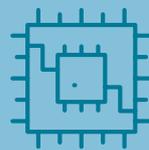
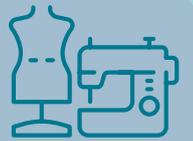




Australian Government

Commonwealth Modern Slavery Statement 2023–24



Acknowledgement of Country

We acknowledge the Traditional Owners and Custodians of Country throughout Australia and acknowledge their continuing connection to land, waters and community. We pay our respects to the people, the cultures and the Elders past, present and emerging.

Dedication

The *Commonwealth Modern Slavery Statement 2023–24* is dedicated to the people and organisations who work tirelessly to prevent modern slavery, and support victims and survivors of modern slavery seeking to rebuild their lives.

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Commonwealth
Modern Slavery
Statement 2023–24

Foreword

Prime Minister



Modern slavery is an abhorrent and evolving reality. Increasingly complex in how it is perpetrated, it is often hidden deep in supply chains that are vast and intricate.

Modern slavery goes against everything we are as a nation. The Australian Government will never tolerate it. Yet eliminating it is a task that cannot be undertaken by government alone.

If we are to address modern slavery in a way that is both meaningful and enduring, we need government, business and civil society to continue working together with determination and clarity of purpose.

The fifth Commonwealth Modern Slavery Statement (Commonwealth Statement) reflects the Australian Government's ongoing commitment to leading by example, including by identifying and addressing the risks of modern slavery in our own operations and supply chains.

I am pleased to support the Commonwealth Statement, and I thank everyone across government who has contributed to its development and the crucial work it outlines.

The Hon Anthony Albanese MP
Prime Minister of Australia
December 2024

Foreword

Attorney-General



I am pleased to present the fifth Commonwealth Modern Slavery Statement, covering the period 1 July 2023 to 30 June 2024, describing the actions taken across government to assess and address risks of modern slavery in our operations and supply chains.

This Commonwealth Statement is developed under section 15 of the *Modern Slavery Act 2018* (Cth) (the Act). It demonstrates our ongoing dedication to strengthening Australia's response to modern slavery and our commitment to increase our understanding of our supply chains.

We are focused on improving capability across government to identify and address risks of modern slavery. To bolster our response, the Australian Government has announced \$2.5 million over two years (2024–25 and 2025–26) to examine the Commonwealth's procurement procedures and supply chains.

The Australian Government seeks to lead by example in continuously improving our response to modern slavery risks in supply chains. This audit will give us increased visibility over modern slavery risks in key areas of the Commonwealth's vast and complex supply networks. This will inform our next phase of reporting under the Act.

Proactive engagement and collaboration are key to combatting modern slavery risks in public sector procurement. Throughout the reporting period, the Australian Government has engaged with international and domestic counterparts to promote information sharing and identification of best practice.

On 28 May 2024, the Australian Parliament passed the *Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Act 2024* (Cth), which received Royal Assent on 11 June 2024. This landmark legislation establishes Australia's first Australian Anti-Slavery Commissioner as an independent office holder and as an important part of Australia's comprehensive response to modern slavery. The Australian Anti-Slavery Commissioner will further strengthen the work undertaken across government, business and civil society to prevent and respond to modern slavery by supporting victims and survivors, raising community awareness, and helping business address the risks of modern slavery in their operations and supply chains.

The Australian Government also introduced several reforms to prevent worker exploitation in its worst forms, for instance, the *Migration Amendment (Strengthening Employer Compliance) Act 2024* (Cth), which creates new criminal offences for misusing migration rules to exploit temporary migrant workers in the workplace, and allows for the prohibition of employers who have engaged in serious, deliberate and repeated exploitation of workers from employing additional temporary migrants for a period of time.

This Commonwealth Statement highlights the depth and breadth of action across government in pursuit of this very important cause. Together, we remain committed to combatting modern slavery and ensuring goods and services procured in Australia do not contribute to modern slavery.

In accordance with section 15 of the *Modern Slavery Act 2018* (Cth), it is my pleasure to submit this fifth Modern Slavery Statement for the 2023–24 reporting period on behalf of the Commonwealth Government of Australia.



The Hon Mark Dreyfus KC MP
Attorney-General of Australia
December 2024

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Executive summary

In this fifth Commonwealth Modern Slavery Statement (Commonwealth Statement), published pursuant to the *Modern Slavery Act 2018* (Cth), the Commonwealth describes its actions to identify, assess and address risks of modern slavery in Commonwealth operations and supply chains during the 2023–24 Australian financial year (reporting period).

The Commonwealth Statement covers all non-corporate Commonwealth entities (NCEs), within the meaning of the *Public Governance, Performance and Accountability Act 2013* (Cth) (PGPA Act). During the reporting period, there were 101 NCEs as listed in the table on page 12, representing the arrangement of portfolios as they stood during the reporting period.

The Commonwealth is one of the largest procurers of a vast range of goods and services in the Australian market, and consequently has a procurement profile characterised by complex and diverse supply chains. The Commonwealth is committed to continuously improving and progressing its identification and mitigation of modern slavery risks across public procurements and investments. In so doing, the Commonwealth has continued to focus on its identified high-risk areas: information and communications technology (ICT) hardware, cleaning and security services, investments, textiles, and construction.

This reporting period represents the second year of the *implementation phase* of the Commonwealth's six-year program of work. In the first year of the *implementation phase*, the Commonwealth undertook a supply chain mapping exercise at a whole-of-government level. During this reporting period, the Commonwealth built upon the supply chain mapping work to focus on developing guidance and tools for supplier engagement and conceptualising a modern slavery risk management lifecycle to help Commonwealth officials understand and manage risks of modern slavery. The aim of this work is to increase the capacity and capability of Commonwealth officials, including through cross-agency collaboration, to engage with risks of modern slavery in Commonwealth operations and supply chains.

NCEs continued to work together to promote existing modern slavery risk tools and guidance to increase awareness of modern slavery risks and understand individual entity challenges.

Looking forward, the Commonwealth aims to increase the capability of its officials to engage with suppliers through a range of tools and methodologies, further embed modern slavery risk considerations into entities' risk management frameworks, and progress the review of its procurement procedures and supply chains. Moving into the final phase of action under its six-year strategy, the Commonwealth will consider the overall effectiveness of its current approach to addressing modern slavery risks and commence planning for the future.

Prioritising continuous improvement – key improvements in this Commonwealth Statement

Key improvements in reporting for this Commonwealth Statement include:

- greater detail on how due diligence processes are implemented at a whole-of-government and individual agency level to assess and address modern slavery risks in Commonwealth operations and supply chains
- insights on how procurement and contract management practices have been improved to better identify, assess and address risks of modern slavery
- greater detail on how NCEs collaborate to improve the whole-of-government response to modern slavery
- information on processes within the Commonwealth for potential victims to raise grievances.
- greater detail on individual NCEs' measures to assess effectiveness of their actions to address modern slavery risks in their operations and supply chains.

How this Commonwealth Statement addresses the seven mandatory criteria in the *Modern Slavery Act 2018 (Cth)*

| Reporting requirement under the <i>Modern Slavery Act 2018 (Cth)</i> | Section in the Commonwealth Statement where the requirement is addressed | Page |
|--|--|-----------------|
| Section 16(1)(a) Identify the reporting entity | Section 1: Covered entities, structure, operations and supply chains | 10 |
| Section 16(1)(b) Describe the structure, operations and supply chains of the reporting entity | Section 1: Covered entities, structure, operations and supply chains | 10 |
| Section 16(1)(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls | Section 2: Whole-of-government overview; and Section 3: Input from Government portfolios and parliamentary departments | 20 and 42 |
| Section 16(1)(d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes | Section 2: Whole-of-government overview; and Section 3: Input from Government portfolios and parliamentary departments | 20 and 42 |
| Section 16(1)(e) Describe how the reporting entity assesses the effectiveness of such actions | Section 2: Whole-of-government overview; and Section 3: Input from Government portfolios and parliamentary departments | 20 and 42 |
| Section 16(1)(f) Describe the process of consultation with (i) any entities that the reporting entity owns or controls and (ii) for a reporting entity covered by a joint statement, the entity giving the statement | Section 5: Consultation | 87 |
| Section 16(1)(g) Include any other information that the reporting entity considers relevant | Section 6: Related activities | 89 |

1

Section 1

Covered entities, structure,
operations and supply chains

This section identifies the Commonwealth as the reporting entity and describes the structure, operations and supply chains of the Commonwealth, as required by section 16(1)(a) and section 16(1)(b) of the *Modern Slavery Act 2018 (Cth)*.

Australian Government's structure and Commonwealth Statement coverage

There are four types of governance structures that support Australian Government bodies to undertake government activities:

- primary bodies which includes NCEs, corporate Commonwealth entities (CCEs), and Commonwealth companies
- secondary statutory structures
- secondary non-statutory structures
- other governance relationships.

Section 15 of the Modern Slavery Act requires the Minister to prepare a modern slavery statement for the Commonwealth, for a reporting period, covering all NCEs within the meaning of the PGPA Act. In accordance with this requirement, this Commonwealth Statement covers all NCEs within the meaning of the PGPA Act.

Non-corporate Commonwealth entities

NCEs are legally and financially part of the Commonwealth of Australia and include:

- **departments of state** – the main bodies that reflect the structure of government
- **parliamentary departments** – support the operation of the Parliament of Australia, its committees and members
- **listed entities** – prescribed by legislation and can be any body, person, group of persons or an organisation.

During the reporting period, there were 101 NCEs, arranged into 15 different portfolios, with each portfolio containing at least one department of state and additional listed entities (see table on page 12). The four parliamentary departments are included in the total number of NCEs but do not sit within a portfolio. Information on the structure of each portfolio, and the parliamentary departments is provided in **Section 3**.

Corporate Commonwealth entities and Commonwealth companies

CCEs and Commonwealth companies are legally separate from the Commonwealth of Australia and so are not covered by this Commonwealth Statement. The Modern Slavery Act requires CCEs and Commonwealth companies that meet the reporting threshold outlined in section 5 of the Modern Slavery Act to prepare their own modern slavery statement detailing the risks of modern slavery in their operations and supply chains, and the actions they have taken to address those risks.

List of *Public Governance, Performance and Accountability Act 2013 (Cth)* non-corporate Commonwealth entities during the reporting period (101)

Agriculture, Fisheries and Forestry

- Department of Agriculture, Fisheries and Forestry
- Australian Fisheries Management Authority

Attorney-General's

- Attorney-General's Department
- Administrative Appeals Tribunal
- Australian Crime Commission (Australian Criminal Intelligence Commission)
- Australian Federal Police
- Australian Financial Security Authority
- Australian Institute of Criminology
- Australian Law Reform Commission
- Australian Transaction Reports and Analysis Centre
- Federal Court of Australia
- National Anti-Corruption Commission
- Office of the Australian Information Commissioner
- Office of the Commonwealth Ombudsman
- Office of the Director of Public Prosecutions
- Office of the Inspector-General of Intelligence and Security
- Office of Parliamentary Counsel
- Office of the Special Investigator

Climate Change, Energy, the Environment and Water

- Department of Climate Change, Energy, the Environment and Water
- Bureau of Meteorology
- Clean Energy Regulator
- Climate Change Authority
- Great Barrier Reef Marine Park Authority

Defence

- Department of Defence (which, for the purposes of this Commonwealth Statement, refers to the Department of Defence and the Australian Defence Force (ADF))
- Australian Signals Directorate
- Australian Submarine Agency
- Department of Veteran's Affairs

Education

- Department of Education
- Australian Research Council
- Tertiary Education Quality and Standards Agency

Employment and Workplace Relations

- Department of Employment and Workplace Relations
- Asbestos and Silica Safety and Eradication Agency
- Australian Skills Quality Authority (National Vocational Education and Training Regulator)
- Fair Work Commission
- Office of the Fair Work Ombudsman
- Safe Work Australia
- Seafarers Safety, Rehabilitation and Compensation Authority (Seacare Authority)

Finance

- Department of Finance
- Australian Electoral Commission
- Digital Transformation Agency
- Future Fund Management Agency
- Independent Parliamentary Expenses Authority
- Parliamentary Workplace Support Service

Foreign Affairs and Trade

- Department of Foreign Affairs and Trade
- Australian Centre for International Agricultural Research
- Australian Secret Intelligence Service
- Australian Trade and Investment Commission (Austrade)

Health and Aged Care

- Department of Health and Aged Care
- Aged Care Quality and Safety Commission
- Australian National Preventive Health Agency
- Australian Radiation Protection and Nuclear Safety Agency
- Cancer Australia
- National Blood Authority
- National Health and Medical Research Council
- National Health Funding Body
- National Mental Health Commission
- Office of the Inspector-General of Aged Care
- Organ and Tissue Authority
- Professional Services Review
- Sport Integrity Australia

Home Affairs

- Department of Home Affairs
- Australian Security Intelligence Organisation
- National Emergency Management Agency

Industry, Science and Resources

- Department of Industry, Science and Resources
- Geoscience Australia
- IP Australia

Infrastructure, Transport, Regional Development, Communications and the Arts

- Department of Infrastructure, Transport, Regional Development, Communications and the Arts
- Australian Communications and Media Authority
- Australian Transport Safety Bureau
- National Archives of Australia
- National Capital Authority

Prime Minister and Cabinet

- Department of the Prime Minister and Cabinet
- Australian National Audit Office
- Australian Public Service Commission
- National Indigenous Australians Agency
- Office of National Intelligence
- Office of the Official Secretary to the Governor-General
- Workplace Gender Equality Agency

Social Services

- Department of Social Services
- Australian Institute of Family Studies
- Domestic, Family and Sexual Violence Commission
- NDIS Quality and Safeguards Commission
- Services Australia

Treasury

- Department of the Treasury
- Australian Bureau of Statistics
- Australian Competition and Consumer Commission
- Australian Office of Financial Management
- Australian Prudential Regulation Authority
- Australian Securities and Investments Commission
- Australian Taxation Office
- Commonwealth Grants Commission
- Inspector-General of Taxation
- National Competition Council
- Office of the Auditing and Assurance Standards Board
- Office of the Australian Accounting Standards Board
- Productivity Commission
- Royal Australian Mint

Parliamentary Departments (not a portfolio)

- Department of Parliamentary Services
- Department of the House of Representatives
- Department of the Senate
- Parliamentary Budget Office

Australian Government's operations

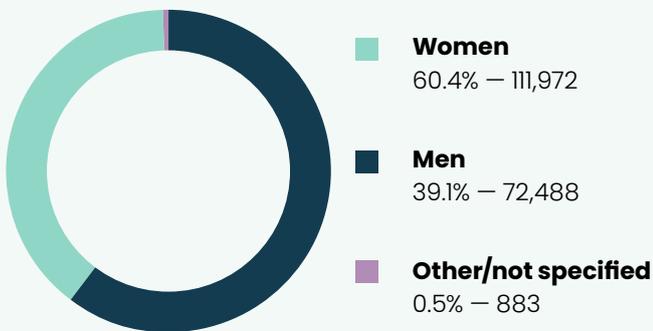
Operations refer to activity undertaken by an entity to pursue its business objectives and strategy. Executive responsibility is allocated through the Administrative Arrangements Order, which specifies the matters dealt with by each department and the legislation administered by each minister.

The responsibilities of the Australian Government include developing and implementing national policies and legislation, making important decisions on behalf of Australians, and representing Australia overseas.

NCEs operationalise these matters through program implementation, service delivery, regulatory and enforcement functions, working in collaboration with civil society partners, peak bodies and state and territory governments. The Australian Government also provides grants and contracts to service providers to assist in achieving these objectives.

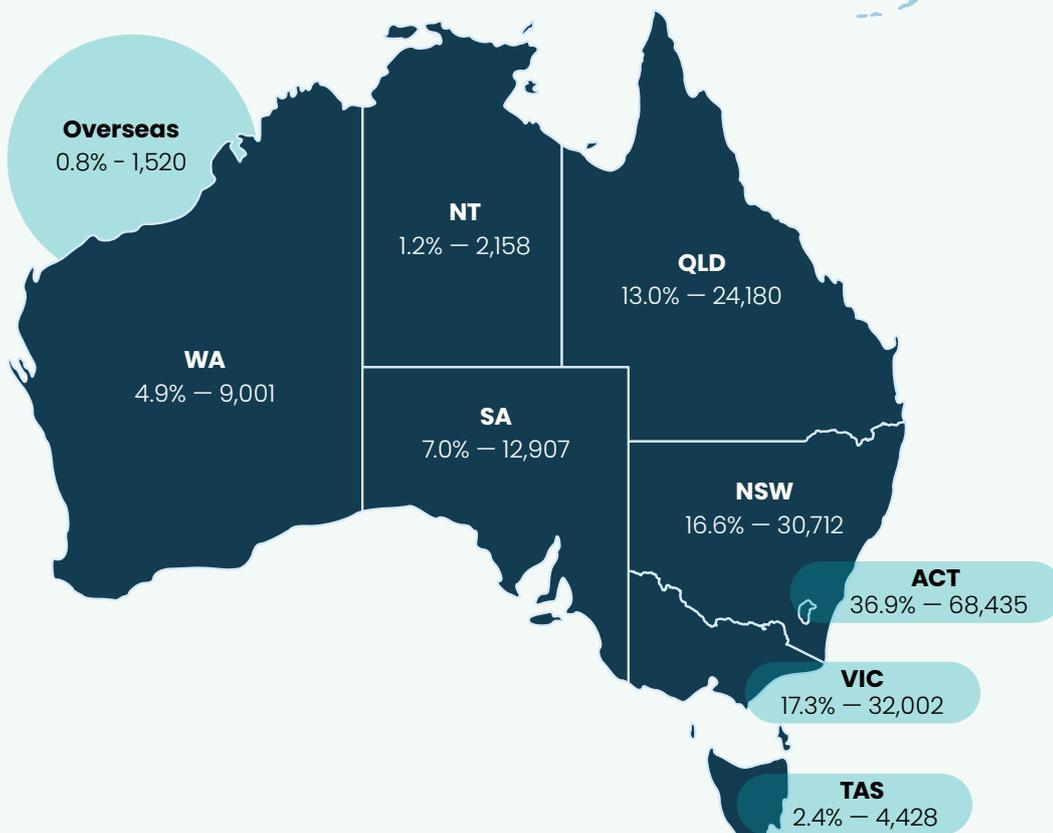
Throughout the reporting period, the Australian Government employed 185,433 Australian Public Service (APS) staff under the *Public Service Act 1999* (Cth), and operated an overseas diplomatic network through 125 overseas posts in 86 countries to support the representation of Australian citizens.

APS Employment as at 30 June 2024

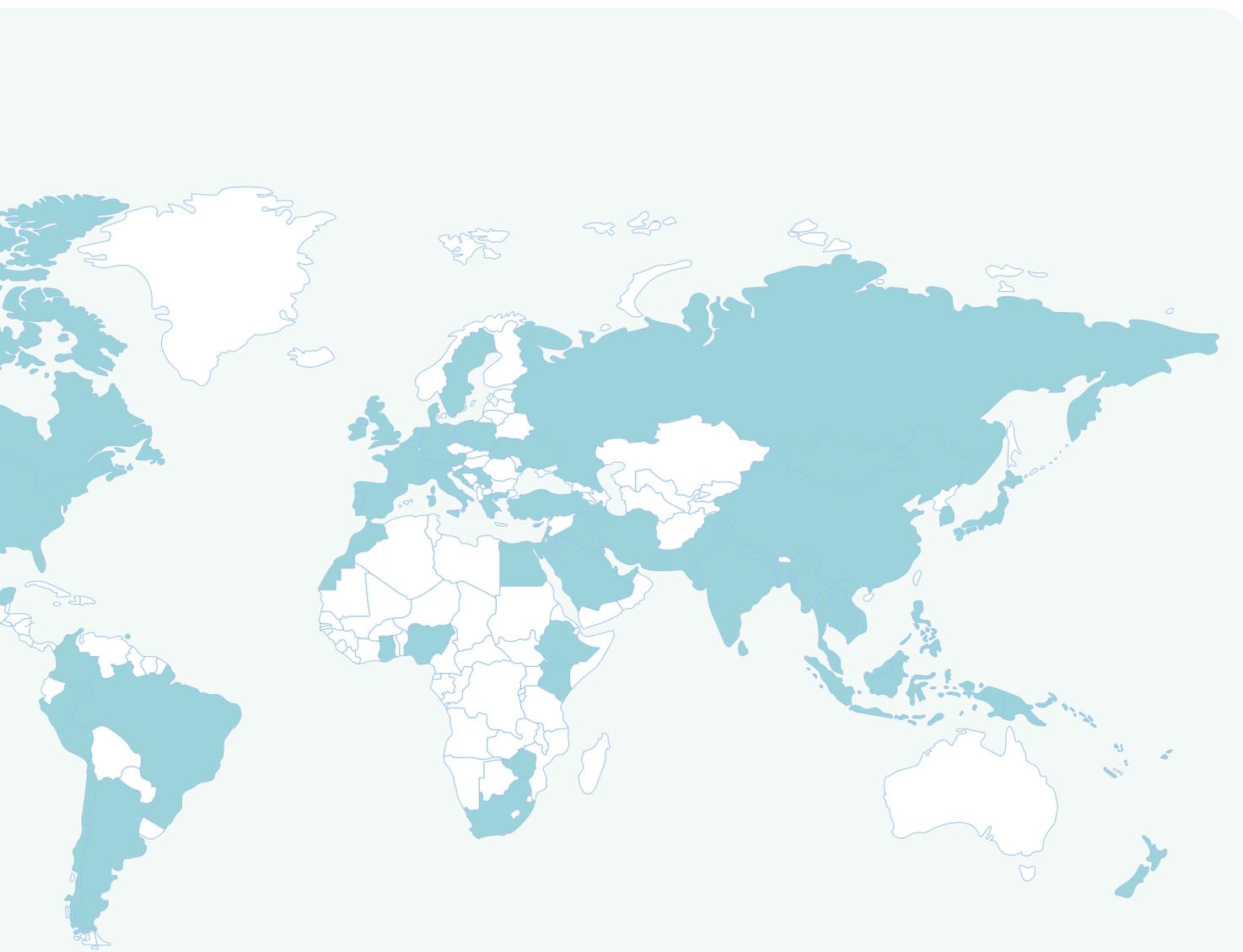


Non-ongoing employees 8.2% – 15,157

Part-time employees 11.8% – 21,833



More information on the Commonwealth's operations within each portfolio and the parliamentary departments are outlined in **Section 3**.



