands of people impacted by the COVID-19 pandemic, supporting people in isolation, and providing emergency relief, including delivering support to/via:

- **70,042** people through mandatory isolation through the delivery of **33,000** wellbeing kits and a Tele-Outreach program that involved **118,516** Psychological First Aid phone calls.
- **522,984** people with COVID-19 resilience information.
- **17,930** calls received through the Community Activation and Social Initiative program (CASI) in Victoria.
- **4,713** individuals impacted by Australia's 2019-20 bushfires with **\$82.3M** cash paid in **8,687** bushfire response grants in FY21. As at 30 June 2021, **\$224.8M**, out of a total of **\$241.6M** raised, had been disbursed or spent, see more in our [Bushfire Reports](#).
- **151,510** people in **43** emergency events responded to across Australia.
- **292,426** people in Australia equipped to be prepared for and recover from disasters.

### Community services

Red Cross recognises the power of community and offers a range of programs to support and engage people in the community, including:

- [Supporting older people](#) – to be independent and maintain social connections while living in the community.
- [Walking alongside Aboriginal and Torres Strait Islander people](#) – with a localised, place-based development approach aimed at empowering them to create and lead their own futures.
- [Supporting people in the justice system](#) – through a range of programs including community-based health and first aid and casework and mentoring for young people under juvenile justice supervision orders, or after release from youth detention.
- [National Disability Insurance Scheme \(NDIS\) Services](#) – supporting people to live in an independent and dignified way, and to take part in community life.
- [Wellbeing and social inclusion support](#) – through programs that promote the participation of people with mental illness in the community and that support the wellbeing of young people.
- [Homelessness Services](#) – including helping people find housing, supporting people at risk of becoming homeless and providing meals to people experiencing hardship.
- [Children and families](#) – supporting vulnerable parents through our family services and helping to support kids at the most important time of their lives.
- [First aid and mental health](#) – providing first aid and mental health training to individuals and organisations, and selling first aid products, kits and defibrillators. During the reporting period we provided first aid training to 41,400 people.

### Help for migrants in transition

*“There is a clear link between the broader migration phenomenon and trafficking in persons. It is true that trafficking victims are not always migrants and, according to the legal definition, victims do not need to be physically moved to be considered as having been trafficked. The stories of victims of trafficking, however, often start as brave attempts to improve their life, as is also the case with many migration stories.”<sup>3</sup>*

Red Cross provides assistance and protection to migrants according to their humanitarian needs. This includes people seeking asylum, refugees, those on temporary visas, people in immigration detention, people who are trafficked or subject to forced marriage, and separated family members. We work directly with those seeking help, irrespective of their legal status, their background, or how they arrived in Australia.

Some of our programs in this area include:

- **Humanitarian Settlement Program** – Red Cross supported **1,639** people who arrived as humanitarian entrants and refugees (45% of whom were children) to settle into their new communities through one-on-one casework, on-arrival support, orientation, housing and linking people with mainstream supports. Assisting refugees establish themselves in Australia can reduce the risk of migrants being exposed to exploitative work conditions and modern slavery.

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- **Emergency relief and casework support for asylum seekers and temporary visa holders** – Red Cross supported over **128,000** people on temporary or no visas, including people seeking asylum, who were not eligible for mainstream government supports during the COVID-19 pandemic. We provided more than **\$51 million** in financial support and reached over **44,000** people with food assistance and provided referral and additional support information to over **554,000** people.

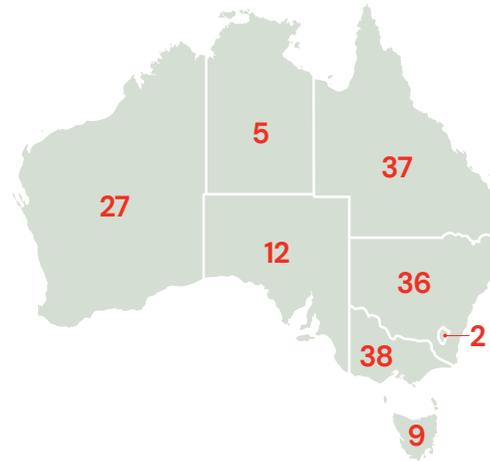
Migrants without access to financial or material support, or work rights, can be particularly vulnerable to exploitative labour practices and modern slavery. This existing problem was exacerbated by the COVID-19 pandemic. Many people on temporary visas, and all undocumented migrants, were ineligible for COVID-19 specific income support, and many were unable to access the public health system or other mainstream services.

- **Restoring Family Links Program** – Our Restoring Family Links programs help people find missing loved ones separated by war, disaster or migration. During the reporting period, we managed **974** cases relating to over **2,255** people to determine the fate or whereabouts of missing family members. We provided **71** Red Cross Messages and responded to **877** Hotline Enquiries. In partnership with the University of New South Wales we also took a close-up look at the [impact of family separation](#).
- **Independent humanitarian monitoring of immigration detention facilities** – Red Cross aims to protect the health, wellbeing and dignity of people in immigration detention through regular independent monitoring of immigration facilities across Australia and supporting offshore monitoring. Although the COVID-19 pandemic forced us to conduct monitoring activities remotely, during the reporting period

our staff and volunteers spent **665** hours or **95** days monitoring the conditions of immigration detention facilities, guided by our [Guiding Principles for Monitoring Immigration Detention](#).

### Retail Stores

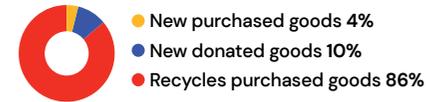
During the reporting period Red Cross operated 166 Red Cross shops located across Australia. Every purchase from the retail stores contributes funds to support our programs and help people overcome hardship, crisis and disaster.



Our retail stores employ approximately 220 staff (including casual staff) and operate with the generous assistance of around 4,500 volunteers each year.

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

### Goods sold in Red Cross stores



Approximately 10% of goods (by sales value) sold in our shops is unsold clothing donated by large retailers. Around 4% of goods sold are new items purchased through wholesalers. Most of these goods are fashion accessories, including sunglasses, hats, socks, candles and diffusers. The goods are purchased through 46 different suppliers who are all based in Australia.

### International Humanitarian Law Program

Our [International Humanitarian Law Program](#) 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.

### Investment Activities

Our Investment Policy and Ethical Investment Guidelines (**Investment Guidelines**) have ensured that since 2018 our investments are in organisations that have a minimum independently assessed ESG rating and do not invest in activities contrary to our Fundamental Principles, such as companies that manufacture parts for arms, adult entertainment or gambling. In addition, we have chosen not to invest in companies that earn more than 10% of their revenue from fossil fuels, alcohol or tobacco.

### Other activities

We also conduct fundraising activities to support our work and engage with thousands of volunteers and members to tell them about the work we do and thank them for their involvement.

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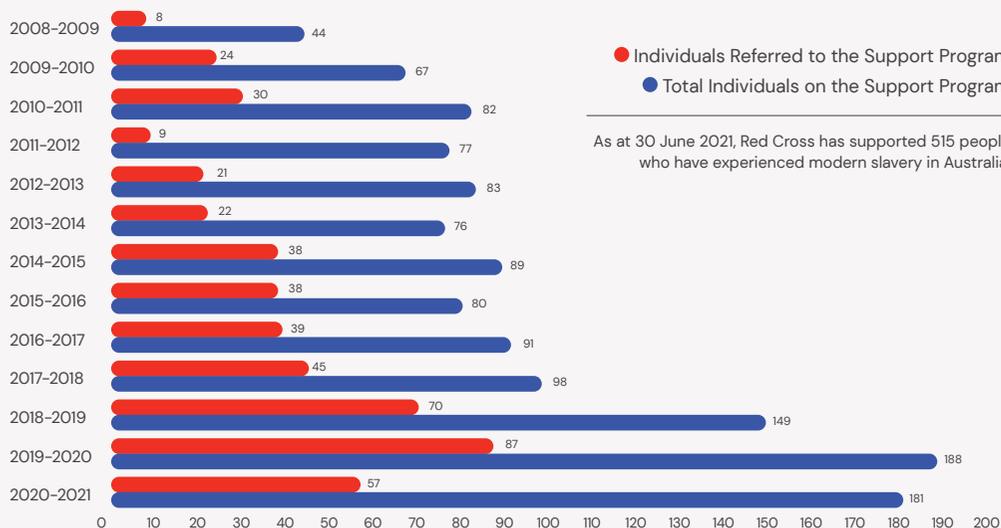
### In Focus – Support for Trafficked People Program

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 \(Support Program\)](#).

