

Modern Slavery – Supplier Factsheet

This fact sheet is designed to provide Waverley Council’s suppliers with an overview of Council’s commitments and steps to reducing modern slavery risks in its supply chain and how these relate to your business. It also provides an outline of what modern slavery is, and guidance on how to identify it and reduce the risk of occurrence in your operations and supply chain.

Background

Under legislation all NSW councils are required to take reasonable steps to ensure that the goods and services they procure are not the product of modern slavery. They must report annually to the NSW Anti-slavery Commissioner on the steps they have taken.

Regardless of legislative requirements, as a spender of public monies, Waverley places high importance on our ethical obligation to consider, identify and manage modern slavery risks within our supply chain.

Council has adopted a Procurement Framework outlining our commitment to preventing and addressing modern slavery in all our procurement activities. A copy of the policy can be found [here](#).

As part of Council’s efforts to reduce modern slavery risk in our supply chain we will be asking suppliers to respond to modern slavery questionnaires as required. We include modern slavery criteria in all Request for Tender and Request for Quote documents. Modern slavery risk management is then carried through to the management of contracts, with modern slavery clauses and Key Performance Indicators.

The intent is to better ensure that Council is not unknowingly supporting or propelling modern slavery practices.

Council has expectations that all its suppliers will

- not engage in modern slavery
- take reasonable steps to ensure that their suppliers and sub-contractors do not engage in modern slavery
- be aware of modern slavery risks facing their business and actively work towards reducing (with the intent of eliminating) those risks
- be open and honest with Council and report any instances of modern slavery found within their operations and supply chain
- adhere to Council’s Code of Conduct and Statement of Business Ethics

Council wants to work with its suppliers to help them in addressing modern slavery risks and this factsheet forms part of that help.

What is Modern Slavery?

Modern slavery is the exploitation of other people for personal or commercial gain. The 2023 [Global Slavery Index](#) estimates that 49.6 million people globally are victims of modern slavery, and that there are around 41,000 potential victims in Australia.

Modern slavery comes in many forms. The most common forms are:

- Human trafficking – involving transporting, recruiting, or harbouring people through violence, threat or coercion, for the purpose of exploitation.
- Forced labour – any work or service which people are forced to do against their will under the threat of some form of punishment.
- Debt bondage / bonded labour – when people borrow money they cannot repay and are required to work to pay off the debt, and then subsequently lose control over the conditions of both their employment and the debt repayment.
- Descent-based slavery – where a person born to an enslaved parent inherits their slave status.
- Slavery of children – when a child is exploited for someone else's gain.
- Forced and early marriage – when a person is married without their consent or against their will.

When someone is being subjected to modern slavery, they are trapped and unable to free themselves from their situation due to being controlled by the perpetrator.

What to look for when assessing for potential modern slavery risk in your supply chain.

The following are risk factors to be considered:

- Where a large order is placed, and a very short turn-around time can be achieved.
- If a contractor quotes a price that seems too cheap.
- If a contractor and/or sub-contractor employs workers who are more vulnerable to exploitative practices i.e base-skill workers and migrant workers.

When these occur, it is possible that modern slavery is happening.

Certain categories and products have higher modern slavery risks. The following categories and products as having a higher risk for modern slavery occurrence:

Categories

Domestic work, construction, manufacturing, agriculture, forestry, and fishing.

Products

Cotton, bricks, garments, and electronics – laptops, computers, and mobile phones.

The risk of modern slavery being present in the supply chain is also higher when product manufacture and raw materials sourcing occur in certain parts of the world. The following countries/regions have been identified as having a higher risk of modern slavery occurring.

Highest prevalence (greatest proportion of population):

North Korea, Eritrea, Mauritania, Saudi Arabia, Türkiye, Tajikistan, United Arab Emirates, Russia, Afghanistan, Kuwait

Largest estimated numbers:

India, China, North Korea, Pakistan, Russia, Indonesia, Nigeria, Türkiye, Bangladesh, United States

Products and raw materials sourced from these countries/regions should be considered as having a higher modern slavery risk.

The NSW Anti-slavery Commissioner has developed an Inherent Risk Identification Tool that utilises information from many sources to classify if a product is high, moderate, or low risk for modern slavery. The tool can be accessed [here](#).