World map of Australian Diplomatic missions

Australian Diplomatic missions include Australian Government Embassies, High Commissions, Consulates, Multilateral Missions and Representative Offices.

■ **Activities in 86 countries**

Commonwealth supply chains

The Commonwealth is one of the largest procurers in the Australian market, purchasing a diverse range of products and services each year.

The Commonwealth's supply chains vary greatly in size and complexity, and include products and services sourced in Australia and overseas.

Supply chains refer to the products and services (including labour) that contribute to the entity's own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers. The definition includes products and services provided to the entity by suppliers, and products and services used by indirect suppliers in the entity's supply chains.

Overview of Commonwealth procurement activities during the reporting period

Over the reporting period, the Commonwealth entered into 83,453 contracts, with a total value of \$99.6 billion. The following graphics provide an overview of the Commonwealth's procurement activity over the reporting period. This information helps outline key components of the Commonwealth's supply chains and operations.

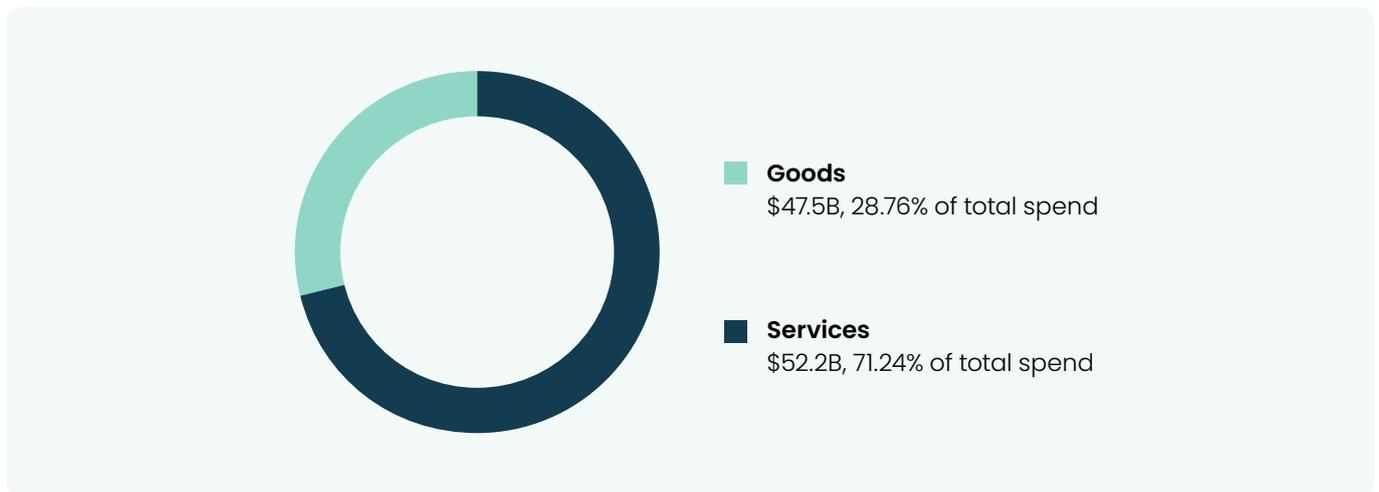


Figure 1. Proportion of Contracts by Type FY23–24

Snapshot



101
non-corporate
Commonwealth
entities covered
by AusTender
data



537
AusTender
categories



83,453
contracts entered
into, with a total
value of \$99.6
billion

5.93%

by volume
(4,946) and

22.97%

by value (\$22.9
billion) of suppliers
located overseas



\$18.7b
of contracts
awarded to
small to medium
enterprises

94.07%
of suppliers
located in
Australia
(by volume)



71.24%
of contracts for
services, with
a value of
\$52.2 billion

28.76%
of contracts
were for goods,
with a value of
\$47.5 billion

77.03%
of total
procurement
spend from
suppliers
located in
Australia
(by value)



*Supplier location does not reflect whether it is an Australian-owned business, as AusTender does not collect this information. In addition, overseas questions are non-mandatory on AusTender. For 2023-24, 93.27% of contracts by value indicated whether the contract was procured and used overseas.

Top 20 categories for goods and services during the reporting period*

| Category | Value | Value % | Volume | Volume % |
|---|---------------|---------|--------|----------|
| 1) Military fixed wing aircraft | \$9.2 billion | 9.24% | 53 | 0.06% |
| 2) Building construction and support and maintenance and repair services | \$6.5 billion | 6.56% | 3,056 | 3.66% |
| 3) War vehicles | \$5.3 billion | 5.32% | 562 | 0.67% |
| 4) Computer services | \$4.4 billion | 4.43% | 7,585 | 9.09% |
| 5) Lease and rental of property or building | \$4.3 billion | 4.33% | 1,135 | 1.36% |
| 6) Military rotary wing aircraft | \$4.1 billion | 4.07% | 115 | 0.14% |
| 7) Real estate services | \$3.7 billion | 3.75% | 16 | 0.02% |
| 8) Aircraft | \$3.6 billion | 3.58% | 143 | 0.17% |
| 9) Missiles | \$3.3 billion | 3.28% | 24 | 0.03% |
| 10) Management support services | \$3.0 billion | 3.01% | 2,384 | 2.86% |
| 11) Components for information technology or broadcasting or telecommunications | \$2.5 billion | 2.46% | 1,287 | 1.54% |
| 12) Temporary personnel services | \$2.3 billion | 2.33% | 8,226 | 9.86% |
| 13) Professional engineering services | \$2.3 billion | 2.33% | 783 | 0.94% |
| 14) Property management services | \$1.9 billion | 1.96% | 460 | 0.55% |
| 15) Education and Training Services | \$1.9 billion | 1.95% | 4,214 | 5.05% |
| 16) Management advisory services | \$1.8 billion | 1.83% | 3,435 | 4.12% |
| 17) Marine craft systems and subassemblies | \$1.7 billion | 1.68% | 1,006 | 1.21% |
| 18) Aerospace systems and components and equipment | \$1.6 billion | 1.63% | 346 | 0.41% |
| 19) Software | \$1.4 billion | 1.45% | 2,319 | 2.78% |
| 20) Aircraft maintenance and repair services | \$1.3 billion | 1.28% | 118 | 0.14% |

* Based on contracts reported to AusTender during the reporting period

Supply Network Analysis Program

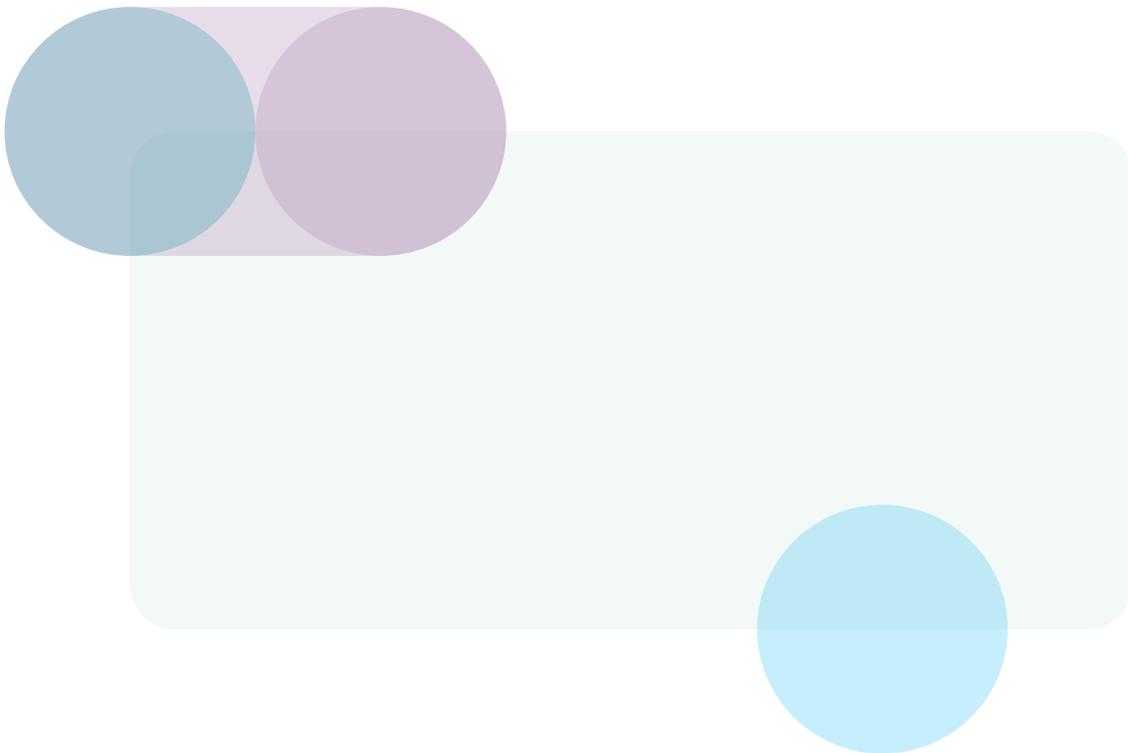
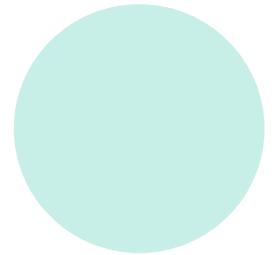
In the previous reporting period, the Commonwealth utilised the Department of Defence's Supply Network Analysis Program (SNAP) to commence mapping of its construction supply chain. It also built on earlier ICT supply chain mapping to better understand modern slavery supply chain vulnerabilities within its multi-tier supply network (Phase 1). Phase 1 of the SNAP project has illustrated the complexity of Australian Government supply chains and underlines the challenges NCEs face in managing risks of modern slavery in their supply chains. See *Commonwealth Modern Slavery Statement 2022–23* for further information on Phase 1.

Building on the findings of Phase 1, the Commonwealth has progressed a second phase of work to develop tools and guidance to strengthen the management of identified modern slavery risks in Commonwealth operations and supply chains, and to promote engagement with suppliers by NCEs.

An overview of the second phase of the SNAP project is provided in **Section 2**.

A review of the Commonwealth's supply chains

During the reporting period, funding of \$2.5 million over two years has been allocated by the Australian Government to undertake a review of the Commonwealth's procurement procedures and supply chains. Further information about the review is provided in **Section 4**.



2

Section 2

Whole-of-Government Overview

Section 16(1)(c) of the *Modern Slavery Act 2018* (Cth) requires reporting entities to describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.

Section 16(1)(d) of the *Modern Slavery Act 2018* (Cth) requires reporting entities to describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.

Section 16(1)(e) of the *Modern Slavery Act 2018* (Cth) requires reporting entities to describe how the reporting entity assesses the effectiveness of such actions.

This Commonwealth Statement reflects the *implementation* phase of the Commonwealth's six-year planned program of work (reporting strategy) to address modern slavery risks in Commonwealth supply chains and operations.

The reporting strategy aligns with the Commonwealth's approach of continuously improving its response to risks of modern slavery.

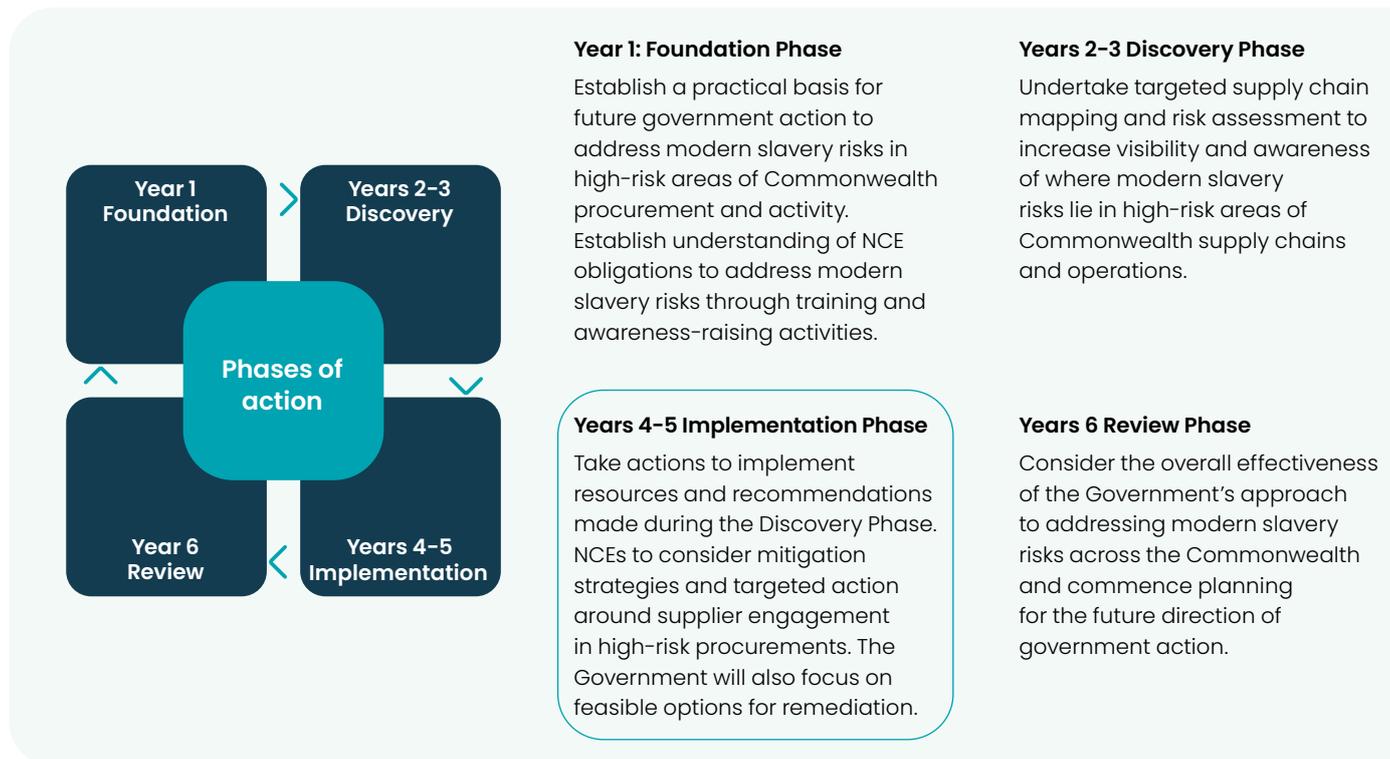


Figure 2. Commonwealth's planned six-year program of work

The *implementation* phase of the reporting strategy builds on the work undertaken in the *discovery* phase by focusing on implementing the resources and recommendations identified during the *discovery* phase.

During the *discovery* phase, the Commonwealth assessed the five risk areas of focus across the Commonwealth's operations and supply chains: ICT hardware, cleaning and security services, investments, textiles, and construction.

Over the reporting period, the Commonwealth continued its targeted risk-based approach, focusing at a whole-of-government level, on addressing key areas of known modern slavery risks. Risks of modern slavery in NCE operations and supply chains continued to be assessed at individual NCE and portfolio levels. Descriptions of these risks and specific actions are outlined in **Section 3**.

High-risk areas of focus

The five key areas of focus for modern slavery risks (five key risk areas) for the Commonwealth continues to be ICT hardware, cleaning and security services, investments, textiles, and construction. During the *foundation* and *discovery* phase, the Commonwealth assessed – through consideration of indicators such as geographic risks, product specific risks,

organisation risks, and sector and industry risks – that its supply chains within these sectors may expose workers to a greater risk of modern slavery. These areas are also generally high purchasing areas in the Commonwealth's purchasing profile. The five key risk areas by value of Commonwealth procurement activities are listed on the following page.

Risks to people as the primary concern

Through training resources and targeted engagement workshops throughout the reporting period, Commonwealth officials were reminded that when assessing risks of modern slavery, the primary concern is the risk to people, rather than the risk to the entity.

The top categories of Commonwealth procurement (refer to page 18) highlights collective Commonwealth spending across the top 20 categories of goods and services procured. However, it is important to note that high spend does not always equate to high-risk of modern slavery.

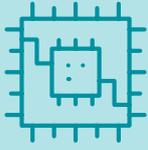
Implementing processes to address risks of modern slavery in Commonwealth contracts

The Commonwealth's approach of targeting these five key risk areas at the whole-of-government level during the *implementation* phase aims to leverage the Commonwealth's position as a significant procurer in these sectors and enable continuous improvement in driving meaningful change.

In line with sections 16(1)(d) and 16(1)(e) of the Modern Slavery Act, the following examples outline the actions, including due diligence processes, and the effectiveness of these actions across the Commonwealth's five key risk areas.

Due diligence measures implemented by the Commonwealth include, but are not limited to, incorporating modern slavery clauses in tender and contractual documents, and engaging with direct suppliers to identify and address risks of modern slavery.

Overview of the Commonwealth's spend in its five key risk areas



ICT hardware

The Commonwealth entered into contracts for ICT hardware to a total value of

\$4.4 billion.

Of this, \$105.4 million (2.41%) was awarded to suppliers with an overseas address and \$1.4 million (0.03%) was procured and used overseas.



Cleaning and security

The Commonwealth entered into new contracts for cleaning and security services with a total value of

\$318.1 million.

Of this, \$79.6 million (25.02%) was awarded to suppliers with an overseas address and \$70.0 million (22.01%) was procured and used overseas.



Investments

Collectively, these public asset funds totaled over

\$289.4 billion

at 30 June 2024.

The Future Fund is the largest of these funds and was valued at \$224.9 billion on 30 June 2024.



Textiles

The Commonwealth entered into new contracts for textiles with a total value of

\$34.7 million.

Of this, \$0.68 million (1.95%) was awarded to suppliers with an overseas address and \$0.16 million (0.46%) was procured and used overseas.

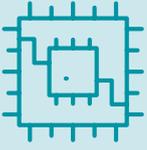


Construction

The Commonwealth entered into contracts for construction projects to a total value of

\$6.6 billion.

Of this, \$68.3 million (1.03%) was awarded to suppliers with an overseas address and \$14.6 million (0.22%) was procured and used overseas.



ICT Hardware

Coordinated procurement arrangements are established for commonly used goods or services by the Commonwealth. These arrangements ensure more efficient processes to deliver better prices, service and quality for the Commonwealth. Coordinated procurement arrangements also offer increased transparency, standard terms and conditions and improved contract management that benefits both the government and suppliers. Where established, coordinated procurement arrangements are mandatory for NCEs, as defined in section 8 of the PGPA Act and paragraph 4.12 of the Commonwealth Procurement Rules.

One such coordinated procurement arrangement relates to the Digital Transformation Agency's (DTA) Hardware Marketplace. NCEs are mandated to procure desktop personal computers, mobile personal computers, virtual desktop devices, monitors, printers, scanners and multifunction devices through the Hardware Marketplace. There are currently 204 approved suppliers on the Hardware Marketplace. Other types of ICT hardware may be procured via the Hardware Marketplace or other procurement methods that align with the Commonwealth Procurement Framework.

ICT hardware procurements may be linked to modern slavery due to the extensive supply chain for parts and components which are used to create the end product.

Supplier engagement

The DTA has implemented several measures within the Hardware Marketplace as well as other ICT panels, arrangements and marketplaces to combat modern slavery.

The DTA uses the Modern Slavery Toolkit to assess risks of modern slavery, including by considering the sector and industry, products and services, geographic locations, and entity history (e.g. past performance, indicators of modern slavery, etc.). For example, the DTA evaluates submissions to the marketplace based on a set criterion, which includes the degree to which applicants have appropriate strategies in place to identify and address risks of modern slavery in their supply chains and workforce.

The DTA engages with sellers through hosting modern slavery information sessions. It also has factsheets available to sellers via its BuyICT portal to educate them and provide accurate information on DTA's contractual requirements.

Sellers who contract on DTA's marketplaces, panels, or who have arrangements with contracts with an annual value of at least AU\$100 million, are required to provide evidence of their registered modern slavery statement/s. These statements provide DTA with visibility of the actions the seller is taking to identify, assess, and address risks of modern slavery in their global operations and supply chains.

The DTA continues to enhance its BuyICT portal to deliver improved buyer and seller user experiences. The DTA also constantly seeks to uplift its contract terms and conditions as it refreshes relevant hardware-related panels, arrangements, and templates.