The number of identified victims referred to Red Cross for support has consistently increased since we began delivering the Support Program in 2009. However, during the reporting period, the number of referrals and the numbers of people receiving support declined. Research found that this is likely an impact of the COVID-19 pandemic and the diversion of police and government resources away from the identification and referral of suspected victims of human trafficking and into the emergency response.<sup>4</sup>

The number of people referred to the Support Program likely represents only a small portion of those exposed to modern slavery in Australia. The hidden nature of exploitation makes quantifying the extent of trafficking and slavery challenging and research suggests that for every person identified as being affected by modern slavery in Australia, there are four additional people that are undetected.<sup>5</sup> Red Cross supports people who have been identified as potential victims of human trafficking and slavery and referred to the Support Program by the Australian Federal Police (AFP) as the sole referring agency. Therefore, these numbers only represent people who have been willing and able to engage with a policing agency for referral. Expanding referral pathways to the Support Program is crucial to ensuring people at risk of modern slavery in Australia feel safe in seeking help and can receive support.

### Individuals Referred and Supported



● Individuals Referred to the Support Program  
● Total Individuals on the Support Program

As at 30 June 2021, Red Cross has supported 515 people who have experienced modern slavery in Australia.

### Type of exploitation experienced by people referred to the Support Program



### Type of exploitation and age at referral of clients supported during financial year 2020-21

Primary type of exploitation	<17	18+
Forced marriage	13	35
Labour exploitation (commercial setting)	>5*	58
Labour exploitation (personal setting)	0	23
Other: trafficking out of Australia	5	20
Sexual exploitation (commercial setting)	0	16
Sexual exploitation (personal setting)	0	10

\* We do not disclose data that is less than 5 to ensure it is not used to identify individuals.

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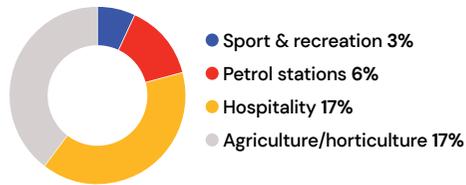
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## Referrals by industry

When people are referred to the Support Program, the industry where the exploitation has occurred is recorded if this information is available.

Perpetrating industry of people referred to the Support Program for labour exploitation



### Case study – Alec

Alec<sup>6</sup> arrived in Australia in 2017. He worked on a farm in Victoria where he was exploited. Alec did not know what sort of visa he was on or what his rights were. He was referred to the Support Program for labour exploitation. In the last 18 months, with the support from government, law enforcement and community organisations, and the ongoing casework support from Red Cross, Alec's life has come a full circle. He and his partner have moved to a new home, he's earned his licence and bought a car, has completed his white card training, and found full-time work where he is happy and respected. Alec and his partner recently welcomed their first baby. Alec says that they "cannot believe how lucky and in love they are".

## The Support Provided

The Support Program provides holistic casework support guided by clients' voices to respond to individual needs. Support may include providing financial support, essential items, emotional support, facilitating access to suitable and stable accommodation, health care, employment, education and training, connection to community, access to social services, or legal and migration advice.<sup>7</sup>

Everyone who has exited the Support Program has reported one or more positive outcomes. The positive outcomes have included establishing secure supports and linkages with community services, financial stability, education, health, support with accommodation, referrals to legal and migration advice, and being provided with information and support to enable them to make informed decisions about their future and to advocate for themselves.

## Frequent Support Provided in the Support for Trafficked People Program



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## How we do it

### Members, volunteers and staff

Our work in Humanitarian Services is supported by 8,587 members, 15,951 volunteers and 1,853 staff.

Diversity in our people enriches our organisation and our impact. Different experiences, capabilities, insights and perspectives are critical to us being a strong and innovative organisation.

- **74%** of staff are female
- **65%** of roles at senior levels are filled by females
- **29%** of staff are employed on a part-time basis

It is also important to us that our workplace reflects the nation's history and incorporates First Nations people. During the reporting period, we appointed an Aboriginal and Torres Strait Islander Retention Lead to identify a national framework to partner with communities to increase our First Nations employees. This has included creating opportunities for First Nations young people to participate in internships with us through the Career Tracker Program.

### Sites

Red Cross has eight national and state offices across Australia that form the basis of our operations.<sup>8</sup> We also have several sites across the country that are used for community programs, membership and other incidental uses, and 166 Red Cross stores across Australia.

### Supply Chain

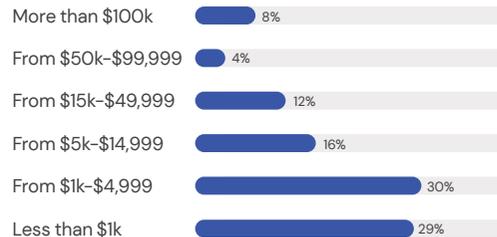
- **1,663** direct active suppliers<sup>9</sup>
- **99%** of suppliers based in Australia
- **80%** of procurement was from 137 suppliers
- Spent less than \$5,000 with **59%** of our suppliers

Our procurement spend is highly concentrated. In the reporting period, 80% of our total procurement spend was with 137 suppliers.

Many of these 137 suppliers were on long-term contracts to provide operational support services, including professional services, information technology services (including hardware and software), property services (including construction, real estate fees and facilities management) and consumables (including meals, personal alarms and first aid products).

Our choice of suppliers is frequently driven by our community activity as we respond to disasters and need. This means we often engage small suppliers in regional areas to provide goods and services to our clients on a short-term or even one-off basis.

#### Suppliers by spend level



### 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.



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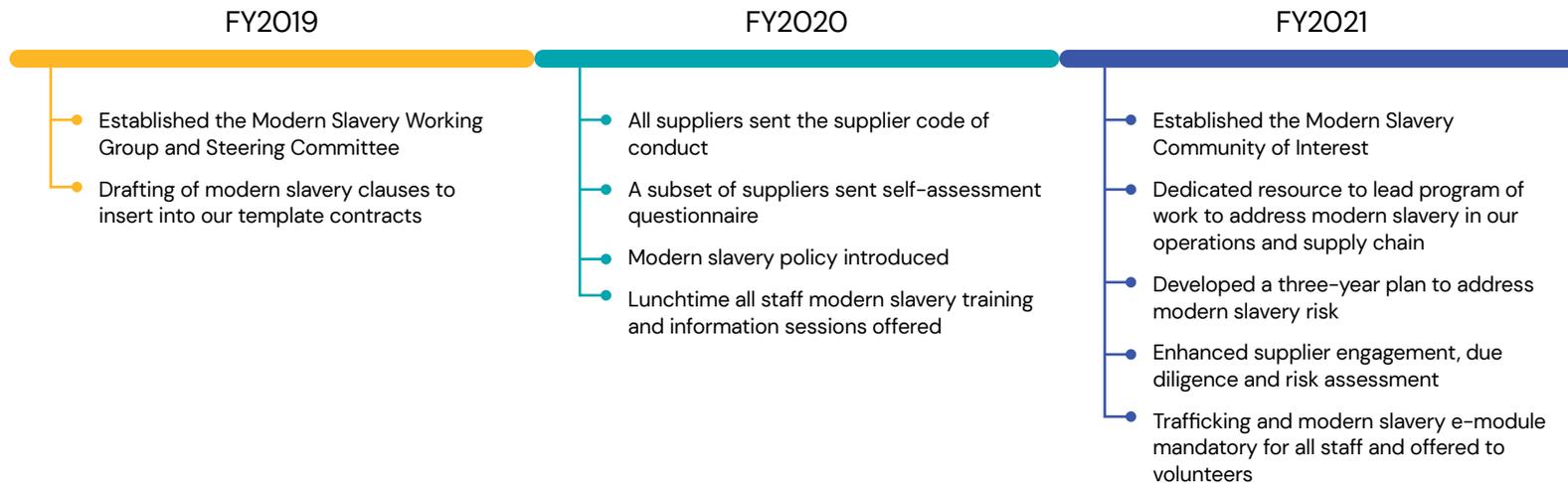
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# Identifying and addressing risks of modern slavery

We are developing a systematic, whole-of-organisation approach to identify where we may cause, contribute to, or be linked to modern slavery risks in our operations or supply chain. We aim to embed processes and systems that enable us to identify and respond to modern slavery risks in our operations and supply chain and leverage our unique position as a humanitarian organisation to work collaboratively with stakeholders to address the systemic risk factors. We are in the early stages of maturity and will continue to develop our processes to reduce the risk of modern slavery.