If the products that you source for your business, either for internal use or to resell, are identified as having a high risk for modern slavery occurrence, below are some tips on how you can work to reduce that risk.

Tips to reduce modern slavery risks

Below are some tips on what you can do to start addressing modern slavery and reduce the risk of it occurring in your operations and supply chain.

- Ensure that all employees are paid according to Australian labour laws and, where relevant, the industry award.
- Ensure that all employees are provided with a safe working environment and are not forced to work excessive hours.
- Learn about modern slavery and how it relates to your sector, business, and supply chains.
- Develop a modern slavery action plan – a process for identifying and addressing modern slavery risk
- Talk to your suppliers – ask them relevant questions to understand their business practices and how they identify and manage modern slavery risks in their operations and supply chains.

If they are supplying you with products that are imported from outside Australia, ask them to investigate and report back to you (with evidence) if the tankships used for

import are compliant with the Maritime Labour Convention 2006 and are regularly inspected and audited by appropriate Maritime Authorities.

If your business is the importer, ask the shipping company directly. If they cannot provide you with assurance and evidence that they are meeting or actively working towards meeting those requirements, consider changing your provider.

For suppliers that are providing you with a service, ask them to provide evidence they are paying their employees a fair wage and that all employees are subjected to fair working conditions consistent with Australian labour laws. Cross-check this with what you are seeing onsite and/or actual delivery timeframes vs reasonable delivery timeframes expected for the number of staff employed. Also ask them to provide information on their recruitment processes and the percentage of their staff that are from vulnerable populations (i.e base-skill workers and migrant workers).

- When engaging new suppliers ask them to complete a questionnaire that will provide you with information on how they are addressing modern slavery in their operations and supply chains.
- Include a modern slavery clause in your supplier contracts.
- Provide your staff and management with access to modern slavery awareness training.
- Ensure your staff and management are aware of how your business is addressing, or planning address, modern slavery risks in your operations and supply chain.
- Develop a policy relating to modern slavery and your commitments to ensure that your business does not knowingly contribute to its occurrence. For example: Human rights Policy, Ethical Sourcing Policy, Modern Slavery Prevention Policy.

Clues that identify a potential victim of modern slavery

- Controlled by another person
- Lack of official identification
- Not able to move around freely
- Foreign, unfamiliar with the language
- Lack of personal belongings, wearing the same clothes every day or wearing clothes unsuitable for work
- Reluctant to speak to strangers or the authorities
- Appear frightened or withdrawn, or showing signs of physical or psychological abuse

- Dropped off and collected for work always in the same way, especially at unusual times

What should you do if you suspect modern slavery is occurring?

If you suspect that someone is a victim of modern slavery you should report this to the Australian Federal Police. This can be done anonymously using their [online form](#), Alternatively call 131 AFP (131237) or email NOSSC-Client-Liaison@afp.gov.au

In the case of an emergency, call 000.

Resources and Useful Websites

LGP Sustainable Choice <https://lgp.org.au/sustainable-choice/suppliers/modern-slavery>

NSW Anti-slavery Commissioner's Inherent Risk Identification Tool [Due diligence and reporting | Communities and Justice \(nsw.gov.au\)](#)

Commonwealth Modern Slavery Act (2018)
<https://www.legislation.gov.au/Details/C2018A00153>

Commonwealth Modern Slavery Act (2018) Guidance for Reporting Entities
<https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>

NSW Modern Slavery Act (2018) <https://www.legislation.nsw.gov.au/#/view/act/2018/30>

Australian Modern Slavery Register & procurement toolkit
<https://modernslaveryregister.gov.au/resources/>

Global Slavery Index <https://www.globalslaveryindex.org/>

How to Develop a Human Rights Policy
https://www.ohchr.org/Documents/Publications/DevelopHumanRightsPolicy_en.pdf

List of Goods Produced by Child Labour or Forced Labour
<https://www.dol.gov/agencies/ilab/reports/child-labor/list-of-goods>

International Labour Organisation <https://www.ilo.org/global/topics/forced-labour/lang-en/index.htm>

Australian Human Rights Commission <https://humanrights.gov.au/our-work/employers/business-and-human-rights-factsheets>

Shop Ethical – ethical consumer guide
<https://guide.ethical.org.au/guide/browse/categories/>