Cleaning and security services

The Commonwealth has three approved Property Service Providers (PSP) under the Property Services Coordinated Procurement (PSCP) Arrangements (the Arrangements). The PSPs are responsible for providing core leasing services and facilities management services to NCEs and additional services as negotiated between PSPs and entities.

The three PSPs are:

- Ventia Property Pty Ltd
- Evolve FM Pty Ltd
- Jones Lang LaSalle (JLL) (ACT) Pty Ltd.

The Arrangements aim to improve the efficiency of property services across the Commonwealth, maximising value for money outcomes by consolidating the Commonwealth's purchasing power. The three PSPs may engage vendors to deliver a number of subcontracted property services – also referred to as downstream contracted services. These include but are not limited to cleaning and security services.

Cleaning services must be procured using methods that align with the Commonwealth Procurement Framework. Security services can be procured using methods that also align with the Commonwealth Procurement Framework.

Due to the nature of downstream contracted services, including cleaning and security services, there may be a risk of exploitation of migrant workers and the use of unauthorised subcontractors. The Commonwealth continues to require PSPs under the Arrangements to strengthen their response to modern slavery risks, including undertaking appropriate due diligence of all downstream subcontractors, and mirroring the requirements of the Commonwealth Procurement Rules (to the extent this is possible) when undertaking procurement activities. Contracts with current PSPs will expire on 30 June 2025. A transition period for the Arrangements is anticipated in the lead up to 30 June, to provide business continuity for entities, and ensure downstream contractors, including cleaning and security services, are managed appropriately throughout transition. Retendering the Arrangements has also afforded the Commonwealth an opportunity to review and strengthen the current operating model of the Arrangements. These enhancements will improve transparency and accountability of both PSPs and downstream contractors with respect to the Modern Slavery Act and will align with the revised Commonwealth Procurement Rules (brought into effect from 1 July 2024).

Engagement with downstream contractors through Property Services Providers

PSPs are responsible for managing property related procurements and contracting activities for NCEs across government, including cleaning and some security services.

Cleaning and security services represent a potential high-risk area for Government. Key modern slavery risks entities may identify within cleaning and security services are set out below.

Under the PSPs' contracts with the Commonwealth, the PSPs are required to develop and maintain a Procurement and Downstream Contract Management Strategy (PDCMS) which defines the PSPs' approach to delivering procurement and subcontract management services. The PDCMS provides the Commonwealth with visibility over how the PSPs are planning, implementing and managing the outcomes of procurement activities and how they are complying with legislation, regulation and policies including, but not limited to, mitigating modern slavery risks in the PSPs' supply chains and use of subcontracting. For example, PSPs undertake risk assessments before onboarding a subcontractor, audits of payment data, training and induction programs, annual reporting, and routine compliance checks to ensure adherence to the overarching agreement with the Commonwealth and the Modern Slavery Act.

As part of the PSPs' responsibility in managing downstream contractors, they must ensure that any personnel or downstream contractor (e.g. cleaners, security guards etc.) that require ongoing access to a Commonwealth property are aware of and comply with each Entity's security clearance requirements in respect of the service provided to that Entity.

The PSP will check the Entity Specific Requirements section of the entity's Schedule 5 NCE Details Notice to confirm the security clearance requirements for the services to be provided at the property. The downstream contractor will then need to complete the PSCP Security Clearance Form which the PSP will submit to the PSCP Security team for processing.

The PSCP Security team will review the application form, conduct an identification check, and then lodge the application in the Australian Government Security Vetting Agency (AGSVA) myClearance Portal for assessment.

The PSCP Security team will notify the PSP once AGSVA has completed the security assessment so the PSP can continue the onboarding process for that downstream contractor.

PSPs are also bound by the requirements of the Head Agreement when procuring services on behalf of an NCE. The PSPs regularly monitor vendors to ensure workers employed through downstream contracts are protected from modern slavery and other potential supply chain risks.

All downstream contractors are reviewed for changes in risk profile every six months, ensuring a high level of visibility and identification of modern slavery risks. Furthermore, undertaking a six-monthly risk rating review process allows PSPs to adjust reporting frequencies allowing closer management of risks of modern slavery in supplier operations or supply chains.

Incorporating obligations regarding modern slavery in terms and conditions in security services

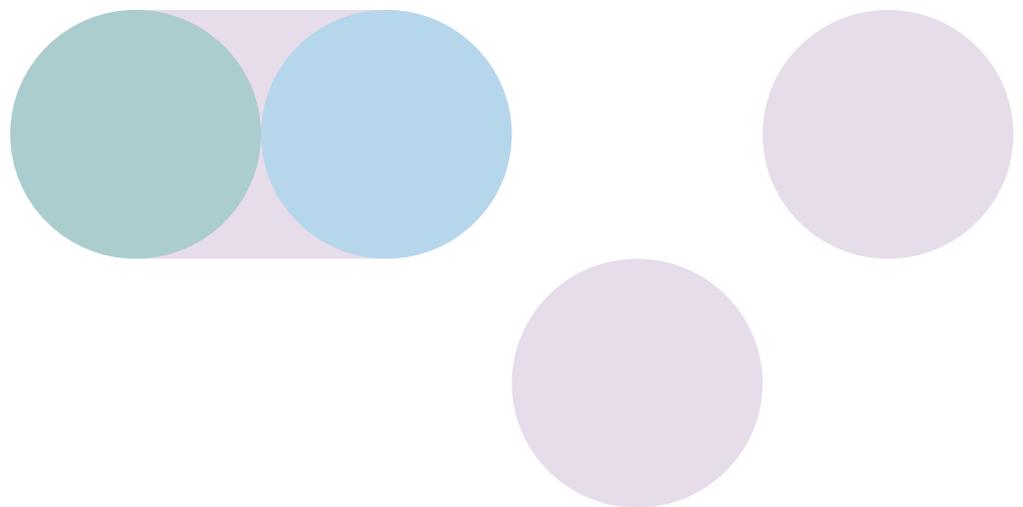
The Australian Federal Police (AFP) engages a single service provider through the Security Services and Maintenance Panel Standing Offer Notice (SON3441941) for the provision of national security guard and patrolling services.

The Deed of Standing Offer states *'the service provider agrees to comply with any legislation applicable to its performance of this deed'*. The applicable legislation includes the *Crimes Act 1914* (Cth), which includes reference to offences against Division 270 of the *Criminal Code* (Cth) (slavery and slavery-like offences).

The service provider employs all their security staff under an award overseen by the Fair Work Commission and in line with relevant state and territory security industry legislation.

As part of procurement processes, the service provider and key personnel (including the bid manager and company directors, area managers, partners and/or specified personnel as applicable), are required to undergo a security, suitability, professional conduct and integrity assessment to determine if the personnel and supplier are suitable to provide goods or services to the AFP.

All workers engaged by the AFP under the national security guard and patrolling services contract are required to be security cleared to AFP Negative Vetting 1 level. Australian citizenship is a mandatory eligibility requirement for all Australian Government security clearances.





Investments

The Future Fund is Australia's sovereign wealth fund. Its purpose is to invest for the benefit of future generations of Australians. The Future Fund is the Australian Government's single largest financial asset, strengthening the Commonwealth's balance sheet and underpinning Australia's credit rating.

The Future Fund Board of Guardians (the Board), is supported by the Future Fund Management Agency (the Agency), and is responsible for investing seven special purpose public asset funds:

- The Future Fund
- The Medical Research Future Fund
- The Aboriginal and Torres Strait Islander Land and Sea Future Fund
- The Future Drought Fund
- The Disaster Ready Fund
- The DisabilityCare Australia Fund
- The Housing Australia Future Fund.

The Board operates independently from the Australian Government and tailors the management of each fund to its unique investment mandate.

Under legislation, the Board is mandated to invest through external investment managers. These managers invest on the Board's behalf both domestically and internationally, across public and private markets. These investments span various financial asset classes, including listed equities, private equity, tangible assets (such as property, infrastructure, and timberland), alternatives, cash, credit, and overlays.

While Australian-domiciled investments within the portfolio are generally considered lower-risk in terms of onshore domestic modern slavery, there are certain sectors and industries where the risk is elevated. These include migrant, outsourced, and low-skilled labour in the horticultural, cleaning, security, and building construction industries.

Modern slavery risks can also be present through Australian-domiciled investments via their supply chains.¹ This occurs when raw inputs to finished products and services originate from high-risk industries or countries. Examples include textiles and apparel from China, Bangladesh, Vietnam, India, Malaysia, Brazil, and Argentina; solar panels from China; electronics from China and Malaysia; and seafood from Thailand, China, Indonesia, Taiwan, and Ghana.²

Modern slavery risks in international investments are likely to be elevated across emerging markets in Africa, Eastern Europe and Asia. A breakdown of investments by geographic region is available in the Future Fund's 2023–24 Annual Report.

Investment in sectors including mining, agriculture, textiles and apparel, construction, industrial manufacturing, diversified support services and technology components may also have elevated modern slavery risks.

The actions described below are examples of the due diligence measures embedded into Australian Government processes to identify, assess and address risk of modern slavery in Commonwealth investments.

Measuring effectiveness

The Agency reports to the Board annually on modern slavery-related activity. Annual disclosures are also made through each Commonwealth Statement and in the Board and Agency's public annual report. The effectiveness of modern slavery frameworks and actions is reviewed regularly through the Agency's modern slavery implementation program.

¹ Modern Slavery in Australia - Global Slavery Index 2023 Country Study, Available from: <https://cdn.walkfree.org/content/uploads/2023/11/14130723/gsi-country-study-australia.pdf>

² Walk Free 2023, The Global Slavery Index 2023, Minderoo Foundation, Available from: <https://www.walkfree.org/global-slavery-index/downloads/>

Case example 1: Integrating modern slavery into investment policies

The Board has integrated modern slavery into its Statement of Investment Policies and its Environmental, Social and Governance (ESG) Policy, which are available on the Future Fund website.

The Agency's underpinning investment frameworks guide how ESG risks, including modern slavery, are identified and managed across the investment portfolio. The Board endeavours to include modern slavery in any relevant new or amended investment management agreement as a relevant ESG issue for the investment manager to take into account when investing the portfolio.

The Future Fund's Investment Team undertakes modern slavery risk assessments across the investment cycle, including: pre-investment due diligence, investment manager reviews, portfolio monitoring, and direct engagement activities.

These risk assessments and ongoing monitoring activities help to identify which investment managers to include in the Future Fund's investment stewardship engagement and monitoring program. Over the reporting period, modern slavery risks were specifically discussed with 19 prospective and existing investment managers across several asset classes, including: infrastructure, listed equities, property, credit, and private equity

Case example 2: The Future Fund's strategic engagement program

The Future Fund's Investment Team also undertook an engagement program with the Agency's Australian listed equities investment managers to better understand their modern slavery risk management and engagement practices. Meetings were held with each manager to discuss their approach, implementation activities, and the nature and quality of modern slavery disclosures. These discussions also provided the opportunity to share observations and knowledge on emerging modern slavery governance practices in the Australian Stock Exchange (ASX).

The Future Fund is invested in eight large Australian infrastructure assets that are subject to the Modern Slavery Act. These assets are diversified across industries including ports, airports, renewable energy, timberland, data centres, telecommunications, and most recently, toll roads. The Future Fund's Investment Team monitors how each asset is performing on a regular basis through a review of their modern slavery statements and engagement with management teams on their policy and approach. There were no reports of actual or potential modern slavery by any of the Future Fund's Australian infrastructure assets during the reporting period.

The Investment Team also undertakes strategic engagement with ASX listed companies through its established investment stewardship program. Discussions on modern slavery risks are commonly undertaken during corporate governance meetings with ASX company Boards or discussions with companies' sustainability specialists. During the year, modern slavery engagements were undertaken with 25 different ASX companies across several industry sectors, including: materials and mining, financials, healthcare, consumer staples, consumer discretionary, and industrials.

Case example 3: Annual ASX modern slavery statements review

Published modern slavery statements for 90 holdings within the Future Fund's ASX listed portfolio were also reviewed during the year. This annual review identified varying levels of progress in identifying, assessing, and addressing modern slavery risks:

- Where companies are new to modern slavery reporting, their statements typically focus on outlining policies, procedures, risk assessment activities and the identification of risks in their operations and supply chains.
- Companies that have been reporting for several years have advanced to identifying and conducting due diligence on identified risks. These companies have moved to target high-risk tier 1 and tier 2 suppliers, or high-risk sites through third-party supplier audits.
- Where due diligence and third-party supplier audits were conducted, findings mostly related to poor labour practices and work health and safety (WHS) issues. These findings included excessive working hours, insufficient payment of wages and benefits, WHS issues, and problems with labour management systems and employment code implementation.
- The majority of modern slavery statements reviewed do not yet report actual or potential instances of modern slavery. A small number of leading companies were found to report indicators of potential forced labour, as defined by the International Labour Organization, or their response to actual or potential labour rights breaches or modern slavery findings.

Leading companies were also found to provide disclosure, context, and immediate and follow-up actions in response to actual or potential modern slavery incidents, as well as reporting on key performance indicators which were observed to include:

- whistleblowing reports
- addressing non-conformances
- improvement in labour practices
- remediation efforts
- terminating or suspending problematic supply chain partners
- educating and engaging suppliers
- collaboration with industry partners.

While it is not mandatory to report on potential or actual incidences of modern slavery under the Modern Slavery Act, leading companies were found to be demonstrating good-practice approaches to transparency and disclosure. This level of information and reporting indicates a more sophisticated understanding of supply chains and a commitment to improving outcomes for people who are subject to modern slavery.

Through this review, the Future Fund identified several modern slavery incidences reported by ASX companies, including:

- seven ASX companies reported actual modern slavery: Ansell, BlueScope Steel, Brambles, Commonwealth Bank, Magellan Financial Group, Westpac Bank, and Woolworths
- five ASX companies reported potential instances of modern slavery: BHP, Coles, Fortescue Metals, Medibank Private, and Qube.

These incidences were disclosed in each ASX company's modern slavery statement and were investigated and addressed by the companies themselves in accordance with their own modern slavery obligations and policies. Where an actual or potential incidence of modern slavery is identified, the ASX company is added to the Future Fund's strategic engagement program.



Textiles

In instances where uniforms or apparel are procured, manufacturing processes may take place in overseas countries outside of Australia's labour laws.

'Sourcing' Key Performance Indicators built into Performance Management Framework

In 2022, the Commonwealth entered into a five-year service agreement with Australian Defence Apparel, for the provision of uniform, accoutrement and personal protective equipment (PPE) supply and management services to the Australian Border Force (ABF) and AFP (the Agencies).

Where possible, the Agencies utilise Australian-made or manufactured suppliers for uniform, PPE and accoutrements. To meet specific requirements, the Agencies also procure items that have been trialled and approved for operational use (through the service provider) from suppliers that may utilise offshore manufacturing capabilities.

These suppliers have a demonstrated history of success and effectiveness in delivering expected expertise, quality and standards to enable and maintain procurement obligations.

Most items manufactured offshore are due to the cost of Australian manufacturing, the absence of experienced textile workers and specialised local facilities.

The service provider is responsible for management of downstream manufacturing companies. The service provider ensures compliance with ethical supply and manufacturing through their membership/accreditations with Sedex Members Ethical Trade Audit and Ethical Clothing Australia. The service provider also conducts accreditation checks of subcontractors prior to engaging their services.

The joint service agreement for the provision of uniform, accoutrement and PPE supply and management services has a Performance Management Framework built in which 'Sourcing' key performance indicators have been established. These performance targets and thresholds are applied to ensure procurement are undertaken in accordance with the applicable Commonwealth legislation and policies, including, but not limited to Ethical Clothing Australia principles and the Modern Slavery Act.

The service provider has also developed a robust demand management and planning methodology addressing all aspects of supply chain principles for inventory management, safety stock levels, re-order points/quantities and reviewing lead-times to meet organisational demand requirements, including, but not limited to high operational tempo, surge capacity and increase in the Agencies' frontline recruitment, mitigating risk of inventory stock outs.



Construction

Building and construction projects rely heavily on a global supply chain for a wide range of materials, commodities, logistics, labour and services. Construction services may be linked to modern slavery due to the subcontracting nature of these services. There is a risk that there may be exploitation of migrant workers and the use of unauthorised subcontractors. There is also limited visibility over the supply chains used in construction projects.

Demonstrating effectiveness of Commonwealth actions in responding to an alleged instance of modern slavery

In July 2022, the Department of Defence was notified of allegations concerning a subcontractor's employee working conditions while supporting the Lombrum Naval Base Redevelopment project on Manus Island, Papua New Guinea. The project manager observed indicators of modern slavery and approached the subcontractor's employees to undertake general welfare checks. The workers noted they were experiencing payment issues from their employer. Following notification to the Defence supplier, investigations were undertaken, with a third-party engaged to undertake an independent audit into the suspected modern slavery incident.

Demonstrating the effectiveness of the Department of Defence's actions (reviewing the allegations and information provided, and engaging with suppliers), the subcontractor remediated the matter, which was positively received by employees. Subsequently the Department of Defence closed out the matter in May 2023 retaining all contracts, but noting the Department of Defence's recommendation to the subcontractor to review payment administration and processes in relation to local labour laws in Papua New Guinea.

Overarching actions

In the reporting period, the Commonwealth progressed a range of actions across its four strategic areas of focus:

1. training and awareness activities
2. procurement and contract management processes
3. supplier activities
4. response activities.

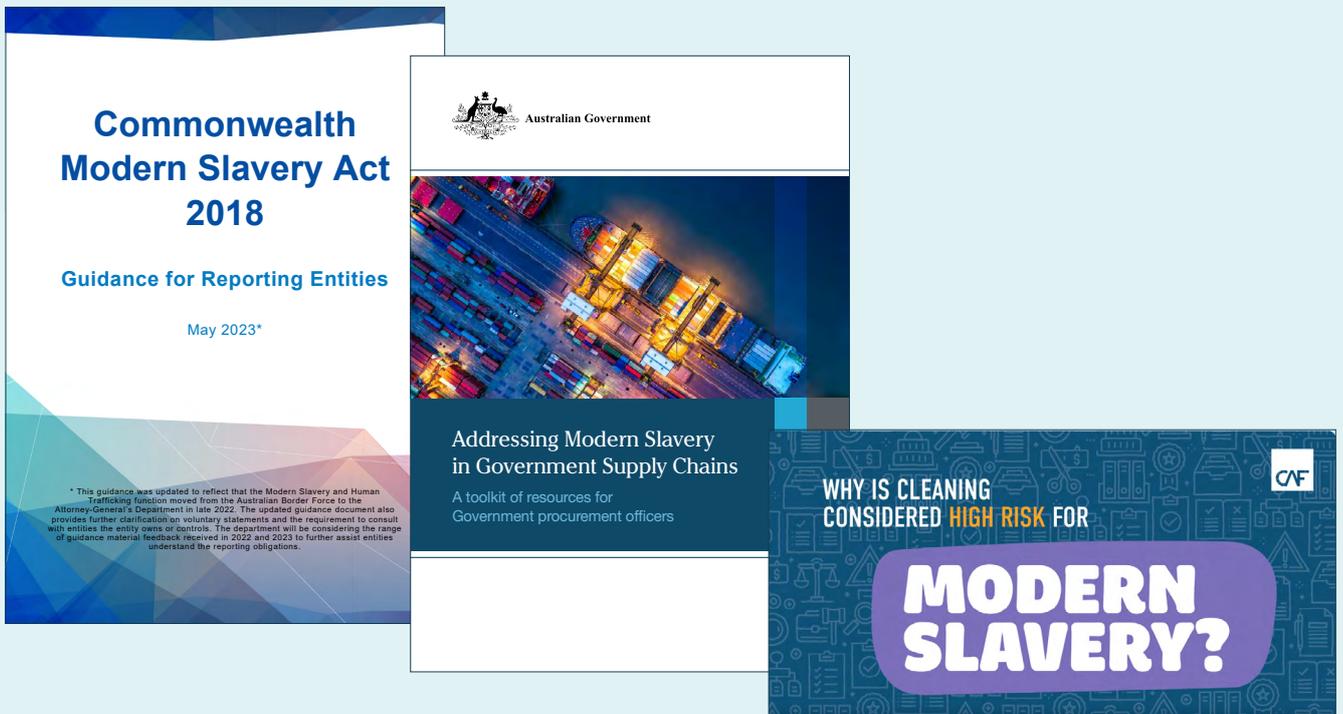
These areas of focus build capacity across the Commonwealth to best identify and respond to modern slavery risks. Actions across these strategic areas support the Commonwealth's implementation of the *Principles to guide Government action to combat trafficking in global supply chains*, a joint commitment between the Governments of Australia, Canada, New Zealand, the United Kingdom and the United States of America.

In particular, these actions promote Principle 1 – 'Governments should take steps to prevent and address human trafficking in Government procurement practices.' A range of key actions against these focus areas are outlined below.

Capacity and capability building

Promoting the Modern Slavery Toolkit and resources to increase staff capability

During this reporting period, the Commonwealth continued to place a focus on engaging with Commonwealth procurement officials and contract managers to increase awareness and understanding about modern slavery in public procurements, promote training via the e-Learning modules and use of the *Addressing Modern Slavery in Government Supply Chains: A toolkit of resources for Government procurement officers* (the Modern Slavery Toolkit).