## Timeline of actions to address modern slavery



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# Governance

Red Cross has established a strong governance structure that engages senior leaders and all areas of the organisation in addressing modern slavery.



## In Focus – Steering Committee and Working Group

### Modern Slavery Steering Committee

- Established February 2019.
- Representatives from Red Cross and Lifeblood’s Executive Teams.
- Responsible for framing modern slavery risk mitigation approach.
- Held 9 meetings (3 in 2020 and 6 in 2021) in the reporting period.
- Key outcomes:
  - endorsed modern slavery workplan for FY2020;
  - endorsed modern slavery statement for FY2020; and
  - highlighted work to wider Executive Team and Board.

### Modern Slavery Working Group

- Established February 2019.
- Subject matter experts from across Red Cross.
- Held 9 meetings (5 in 2020 and 4 in 2021) in the reporting period.
- Key outcomes:
  - prepared modern slavery statement for FY2020;
  - developed workplan for FY2020;
  - developed three-year strategy to progressively assess and address modern slavery risks across the organisation;
  - led supplier due diligence process;
  - established the Modern Slavery Community of Interest; and
  - conducted all-staff training session.

## In Focus – Modern Slavery Community of Interest

Effectively addressing modern slavery requires our people to understand the risks of modern slavery and to consider those risks in their day-to-day activities. We established the Modern Slavery Community of Interest to engage people across the organisation in the approach to assessing and addressing modern slavery. The Community of Interest:

- provides feedback on actions to assess and address modern slavery;
- provides ideas about what Red Cross can do to assess and address modern slavery in our operations and supply chain;
- advocates in relation to modern slavery across the organisation, including undertaking and promoting training;
- provides input into the development of the projects/programs of work designed to assess and address modern slavery; and
- identifies risks associated with projects/ programs of work designed to assess and address modern slavery.

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### In Focus – Board Commitment

Nazli Hocaoglu joined the Society Board as the Youth Member in 2020. Nazli is an executive and a company secretary in the artificial intelligence sector, where data and AI are leveraged to help organisations manage critical safety and security decisions, whilst upholding individual privacy and human rights. The daughter of first-generation Australians, Nazli's family arrived in Australia from Bulgaria, via Turkey. Growing up in Western Sydney, she witnessed the challenges most migrants face and the determination to overcome them.

Nazli is passionate about humanitarian issues, an advocate for the abolition of modern slavery and completed a Masters in Human Rights Law at the University of London. Nazli's study focused on international discrimination of minorities, especially refugees, women and children. Nazli's work in AI involves legal and governance oversight in emerging technology companies. Her current projects include software combatting mass violence and terrorism risk, a crowd management software that measures density, flow and mood, as well as a platform that provides end-to-end product lifecycle management.

Nazli has been actively engaged in our work to address modern slavery, providing guidance and commitment to support our whole-of-organisation approach. Nazli is keen to see us continue to leverage technology to develop robust and repeatable systems that can be embedded within the organisation to create lasting change.

### An organisational-wide approach

During the reporting period we recruited a dedicated resource to lead our work in this area and developed a three-year plan to set clear goals and targets to ensure our approach continues to evolve and improve.

### Embedding lived experience in our work to address modern slavery

We aim to embed the experience of stakeholders and survivors into our work to address modern slavery risks within Red Cross's operations and supply chain. The National Program Coordinator of the Support Program and Lead of Trafficking, Forced Labour and Forced Marriage is an integral member of the Modern Slavery Working Group and leads the training and education work stream. The Modern Slavery Project Lead attends the trafficking, forced labour and forced marriage team monthly updates and the two roles work together on joint initiatives to address modern slavery and the underlying systemic causes.



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# Policies

Our policies and procedures articulate our values, ways of working and expectations. They provide a framework to assist identify and address modern slavery and human rights risks in our operations and supply chain. We continue to review and update our policies, processes and tools to improve our actions in this area. The policies that are most relevant to our efforts to address modern slavery risks are outlined below.

Policy/Protocol	Purpose	Review
<a href="#">Ethical Framework</a>	Outlines our values and principles and a framework to apply the principles to hold ourselves and others accountable.	2021
<b>Investment Guidelines</b>	Ensures our investments are consistent with the Fundamental Principles. All investments are monitored to ensure continued alignment with the Investment Guidelines.	2021
<b>Partnership Protocol and Screening</b>	Provides a criterion to evaluate partnerships to ensure they align with the Fundamental Principles. The screening tool allows people to evaluate partners against the protocol. During the reporting period the protocol was reviewed to ensure it adequately addressed modern slavery risks.	Review ongoing
<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. Applies to all Red Cross people and outlines our expectation that all suppliers comply with the principles set out in our Supplier Code of Conduct (referred to below).	June 2022
<a href="#">Procurement Policy</a>	Requires employees to comply with the Ethical Framework when procuring goods and adopt a holistic evaluation of suppliers considering ethical and social impacts of procurement including the modern slavery risks.	Under review
<b>Supplier Code of Conduct</b>	Suppliers are required to notify us when any material risk of modern slavery is identified and take practical and effective steps to address that risk. Suppliers must allow audits, visits and training programmes from Red Cross as requested.	May 2022
<a href="#">Whistle-blower Policy</a>	Creates a framework to allow people to come forward with concerns, with the knowledge that their confidentiality will be protected.	2021

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# Operations

## Our workers

Our culture of care for workers starts within our organisation with a holistic approach to wellbeing of our staff. The work we do at Red Cross is often complex and challenging; we support people experiencing extreme vulnerability and stress, and work in emergency and disaster situations. We have developed an Ethical Framework that provides a clear, shared understanding of Red Cross's values and principles, and guides our actions. The framework is supported by a range of tools including online e-learning modules and an external Ethics Centre hotline that enables people to talk through concerns in a confidential manner.

All employees are covered by the appropriate modern award or enterprise agreements (**Award**) and can choose whether they join a trade union. However, as we reported in our previous statement, in 2018, Red Cross, like many employers, discovered that it had unintentionally failed to comply with some Award frameworks and consequently had been paying some employees incorrectly. When we realised this had occurred, we established a dedicated team to identify remuneration and compliance mistakes of the past, rectify the mistakes and address underlying systemic causes. This process included reviewing employee pay histories from 1 July 2012 to 12 October 2020, which impacted approximately 10,000 current and former

employees across 20 industrial instruments – noting not all had been underpaid.

We have been committed to addressing the systemic issues that allowed these mistakes to happen:

- in October 2020 we implemented a new payroll system which is correctly configured to the Awards that currently apply to Red Cross employees; and
- we have run a comprehensive, organisation-wide program to up-skill and embed essential knowledge across the organisation to ensure our people are supported and empowered to work in line with the Award requirements.

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## Our programs and operations

We conducted a modern slavery operational risk assessment for the second year. The risk assessment considered several issues that assisted us to identify where we may cause, contribute or be linked to modern slavery, or other human rights abuses in our operations, including:

- the use of volunteers;
- the use of labour hire agencies;
- the use of fundraising agencies;

- investments;
- engagements with business and people in high-risk sectors and locations;
- donations of money, goods and services; and
- due diligence and other risk-related reviews or screening of organisations we engage with.

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, and the ability

to remediate any adverse impacts.

As we act according to the Fundamental Principles and the Ethical Framework, our risk of causing, or contributing to, modern slavery in our operations is low. However, there were risks that we might be linked to modern slavery in our operations as outlined below.

Operational Area	Modern Slavery Risk	Actions to address modern slavery risks
Economic participation program	Our operational risk analysis identified that two business units were involved in assisting migrants in transition secure employment. Working with people in times of vulnerability can increase their risk of exploitation.	Program managers conduct employer due diligence prior to work placement, but there is variability in the level of screening between State offices. Recognising the need for enhanced care in this area, we began a program of work to develop a national framework of enhanced due diligence of prospective employers, and increased support and feedback mechanisms for employees. This work will continue during the next reporting period.
Temporary, agency and seasonal workers recruited through labour hire agencies	Our operational risk analysis found that 42% of respondents use temporary, agency or seasonal workers to carry out their programs. These workers are regularly engaged and paid directly by the agency. Workers involved in fundraising were identified as a specific risk area.	Workers engaged on a temporary or seasonal basis are exclusively sourced through four recruitment agencies and the work is done under the supervision of the agency. We prioritised our labour hire providers for supplier due diligence and sent them our Supplier Code of Conduct for acknowledgement and our modern slavery self-assessment questionnaire.  We require our fundraising agencies to ensure all workers involved in 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 also 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. Our contracts with fundraising agencies also include our standard template modern slavery clauses as outlined on <a href="#">page 17</a> .

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Operational Area	Modern Slavery Risk	Actions to address modern slavery risks
Retail stores	Risk that we could be linked to modern slavery through the supply chain of new purchase goods sold in our retail stores or through the manufacturing of donated goods before they reach Red Cross.	All new purchase goods are sourced directly from Australian wholesalers. All suppliers of new purchased goods to our retail stores were sent our modern slavery self-assessment questionnaire and were prioritised for further due diligence. Large retail chains that donate goods to the Red Cross's stores have been prioritised for screening through the partnership assessment tool.
Corporate services	Facilities management has a high risk of modern slavery in Australia. There is a risk that we may be linked to labour exploitation and forced labour through subcontractors involved in facilities management, including cleaning, security and other services.	We appointed a new facilities management provider to manage all our sites across Australia. The selection process included a comprehensive assessment of suppliers' actions to address modern slavery risks. The Red Cross team stress tested the preferred supplier's final pricing against the contract requirements to ensure the supplier could deliver the contract while meeting all legal requirements including minimum wage payments. The contract included a cascading modern slavery clause which includes the right to audit their subcontractors and supply chain and ensure their subcontractors are aware of, and have access to, our grievance mechanisms.
Partnerships and collaborations	Seventy-seven per cent of respondents to our operational risk assessment said they engage with external parties to deliver their services, creating a risk that we may be linked to modern slavery through the supply chains of organisations we partner or collaborate with.	All Red Cross people are required to complete a screening tool before entering partnerships. The screening tool assesses the involvement of potential partners in adverse impacts on human rights and high-risk industries. Partners are disqualified if they are found to be at a high risk of impacting human rights adversely. During the reporting period the Partnership Protocol and Screening Tool were reviewed to ensure they adequately addressed modern slavery risks. We also began development of an automated technological screening process that could be used to assess and record human rights and modern slavery risk prior to engagement.
Use of volunteers	Sixty-nine per cent of our business units reported that they rely on volunteers to deliver their programs.	We created a position description for all volunteers, to set out clear parameters of the role and to ensure they are genuinely voluntary arrangements. To better understand any risks associated with the use of volunteers we conducted an internal audit of volunteer management during the reporting period. The audit recommended clarifying responsibilities, reviewing and approving volunteer management position descriptions, and developing a checklist that could be used by teams reviewing volunteer position descriptions to ensure the descriptions are accurate and comply with the Red Cross's requirements. This work is currently underway.

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## In Focus – Modern slavery clauses in template agreements

### Modern slavery obligations

#### 1. Compliance with Laws:

You agree that in performing the Services, you will comply with all Australian Modern Slavery Laws and Foreign Modern Slavery Laws applying to You in the location or locations in which the Services are performed.

#### 2. Supplier Code of Conduct:

You agree to accept, and act in accordance with, our current Supplier Code of Conduct as updated from time to time and provided to You through our Supplier Portal.

#### 3. Addressing Modern Slavery:

You agree that:

- a. you will use best endeavours to ensure that there is no Modern Slavery in Your supply chain or operations; and
- b. in the event that You identify any material risk of Modern Slavery in Your supply chain or operations, You will:
  - i. notify Us within five (5) business days of having identified that material risk;
  - ii. use best endeavours to address that material risk;
  - iii. use best endeavours necessary to prevent the recurrence of the conditions or circumstances which gave rise to the material risk in an effective and timely manner; and
  - iv. notify us of the steps You have taken in clause 5.3(b)(ii) and (iii).
- c. you will require any subcontractor You engage in relation to this Agreement to agree to the same requirements set out in this clause 3.

#### 4. Training:

You agree to provide Modern Slavery training for Your Personnel who provide goods or services in connection with this Agreement.

#### 5. Auditing:

You agree to maintain records (Audit Records) which in a detailed manner:

- a. describe Your supply chain and operations in regard to all goods and services provided to Us in connection with this Agreement including at least first tier suppliers;
- b. record all training completed by Your Personnel which is relevant to clause 4; and
- c. if You are subject to Australian Modern Slavery Laws, describe the steps taken by You to:
  - i. identify and assess the risk of Modern Slavery;
  - ii. report on the risks of Modern Slavery;
  - iii. address the risk of Modern Slavery; and
  - iv. evaluate the effectiveness of the actions described in clause 5(c)(i)–(iii).

#### 6. Producing records on request:

The Audit Records must be made available to Us for copying and inspection within five (5) business days of You having received in writing a request from Us for access to such records.

## In Focus – Facilities Management

During the reporting period we mobilised a new facilities management provider across all our facilities. We have facilities across Australia and have introduced a single supplier to manage the entire program while meeting all compliance requirements and recognising that the area was considered high risk of modern slavery. The contract was offered following a full tender process undertaken in FY20 managed by a cross-directorate evaluation team comprising subject matter experts. The team used a comprehensive evaluation framework against which to assess suppliers. The framework specifically considered how each supplier managed compliance across a range of issues including modern slavery, work health and safety, fair work and awards, localisation and indigenous diversity. Short-listed suppliers were asked to present on how they managed compliance and human rights risks including their plans to assess and address modern slavery risks. The Red Cross team stress tested the preferred supplier's final pricing against the contract requirements to ensure the supplier could meet all industrial award requirements within the pricing model. The supplier was required to sign a contract that included a cascading modern slavery clause which includes the right to audit their subcontractors and supply chain and ensure their subcontractors are aware of, and have access to, our grievance mechanisms.

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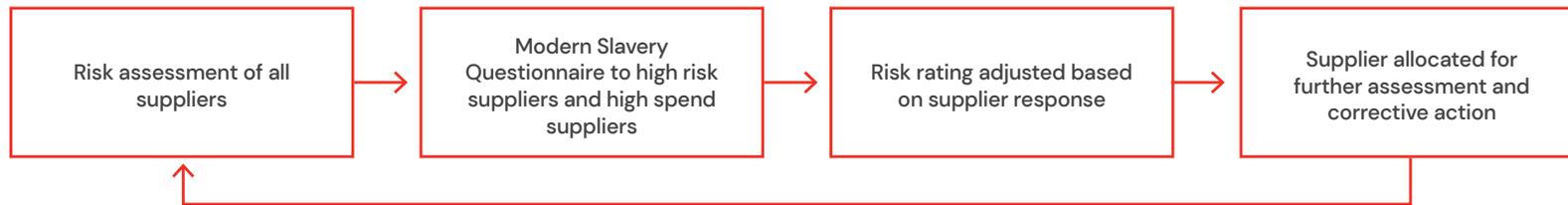
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# Supply chain

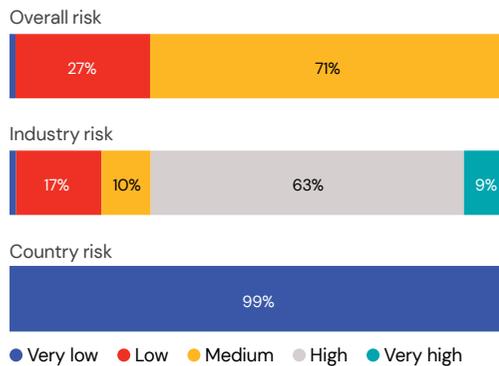
Our due diligence process aims to allow us to partner with suppliers to gain a deeper understanding of the modern slavery risks in our direct and extended supply chains and effectively address those risks. During the reporting period, we reviewed and updated our supplier due diligence procedure, streamlining it to be more consistent with the nature of our diverse supplier base.

## Supplier due diligence



To identify where risks of modern slavery in our supply chain were most significant, we conducted an initial risk assessment of all suppliers based on geographic and sector risk.

### Supplier risk summary



With 99% of our suppliers based in Australia, the overall risk of modern slavery in our supply chain was medium to low. However, 9% of our suppliers were in very high-risk industries, including:

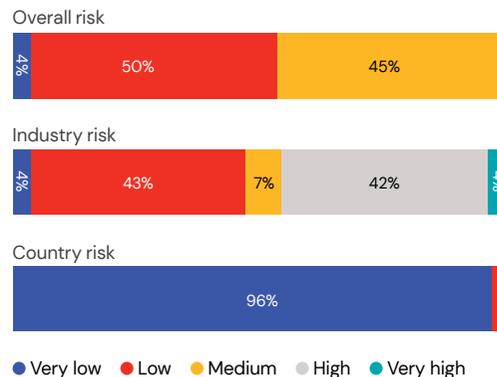
- food products & food retailing;
- construction & engineering;
- security & alarm services;

- health care facilities & supplies; and
- apparel & luxury goods.