Improvements on procurement and contract management practices

Commonwealth Supplier Code of Conduct

The Commonwealth Supplier Code of Conduct (Code) came into effect on 1 July 2024. The Code clearly outlines the Commonwealth's minimum expectations of suppliers and their subcontractors while under contract with the Commonwealth, and places a positive duty on suppliers to proactively prevent misconduct.

The Code is mandated for inclusion in Commonwealth forms of contract through the

Commonwealth Procurement Rules (CPRs), unless exempted by the Accountable Authority.

Paragraphs 3.2 and 3.3 of the Code stress suppliers' conduct including the prevention of involuntary labour and human rights abuse, discrimination and harassment within supply chains, and the support of supplier diversity.

Breaches of the Code may require remediation activity or, if a breach is not rectifiable, the Commonwealth entity may choose to terminate the contractual agreement. Further guidance relating to the Code is available on the 'Commonwealth Supplier Code of Conduct – Overview' page of the Department of Finance website (<https://www.finance.gov.au/government/procurement/commonwealth-supplier-code-conduct-overview>).

Establishment of the new Whole of Australian Government Legal Services Panel

The Attorney-General's Department (AGD) administers the Whole of Australian Government Legal Services Panel (the Panel) as a coordinated procurement arrangement, consistent with the Commonwealth Procurement Rules. The Panel leverages the Commonwealth's purchasing power, increases price transparency and creates efficiencies in the Commonwealth's engagement with external legal services providers (LSPs). Use of the Panel is mandatory for NCEs, while other Commonwealth bodies can opt-in by way of a Deed of Participation.

The new Panel commenced on 1 July 2024 and replaced the earlier Panel, which was in place since August 2019. Work to establish the new Panel occurred throughout the reporting period. The process undertaken to establish the new Panel is an example that illustrates how modern slavery risk considerations are incorporated into the planning and evaluation of a procurement activity at a whole-of-government coordinated procurement level.

Assessment of modern slavery risk during the evaluation stage of the procurement

The tender process required respondents to confirm their historical compliance and future commitment to compliance with Commonwealth laws and policy requirements and to provide details of any current or previous breaches, or non-compliance with, the Modern Slavery Act and policy requirements relating to contracting with the Commonwealth.

As part of the evaluation process of tender responses, relevant teams considered the following key factors with regard to assessing the risk of modern slavery in the procurement of external legal services to the Commonwealth:

- sector and industry risks
- geographic risks
- product and services risks
- supply chain model risks.

It was determined, having mapped the likely modern slavery risks across these four categories, that there was a low risk level associated with each respondent being assessed.

Modern slavery considerations incorporated into the Head Agreement

The Head Agreement executed by all successfully appointed panellists includes contractual obligations relating to the Modern Slavery Act. A contract variation was entered into by the parties to also include additional provisions relating to the Commonwealth Supplier Code of Conduct, which was effective from 1 July 2024, post the execution of the originating Head Agreements.

Activities to improve Commonwealth response to risk of modern slavery in supply chains

Phase 2 of the Supply Network Analysis Program project

Managing risks of modern slavery across multi-tier supply networks is complex. The findings of Phase 1 of the SNAP Project demonstrate the breadth and complexity of the Commonwealth's supply chains, and highlights the challenges NCEs face in managing risks of modern slavery in individual and collective supply chains.

Building on the findings of Phase 1 (reported in *Commonwealth Modern Slavery Statement 2022–23*), the Commonwealth has progressed a second phase of work to strengthen the management of identified risks of modern slavery by NCEs, and to open conversations with suppliers on modern slavery risks in their supply chains.

The Commonwealth recognises the importance of collaboration and consultation to understand risks of modern slavery and create useful supports that can be used by procurement officers, contract managers and business areas when commencing and managing a public procurement. To this end, officials from a range of NCEs were consulted during the reporting period to inform the development of a modern slavery risk management lifecycle, and supporting tools and methodologies, to ensure they are practical, fit-for-purpose and align with the Commonwealth Procurement Framework.

A table-top exercise

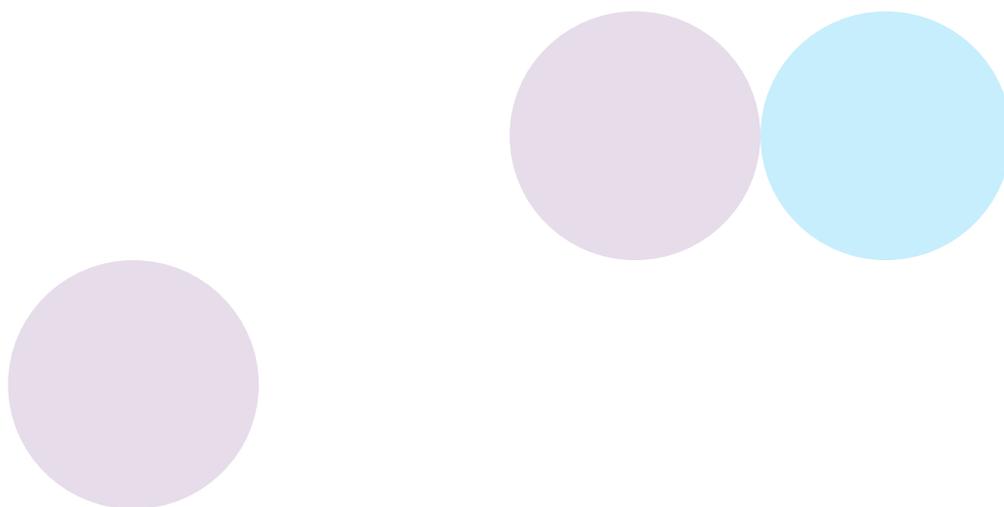
In May 2024, operational staff from NCEs with varying levels of maturity in identifying and managing risks of modern slavery in entity supply chains participated in a table-top exercise.

The primary objective of the table-top exercise was to develop an understanding of the modern slavery risk exposures that could exist in the Commonwealth's supply networks and to inform the development of a new suite of risk engagement tools and methodologies for NCEs to complement their existing risk management and procurement processes.

The input and feedback received from the workshop and further engagements contributed significantly to the drafting of risk engagement tools, methodologies and guidance, and identified gaps and opportunities to improve the management of modern slavery risks in public procurement. These outputs will be refined and validated through further consultation in the next reporting period.

Commencement of a modern slavery risk case study

During the reporting period, the Commonwealth commenced the planning of a modern slavery risk case study. The purpose of this case study was to draw insight and lessons learnt from a NCE's experience managing an alleged instance of modern slavery through engagement with tier 1 and tier 2 suppliers within a supply chain. These insights will shape and inform the development of guidance for officials to address potential modern slavery exposures in their supply chains by strengthening supplier engagement and understanding the barriers to providing an effective response. The findings from the case study will help refine the risk engagement tools and methodologies, and guidance for NCEs.



Guidance for NCEs in responding to possible modern slavery involving suppliers

The Commonwealth continues to update its guidance for NCEs in responding to modern slavery in supply chains. Consultation with NCEs identified the need for practical guidance as no two instances of modern slavery are the same. The key learnings from consultations that will inform the finalisation of guidance documents include the need to:

- differentiate between an identified modern slavery risk and an alleged instance of modern slavery in a supply chain, as the immediate response will differ between the two scenarios

- establish a risk management lifecycle that expands beyond the initial procurement stage into contract management
- develop guidance on establishing and maintaining open conversations with suppliers.

The guidance will assist contract managers to proactively address and remediate a potential risk exposure to modern slavery in a supply chain.

It will complement existing risk management processes within NCEs, while aligning with best practice guidance and acknowledging the three pillars of the United Nations Guiding Principles (UNGPs) on Business and Human Rights: Pillar 1 State Duty to Protect, Pillar 2 Corporate Responsibility to Respect, and Pillar 3 Access to Remedy.

Remediation

The Commonwealth continues to model the UNGPs expectations for businesses that identify they have caused or contributed to adverse impacts such as modern slavery, to provide for, or cooperate in, the remediation of that impact. This means ‘making good’ the adverse impact by restoring the victim to the situation they would be in if the adverse impact had not occurred.

| DEGREE OF INVOLVEMENT | | | |
|---|--|--|--|
| | CAUSED by your entity | CONTRIBUTED TO by your entity | DIRECTLY LINKED TO your entity |
| Definition | Operations or actions in your entity’s supply chains directly result in modern slavery practices. | Operations or actions in your entity’s supply chains increase the risk of modern slavery occurring. For example, an omission incentivises modern slavery. | Operations, products or services of your entity are connected to modern slavery through the activities of another entity your entity has a business relationship with. |
| How this affects the entity’s response | <ul style="list-style-type: none"> • Take action to cease or prevent the risk and provide for or cooperate in remedying any actual impact. • Cooperate in remedying any actual impact. | <ul style="list-style-type: none"> • Take action to cease or prevent your contribution to the risk. • Provide for or cooperate in remedying any actual impact. • Use leverage to mitigate remaining risk. | <ul style="list-style-type: none"> • Use leverage to influence the entity causing the risk to take action. • Consider if you should provide for or cooperate in remedying any actual impact. • Consider exiting in discrete circumstances |

Remediation can take many forms, including steps to ensure the harm cannot recur, formal apologies, compensation, or ceasing certain activities. The UNGPs expect that entities develop processes to enable remediation, such as the establishment of a grievance mechanism (that is, a way for people to safely raise concerns about the impact an entity is having on them).

Grievance mechanisms can also sit alongside other internal policies and processes that enable concerns to be identified and/or addressed. For example, an entity’s remediation processes may include whistle-blower hotlines, ‘speak up’ policies, supply chain hotlines, contract clauses with dispute resolution provisions and engagement with key stakeholders, such as at-risk communities or workers.

Processes within the Commonwealth to raise grievances

During this reporting period, there was a greater focus on identifying existing grievance mechanisms.

Processes to raise grievances for potential victims within the Commonwealth include:

Australian Human Rights Commission

The Australian Human Rights Commission (the Commission) has the power to investigate and attempt to conciliate complaints of discrimination. If an individual believes they have been unlawfully discriminated against, they can lodge a complaint with the Commission.

The *Australian Human Rights Commission Act 1986* (Cth) provides that after a complaint is terminated, the person affected by the alleged discrimination may in certain circumstances be able to apply to the Federal Circuit and Family Court of Australia (FCFCOA) or the Federal Court of Australia (FCA) to have the matter decided by the court.

The Commission also has the power to investigate and attempt to conciliate complaints about breaches of human rights by the Commonwealth or one of its agencies. If an individual believes that the Commonwealth has breached their human rights, they can lodge a complaint with the Commission.

If the President of the Commission is of the opinion that there has been a breach of human rights, the President may report the matter to the Attorney-General.

Australian National Contact Point for Responsible Business Conduct

The Australian National Contact Point for Responsible Business Conduct (AusNCP) is housed in the Department of Treasury (Treasury) and was established as part of Australia's obligations to promote the Organisation for Economic Co-operation and Development's (OECD) *Guidelines for Multinational Enterprises on Responsible Business Conduct* (the OECD Guidelines). The OECD Guidelines set out the voluntary standards the Australian Government expects multinational enterprises operating in and from Australia to follow. The OECD Guidelines cover a broad range of topics, including:

- general principles of responsible business conduct (for example, due diligence requirements in their business relationships and supply chains)
- disclosure
- human rights
- employment and industrial relations
- consumer interests
- the environment.

As part of its obligations to promote the OECD Guidelines, the AusNCP established a non-judicial grievance mechanism to handle complaints against multinational enterprises regarding alleged breaches of the OECD Guidelines.

Victims of modern slavery can submit a complaint to the AusNCP against a multinational enterprise alleging a breach of the OECD Guidelines. The goal of the AusNCP process is for the complainant/ notifier and multinational enterprise to work with the AusNCP to facilitate a discussion of the issues raised in the complaint with the goal of coming to an agreement. The contents of the agreement are up to the parties, but can include apologies and changes in enterprise policies.

Office of the Fair Work Ombudsman

The Office of the Fair Work Ombudsman's (OFWO) provides tools and resources to assist potential victims understand their workplace entitlements and protections in multiple languages on the OFWO website (www.fairwork.gov.au). The OFWO operates several channels where potential victims can raise grievances and report workplace issues including a contact centre and an anonymous online form.

These avenues may support individuals by receiving complaints, investigating allegations of abuse, and/or facilitating the remediation process. They may also contribute to remediation by building capacity and raising awareness about rights and remedies.

Victims of modern slavery may be able to access support through the Support for Trafficked People Program (STPP), upon assessment and referral by the AFP. An additional referral pathway pilot program established during the reporting period and commencing in 2024 will also enable a consortium of community service providers (led by The Salvation Army) to refer persons to the STPP without the requirement to engage with law enforcement.

Further, Australia’s first federal Anti-Slavery Commissioner was established during this reporting period. The Australia Anti-Slavery Commissioner is

an independent statutory office holder and a new pillar in Australia’s response to modern slavery. While the Australian Anti-Slavery Commissioner’s functions do not include managing individual cases, they include engaging with, and promoting engagement with, victims of modern slavery to inform measures for addressing modern slavery. Details on the *Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Act 2024* (Cth) are provided in **Section 6**.

Details on individual NCE’s complaint processes are provided in **Section 3**.

Additional actions

In addition to the actions above, the Commonwealth also progressed the following actions across its four strategic areas of focus.

| Strategic area of focus | Actions undertaken during this reporting period |
|--|---|
| Training and awareness activities | <ul style="list-style-type: none"> • Delivered a series of presentations to NCEs about the findings of the mapping project on government supply chains for the ICT and Construction industries. • Hosted a capacity-building workshop on modern slavery within government procurement, attended by over 20 NCEs. The workshop focused on collaboration and sharing of good-practice examples across the Commonwealth, identifying gaps and opportunities in the government’s work, and provided an opportunity to consult on future tools and resources for procurement officers. • Tailored capacity-building sessions to individual NCEs on modern slavery risk identification and management. • Raising awareness of modern slavery risks in public procurement with relevant contract managers through various forums. For example, a whole-of-government Property Working Group forum attended by Commonwealth property managers. • Commenced work to centralise e-Learning modules in the APS Academy, which supports learning and development initiatives across the APS. • Continued to promote information and good-practice sharing with international and domestic counterparts. |
| Procurement and contract management processes | <ul style="list-style-type: none"> • Secured funding in the federal Budget 2024–25 over two years to conduct a review of Commonwealth procurement procedures and supply chains. The review aims to increase understanding of modern slavery risks in Commonwealth supply chains and how to better integrate modern slavery risk identification and management into procurement procedures. • Conducted ongoing promotion of modern slavery in public procurement resources across the Commonwealth. |
| Supplier activities | <ul style="list-style-type: none"> • Progressed work on guidance materials to assist NCEs to engage with suppliers on modern slavery risks. • Presented at an ICT supplier briefing session hosted by DTA on good practice reporting trends under the Modern Slavery Act, and provided advice on industry collaboration. |
| Response activities | <ul style="list-style-type: none"> • Continued to update guidance for NCEs in responding to alleged instances of modern slavery or supply chain risks. • Met with the pilot modern slavery Survivor Advisory Council established by The Salvation Army’s Lived Experience Engagement Program to discuss good-practice remediation and understand how the Commonwealth can best support people experiencing modern slavery. |

Whole-of-Government Mandatory Criterion 4: Measures of effectiveness

This section provides a whole-of-government overview of how the Commonwealth has reviewed the effectiveness of its actions to assess and address modern slavery risks.

Additional measures specific to each portfolio to assess the effectiveness of their actions are outlined in **Section 3**.

The Commonwealth’s measures of effectiveness come from the Performance Review Framework (the Framework) developed by the Australian Institute of Criminology during the *discovery* phase, in consultation with the Interdepartmental Committee on Modern Slavery in Public Procurement (IDCP). A summary of this Framework is outlined below, with a more extensive overview available in the 2021–22 Commonwealth Statement.

The table on page 40 highlights some key indicators against the Framework.

In the 2021–22 reporting period, NCEs were surveyed on progress against the Framework to establish a baseline of data (reflected in the 2021–22 Commonwealth Statement). The Commonwealth intends to collect further data in the next reporting period (the *review* phase of the Commonwealth’s planned program of work), to further reflect progress and assess the effectiveness of its actions against the Framework.

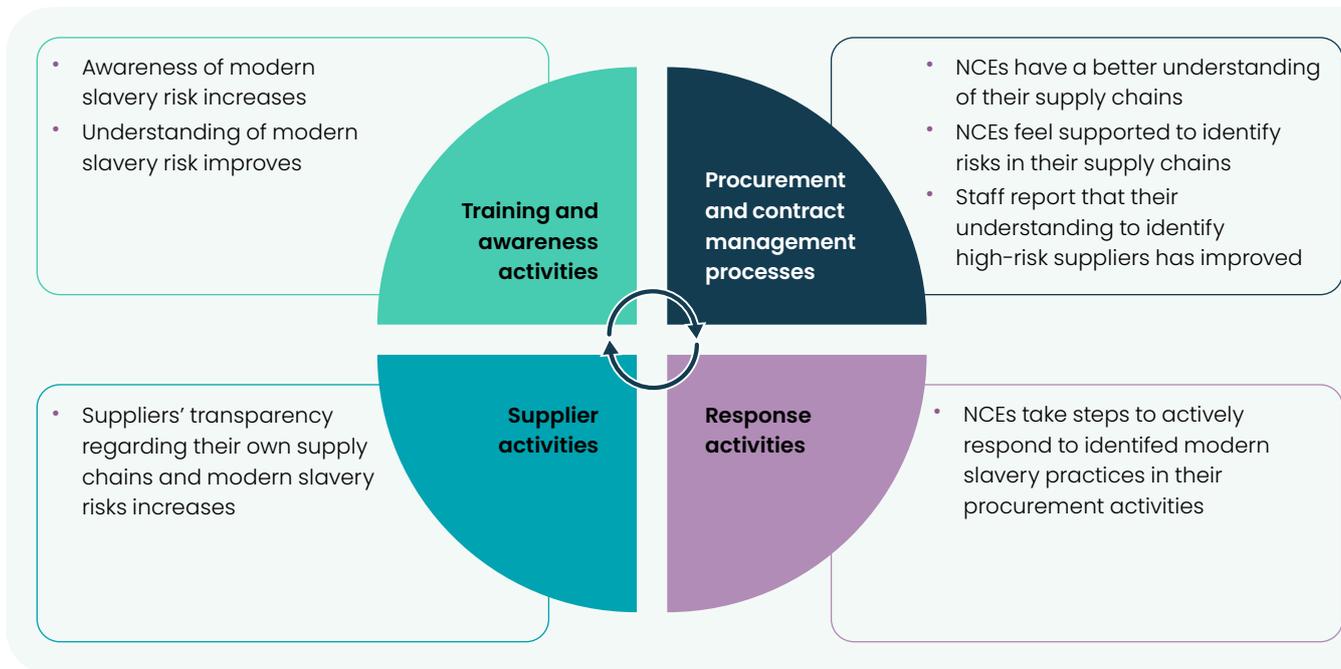


Figure 3. An overview of the 4 strategic areas of focus and the planned outcomes underpinning how effectiveness of Commonwealth actions are assessed per the Performance Review Framework

Training and awareness raising activities

- The Commonwealth’s consolidated Modern Slavery Toolkit has been downloaded a total of 32,986 times* from the Modern Slavery Statements Register.
- Delivered four tailored capacity-building training sessions with individual agencies.
- Provided e-Learning modules to eight NCEs for use on internal learning and development platforms.
- 23.76% of NCEs reported that staff training was mandatory for procurement officials.
- 56.44% of NCEs reported that staff were encouraged to undertake staff training.
- Delivered a national social media human trafficking awareness-raising campaign in conjunction with World Day Against Trafficking in Persons.

Procurement and contract management processes

- The Commonwealth’s model modern slavery contract clauses have been downloaded 23,209 times* from the Modern Slavery Statements Register.
- The Commonwealth’s model modern slavery tender clauses and guidance have been downloaded 8,420 times* from the Modern Slavery Statements Register.
- 72.28% of NCEs reported use of the model modern slavery contract clauses in the reporting period.
- 52.48% of NCEs reported use of the model modern slavery tender clauses in the reporting period.
- All portfolios, including over 30 NCEs, were members of the IDCP, attending regular meetings to collaborate on modern slavery risk in Commonwealth procurement.

Supplier activities

- The Supplier Questionnaire has been downloaded a total of 38,335 times* from the Modern Slavery Statements Register.
- 24.75% of NCEs reported use of the Supplier Questionnaire in the reporting period.
- Progressed work on guidance to assist NCEs to engage with suppliers on modern slavery risks.

Response activities

- Within the Future Fund’s ASX listed portfolio:
 - seven ASX companies reported actual modern slavery
 - five ASX companies reported potential instances of modern slavery.

These incidences were disclosed in each ASX company’s modern slavery statement and were investigated and addressed by the companies in accordance with their own modern slavery obligations and policies. Where an actual or potential incidence of modern slavery is identified, the ASX company is added to the Future Fund’s strategic engagement program.

*As at 25 September 2024

Addressing strategic areas of focus to support the achievement of planned outcomes

The actions described below to address an identified risk of modern slavery in Defence's clothing and footwear supply chain highlights how actions relating to the strategic areas of focus may support the Commonwealth with achieving planned outcomes in practice.