We cross-referenced our risk screening with the nature of our relationship with suppliers to identify areas of greatest leverage. Although expenditure does not associate with modern slavery risk, it does impact the leverage we have over suppliers.

The modern slavery risk amongst the 137 suppliers that make up 80% of our procurement spend was lower than our overall supplier risk, with 50% of those suppliers being considered low risk.

### Supplier risk summary – Top 137 suppliers



Four percent of those suppliers were very high industry risk and 42% high industry risk. Our risk assessment suggests the risks associated with these suppliers were likely to relate to three broad areas:

- Information technology hardware – is recognised as a high risk of modern slavery including forced labour and child labour and the supply chain of the electronics sector gives rise to significant risk of modern slavery in the production of raw materials.<sup>10</sup> Our dependence on technology and prevalence of modern slavery risk in the sector makes addressing this risk particularly challenging.
- Property services and facilities management including cleaning, security and maintenance.
- Consumables including medical suppliers and promotional goods like t-shirts and other merchandise. While we purchase these goods through companies based in Australia, many of these companies source from overseas.

Suppliers that were high-risk or high spend were asked to complete our modern slavery self-assessment questionnaire. The questionnaire was drafted with input from external experts and designed to encourage compliance. The questionnaire asked suppliers to provide

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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.

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 2020–21, we spent less than \$5,000 per annum per supplier with 59% of our suppliers. Many of these low value transactions are one-off purchases to support client’s 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.

Having a supply chain comprised of many low value transactions from small businesses may mean these suppliers do not have the governance

processes of larger organisations and reduces the leverage we may have with these suppliers. This presents an ongoing challenge for our teams to robustly manage modern slavery risks.

To increase awareness and understanding of modern slavery, all suppliers with a spend of more than \$4,000 were asked to acknowledge our Supplier Code of Conduct and provided a copy of our Guide to Addressing Modern Slavery for Australian Businesses.

Specific action was taken to assess modern slavery risk when entering large contracts. Each instance was assessed on a case-by-case basis taking into account 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.

### In Focus – Strengthening supplier contracts

During the reporting year we refined and improved the modern slavery clauses included in contracts with service providers. Our standard clause now includes the following requirements:

- compliance with both Australian and international laws regarding modern slavery;
- acceptance of our Supplier Code of Conduct through our supplier portal;
- use of best endeavours to ensure that there is no modern slavery in a service provider’s supply chain or operations and obligations to notify us if a material risk of modern slavery is identified;
- provision of modern slavery training for their personnel who provide goods or services to Red Cross;
- maintenance of records in relation to their supply chain and operations and their assessment of modern slavery risks;
- a warranty that the service provider has not been convicted of an offence relating to modern slavery or been the subject of an investigation, inquiry or enforcement proceedings connected with modern slavery; and
- subcontractors engaged by the service provider must agree to the same obligations.



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# Grievance mechanisms

Effective grievance and complaints mechanisms are essential to identifying and addressing modern slavery risk. During the reporting period, we reviewed and updated our whistle-blower policy to specifically reference modern slavery with oversight by the Society Board. We also began a comprehensive review of our grievance mechanisms to ensure all Red Cross people, including staff, volunteers, members and people impacted by Red Cross's activities are aware of the channels available to raise concerns and that we have systematic and comprehensive processes to respond appropriately.

## In Focus – Whistle-blower Policy

We wanted to ensure the policy created a framework that enabled all Red Cross people (including suppliers and partners) to feel safe to speak up when there are reasonable grounds to suspect unethical or unlawful practices, including concerns in relation to modern slavery.

Concerns can be reported (anonymously) to STOPline, our whistle-blower hotline run by an external and independent third party. It is possible to make a report to STOPline via:

- Phone: 1300304550 (Australia) or +61398113275 (overseas)
- Email: [redcross@stoline.com.au](mailto:redcross@stoline.com.au)
- Website: [redcross.stoplينerreport.com](http://redcross.stoplينerreport.com)
- Post: C/O The STOPline, Locked Bag 8, Hawthorn, VIC 3122
- Fax: Attention: Case Manager C/O The STOPline +61398824480
- App: search for STOPline in the iTunes App Store or Google Play to download the free app and submit a disclosure.

Red Cross takes steps to ensure the general welfare and protection needs of those who raise concerns, including responding to retaliatory activity.



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# Education and training

Awareness and understanding are crucial to addressing modern slavery risks in our operations and supply chain. We conducted several education and training activities to continue to build the capability of our staff and volunteers to prevent and respond to modern slavery.

## Internal Training

### Modern Slavery E-module

- Distributed to all staff as mandatory training.
- Incorporated into mandatory induction training for all new staff.
- Available to all volunteers.

### Modern Slavery All Staff Webinar

- Held in June 2021.
- 162 people from across Red Cross staff and the Society Board.
- Nazli Hocaoglu, the Youth Representative of the Society Board, opened the session.

### Modern Slavery Briefing for Operations Staff

- Held in June 2021.
- 48 employees attended.
- Topics:
  - understanding modern slavery;
  - Red Cross response to modern slavery;
  - Modern Slavery Act; and
  - updates from Modern Slavery Working Group.

### Monthly anti-trafficking updates

- 12 delivered, one per month.
- Information session for all Red Cross staff involved in anti-trafficking projects (including case workers, team leaders and Migration Support Program leads).
- Provides information on Red Cross’s work in response to human trafficking and slavery, as

well as developments in the Australian sector, and highlights opportunities for further learning.

### Asia Pacific Migration Network (APMN)

- In partnership with the IFRC, Red Cross supported the APMN regional working group on labour migration and human trafficking to deliver a webinar on regional migration and protection trends, with Protection, Gender and Inclusion focal points from 15 national societies, and a key focus on understanding the impact of COVID-19 on trafficking in persons in July 2020.
- In partnership with the IFRC and the British Red Cross, Red Cross led the first of a series of four development sessions with protection and migration focal points from Red Cross and Red Crescent National Societies in the Asia Pacific region, on understanding and responding to trafficking in persons, in June 2021.

### In Focus – E-module on Trafficking and modern slavery

A highlight of our work was the development of the first ever Red Cross e-module on understanding and responding to trafficking in persons that was developed in collaboration with the British Red Cross and the IFRC. The module was developed by a global working group that included members of the [Global Protection Cluster Anti-Trafficking Task Team](#) and those with lived experience of human trafficking and slavery (engaged through the [Survivor Alliance](#)) and is available in 4 languages to all Red Cross and Red Crescent staff and volunteers globally. We adapted the e-module specifically for the Australian context and developed a section that explained the requirements of the Modern Slavery Act and the steps we are taking as an organisation in response. We made this mandatory training for all Red Cross staff and available to all volunteers.

### In Focus – Awareness & understanding of modern slavery amongst Red Cross people

To effectively address modern slavery risks, people across all areas of Red Cross need to understand the risks of modern slavery and, where necessary, change practises to reduce those risks. We sent a training needs analysis survey to all Red Cross staff and volunteers to assess their level of awareness and understanding of modern slavery. The survey results suggest that Red Cross people have a good understanding of modern slavery and the indicators of trafficking and slavery but need more information about how this relates to their roles and how to reduce the risk of modern slavery in our operations and supply chain. Going forward, we will build on people’s knowledge to expand their understanding of what they are required to do in their individual roles to reduce the risk that we may be linked to modern slavery in our operations or supply chain.

### Red Cross People’s Understanding of Modern Slavery



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## Industry and sector collaboration

We cannot address modern slavery alone. Broad collaboration involving a range of stakeholders from different sectors including government, non-government agencies, industry and rights holders can assist to identify and prevent modern slavery and ensure those identified receive the protection and support they need.

In Australia, Red Cross fulfils an important auxiliary role to public authorities in the humanitarian field and [has pledged to collaborate with the Australian Government](#)<sup>11</sup> to respond to modern slavery. We aim to increase awareness of modern slavery and build the capacities of businesses, frontline workers, and regional, local and migrant communities, to identify indicators of modern slavery and understand pathways for support.

### Sector collaboration

Red Cross's work with survivors means we are uniquely positioned to provide evidence informed guidance. We work with government and other stakeholders to identify and address the systemic causes of modern slavery, and to support and empower those who have experienced exploitation. Red Cross participated in numerous forums and consultation processes seeking to bring forth the experience of survivors to inform and improve processes, including:

- **National Action Plan to Combat Modern Slavery 2020–25** – Red Cross consulted directly with government and other stakeholders on the development of this strategic plan, the evaluation of the previous plan, and the development of a monitoring and evaluation framework to assess the effectiveness of work to combat modern slavery for the next 5 years.
- **National Roundtable on Human Trafficking and Slavery** – Red Cross is a member of this collaborative mechanism between government and civil society and in August and December 2020, Red Cross participated in the National

Roundtable senior officials and ministerial meetings.

- **Australian Border Force (ABF), Forced Marriage Protection Orders Consultation Group** – Red Cross was invited to join the ABF led Forced Marriage Protection Orders Consultation Group in March 2021. The Group is comprised of civil society, individuals and organisations with specialised experience in supporting people in, or at risk of, forced marriage to advise on the government's development of a Forced Marriage Protection Orders Model.
- **Partnering to End Modern Slavery: Australia's National Conference on Modern Slavery** – In June 2021, Red Cross presented on our work to undertake a national accommodation needs analysis for people impacted by human trafficking and slavery at this conference.
- **Look at Little Deeper – AFP Training** – In March 2021, Red Cross was invited to undertake a video interview for the AFP, highlighting the role of Red Cross in supporting people affected by human trafficking and slavery through the Support Program, as part of their training package 'Look a Little Deeper'. The training was shared with State and Territory police forces.

### State, Territory and community groups

We engage 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.

We also co-chair, or actively participate in, State and Territory forced marriage and anti-trafficking networks which aim to build community and sector awareness and capacity, including:

- **New South Wales** – Red Cross co-chairs the NSW Forced Marriage Network and the NSW Trafficking Response Network.
- **Victoria** – Red Cross co-chairs the Victorian Forced Marriage Network and its three working groups (focused on the areas of education, training and capacity building; research and policy; and direct service response) and is a member of Victoria's Human Trafficking Network.
- **Northern Territory** – Red Cross co-chairs the Anti-Trafficking Working Group.
- **Queensland** – Red Cross helped establish the Queensland Human Trafficking Network along with the International Organisation for Migration and Queensland University of Technology and Red Cross is part of an awareness raising subgroup, which organises local events to raise awareness of trafficking and slavery including indicators and referral pathways. Red Cross's Queensland staff are also involved in the Police and Ethnic Advisory Group.
- **Western Australia** – Red Cross is a member of the Western Australia Forced Marriage Network Steering Committee and the Western Australia Interagency Network on issues of modern slavery and human trafficking.
- **South Australia** – Red Cross co-chairs the Forced Marriage Network.
- **Tasmania** – Red Cross established the Tasmanian Forced Marriage Network.

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We have also undertaken different engagement activities with frontline responders and community organisations to increase awareness about indicators of modern slavery and referral pathways, including:

- Raising Awareness on Modern Slavery within Central Australia: A dedicated project in the Northern Territory to increase awareness of trafficking and referral pathways, particularly in Tennant Creek and Alice Springs. This includes sessions targeted to frontline responders and service providers including healthcare workers, school counsellors, police, disability sector workers, real estate agents, emergency relief providers, shire councils, religious institutions and fire and rescue services.
- Conducting educational sessions on the impacts of COVID-19 on labour exploitation within the NSW Trafficking Response Network.
- Delivering virtual training to frontline staff in community and regional centres in Victoria, with a specific focus on forced labour and how to identify trafficking indicators and respond safely and ethically.
- Providing training on trafficking indicators to Extreme Hardship Support Program staff including case workers and frontline triage staff in Victoria.
- Presenting on the role and supports available under the Support Program for people who have experienced trafficking, forced labour and forced marriage in Tasmania, together with sessions on how to identify and support situations of forced marriage with members of the Afghani, Pakistani, Indian, Nepalese, Chinese, Syrian, Iraqi and Iranian communities.
- Equipping the NSW and ACT Settlement Sector to combat labour exploitation in migrant communities (Home Affairs Modern Slavery Grant Opportunity 2020-21) and developing

a tailored training package to enable frontline workers to identify labour exploitation and respond to suspected cases. The training was piloted between March and April 2021 with workers from several participating organisations testing its relevance and impact and formally launched in June 2021.

We also engaged with vulnerable communities through the following projects:

- **NSW Forced Marriage Peer Support Group Project** – through the NSW Department of Communities and Justice COVID-19 Domestic & Family Violence Grant program, Red Cross is delivering a forced marriage peer support project – ‘Empowered to Respond’. The project aims to provide safe and welcoming spaces to socially isolated women and girls who are impacted by, or at risk of, forced marriage in NSW. It provides an opportunity for them to build connections to decrease feelings of isolation that have likely been amplified by the COVID-19 pandemic. It also aims to empower participants, enhancing their understanding of their rights to decrease the risk of exploitation and family violence whilst promoting independence and decision making to prevent forced marriage.
- **VIC Forced Marriage Prevention Project** – through funding from the VIC Department of Families Fairness and Housing, this forced marriage prevention project works with three communities from multicultural backgrounds including Afghan, Indian and Rohingya who have self-identified as being affected by forced marriage. The project aims to work collaboratively with multicultural communities and bicultural workers to develop culturally appropriate strategies to prevent forced marriage.

## Collaboration with other not-for-profit organisations

Collaboration can increase our impact and is essential to effectively addressing modern slavery. Over the reporting period we participated in several not-for-profit forums to share learnings about the actions to assess and address modern slavery risk in our operations and supply chains. Red Cross is an active participant in the Not for Profit Legal and Governance Network convened by Elaine Leong, Group General Counsel and Group Company Secretary of The Benevolent Society which brings together charities and not-for-profits of all sizes. A Modern Slavery sub-group of that network meets quarterly to share information about addressing modern slavery and other human rights impacts and convened several expert presentations and discussions during the reporting period.

Red Cross has begun discussions with The Benevolent Society, and other not-for-profit organisations, about more formalised sector collaboration including consideration of a platform to share resources and standardised modern slavery risk screening of suppliers. We see peer collaboration around supplier risk assessment as an opportunity to increase our leverage with suppliers and to continue to raise awareness and understanding of modern slavery amongst smaller suppliers.

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## Research and policy

Knowledge and understanding are key to alleviate modern slavery. Research and policy developments provide guidance and frameworks to identify risks and constantly improve supports for vulnerable people. Red Cross is committed to progressing, and sharing understanding, and leveraging our unique position through the IFRC and our understanding gained through our work with vulnerable groups and people impacted by human trafficking and slavery. We regularly undertake research projects and prepare submissions to identify gaps in the current response and inform policy developments. Highlights from our research and policy activities during the reporting period include:

- **[COVID-19 Impacts Us All](#)** – Red Cross prepared a report on the impacts of COVID-19 on people without visas or on temporary protection visas. The report considered the demographics of people on temporary visas accessing emergency relief and the consequential risks of exploitation.
- **[Locked down and left out? Why access to basic services for migrants is critical to our COVID-19 response and recovery](#)** – prepared by the newly established Red Cross Red Crescent Global Migration Lab, the report draws on research conducted by the National RCRC Societies into the direct and indirect impacts of the COVID-19 pandemic and related policy measures on migrants' access to basic services.
- **[COVID-19 continues to impact us all: Impacts and barriers for people on temporary and without visas in Australia](#)** – An additional case study for the Australian component of the 'Locked Down and Left Out' report was also released that considered the impacts and barriers for people on temporary protection visas and those without visas in Australia.
- **[Sight Unseen: A vision for effective access to COVID-19 vaccines for migrants](#)** – the Global Migration Lab report was also released on vaccines for migrants.
- **[Submission to the Parliament of New South Wales Joint Select Committee on Coercive Control](#)** – In January 2021, Red Cross made a submission to this enquiry. Red Cross recommended the committee consider the patterns of coercive and controlling behaviour within the context of human trafficking, slavery and forced marriage, and how the current framework could be improved to better recognise the intersection between family violence and modern slavery in Australia.

### Current research projects include:

- **[Supporting the Dependents of Human Trafficking and Forced Marriage Survivors](#)** – This research 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.
- **[Barriers in accommodating survivors of modern slavery: Working Towards safe, sustainable, and suitable housing](#)** – This research project aims to undertake an in-depth analysis of the accommodation options for survivors of modern slavery, the barriers and challenges to navigating the housing system, and explores the opportunities to improve supports available.
- **[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 for people who have experienced sexual exploitation, particularly in commercial settings. The project is led by the AIC and will contribute to an improved understanding of service and systemic gaps.