The planned outcomes this example may address are:

- suppliers' transparency regarding their own supply chains and modern slavery risk increases
- NCEs have a better understanding of their supply chains.

Case example 1: Strategic area of focus – Supplier activities

Defence contract managers engage with suppliers to monitor performance, delivery and other requirements in accordance with contract clauses (including modern slavery clauses where applicable).

In higher value and higher risk contracts, contract managers engage with suppliers to ensure modern slavery legislative requirements are reflected in subcontracting arrangements as they are entered into.

Case example 2: Strategic area of focus – Procurement and contract management activities

Specifically, during the reporting period, Defence:

- Integrated a Modern Slavery Compliance Statement into all contracts for the procurement of clothing and footwear for the ADF.
- Sent a team of clothing procurement experts to multiple sites in Australia to conduct a quality and modern slavery compliance audit of major clothing manufacturers, all of whom supply Defence with clothing. The team was able to view all relevant factories and workplaces and found no evidence of non-compliance with Defence contracts or international certifications, in particular the Worldwide Responsible Accredited Production Certificate (closely linked to Australia's modern slavery legislation).
- Reviewed program governance and reporting with the aim of strengthening reporting on compliance metrics, including modern slavery. The project reporting template was updated to include a reporting metric for modern slavery incidents or potential incidents. This was to ensure that suppliers are regularly reporting on modern slavery and where applicable, any concerns and risks are discussed at the monthly project governance forum.

3

Section 3

Input from Government portfolios
and parliamentary departments

In addition to Section 2, this section describes the risks of modern slavery in supply chains and operations, the actions taken to assess and address the identified risks and measures of effectiveness that are specific to the NCEs within each of the 15 portfolios and the four parliamentary departments, further fulfilling the requirements of Section 16(1)(c), Section 16(1)(d), and Section 16(1)(e) of the *Modern Slavery Act 2018 (Cth)*.

Each portfolio has distinct responsibilities and undertakes procurement activities in support of these responsibilities. Portfolios differ in size and encounter unique challenges, resulting in varying levels of maturity in identifying and responding to risks of modern slavery.

During the reporting period, NCEs have continued their efforts to:

- consider modern slavery risks on a case-by-case basis
- improve procurement and contract management practices to assess and address modern slavery risks in their supply chains and operations
- raise awareness within their agency and with their suppliers
- utilise tools and guidance
- collaborate with other agencies within and outside of their portfolio.

Six portfolios have reported working groups at the portfolio level to collaborate about modern slavery risks in their supply chains, and actions to assess and address these risks.

In addition to whole-of-government remediation processes, in this Commonwealth Statement, portfolios have reported on established grievance mechanisms, including existing complaint portals, to respond to notifications of modern slavery risks or identified instances of modern slavery.

Figures 4, 5, 6 and 7 provide an overview of the use of the training, tools, and resources available across portfolios and parliamentary departments. These include the use of e-Learning modules, the Supplier Questionnaire, and modern slavery contract and tender clauses.

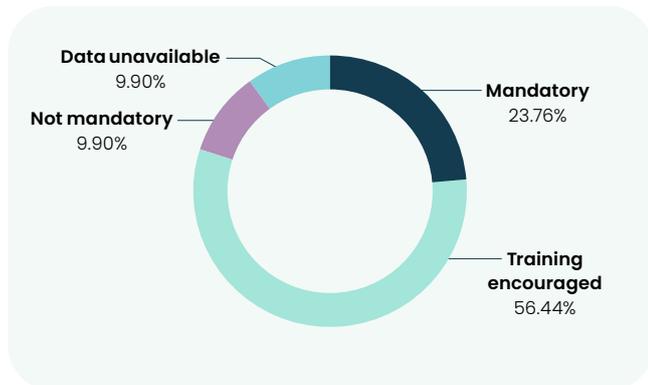


Figure 4: Overview of training for procurement staff by NCEs

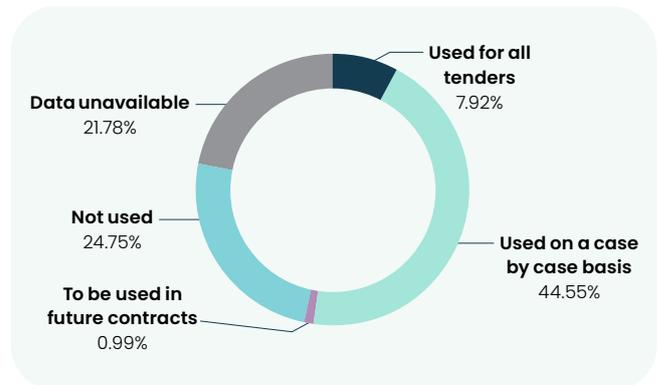


Figure 6: Overview of how the modern slavery tender clauses are utilised by NCEs.

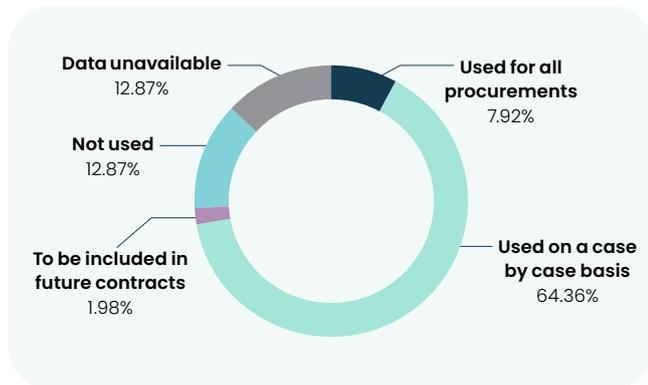


Figure 5: Overview of how the model modern slavery contract clauses are utilised by NCEs.

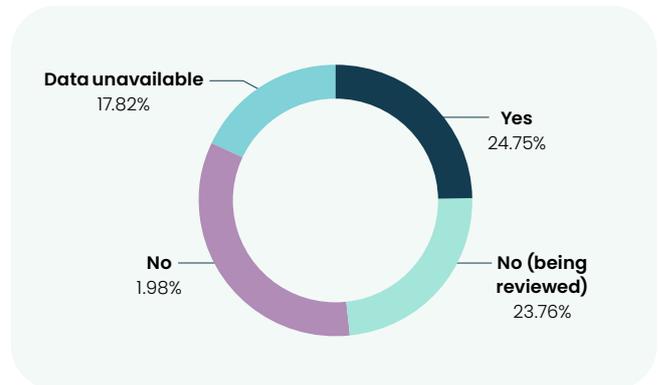


Figure 7: Overview of whether the Supplier Questionnaire within the Modern Slavery Toolkit are utilised by NCEs.

Agriculture, Fisheries and Forestry

The Agriculture, Fisheries and Forestry portfolio represents the national interest across agricultural, fisheries and forestry industries. It is inclusive of two NCEs during the reporting period.

During the reporting period, the five areas of highest contract value were:

- ICT hardware and software maintenance and support
- temporary personnel services
- environmental management
- property management, including lease and rental of property or building
- business administration service.

Risks

During this reporting period, portfolio agencies continued to target modern slavery risks, with the main risks remaining in the following industries:

- cleaning and security services
- ICT hardware
- textiles (uniforms) and PPE
- construction and maintenance.

Response

Planning the procurement

- During the planning, consideration is given as to whether modern slavery is prevalent with the good and/or service being procured, including the supply chain model involved.
- The procurement plan is provided to a centralised Procurement Team for review and advice as to any additional requirements necessary to proceed with the procurement. For example, addition of potential mitigation strategies throughout the life of the procurement.
- A formal Procurement Risk Assessment is completed to identify whether the procurement activity may introduce modern slavery risks into the department's supply chain with consideration given to the industry/sector being approached, the location of goods and/or services and the likelihood and prevalence of modern slavery risk.

- If there are risks of modern slavery identified, modern slavery clauses will be added into the procurement documentation as necessary. A suite of bespoke approach to market (ATM) documentation and contract templates exists which include modern slavery clauses to alert prospective tenderers of measures being taken by the NCE, and to prompt tenderers to review their supply chains in accordance with the degree of risk.
- Legal advisers are engaged for high-risk procurement activities where required.

Approaching the market

- Modern slavery clauses are incorporated into the initial ATM documentation to outline and address modern slavery requirements as appropriate. The ATM documentation also stipulates the draft modern slavery contract clauses to be adhered to throughout any resulting contract, for acceptance and compliance by any successful supplier.
- Potential suppliers are asked to provide details of how they identify, assess and address risks of modern slavery practices in their operations and supply chains, which may also include the need for a further policy or plan to be provided. This allows for the adoption of any required mitigation strategies for any risks identified.

Evaluate and engage

- The supplier's proposed approach to addressing modern slavery risks is considered when evaluating and assessing their tender submission, including their responses to the Supplier Questionnaire.
- Modern slavery risk considerations are incorporated into standard clauses and contract terms. This may include necessary provisions for the ongoing management of and engagement with the supplier, such as, a requirement to conduct due diligence of the suppliers' supply chain and operations.



Report and manage the contract

- Prompts are embedded in contract management tools and resources to ensure that modern slavery risks are considered by portfolio officials during the ongoing contract management phase. For example, there is a prompt in the 'Transition-In Checklist' to consider risks of modern slavery. This is to ensure that modern slavery risks are considered in the start-up phases and then continued throughout the contract management phase.
- Measures to safeguard against potential modern slavery risks are incorporated and action plans are developed to mitigate any identified risks in each contract, where appropriate. This contributes to building knowledge of relevant supply chain risks and how to best manage them.

Training and awareness raising activities

Over the reporting period, the portfolio continued its commitment to training and awareness through:

- conducting face-to-face procurement and contract management training, which covers the consideration of modern slavery risks in supply chains and operations
- providing strategic advice to officials and promoting use of the Modern Slavery Toolkit to support officials undertaking procurement activities
- e-Learning modules for staff covering the Modern Slavery Act and broader modern slavery considerations for procurement officers.

Grievance processes

Complaints or feedback can be provided in a variety of methods, and may be submitted at any time during or after completion of a procurement related activity. Complaints can be made through the following channels:

- External departmental websites provide guidance on how to submit a complaint, complaint forms, relevant contact information and submitting Public Interest Disclosures.
- Tender documentation includes contact information to submit a complaint or provide feedback during a procurement process.

Outcomes

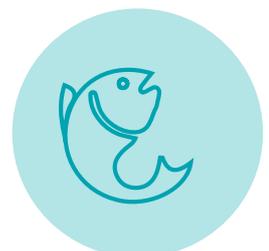
- Training and education: Improved awareness and ability to identify modern slavery risks observed through increased completion of modern slavery e-Learning modules and the provision of regular procurement principles training.
- Implementation of additional resources and tools: Additional requirements have been incorporated within internal guidelines for addressing complaints relating to risks or allegations of modern slavery.
- Improved procurement and contract management practices: The Department of Agriculture, Fisheries and Forestry (DAFF) undertook a major ICT tender which included the requirement of a modern slavery statement and risk management plan embedded into the contract and was entered into within the reporting period. This contract included practices in place for raising concerns of modern slavery risks and potential human rights issues. Secure channels are provided by the supplier for its employees to raise risks and issues which are designed to protect anonymity.
- Increased collaboration: DAFF established a Procurement and Contract Management Community of Practice, to allow for targeted dissemination of procurement related information and provides a regular forum to discuss risks and/or issues identified in procurement practices.

Looking forward

The portfolio will continue to focus on:

- uplifting and improving risk identification practices and mitigation strategies, including through building further requirements for identification into relevant procurement and tendering processes
- ensuring modern slavery risks are considered as part of the standard risk assessment process on every procurement, regardless of value.

As a result of the upgrades to the financial management information system, it is expected that there will be greater oversight from the central procurement team on modern slavery risks.



Attorney-General's

The Attorney-General's portfolio is diverse, encompassing legal services, national security and criminal law, integrity and anti-corruption matters, the Commonwealth justice system including courts, tribunals, justice policy and legal assistance, regulation and reform, protecting and promoting human rights, and support for Commonwealth royal commissions. During the reporting period, the portfolio included 16 NCEs.

The five areas of highest contract value during the reporting period were:

- property leasing and management
- software and maintenance services
- computer equipment and accessories
- labour hire - temporary personnel services
- legal services.

Risks

High-risk areas in the portfolio align with the five key risk areas described in **Section 2**.

For example, the AFP is particularly exposed to modern slavery risks across its textiles supply chain. Given most of the manufacturing of products in textiles takes place offshore, ensuring supply chains are free from modern slavery can be difficult to monitor.

Response

A number of processes have been implemented to identify, assess and address modern slavery risks across the portfolio.

Training and awareness activities

- Conducting Australian Securities and Investment Commissions (ASIC) searches for all ICT vendors. This check focuses on international ownership, directors and supplier reputation.
- Using existing traceability processes to improve information about the source of products.
- Reviewing modern slavery statements registered on the Modern Slavery Statements Register for high-risk suppliers.

Procurement and contract management activities

- Requesting modern slavery statements from tenderers in open tender processes and considering the risk identification and management activities detailed during the risk assessment process.
- Engaging with suppliers through contract negotiations and regular contract management meetings, to identify any suppliers that are not addressing modern slavery risks and gather information about subcontractor modern slavery risk management processes for all ICT procurements.
- Reviewing the AFP National Guideline on Procurement and Contracting. This review includes all associated procurement and contract management documentation and templates. The review is expected to strengthen modern slavery considerations within the guideline itself, risk assessment templates, contract clauses and contract management plans.
- Mapping all vendors and subcontractors in relation to AFP infrastructure procurements. Tenderers must confirm their acceptance to, incorporation of, and compliance with, the Commissioner's Orders and supporting policies (similar to a vendor code of conduct). This code includes a requirement to comply with modern slavery requirements.
- Managing cleaning services through JLL. JLL works closely with downstream vendors through formal ongoing vendor management framework and due diligence audits. These place a focus on ensuring compliance with modern slavery frameworks including the Modern Slavery Act.



Cleaning Accountability Framework Certification

The AGD holds membership with the Cleaning Accountability Framework (CAF) and continues to progress work to obtain CAF building certification across its premises. The CAF is an organisation, whose mission is to improve labour practices in the cleaning industry. CAF works with cleaners, worker representatives, tenants, contractors, property owners, facility managers, and investors across the cleaning supply chain to ensure ethical labour practices including through its Building Certification model, which provides an assessment as to whether buildings are being procured, managed, and delivered in a manner that foregrounds respect for cleaners' labour rights.

Response activities

Case example: A supplier's grievance process

Cleaning services for the AFP is managed through Jones Lang LaSalle (JLL).

The AFP has reported JLL's *Ethics Everywhere* helpline is a confidential reporting platform available to employees, contractors, clients, supply partners, and members of the public to raise concerns or report suspected behaviours that may be a breach of JLL's modern slavery policies or the law. It is available 24 hours a day, seven days a week, and in multiple languages. Reports can be made anonymously.

JLL's *Whistleblower and Non-Retaliation Policy* further supports efforts to encourage speaking up by addressing the challenges of remediating illegal activities while protecting victims.

Outcomes

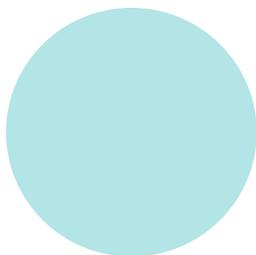
Outcomes for the reporting period include:

- increased awareness of the training resources used by procurement officials
- increased use of modern slavery tender and contract clauses in procurement processes
- increased collaboration within the portfolio and across government to ensure the portfolio stays informed.

Looking forward

The portfolio will continue to focus on:

- raising awareness of modern slavery risks by providing detailed information, access to online training and updated procurement documentation outlining the requirements
- encouraging the use of modern slavery training and toolkits in conjunction with internal risk management processes and documentation
- requesting modern slavery statements from tenderers in open tender processes and actively engaging with suppliers through the life of the contract to identify and manage risks of modern slavery
- engaging with prospective suppliers including utilising the Supplier Questionnaire for higher risk contracts.



Climate Change, Energy, the Environment and Water

During the reporting period, Climate Change, Energy, the Environment and Water portfolio included five NCEs, representing national interests across climate change, energy, the environment, water and the Antarctic.

The five highest areas of contract value within the portfolio were:

- environmental management*
- temporary personnel services
- professional procurement services
- management advisory services
- property management services.

* Environmental management includes water purchasing.

Risks

High-risk areas in the Climate Change, Energy, the Environment and Water portfolio align with the key high-risk areas described in **Section 2**.

For example, the Antarctic Division within the Department Climate Change, Energy, the Environment and Water (DCCEEW) requires protective clothing of a high quality and technical standard for the safety of expeditioners operating in harsh environments. Given the offshore risks associated with textiles, this is assessed as a high-risk area. Similarly, the Climate Change Authority (CCA) procured a new lease, including construction and fit-out, during the reporting period. This involved a number of subcontractors and a high-value contract, again meeting the high-risk threshold.

Specific risks of modern slavery were identified through risk assessments, with mitigations including use of modern slavery risk assessment tools and proactive engagement with suppliers.

Response

Training and awareness raising activities

- Providing training to procurement staff about the requirements of the Modern Slavery Act and educating staff that the e-Learning modules are available to all officials, via agency hosted learning platforms and the Modern Slavery Statements Register.

Procurement and contract management activities

- Mandating training for DCCEEW's central procurement team.
- Incorporating Modern Slavery Act requirements into updated procurement planning processes, evaluation considerations, and risk assessment templates.
- Updating procurement planning documents to include checklists capturing the requirements of the Modern Slavery Act for use by some portfolio agencies.
- Involving central procurement teams in the development of higher risk tenders and contracts. Where modern slavery risks are identified, contracts generally include model clauses from ClauseBank or the Modern Slavery Toolkit.
- Engaging with verified licensed providers when procuring contract labour hire services.
- The Bureau of Meteorology (the Bureau) and CCA publish guidance about raising and handling procurement complaints, including modern slavery concerns on their external websites.

Supplier activities

- The portfolio used the Supplier Questionnaire when tendering in circumstances where a high-risk of modern slavery was identified.

Grievance processes

- DCCEEW's website provides instructions for making procurement complaints.
- The Bureau and CCA publish guidance about raising and handling procurement complaints, including modern slavery concerns on their external websites.

Measuring effectiveness

Measures to assess effectiveness identified by the portfolio included:

- Obtaining feedback from staff on the usefulness of training and adjusting training accordingly where improvements are identified, and the frequency and type of questions received by line areas relating to modern slavery risks and risk management.
- The Bureau undertook internal assurance reviews during the reporting period to monitor its compliance against the relevant Commonwealth procurement rules and policies. This included assessing compliance against the requirements of the Modern Slavery Act and reviewing recordkeeping practices. This process of conducting internal assurance reviews is ongoing and will be captured in future reporting periods to monitor ongoing effectiveness.
- Monitoring the Bureau's compliance against the recently updated internal procurement procedure. This procedure reflects the requirement to comply with the Modern Slavery Act and was disseminated for staff-wide consultation and feedback.

Outcomes

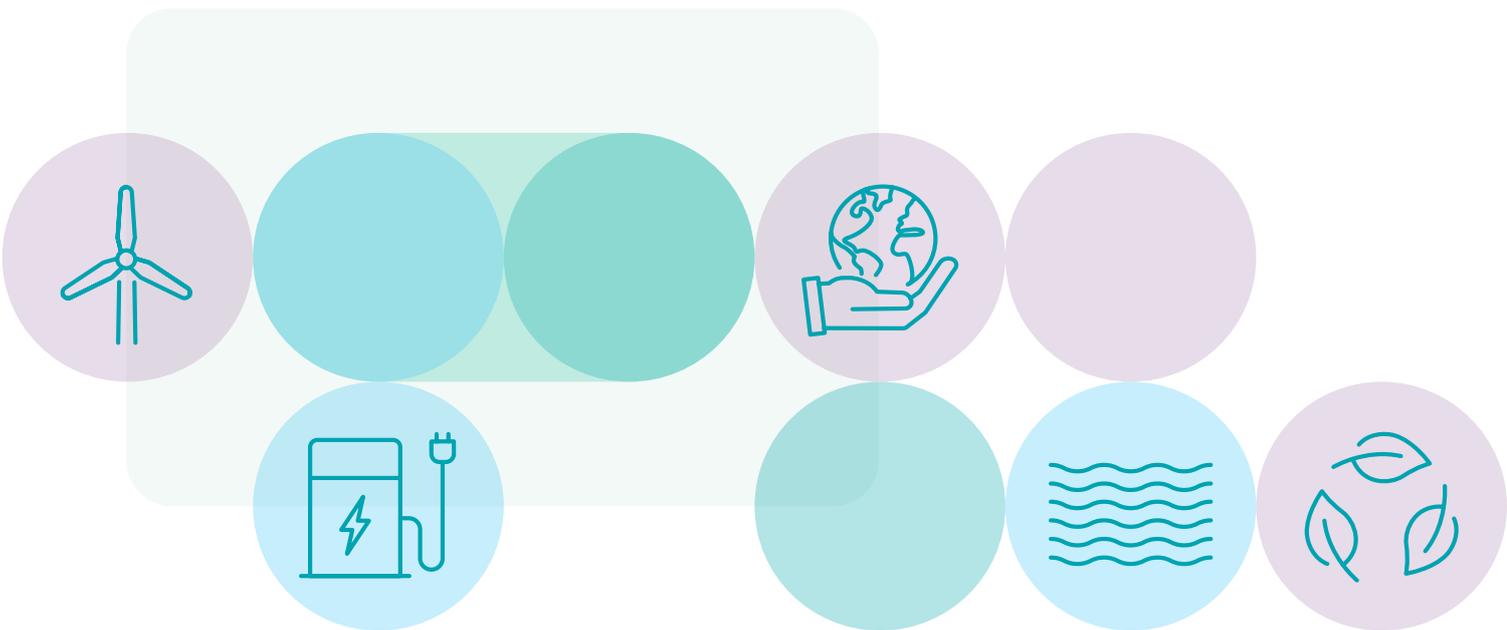
Outcomes for the reporting period include:

- improved procurement and contract management practices
- increased consultation and feedback from staff
- improved measures to monitor effectiveness in identifying and addressing risks of modern slavery.