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# Effectiveness of Actions

We have developed a three-year plan to systematically address our risk of causing, contributing to or being linked to modern slavery. It is an iterative process of continuous improvement, and we are at the early stages of the journey.

During the reporting period, we began developing a framework and key performance indicators to assess the effectiveness of our actions. Our framework was designed to ensure a comprehensive approach to identifying and addressing modern slavery risk in line with the United Nations Guiding Principles on Business and Human Rights.

Our assessment of the effectiveness of our actions has developed consistently with the maturity of our actions in each area. In the more developed aspects of our program, for instance around governance and policy commitment, we have begun collecting metrics that provide an indication of the effectiveness of our actions. For the more emergent aspects, we focused on establishing baseline measurements that could be used to assess the effectiveness of our actions in subsequent reporting periods. As we continue to develop our program, we will expand the quantitative and qualitative measures that assess the effectiveness of our actions, targeting specific risk areas and specific risks to people consistent with the maturity of our modern slavery program.

## A comprehensive approach to address modern slavery



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# Effectiveness Indicators & Results

Area of Work	Effectiveness indicators
<b>Governance and policy commitment</b>	<ul style="list-style-type: none"> <li>• Robust governance structure:               <ul style="list-style-type: none"> <li>– number of meetings of the cross-functional steering committee, working group and community of interest – see notes on <a href="#">page 11</a>; and</li> <li>– governance meetings attendance rate.</li> </ul> </li> <li>• Understanding of modern slavery concepts and application amongst Red Cross people:               <ul style="list-style-type: none"> <li>– percentage of people completing the modern slavery training needs analysis survey understood what modern slavery was – currently 96%; and</li> <li>– percentage of people completing the modern slavery training needs analysis survey were familiar or very familiar with concepts relating to modern slavery – currently 80%.</li> </ul> </li> <li>• Red Cross people’s confidence in applying modern slavery concepts in their work – 62% of people who completed the modern slavery training needs analysis survey were confident or very confident in applying modern slavery concepts to their work.</li> </ul>
<b>Risk assessment</b>	<p>Supplier risk assessment:</p> <ul style="list-style-type: none"> <li>• percentage of active suppliers screened for modern slavery risk – 100% for the reporting period; and</li> <li>• percentage of suppliers that responded to the modern slavery self-assessment questionnaire – 31%.</li> </ul> <p>Operations risk assessment:</p> <ul style="list-style-type: none"> <li>• percentage of business units collaborating with other agencies who conduct some form of risk assessment on the other agency – 80%; and</li> <li>• percentage of business units collaborating with other agencies who conduct a risk assessment that includes consideration of the entity’s respect for human rights – 60%.</li> </ul>

Area of Work	Effectiveness indicators
<b>Act &amp; Remediate</b>	<ul style="list-style-type: none"> <li>• Percentage of active suppliers with material spend (defined as above \$4,000 per annum) that were sent the Supplier Code of Conduct and Guide to Modern Slavery for Australian Businesses – 100%.</li> <li>• Percentage of suppliers whose modern slavery risk is downgraded based on their answers to the modern slavery self-assessment questionnaire – 81%.</li> <li>• Percentage of business units that initiated actions to assess and address modern slavery – 61%.</li> </ul>
<b>Stakeholder engagement &amp; grievance mechanisms</b>	<ul style="list-style-type: none"> <li>• Percentage of emergency relief clients that reported they accessed information on labour exploitation from us – 55%.</li> <li>• Number of people who accessed referral and additional support information including information on labour exploitation – 554,000 people.</li> <li>• Number of incidents indicating modern slavery reported through our whistle-blower or ReportIT processes – none.</li> </ul>

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# Impact of COVID-19

## Impact on our operations and supply chain

The cumulative effects of drought, bushfires, floods and the COVID-19 pandemic have been devastating. We have not experienced such demand for our humanitarian services since wartime.

Our efforts to assess and address modern slavery were significantly impacted by the COVID-19 pandemic. As the pandemic continued to impact people and communities across Australia, with lockdowns and restrictions increasing social isolation, demand for our services continued to grow. We had to adapt our approach and find ways to support people in a world where physical distancing was often mandatory. Internally, we had to modify our processes to respond to COVID-19 risks and implement prevention strategies. As such, this Statement recognises an iterative approach where we aim to constantly improve our processes to understand and address our risks of modern slavery.



## Support during COVID-19

The COVID-19 pandemic has continued to impact everyone. It increased the vulnerability of workers in Australia and around the world, with evidence suggesting human traffickers have opportunistically increased focus on labour exploitation.

As the global pandemic became a local emergency, Red Cross activated to provide emergency relief to thousands of people in Australia on temporary visas, supporting people in isolation or quarantine or in remote communities. As at the end of June 2021, Red Cross reached 522,948 people with COVID-19 resilience information, delivered support to 70,042 people in Australia through mandatory isolation with 118,516 Psychological First Aid phone calls. We delivered 33,000 wellbeing kits to people in hotel quarantine.

## Support to migrants during COVID-19

Migrants are particularly vulnerable to labour exploitation and modern slavery and this situation has been exacerbated by COVID-19. Red Cross's research into services for migrants completed as part of the global Red Cross and Red Crescent Report, [Locked down and left out? Why access to basic services for migrants is critical to our COVID-19 response and recovery](#) released on 9 March 2021, included responses from 1,925 people in Australia on temporary visas or without visas. This research highlighted that 55% of people on temporary visas that contacted Red Cross for information during the COVID-19 crisis wanted, and were provided with, information on labour exploitation and avenues of support. Red Cross also published a report on how [COVID-19 Impacts Us All](#). The report explored how COVID-19 impacted those without a visa and on temporary protection visas and exacerbates risks of exploitation. We also published an additional case study for the Australian component of the 'Locked Down and Left Out' report.

Red Cross has focussed on supporting people experiencing vulnerability because of migration. Temporary visa holders were identified as a key group requiring support as many lost their jobs due to movement restrictions associated with COVID-19 and had limited options for income, leading to increased risk of destitution, exploitation, unsafe work, and an inability to meet basic needs and stay healthy.

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Red Cross, in partnership with a range of agencies and community organisations, has played a critical role in supporting migrants. Our support has included:

- **Emergency relief payments** – in collaboration with a range of partners including government and local community partners, Red Cross provides emergency relief payments to migrants on temporary visas or with no visa (regardless of their status), who are experiencing financial hardship and do not have access to mainstream supports during COVID-19. The payments support people's basic needs and are typically useful to bridge short-term gaps in household finances; they support costs for food, rent, utilities, transport, access to healthcare and medicines.
- **Complex Casework support** – we provide complex casework support to people who are assessed as having significant vulnerabilities (for example, family violence, children at risk, deterioration of mental health, complex physical health issues). Support was expanded this year to a specific program supporting people on temporary visas experiencing family violence.
- **Food Packages** – in addition to emergency relief payments, food packages are also available to those struggling to meet their daily food needs (provided in partnership with food charities and local community organisations around Australia). Red Cross has worked with 19 organisations including Filipino, Sri Lankan & Nepali Associations, Anglicare, Foodbank, Second Bite, OzHarvest, and local councils to undertake this work.

- **Referrals** – we provide direct referrals to assist people to access additional services based on their needs and referral information at scale via our website. This information includes details on indicators of labour exploitation and how to access further information and support if instances of modern slavery are suspected.

In the reporting period, Red Cross has:

- supported over 128,000 people on temporary or no visas, including people seeking asylum who were not eligible for mainstream government support during COVID-19 with emergency relief payments and complex casework support;
- provided over \$51 million in financial support;
- reached over 44,000 people with food assistance;
- provided over 554,000 people with referral information and additional support for people on temporary or no visas; and
- provided 84,492 people with emergency relief payments.

We are confident that the support Red Cross has provided to migrants during the COVID-19 pandemic has indirectly helped to mitigate risks of modern slavery for migrants on temporary visas.



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# Consultation

Lifblood forms part of the Society. Lifblood's purpose of delivering life-giving blood plasma, transplantation and biological products for world-leading health outcomes is very different to Red Cross's purpose. Recognising this, Lifblood operates as a separate division with its own management team and Lifblood Board as described above.

Given Lifblood's distinct operations, this reporting period Lifblood will prepare and submit its own modern slavery statement approved by Lifblood's principal governing body, the Lifblood Board.

Red Cross consulted with Lifblood in the preparation of this Statement. Lifblood's General Counsel sits on Red Cross's Modern Slavery Steering Committee. Our established cross-functional group including Procurement, Legal, Partnerships and Strategy, includes members of both divisions and 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.

Going forward, we are developing ways to increase our engagement and consultation with Lifblood. This includes mapping the modern slavery governance structure and management across the two divisions to establish a formal structure to regularly engage cross-functionally, and across management levels, and to identify opportunities for collaboration.



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# Continuing our work

Our focus for the year ahead is to continue to build robust, repeatable processes that effectively identify and address modern slavery risks in our supply chain and operations. The table sets out our key actions for the reporting period and our plans for the coming year to illustrate our progress to date.

	FY2021	FY2022
<b>Policy commitment &amp; governance processes</b>	<ul style="list-style-type: none"> <li>Established a Modern Slavery Community of Interest to expand our governance processes to all parts of the organisation.</li> <li>Enhanced modern slavery governance.</li> <li>Appointed resource dedicated to leading modern slavery program of work.</li> </ul>	<ul style="list-style-type: none"> <li>Expand modern slavery working group and community of interest.</li> <li>Refresh the procurement strategy and policy to minimise modern slavery risk.</li> <li>Review of credit card policy.</li> <li>Policy gap analysis.</li> <li>Modern slavery incorporated on risk register.</li> </ul>
<b>Assessment of risk</b>	<ul style="list-style-type: none"> <li>High-level risk assessment of our operations &amp; supply chain.</li> <li>Modern slavery screening of all active suppliers.</li> <li>Self-assessment questionnaire to all high risk and high spend suppliers.</li> <li>Supplier Code of Conduct sent to all suppliers with spend over \$4,000 during the reporting period.</li> <li>Developed screening tool to assess risk of partners.</li> </ul>	<ul style="list-style-type: none"> <li>Develop process for assessing modern slavery risks of suppliers during the onboarding process.</li> <li>Expand supplier screening process.</li> <li>Continue to develop our supplier due diligence framework and send out self-assessment questionnaire to suppliers in next level of risk.</li> <li>Deep dive analysis of high-risk areas including partnerships with our retail stores.</li> <li>Collaborate with other not-for-profits to assess supplier risk.</li> </ul>
<b>Act &amp; Remediate</b>	<ul style="list-style-type: none"> <li>Asked all suppliers with a spend of over \$4,000 per annum to “accept” our Supplier Code of Conduct.</li> <li>Began comprehensive review of grievance process involving the Society Board.</li> <li>Conducted a training needs analysis to assess staff and volunteers’ understanding of modern slavery.</li> <li>Incorporated modern slavery risk assessment into the tender process and modern slavery clauses into significant contracts.</li> </ul>	<ul style="list-style-type: none"> <li>Develop framework for corrective action plans based on supplier segmentation strategy.</li> <li>Work with key suppliers to assess and address modern slavery risks.</li> <li>Develop support tools to enable staff and volunteers to make ethical procurement decisions taking into consideration modern slavery risks.</li> <li>Training for the Society Board and Executive Management on modern slavery with input from external experts to guide our understanding and approach.</li> <li>Targeted training to staff in high-risk areas like procurement, property management and retail.</li> </ul>

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	FY2021	FY2022
<b>Act &amp; Remediate (cont.)</b>		<ul style="list-style-type: none"> <li>Progress collaboration with other not-for-profits including sharing of resources to address risk areas.</li> <li>Begin development of the 'Work Right Hub' to provide information, tools and resources to, and take enquiries from, migrants, community stakeholders, businesses and civil societies.</li> <li>Roll out a framework to allow comprehensive due diligence of employers involved in our economic participation program and support employees as they transition into employment.</li> <li>Implement checklist to review volunteer position descriptions and clarify approval process.</li> </ul>
<b>Track effectiveness</b>	<ul style="list-style-type: none"> <li>Rolled out training needs analysis questionnaire.</li> </ul>	<ul style="list-style-type: none"> <li>Continue development of framework to track and measure the effectiveness of our efforts.</li> </ul>
<b>Stakeholder engagement &amp; grievance mechanisms</b>	<ul style="list-style-type: none"> <li>Modern slavery specifically added to Whistle-blower policy</li> <li>Began comprehensive review of complaints/concerns process with involvement of the Society Board.</li> <li>Extensive stakeholder engagement across industry leveraging our knowledge from working with vulnerable groups and survivors.</li> </ul>	<ul style="list-style-type: none"> <li>Review complaints/concerns policies and processes to ensure staff, volunteers and members are aware of the processes, and feel comfortable that we have clear and transparent processes to raise any concerns.</li> <li>Continued stakeholder engagement including commencement of the development of a 'Work Right Hub'.</li> </ul>
<b>Reporting &amp; communication</b>	<ul style="list-style-type: none"> <li>Incorporated modern slavery discussions in reviews with key suppliers.</li> </ul>	<ul style="list-style-type: none"> <li>Incorporate modern slavery discussion in all supplier reviews.</li> <li>Develop and implement ongoing process of measurement and reporting around grievance mechanism.</li> <li>Implement formal processes for consultation and collaboration across relevant management and operational areas with Lifeblood.</li> </ul>

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

[Modern Slavery Resources](#) – in August 2019, thanks to a grant from the Department of Home Affairs, Red Cross published a suite of multilingual materials with information about modern slavery for community members and frontline workers. A flyer, postcard, brochure, smaller discreet brochure and poster are available to download from our website in 12 different languages. These materials include print resources explaining human trafficking, forced labour and domestic servitude indicators and where to get help.

[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. The report highlights a significant increase in the number of referrals received per calendar year in 2018 and 2019, as well as gradual changes in the primary ‘reason for referral’ (as determined by the AFP) throughout the decade. The report aims to increase understanding of not only the prevalence but also the diversity of ways in which people have experienced exploitation in Australia.

[Addressing Modern Slavery – A Guide for Australian Businesses](#) – in January 2020, Red Cross was pleased to publish this guide developed in conjunction with students from Ducere Global Business School, which supports businesses who are reporting entities under the Modern Slavery Act to meet their reporting obligations and to effectively contribute to combating modern slavery.



## COVID-19 and modern slavery resources

[IFRC, COVID-19 Impact on Trafficking in Persons – Factsheet](#) – this factsheet is a quick reference tool describing how the COVID-19 global pandemic may place communities at increased risk of trafficking and how it may impact trafficked persons, 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.



[Least protected, most affected: migrants and refugees facing extraordinary risks during the COVID-19 pandemic](#) – The report contains a number of recommendations for governments on how COVID-19 responses can best keep everyone safe, including by ensuring the policies introduced to control the pandemic are not used to justify inhumane treatment of migrants and refugees.

[COVID-19 IMPACTS US ALL Ensuring the safety and well-being of people on temporary visas during COVID-19](#) –This report shares what Red Cross has learnt about the impact of COVID-19 on people on temporary visas and people without visas in Australia through our humanitarian response to the pandemic.

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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. United Nations Office on Drugs and Crime (UNODC), 2016 Trafficking in Persons Report (pg. 14).
4. Nerida Chazal & Kyla Raby, The Impact of Covid-19 on the Identification of Victims of Modern Slavery and their Access to Support Services in Australia, *Journal of Modern Slavery*, Volume 6, Issue 2, 2021.
5. Lyneham S, Dowling C & Bricknell S 2019. *Estimating the dark figure of human trafficking and slavery victimisation in Australia*. Statistical Bulletin no. 16. Canberra: Australian Institute of Criminology. <https://www.aic.gov.au/publications/sb/sb16>.
6. Story is based on a real-life story but names have been changed to protect privacy.
7. For more information, see Support for [Trafficked People Program](#).
8. Red Cross has offices in each state and territory and a national office, combined with the state office, in Victoria.
9. Direct active suppliers are those that we purchased from during the reporting period. Direct active suppliers excludes spend via credit cards or petty cash.
10. [2020 List of Goods Produced by Child Labor or Forced Labor \(dol.gov\)](#) [Forced Labor in Malaysia's Electronics Industry - The Atlantic](#), [VeriteForcedLaborMalaysianElectronics2014.pdf](#).
11. International Red Cross and Red Crescent, 33rd International Conference, International Statutory Meetings Pledges, [Modern Slavery](#).

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