Looking forward

The portfolio will continue to focus on:

- increasing internal communications with line areas to build awareness of modern slavery
- continuing education for delegates and other internal staff
- training in modern slavery risk screening, assessment, and mitigation is planned prior to any future large-scale clothing supplier engagement via open tender
- continuing to review and update tender and contract templates, risk assessments, and reporting tools
- considering the scope of the target audience for training, beyond the central procurement team
- amending the DCCEEW website to include a reporting avenue for allegations or risks of modern slavery, and links to relevant information.



Defence

Defence's primary role is to defend Australia and its national interests, promote security and stability, and support the Australian community as directed by the Australian Government. During the reporting period, the Defence portfolio included four NCEs as listed in the table on page 12.

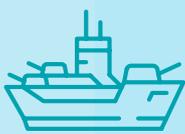
The categories with the highest contract value within Defence are:

1. military fixed wing aircraft (\$9.21 billion)
2. building construction, support, maintenance & repair services (\$5.91 billion)
3. war vehicles (\$5.30 billion)
4. military rotary wing aircraft (\$4.05 billion)
5. real estate services (\$3.72 billion).

Risks

General areas of high modern slavery risk identified within the Defence portfolio:

- Offshore projects – For example, Defence delivers infrastructure projects and undertakes various related activities within Pacific Island Countries, which are known to be at high-risk of modern slavery.
- Direct procurement of services and products such as clothing, logistics and ICT hardware and software, where downstream supplier employee arrangements may not be known. For example, a risk to the direct procurement of ADF clothing lies in the dominance of identified high-risk manufacturing locations in South-East Asia. The Australian Textile, Clothing and Footwear industry has continued to contract in size (since the deregulation of import tariffs late last century), and no longer has the capability or capacity to deliver the full range of clothing products required by ADF personnel. There is also risk that one or more of Defence's suppliers may not adhere to the Modern Slavery Act.
- Indirect procurement of goods. For example:
 - The importation of raw materials and components that enable the manufacture and sustainment of Defence's inventory of weapons, including those also used by service providers within the supply chain.
 - The procurement of medical consumables, aids and appliances. These procurements frequently involve textiles, often being manufactured overseas in higher risk geographical locations. Given the nature of the procurements, agencies have limited visibility of the downstream supply chain for these goods.
- Procurement of building services (including cleaning and security). For example, the Department of Veterans' Affairs has identified modern slavery risk areas in current and upcoming construction procurements. These assessments were made based on identified high-risk areas and indicators.



Response

Actions taken within the Defence portfolio during the reporting period include:

Training and awareness raising activities

- Promoting a fact sheet and the tools available to assist in further developing Defence officials' understanding of modern slavery risks across the procurement lifecycle, and encouraging staff to report any identified or potential modern slavery risks to management for escalation.
- Delivering a presentation on modern slavery including a case study on the Papua New Guinea Lombrum Naval Base Redevelopment project (see page 32) to staff, highlighting the importance of modern slavery controls.
- Engaging with other NCEs to discuss modern slavery and improve and share knowledge.
- Developing an intranet site with information for procurers to consider modern slavery risks. The website links to the e-Learning modules, the Modern Slavery Toolkit and information available to educate and inform staff.
- Delivering procurement information sessions to provide guidance on procurement processes and obligations.
- Reviewing existing assessments of potential suppliers, specifically through the online Modern Slavery Statements Register prior to entering into contracts.

Procurement and contract management activities

- Maintaining modern slavery guidance for Defence officials to build staff capability and increase awareness over the reporting period. This provides advice on the obligations of Defence officials in relation to reducing the risk of modern slavery in its procurements, including guidance on how the modern slavery risk screening tool can be applied to Defence procurements.
- Including the consideration of modern slavery in the Defence Commercial Framework and by doing so, ensuring implementation of appropriate mitigation strategies.
- An area within Defence managing offshore projects has developed a Modern Slavery Control Plan, which is applied to all of their procurement activities. It details the steps to be taken to assess and determine appropriate alignment actions and protocols in relation to specific modern slavery risks, such as non-payment or underpayment of workers' wages, benefits and issues around worker treatment and working conditions.

- Defence officials conducting procurements engage risk assessments to identify risks (including modern slavery risks), highlight concerns and take mitigation actions as applicable. During this process, additional risks with subcontracting arrangements are also reviewed.
- Utilisation of tools and resources such as the Global Slavery Index, the Responsible Sourcing Tool, and the Modern Slavery Statements Register, to consider the general risk profile of the procurement and the risk profile of the supplier relating to modern slavery compliance. By understanding the complexities and interdependencies within these networks, Defence ensures the resilience and efficiency of supply chains remains robust and responsive to challenges.
- Incorporating a requirement for tenderers to provide a response to a questionnaire on their approach to modern slavery, for procurement activities at risk of modern slavery. The tenderer's response is assessed and evaluated during the tender process to determine if there are any potential issues and/or concerns with their outlined approach.
- Embedding modern slavery contract clauses in contracts and subsequent contract management activities, where the risk assessment and analysis deem it necessary, may assist to minimise potential non-compliance with the Modern Slavery Act.
- Adding controls to ensure that PGPA Act Delegates are aware of the modern slavery risks in the supply chain when committing Commonwealth funds.

Supplier activities

- Mandating obligations to implement procedures and processes, and notification requirements, to enable the monitoring of modern slavery risks in supply chains, and the flow down of contractual obligations to subcontractors if required. Subcontractors are also required to implement these procedures and obligations to their subcontractors and suppliers (where applicable).
- Engaging with suppliers on risks of modern slavery is undertaken at both the procurement stage, and throughout the contract lifecycle.
- Meetings between Defence and suppliers are held at tactical, operational and strategic levels at appropriate intervals (typically weekly, monthly or biannually), to reflect on contract performance and compliance. Any concerns by either party in relation to supply chain issues, including modern slavery risks, should be raised in these forums and subsequently addressed.

Grievance processes

- Defence officials are encouraged to report any identified or potential modern slavery risks to management for escalation.
- Defence also has a number of complaint mechanisms available to allow affected stakeholders to raise complaints or concerns in relation to procurement including:
 - The Defence Procurement Complaint Scheme, which was established to independently manage complaints about Defence procurement; and
 - Using a Public Interest Disclosure, which allows public officials to disclose suspected wrongdoing by a government agency or public official.
- In Defence, public officials include current and former APS employees, ADF permanent and reserve members, Cadets, Officers and Instructors of the Australian Defence Force Cadets, contracted service providers that are, or have been, engaged under contract with the Commonwealth.
- Where Defence considers there is a high-risk of modern slavery and therefore it is appropriate to take additional steps to ensure these risks are identified and mitigated, it places the following contractual obligations on suppliers:
 - If at any time the Contractor becomes aware of modern slavery practices in the operations and supply chains used in its performance of the Contract, the Contractor shall as soon as reasonably practicable:
 - notify the Commonwealth of the modern slavery practices and provide any relevant information requested by the Commonwealth
 - take all reasonable action to address or remove these practices, including where relevant by addressing any practices of other entities (including subcontractors) in its supply chains
 - take all reasonable steps to remediate any adverse impacts caused or contributed to by the Contractor from these practices in accordance with the UNGPs
 - consult with the Commonwealth about the Contractor's actions and steps under clauses (x) and (y)
 - provide updates to the Commonwealth of its progress in addressing or removing the practices and remediating the adverse impacts on a regular basis and as otherwise requested by the Commonwealth.

Outcomes

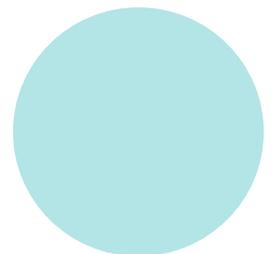
Outcomes for the reporting period:

- Officials demonstrating an increased awareness of modern slavery risks and knowledge of the tools available to support the identification of potential modern slavery occurrences in procurements.
- Increased use of the online annual supplier statements through the Modern Slavery Statements Register.
- Increased identification of potential modern slavery in procurement processes and application of risk mitigation strategies.

Looking forward

The portfolio will continue to focus on:

- collaborating with other NCEs and contributing to the strengthening of the toolkit of resources for addressing modern slavery
- raising awareness of modern slavery risks in procurement activities
- ensuring training materials remain fit-for-purpose
- supporting staff awareness and training on modern slavery risks across the portfolio
- actively engaging with suppliers in relation to their risks of modern slavery and mitigation strategies
- developing a stronger understanding of supply chains.



Education

The Education portfolio's purpose is to create a better future for all Australians through education. The Education portfolio included three NCEs during the reporting period.

The portfolio's five areas of highest contract value were:

- research programs
- project management
- data services
- management advisory services
- computer services.

The Department of Education has a Memorandum of Understanding (MoU) with the Department of Employment and Workplace Relations (DEWR) for the supply of services covering a wide range of items including office premises, security and access control, cleaning, ICT services, software, hardware and related systems. The Department of Education therefore does not directly manage the supply contracts for these services and relies on DEWR to identify and manage any associated modern slavery risks and compliance issues during the procurement stage.

Risks

High-risk areas in the Education portfolio align with the five key risk areas described in **Section 2**.

The Tertiary Education Quality and Standards Agency (TEQSA) entered into a property management contract during the reporting period. Noting the high-risk nature of these arrangements, the cleaning provider leases require that persons engaged in cleaning services are of good reputation, competent and comply with *AS 4811:2006 Employment Screening*.

Response

Training and awareness raising activities

Over the reporting period, the portfolio continued to commit to training and awareness through actions including, but not limited to:

- encouraging all portfolio staff to complete e-Learning modules irrespective of whether they have a role in procurement activities:
 - Through completion of the e-Learning modules, staff have indicated that they have developed a stronger awareness and understanding of modern slavery risks, and increased competency to manage modern slavery risks in the procurement process.
- Australian Research Council (ARC) senior leadership group received a presentation on modern slavery in public procurement

- providing non-mandatory compliance training concerning contract, procurement, and probity, which included modern slavery, to all staff via online and face-to-face presentations
- the Department of Education worked with the OFWO to ensure that international students are aware of their rights and responsibilities while working and studying in Australia to prevent workplace exploitation, including modern slavery
- using Standard 6 of the *National Code of Practice for Providers of Education and Training to Overseas Students 2018* requiring education providers to inform international students about their work rights and conditions, and how to resolve workplace issues including referrals to appropriate services and programs at no cost to the student:
 - These activities reduce the risk of international students falling victim to unscrupulous employers. This includes working with the Department of Home Affairs to promote awareness of migrant work protections, including new protections introduced through the *Migration Amendment (Strengthening Employer Compliance) Act 2024* (Cth).

Procurement and contract management activities

During the reporting period, the portfolio engaged in procurement and contract management activities to address risks of modern slavery, including, but not limited to:

- updating the Department of Education's Modern Slavery Risk Plan, which maps out modern slavery risks, relevant risk rating, and mitigation actions:
 - The plan is reviewed annually, and staff are encouraged to include modern slavery risks and treatments in the plans they create where applicable.
- using the Department of Education Procuring Official Checklist, which includes a modern slavery section
- using the Department of Education Long Form Services Contract template which includes a modern slavery clause, included in contracts where modern slavery risks are present.

Supplier activities

- Analysing contracts for areas of potential modern slavery risk.
- Inviting suppliers to complete the Supplier Questionnaire.

Case Study:

The Department of Education analysed its existing contracts for areas of potential modern slavery risk and identified two contracts with heightened risk relating to services for international students. The two suppliers were invited to complete the *Supplier Questionnaire – Identifying modern slavery risks*.

Through the questionnaires, the Department of Education was able to identify modern slavery risk awareness and actions taken by these suppliers to address the risk of modern slavery in their operations and supply chains.

Supplier A

Supplier A has a well-developed Supplier Management Framework for their supply chain and identified key subcontractors at all levels of their organisation. The framework includes a governance checklist which includes the requirement to provide a copy of the applicable subcontractors' modern slavery statements, which is a mandatory requirement during all tender and contract renewal processes. Supplier A expects their supply chain to adopt the same high standards that they have, and has identified high-risk locations, requires their supply chain to confirm that they pay the national minimum wage to their staff, and that supply chain research must be conducted before entering into any agreement.

Further, Supplier A has a cross functional Global Governance Group that holds monthly meetings to measure the effectiveness of their adherence to their policy framework, including the Global Supplier Management Framework. This Group reports to the Board of Directors monthly and includes reporting on compliance with modern slavery obligations. Additionally, this supplier advised that corporate compliance training is mandatory for all employees, which includes training on modern slavery.

Supplier B

Supplier B conducts due diligence before onboarding any new subcontractors, including a review of their business practices and a reference check. This recognises that the multinational companies they may work with might only have limited awareness of local market practices and the Commonwealth's requirements with regards to modern slavery prevention.

Grievance processes

The Department of Education, ARC and TEQSA have complaint websites that detail how to make a complaint, including online complaint forms and email addresses. Additionally, the department's complaints website includes information on emergency support services.

Outcomes

Outcomes for the reporting period include:

- increased engagement across NCEs, including participation in various workshops throughout the reporting period, aimed at tackling modern slavery at a whole-of-government level
- increased awareness and understanding of modern slavery risk leading to improved competency to manage modern slavery risks in the procurement process.

Looking forward

The portfolio will:

- continue to focus on awareness of modern slavery risks in its activities and identifying modern slavery risks in supply chains
- focus on increasing engagement with suppliers in identified procurement areas of high-risk or services/programs for potentially at-risk individuals, for example international students or vulnerable students
- the Department of Education will continue analysing its contracts for areas of potential modern slavery risk and inviting suppliers to complete the Supplier Questionnaire to help raise awareness of modern slavery with suppliers
- develop a supplier engagement plan for the ARC to help target their forward-looking actions by focusing on higher risk suppliers
- consider the introduction of e-Learning modules and procurement training on modern slavery in public procurement on TEQSA's learning and development environment to increase awareness across the agency, especially for officials that undertake procurement activities within the agency
- reviewing its procurement framework and approach, including guidance and forms (for example, Purchase Requisition Form and Business Case template) to include consideration of modern slavery risks during the procurement process.

Employment and Workplace Relations

The Employment and Workplace Relations portfolio works actively to fill skills gaps to support Australia's economic growth by identifying industries with skill shortages, including in emerging industries fundamental to the prosperity of individuals, businesses, and our nation.

Additionally, the portfolio is also responsible for:

- strategic planning to prevent asbestos exposure
- developing policy on work health and safety
- regulating vocational education and training providers
- promoting harmonious, productive, cooperative, and compliant workplaces
- regulating registered organisations and resolving workplace issues.

During the reporting period the portfolio included seven NCEs.

The five areas of highest procurement contract values across the portfolio were:

- employment services
- computer services
- temporary personnel services
- components for Information Technology or broadcasting or telecommunication
- education and training services.

Risks

In addition to the five key areas of focus as outlined in **Section 2**, the portfolio has identified additional areas of potential high-risk as:

- employment services - based on the scope, scale, complexity and high-values of the relevant arrangements
- office furniture and fittings - there are risks of modern slavery in the procurement of office furniture and fittings, which was manufactured overseas, especially in countries with poor governance and conflicts.

Response

Training and awareness raising activities

Over the reporting period, training and awareness-raising activities relating to modern slavery by the portfolio include, but are not limited to:

- raising awareness through information sharing on the reporting requirements under the Modern Slavery Act and reasons for including modern slavery contract clauses into contracts
- updating internal procurement related policies and the intranet to include additional information about modern slavery in public procurement.

Case Example:

In October 2023, the Department of Employment and Workplace Relations (DEWR):

- published a news item on the Employment Services Provider Portal (the department's web platform for communication) to remind providers of their reporting obligations for modern slavery
- provided instructions to contract management staff on managing employment service providers with modern slavery obligations.



Procurement and contract management activities

Over the reporting period, the portfolio strengthened its management of modern slavery risks through the following procurement and contract management activities:

- Including modern slavery clauses and requirements in tender, contracts and other documentation relevant to risks, where appropriate, to ensure suppliers are maintaining ethical supply chain practices and are providing pay and conditions to workers in accordance with workplace laws including and not limited to the *Fair Work Act 2009* (Cth) (Fair Work Act) and Modern Slavery Act.
- Reviewing tender and contractual templates by the DEWR legal team to ensure that they reflect the updated modern slavery clauses.
- Introducing the requirement for all staff who regularly procure goods and/or services on behalf of the Fair Work Commission (FWC) to provide information about modern slavery for each procurement.
- Building in the requirement to identify subcontractors and comply with the Modern Slavery Act into all of the OFWO procurement processes and contracts.
- Requiring officials to make reasonable enquiries that any procurement is carried out with consideration for relevant regulations and/or regulatory frameworks, including but not limited to tenderer's practices regarding labour regulations and ethical employment practices.
- DEWR requires all ICT hardware contracts include approved modern slavery clauses prior to engagement with the seller, to mitigate risks within the supply chain. Through this avenue sellers can respond to the department if any issues are raised.

Supplier activities

- The modern slavery contract clause covers supplier's duty to notify the agency as soon as possible if any risks are identified during the contract period.
- Suppliers are provided with an opportunity to raise any concerns before contracts are signed.
- Writing to Landlords seeking confirmation of compliance with the Fair Work Act and adherence to Australian workplace laws.
- Engaging with suppliers on issues relating to modern slavery, where a high-risk for potential modern slavery issues is identified. The FWC may request a copy of the supplier's policies and processes (if any) they have in place to respond to modern slavery risks, and/or use the Modern Slavery Toolkit to guide each stage of the process for considering modern slavery risks within the existing Commonwealth Procurement Framework.

Grievance processes

- DEWR has a general procurement complaints mailbox which is actively managed by DEWR's central procurement team.
- The OFWO has procurement processes that include avenues for complaints and grievances as required in accordance with the Commonwealth Procurement Rules.
- The OFWO also maintains multiple access points including a contact centre where members of the public including workers and employers can contact the OFWO seeking information about modern awards, employee entitlements and request assistance regarding workplace disputes.
- The OFWO's Fair Work Inspectors (FWIs) may interact with victims and perpetrators of human trafficking and modern slavery whilst undertaking their duties. The FWIs are aware of the indicators of human trafficking and modern slavery and report suspected cases to the AFP when they encounter them.
- Asbestos and Silica Eradication Agency (ASSEA) has a process in place to allow complaints to be received and managed.



Outcomes

Outcomes for the reporting period include:

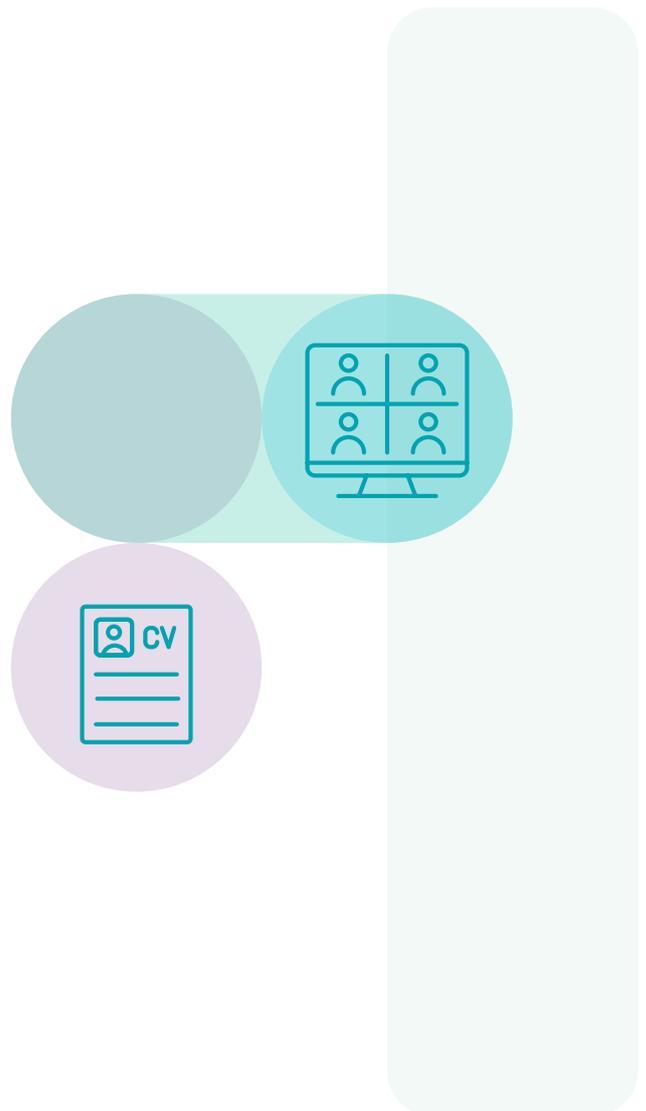
- increased internal communications including information sharing to raise awareness about risks of modern slavery in ICT hardware, and awareness raising through updated intranet pages
- increased engagement with suppliers
- improved contract management practices.



Looking forward

The portfolio will:

- continue to ensure modern slavery clauses are included in all applicable ICT Hardware Procurement requests
- review processes with the ASSEA, FWC and OFWO's procurement activities to ensure model clauses are included and the risk of modern slavery is considered
- consider improvement measures going forward and liaise with the purchasing areas accordingly to pass on knowledge and ensure additional considerations for products purchased overseas in market research prior to raising the procurement request
- continue to ensure its employment services contract management activities and procurement processes ensure compliance with relevant modern slavery legislation
- disseminate regular correspondence on modern slavery in public procurement via internal communication channels
- where relevant, encourage staff involved in procurement activities to use the Supplier Questionnaire
- increase awareness of the Modern Slavery Act and its implications within the Australian Skills Quality Authority's purchasing officials in relation to the acquisition of any services or supplies via direct support from the central procurement team
- deliver procurement training and refresher courses to FWC staff, including about modern slavery, for those staff who regularly procure goods and services
- establish and implement within DEWR improved processes for measuring effectiveness of actions to manage risks of modern slavery which will be reported in the future.



Finance

The Finance portfolio provides high quality advice, frameworks and services to achieve value in the management of public resources for the benefit of all Australians. During the reporting period, the portfolio included six NCEs.

The portfolio's five areas of highest contract value were:

- property management, construction and leasing services
- information technology and related services
- personnel and recruitment services
- advertising (supporting the Whole of Australian Government Arrangements)
- management advisory services (consultancy and non-consultancy).

Risks

High-risk areas in the Finance portfolio align with the key high-risk areas described in **Section 2**.

The portfolio procured, by value:

- 34% of its newly awarded contracts during the reporting period on building and construction related services (including contracts for lease arrangements)
- 27% of its newly awarded contracts during the reporting period on ICT and telecommunications goods and services.

Further, a small number of contracts were procured within other high-risk sectors including:

- security (guarding services and security equipment)
- uniforms and promotional merchandise
- cleaning services.

Staff across the portfolio recognise the requirement for ongoing commitment to build a deeper understanding of the nature of modern slavery risks in the global supply chain, particularly with respect to downstream arrangements and the use of subcontractors.

During the reporting period, the portfolio undertook the following actions to support the identification of modern slavery risks in procurement and contracts:

- Conducting supply chain mapping and risk assessment exercises to identify the likelihood and impact of possible modern slavery risks, including sector and industry risk, product and services risk, geographic risk, and operational and entity risk.
- Assessing risk including the consideration of:
 - sector and industry risk – certain sectors and industries have higher modern slavery risks because of characteristics, products and processes.
 - product and services risk – certain products and services have higher modern slavery risks because of the way they are produced, provided or used.
 - geographic risk – some countries have higher risks of modern slavery due to poor governance, weak law, vulnerable population, high conflict, migration flows and poverty.
 - operational and entity risk – some entities have modern slavery risks because of poor operational or governance structures, especially in areas of subcontracting and outsourcing where visibility and control is reduced.
 - outcomes from the application of the modern slavery risk screening tool to differentiate between low, medium, and high-risk categories.

In considering modern slavery risk, it should be acknowledged:

- The portfolio entered 18 contracts with international suppliers. Of these, none were in a geographic area that have high instances of modern slavery.
- 55% of contracts awarded were entered using a routine panel arrangement. Non-compliance with modern slavery obligations can lead to a supplier being removed from a panel arrangement.
- Finance has a high instance of ICT and building/construction procurements engaged via panel arrangements. When these arrangements were established, suppliers were assessed for their compliance with the Modern Slavery Act, where the supplier is a reporting entity under the Act.
- Visibility of modern slavery practices in downstream supply chains remains limited. Finance relies on data collected from tier 1 suppliers to analyse modern slavery risk associated with downstream outsourcing.

As operational needs change and supply chain understanding increases, modern slavery risk assessment processes will evolve and improve across the portfolio.

Response

Training and awareness raising activities

To enhance continuous improvements, the following activities have occurred across the portfolio:

- Developing an internal modern slavery strategy to promote engagement with modern slavery across the procurement lifecycle.
- Hosting the modern slavery e-Learning modules, modern slavery toolkit, and modern slavery model clauses on the internal procurement intranet to facilitate uptake of these resources by staff.
- Delivering modern slavery workshops aimed at staff with large value property and construction contracts to discuss potential modern slavery issues in downstream supply chains.
- Circulating internal policies and updates on modern slavery risks across the entity and integrating modern slavery into existing training materials and guidance.

Procurement and contract management activities

Over the reporting period, the portfolio undertook actions to improve procurement and contract management processes relating to modern slavery, including:

- including modern slavery obligations in ATM templates as an unweighted evaluation criterion for high-value procurements to assess the extent to which the tenderer has put in place processes to prevent or mitigate the risk of modern slavery occurring in its operations or supply chains
- ensuring all procurement valued at or above \$200,000 (GST inclusive) include modern slavery obligations in both the tender and contract documentation
- ensuring all procurement valued at or above \$1 million (GST inclusive) require suppliers to respond to the Supplier Questionnaire and submit a Modern Slavery Action Plan with tender submissions for assessment
- developing a modern slavery due diligence checklist for staff to use when considering the impact of modern slavery in procurement and contracting
- using the Modern Slavery Toolkit to include relevant model modern slavery clauses into all procurements and contracts that were assessed as having a potential for modern slavery risk
- conducting supply chain mapping and risk assessment exercises to identify the likelihood and impact of possible modern slavery risks, including sector and industry risk, product and services risk, geographic risk, and operational and entity risk
- developing a modern slavery checklist for suppliers to uplift modern slavery policies and procedures in supply chains
- incorporating modern slavery considerations into standard procurement risk management practices
- conducting contract management reviews and monitoring the performance of major contracts to confirm no instances of modern slavery were identified
- completing and recording contract performance reporting at the end of relevant contracts, to support future due diligence and enhance continuous improvement.

Supplier activities

During the reporting period, the portfolio undertook the following actions to engage with suppliers to promote issues relating to modern slavery:

- Asking suppliers to provide a completed Supplier Questionnaire when responding to any procurement designated as potential for high risk of modern slavery. The Supplier Questionnaire formed part of the tender evaluation process and was also used to build specific obligations in subsequent contract(s).
- Requesting regular updates from suppliers as part of contract reporting obligations and conducting periodic assessment of suppliers (such as desktop reviews or unannounced audits)
- Encouraging suppliers to have a code of conduct or modern slavery policy that demonstrates commitment to addressing modern slavery risks.
- Conducting due diligence and monitoring performance of suppliers with respect to modern slavery, especially those in higher risk areas. This included:
 - Asking the supplier to share its internal policies for monitoring and reporting instances of modern slavery
 - Ensuring the supplier delivers staff awareness training that supports the early identification and prevention of modern slavery risks.
 - Including obligations on suppliers to proactively manage modern slavery risks and associated legal and governance obligations in contractual agreements. If modern slavery was to be identified, the supplier would be required to disclose, assess, investigate and remediate. Suppliers are contractually required to report any confirmed modern slavery cases, develop remediation plans and act within the defined contractual timeframe. They must also permit verification of their compliance, including access to premises and records as required.

Grievance processes

Each entity has an established process to manage with complaints raised by individuals or suppliers in relation to procurement and contracting activities, managed by the central procurement team(s) of each entity.

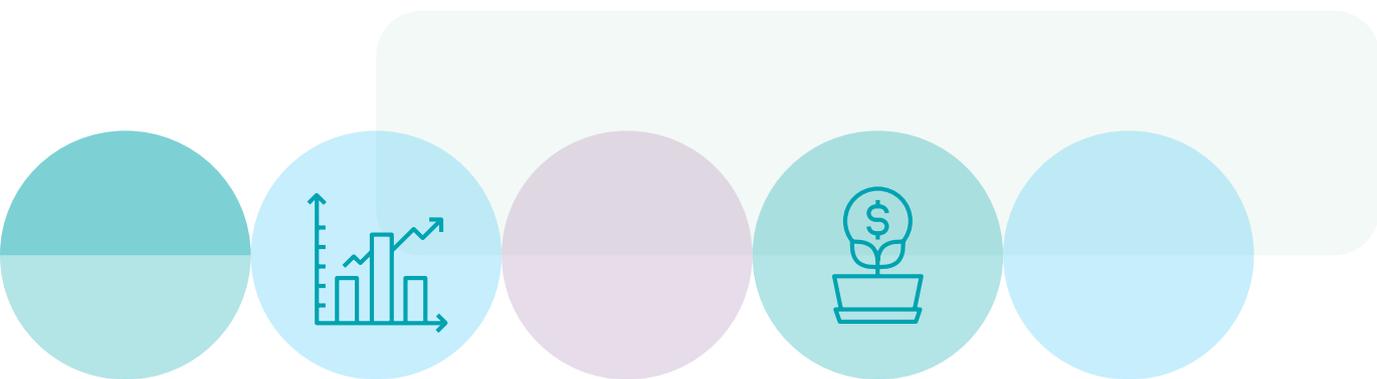
Information on how to submit complaints is available in several forms. Each agency has a complaint page on their public website for suppliers and individuals who may wish to make a complaint (of any nature) to the entity. Complaints processes are also included in contractual documents and suppliers can submit complaints to the designated contracts manager.

Individuals or suppliers can also contact the Department of Finance Procurement Complaints Administrator for assistance with grievances or to report actual, potential or perceived instances of modern slavery.

While no instances of modern slavery have been reported in the portfolio to date, each agency has a remediation process established in line with their approved policies. This generally includes:

- engaging with the complainant to understand and document the concern
- assigning an independent party to investigate
- where it is confirmed that the complaint relates to modern slavery, undertake targeted due diligence and a contract management review
- engage in mediation and resolution
- where required, the Commonwealth may escalate including, but not limited to:
 - engage with senior management
 - implement a remediation plan
 - suspend the contract in question
 - terminate the contract in accordance with termination provisions.

If confirmed, the welfare of people in or at risk of modern slavery is foremost in any remediation process.



Measuring effectiveness

During the reporting period, the portfolio used the following to measure the effectiveness of actions within the portfolio to address risks of modern slavery:

- Staff participating in training are given QR codes to provide quantitative and qualitative feedback as to whether the training improved maturity and understanding of modern slavery risks.
- Staff are required to upload risk assessments to the Financial Management Information System to be reviewed as part of procurement assurance processes. Risk assessments are mandatory for all procurement and contracting activities. Risk Management Plans are mandatory for all procurement and contracting activities valued at or over \$1 million.
- Internal communications on relevant connected policies and legislation are released quarterly. Traffic to the internal Procurement Assist intranet site is reviewed to gauge interest and improve future engagement.
- Statistics for the use of due diligence checklist(s) and modern slavery guidance are reviewed regularly.
- Contract assurance and compliance reviews are undertaken annually, which include obligations to confirm the inclusion of modern slavery clauses in contracts.
- Random checks of supplier websites are undertaken to confirm the supplier is meeting minimum expectations for modern slavery compliance.
- Contract managers are encouraged to discuss modern slavery compliance with suppliers in quarterly contract management meetings.

Outcomes

Outcomes for the reporting period include:

- improved procurement and contract management practices to consider risks of modern slavery through the procurement lifecycle.
- increased supplier engagement to promote issues relating to modern slavery.

Looking forward

The portfolio will focus on:

- continuously increasing awareness and education across its operations and supply chains to find more effective ways to identify modern slavery risks and mitigate those risks with preventative measures
- continuously increasing staff awareness and carrying out targeted capability building for officials who have supply chain responsibilities, particularly in high-risk categories
- actively collaborating with other Commonwealth entities on modern slavery to inform better practice and a consistent, common approach across government
- where possible, proactively engaging with suppliers to foster a collaborative approach to managing supply chain modern slavery risks
- undertaking a targeted review of procurement processes and vendors to ensure procurement and contracting practice are sufficient to address risk of exposure.

The portfolio will also consider implementing future actions to improve modern slavery effectiveness, such as:

- developing a specific supplier engagement questionnaire for contracts which may be at higher risk of modern slavery
- developing supplier training for modern slavery engagement with downstream supply chains.



Foreign Affairs and Trade

The Foreign Affairs and Trade portfolio is responsible for delivering a global network of embassies and missions, alongside an international affairs policy capability, to support Australia's national interests and influence abroad. The portfolio also works across the Australian Government to promote a stable and prosperous regional and global environment. The portfolio included four NCEs during the reporting period.

The five areas of highest contract value within the portfolio during the reporting period were:

- management advisory services
- business administration services
- building construction and support and maintenance and repair services
- lease and rental of property or building
- public administration and finance services.

Risks

High-risk areas in the Foreign Affairs and Trade portfolio align with the key high-risk areas described in **Section 2**.

Across the portfolio, most contracts and variations relate to provision of services that have a low risk of modern slavery.

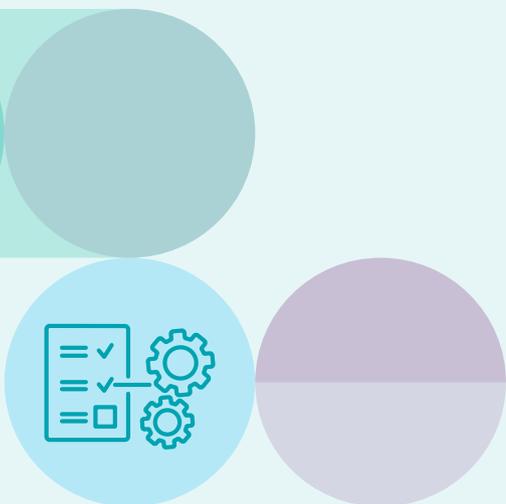
The area with the highest risk of modern slavery for the reporting period is within the building and construction sector, including procurements undertaken offshore with local suppliers. This included but was not limited to security/guarding services, construction projects, cleaning, support and maintenance, utilities, trade shows and exhibits.

Response

A number of processes have been implemented to identify, assess and address modern slavery risks across the portfolio. These include but are not limited to:

Training and awareness raising activities

- Attending workshops to strengthen the management of modern slavery risks.
- Over the reporting period, all portfolio staff have been encouraged to complete the e-Learning modules irrespective of whether they have a role in procurement activities. Through completion of the e-Learning modules, staff have indicated that they have developed a stronger awareness and understanding of modern slavery risks, and increased competency to manage modern slavery risks in the procurement process.
- Including modern slavery procurement obligations as a standing agenda item for Austrade's global leadership meetings covering awareness and training and the tools available on Austrade's Intranet.
- Modern slavery as a topic is discussed at meetings involving the Department of Foreign Affairs and Trade (DFAT) ICT procurement area and the DFAT central procurement area. This is intended to raise awareness of issues, identify risks and regularly discuss areas of possible risk with stakeholders to promote best practice in the wider division responsible for ICT procurement and contract management.
- Including information on modern slavery in the December 2023 newsletter to the DFAT Supplier Network. This reaches approximately 50 suppliers, who were requested to share the information to their subcontractors. The information included links to the Modern Slavery Act, the *National Action Plan to Combat Modern Slavery 2020–2025* and *DFAT's International Engagement Strategy on Human Trafficking and Modern Slavery: Delivering in partnership*.
- Providing training to 64 Australian Centre for International Agricultural Research (ACIAR) staff on modern slavery risks including how to identify risks and reporting obligations.
- Including additional information on modern slavery risks in ACIAR's internal procurement and contract management training program.



Procurement and contract management activities

DFAT

- Completing modern slavery risk assessments for all major procurements.
- Requesting information directly from suppliers about subcontractors that are used.
- Including provisions in approaches to market and agreements to capture suppliers' modern slavery obligations. Subcontractors must also comply with the same obligations under the modern slavery framework.
- Including guidance in the contract management phase of the procurement process to further set out obligations of DFAT personnel on how to review and assess compliance with modern slavery framework requirements.
- Requesting specialist legal review of contractual clauses pertaining to risks of modern slavery before entering into contracts for high-value, strategic procurements.
- Requiring certification and compliance with specified standards (for example, ISO, ANSI/ASIS PSC) to be submitted with responses to approaches to market.
- Including modern slavery compliance in evaluation criteria for major/strategic tender processes.

Austrade

- Undertaking a quarterly review of the types of new procurements to understand any emerging trends. This includes any subcontractor arrangements in high-risk areas.
- Updating its procurement planning checklist to include a requirement to identify any potential modern slavery risks.
- Maintaining a dedicated modern slavery page on Austrade's Procurement HUB 365 site which contains information and links to modern slavery tools and resources.

ACIAR

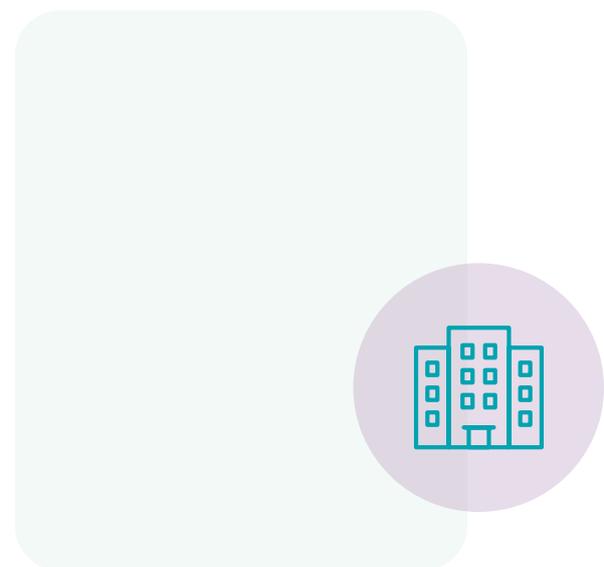
- Continuing to monitor procurement activities to determine if any are of a medium to high risk of modern slavery.
- Out of the 232 new contracts entered into during the reporting period (valued over \$10,000), none have been deemed medium to high-risk of modern slavery.
- Including model modern slavery tender and contract clauses in procurement documentation, where appropriate.

Supplier activities

- Engaging with key suppliers through regular discussions or through biannual Contract Management Group meetings and key performance indicators/compliance checks to:
 - understand how they are addressing their modern slavery risks
 - build supportive, transparent and collaborative relationships in turn encouraging suppliers to be open about modern slavery risks.
- Where applicable and appropriate, requesting for suppliers to provide modern slavery statements, submit a Modern Slavery Risk Management Plan or confirm if they have a modern slavery prevention policy in place.

Grievance processes

- All Commonwealth contract documents have standard complaints clauses.
- An assigned contract manager or tender contact officer can be contacted to speak about modern slavery and other workplace issues.



Case Example: Responding to risks of modern slavery in contracts managed offshore

Embassy staff became aware that a contract worker was struggling to make ends meet for their family based on the low salary they received from the supplier company.

The contract had modern slavery clauses and other appropriate clauses to support compliance monitoring. Under the contract, the Embassy was able to request monthly salary slips from the supplier and identified that, while the supplier was complying with local labour laws by paying the minimum wage, when compared to national data, the contract workers' salaries placed them well below the poverty line. It was assessed that 50% extra of their gross salary would be required to maintain their salaries safely above the poverty threshold.

This situation was the norm at the time with between 40–50% of locals living below the poverty line, with many of those unemployed or underemployed. Australia as a developed nation is taking steps to support contract workers in line with our values of fairness and equality.

Embassy staff identified that another supplier company paid a special 'diplomatic' bonus to its contract workers as a performance incentive and those workers reported being able to provide sufficiently for their families. Working with the Embassy's lawyers, it was identified there was a specific law that allowed suppliers to provide a special bonus for certain work locations, which could be included as a contractual requirement so long as it was made clear that the contract workers remained employees of the supplier company and not the Embassy.

Embassy staff negotiated with the supplier, who was not paying the bonus, to amend the contract to include an 'Embassy' 50% gross bonus each month. The Embassy was able to monitor the implementation of the bonus through requesting the salary slips each month.

When future supplier contracts came up for tender, the requirement for a 50% bonus was included in the request for quote documentation.

Affected contract workers confirmed that the measures assisted them to break out of poverty and adequately provide for their families.

Measuring effectiveness

Methods to monitor effectiveness of such actions across the portfolio include:

- periodically reviewing learning and development reports on e-Learning module completions
- feedback from staff on training
- frequency of information sharing internally and across agencies
- conducting reviews of staff awareness and competencies in managing modern slavery risks in ICT procurement processes.

Outcomes

Outcomes for the reporting period include:

- Increased information sharing and collaboration across NCEs.
- Increased the number of modern slavery awareness training completions:
- ACIAR observed an increase of 15 staff attending training on modern slavery risks including how to identify risks and reporting obligations since the last reporting period
- DFAT observed an increase of 18 staff completing the e-Learning modules since the last reporting period.
- Increased understanding on suppliers' awareness of modern slavery and the actions of the suppliers through conducting a compliance check in contract management meetings and by expanding the requirement that suppliers provide Modern Slavery Risk Management Plans as part of contract review processes.
- Additionally, the portfolio anticipates that through the completion of the Supplier Questionnaire, that suppliers are increasing their knowledge of modern slavery risks and are building their capability around identifying, mitigating and responding to modern slavery risks.
- Improved understanding of the tenderers' modern slavery risk mitigation strategies during the procurement process. For example, during the reporting period, one procurement identified modern slavery risks and used the Modern Slavery Toolkit and templates as part of a large value, complex request for tender (RFT). Responses were received from each of the tenderers detailing their mitigations to be applied over the contract.

Looking forward

The portfolio will focus on:

- increasing the use of the Modern Slavery Toolkit and completion of the e-Learning modules
- continuing to raise awareness about modern slavery to staff and suppliers.

DFAT

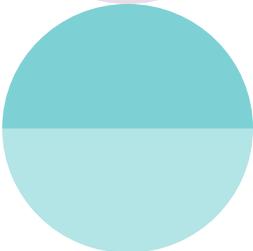
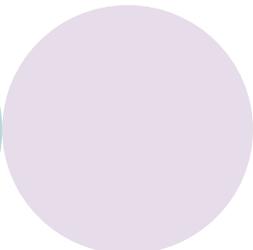
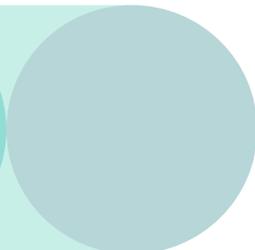
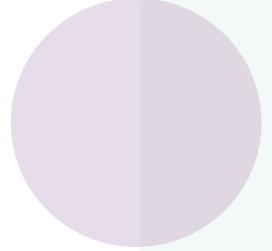
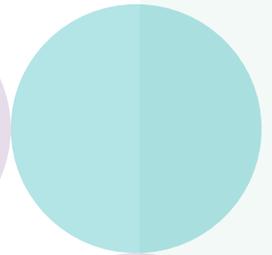
- Request that the supplier complete Modern Slavery Risk Management Plans if this is not already provided as part of the supplier's contract management documentation.
- Engaging with strategic suppliers via regular vendor management forums to discuss compliance with modern slavery risks. For example, buying channels, grey market, refurbished hardware, third-party providers to ensure purchases are of genuine products, and point them to the Modern Slavery Toolkit.
- Obtaining more detailed information from the contractors and subcontractors on how they are managing and mitigating modern slavery risks.
- Developing a vendor management framework to address modern slavery risks and requirements.
- Engaging with DTA as panel manager of the Hardware Marketplace to discuss any areas where DFAT can strengthen process/ documentation within the marketplace head agreement context.

Austrade

- Tracking compliance with record keeping practices to ensure correct documentation is being used. For example, risk assessments.

ACIAR

- Proactively monitoring its suppliers' publication of modern slavery statements on the Modern Slavery Statements Register.



Health and Aged Care

The Department of Health and Aged Care and its broader portfolio of agencies deliver a wide range of health services and outcomes to the Australian population through diverse and interconnected programs, funding health, aged care and sport services, infrastructure and projects. The portfolio included 13 NCEs during the reporting period.

The highest areas of contract value within the portfolio were:

- blood products
- vaccines, pharmaceuticals, and medical supplies
- health services
- accommodation and property operating expenditure
- management advisory services.

Risks

In addition to the five key high-risk areas described in **Section 2**, the Health and Aged Care portfolio have identified the risks of modern slavery in the following types of procurement activities:

- rapid antigen test kits
- imported blood products
- health and medical supplies including PPE
- a range of other medical equipment and consumables.

Following the announcement of the COVID-19 pandemic in 2020, the global supply chains for PPE and other medical equipment and consumables were put under pressures not seen in recent history. Modern globalisation has funnelled the majority of associated manufacturing offshore where workers may face higher risks of modern slavery, and this often occurs in locations with minimal regulation and oversight of general working conditions.

Response

In delivering these health outcomes the portfolio acknowledges that there are inherent risks, including modern slavery, in new and existing procurement supply chains. The portfolio has been actively addressing modern slavery risks in our procurement activities, as detailed below.

Training and awareness raising activities

- Encouraging suppliers and their staff to comply with modern slavery requirements through relevant tender documentation.

Procurement and contract management activities

- Establishing a Strategic Procurement Branch at the Department of Health and Aged Care.
- Updating the Department of Health and Aged Care's procurement templates for RFT, evaluation, and contracts to enhance transparency and risk mitigation. The updated templates now include model clauses that address modern slavery risks.
- Working with procurement officers in implementing strategies to improve visibility into contract supply chains, especially in high-risk industries.
- Contract management materials at the National Blood Authority have been updated to include modern slavery clauses in ATM and contract templates.
- Staff training and guidance materials have been updated to cover modern slavery awareness at the National Blood Authority.

Case Example: Leadership buy-in and collaboration

The Department of Health and Aged Care's Accountable Authority Instructions require all procurement activities valued at \$80,000 and over be undertaken in partnership with the department's Strategic Procurement Branch. For complex high-risk procurements this includes engagement at the planning stages to ensure necessary considerations such as modern slavery management are made and applied to the procurement process.

Portfolio agencies also have access to the Strategic Procurement Branch through the Shared Services model. This arrangement provides portfolio agencies with support and collaboration in undertaking procurement and contract management activities.



Response activities

Portfolio agencies have access to the department's Strategic Procurement Branch through the Shared Services model. This arrangement provides portfolio agencies with support and collaboration in undertaking procurement and contract management activities.

During the reporting period, to enhance transparency and risk mitigation, updated procurement templates for the RFT, Evaluation, and Contracts were developed by Strategic Procurement Branch. These templates now include model clauses that address modern slavery risks. Strategic Procurement Branch has worked with procurement officers in implementing strategies to improve visibility into contract supply chains, especially in high-risk industries.

The department is finalising evaluations for the RFT to establish a supply panel for Personal Protective Equipment (PPE Panel). The resulting Standing Offer terms and conditions will include measures to identify and mitigate modern slavery risks across supply chains. This includes accountability for suppliers to maintain policies/plans to address modern slavery, establish grievance mechanisms and implement accountabilities across managing operations and supply chains.

The National Blood Authority manages contracts with commercial suppliers, including those for imported blood products. Updated contract management materials to include modern slavery clauses in ATM and contract templates have been implemented. Additionally, staff training and guidance materials will also cover modern slavery awareness.

These efforts demonstrate the portfolio's commitment to ethical procurement practices and our dedication to combatting modern slavery.

Outcomes

Outcomes for the reporting period include improved procurement and contract management practices to promote due diligence activities.

Looking forward

The portfolio will continue to:

- review learning material, training and capability for procurement and contract management officers to identify further improvements
- look to enhance assurance activities to continue to ensure compliance with modern slavery requirements, particularly in complex, high-risk procurements
- further embed risk assessment tools into procurement planning and contract management activities.

Under development: Establishment of a Personal Protective Equipment Panel

The department is finalising evaluations of responses to the RFT to establish a PPE Panel. The resulting Standing Offer terms and conditions will include measures to identify and mitigate modern slavery risk across supply chains, accountability for suppliers to maintain policies/plans to address modern slavery, establishing grievance mechanisms and implement accountabilities across managing operations and supply chains.

The PPE Panel will commence in 2024–25 and contain provisions to refresh during the term of operation. Ongoing management will also include the requirement for each panel supplier to establish and maintain a Modern Slavery Risk Management Plan, which addresses the monitoring of supply chains, staff training and grievance reporting mechanisms.

It is expected that lessons learnt from this panel with multiple suppliers in a high-risk industry will be applied to other procurement activity across the portfolio and help educate and build on the portfolio's management of modern slavery risk mitigation.



Home Affairs

The Department of Home Affairs (including the Australian Border Force) and portfolio agencies are responsible for delivering a wide range of services to the Australian people, including emergency management, national security, cyber and critical infrastructure resilience and security, immigration, border security and management, counter-terrorism, and citizenship and social cohesion. During the reporting period, the portfolio included three NCEs.

The five areas of highest contract value across the portfolio were:

- management support services
- security surveillance and detection
- education and training services
- computer services
- refugee programs.

Risks

The portfolio considers each procurement activity on its merits and the outcome of the assessment conducted by the business area using the Modern Slavery Toolkit.

Consideration is given, but not limited, to the:

- contract value
- service being procured
- location of the services being delivered
- type of industry/sector and if it is known to be a risk industry/sector
- organisational risks
- manufacturing location of the product
- supply chain where applicable.

In addition to the five key risk areas described in **Section 2**, the portfolio, through its procurement and contracting activities, has identified a number of high-risk areas where modern slavery could have impacts on the delivery of goods and services. These areas include security, surveillance and detection activities, and recruitment (for permanent, temporary and contractor staff).

Response

Training and awareness raising activities

Over the reporting period, the portfolio continued to commit to training and awareness through actions including, but not limited to:

- embedding links to the e-Learning modules on the procurement professionalisation intranet page which is available to all staff
- raising staff awareness of modern slavery considerations through intranet notices and the Department of Home Affairs' finance newsletter.

Procurement and contract management activities

The Department of Home Affairs, through its procurement lifecycle, includes policies and information for delegates to consider potential impacts modern slavery may have on procurements. As part of the procurement risk assessment, officers undertaking a procurement are required to assess the risks that may be associated with their procurement in relation to modern slavery.

For industries at high-risk of modern slavery, additional oversight is provided through the usage of the Modern Slavery Toolkit in the tender evaluation process. The responses highlight areas where additional risks may be present. Additionally, through the contract management phase, engagement with suppliers can provide additional assurance that their supply chains are being appropriately managed to address risks of modern slavery.

Supplier activities

The portfolio engages with suppliers and seeks supplier input through the completion of the Supplier Questionnaire. Contract managers work with suppliers to assess and if required, mitigate modern slavery risks.

Response activities

Contract managers use the contract as the mechanisms within the contract are available to manage any issues. This includes using the dispute resolution and remediation action plans.

Contract managers can approach the Procurement and Contracts Support Branch in the Department of Home Affairs for advice, guidance and support if there are any contractual issues, including any concerns or issues regarding modern slavery.

Measuring effectiveness

The portfolio continues to undertake ongoing assurance activities throughout the various phases of the procurement, to ensure that modern slavery risks are considered and addressed at each stage. The assurance activity also identifies any gaps in the guidance and procedure to measure effectiveness. Any improvements required are addressed through continuous improvement activities and effectiveness is measured through:

- feedback/statements and regular reporting from suppliers on compliance
- transparency of suppliers' supply chains
- reports on suppliers' measures that have been implemented
- information from governing bodies on modern slavery.

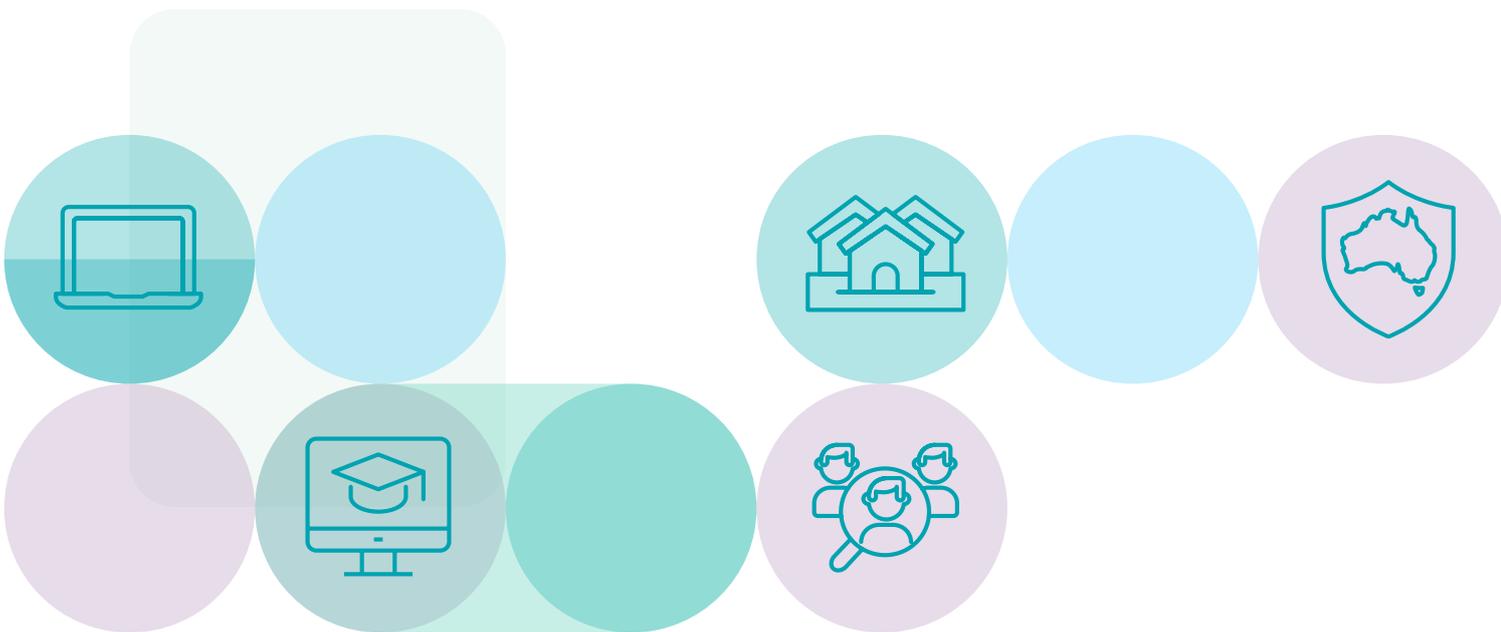
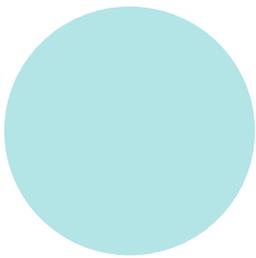
Outcomes

- Increased support for contract managers to address modern slavery.
- Contract managers are able to approach Procurement and Contracts Support Branch in the Department of Home Affairs for advice, guidance and support if there are any contractual issues. This includes any concerns or issues regarding modern slavery.
- Increased focus on due diligence.
- As part of the evaluation process, evaluation teams are responsible for conducting commercial and financial viability checks. This could include but is not limited to checking:
 - a potential supplier's exposure to risk, including factors such as the industry and supply chain complexity
 - background checks to identify dishonest, unethical or unsafe supplier practices, including modern slavery practices.

Looking forward

The portfolio will continue to:

- encourage and educate staff on modern slavery considerations
- consider modern slavery when planning for a procurement activity
- undertake due diligence when procurements are conducted so that any issues or concerns regarding modern slavery may be identified at an early stage.



Industry, Science and Resources

The Industry, Science and Resources portfolio has responsibility for supply chain matters in relation to manufacturing and industry sections. The Department of Industry, Science and Resources (DISR) has a division dedicated to sovereign capabilities and supply chain resilience which identifies vulnerabilities in supply chains critical to Australia's national interests. During the reporting period, it included three NCEs.

The five areas of highest contract value across the portfolio were:

- satellites
- earth science services
- enhanced telecommunications services
- Platform as a Service (PaaS - Cloud)
- lease and rental of property or building.

Risks

The portfolio's modern slavery risks align to the five risk areas identified for the whole of Commonwealth as outlined in **Section 2**.

The five areas of highest contract value across the portfolio were:

- satellites
- earth science services
- enhanced telecommunications services
- Platform as a Service (PaaS - Cloud)
- lease and rental of property or building.

The portfolio uses the modern slavery resources that are available including the Modern Slavery Statements Register. This register allows for identification of suppliers within the key risk areas and the publication of their modern slavery statements, in order to maximise transparency and ensure that entities are publicly accountable for their actions to address modern slavery risks.

The management of risk within our portfolio is in accordance with the PGPA Act and the Commonwealth Risk Management Framework and is consistent with AS/NZS ISO 31000:2018 Risk management – Guidelines.

These risks are being managed under the entity's reporting and risk management framework that includes the regular monitoring and review of controls and identified mitigating actions.

Mitigating actions are taken on a per-activity basis in line with guidance available from the Modern Slavery Toolkit.

Response

Training and awareness raising activities

- The portfolio delivered procurement training and awareness sessions throughout the year, and modern slavery is one of the topics raised during these sessions.
- DISR intranet content and guidance, directs officials to the Modern Slavery Statement Register to access the model modern slavery contract clauses for contract inclusion and the Modern Slavery Toolkit. As updates to policy or guidance are released, intranet content is updated in conjunction with news articles and communications.
- Modern Slavery e-Learning modules have now been incorporated into DISR's learning platform.
- Communication articles on modern slavery in public procurement are circulated as a way to increase awareness amongst staff and specifically those undertaking procurement.

Procurement and contract management activities

- DISR policy requires officials to consider modern slavery as part of any procurement process. The implementation of a procurement e-form, aimed to drive consistency and improve compliance, supports this by requiring officials to consider the policy as part of the planning process.
- DISR Risk Management Framework requires officers to manage risks identified, which includes regular monitoring and review of controls and identified mitigating actions. Support for business areas is available through experienced procurement advisory and legal teams.
- Modern slavery contract clauses are utilised in the portfolio, including those set out under Commonwealth Contracting Suite and some panel procurement documentation.
- IP Australia mandate the consideration of modern slavery risks with procurement risk assessment templates.
- IP Australia maintain a Clausebank with specific provisions related to modern slavery that can be incorporated into IP Australia contracts as needed..

Response activities

DISR, IP Australia and Geoscience Australia continue to promote modern slavery considerations and risks throughout the procurement lifecycle. This includes specific reference to modern slavery as part of the implementation of the procurement e-form being trialled within DISR.

Outcomes

Outcomes for the reporting period include:

- increased awareness of modern slavery risks by incorporating modern slavery into procurement training sessions and promoting key measures to address modern slavery in public procurement via internal communications
- improved procurement and contract management processes. For example, IP Australia has and will continue to make sure procurement officials review approvals under section 23(3) of the PGPA Act to confirm that the spending proposal appropriately address modern slavery risks.

Looking forward

The portfolio will continue to:

- engage with its contract managers and procurement officials to identify and address risks associated with modern slavery and encourage a culture of continuous improvement to ensure our mitigations remain effective
- promote modern slavery considerations and risks throughout the procurement lifecycle across the portfolio to further equip procuring officials, contract managers and delegates or decision makers with the necessary knowledge
- DISR will review policies, guidance and templates to ensure modern slavery guidance and tools are readily accessible.



Infrastructure, Transport, Regional Development, Communications and the Arts

Infrastructure, Transport, Regional Development, Communications and the Arts provide policy advice and deliver programs, projects and services in the infrastructure, transport, communications and arts sectors, supporting our regions, cities and territories. The portfolio included five NCEs during the reporting period.

The five areas of highest contract value for the portfolio were:

- management advisory services
- transport operations
- computer services
- components for information technology or broadcasting or telecommunications
- personnel recruitment.

Risks

High-risk areas in the portfolio align with the five key risk areas described in **Section 2**, with the key risk sector for the portfolio being ICT procurement.

A risk analysis of procurements was undertaken across the portfolio, with particular regards to sectors and industry risk, product and service risk and geographic risk. The Modern Slavery Toolkit is also used as part of standard risk assessments applicable to all procurements.

Response

Training and awareness raising activities

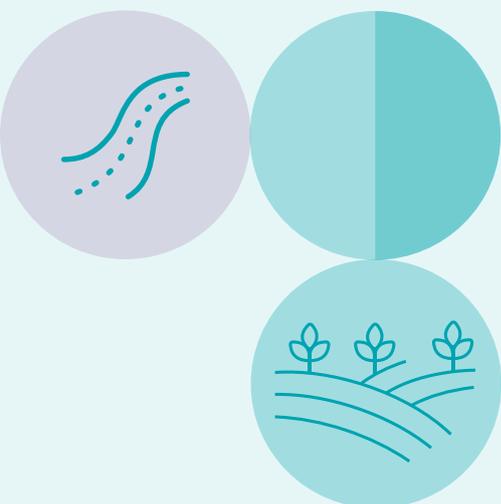
Over the reporting period, the portfolio continued to commit to training and awareness through actions including, but not limited to:

- including information related to modern slavery risks in internal procurement guidance, which is aimed at raising overall awareness when undertaking procurement activities, particularly in high-risk industries
- hosting the e-Learning modules on the online learning management system
- delivering a multi-module internal procurement training program, which covers modern slavery, for officials and delegates on a regular basis
- periodically publishing intranet news stories to remind staff of modern slavery requirements.

Procurement and contract management activities

- Procurement risk assessment templates are utilised with modern slavery as an item that must be considered by officers as part of procurement planning.
- Modern slavery questions are incorporated into the ATM documentation to be completed by potential suppliers as part of their tender response.
- Clauses are incorporated into contract templates, requiring the supplier to take reasonable steps to identify, assess and address risks of modern slavery practices in the operations and supply chains used to deliver the contracted requirements.

These templates and information are available from the intranet, and are utilised by officers offering a standard approach to public procurement.



Response activities

The portfolio is working to develop strategies, process and procedures to manage and resolve concerns, grievances and other issues that may arise or be raised throughout a procurement or contract management phases and provide support and assistance where possible and ensure the approach is consistent with broader Commonwealth processes.

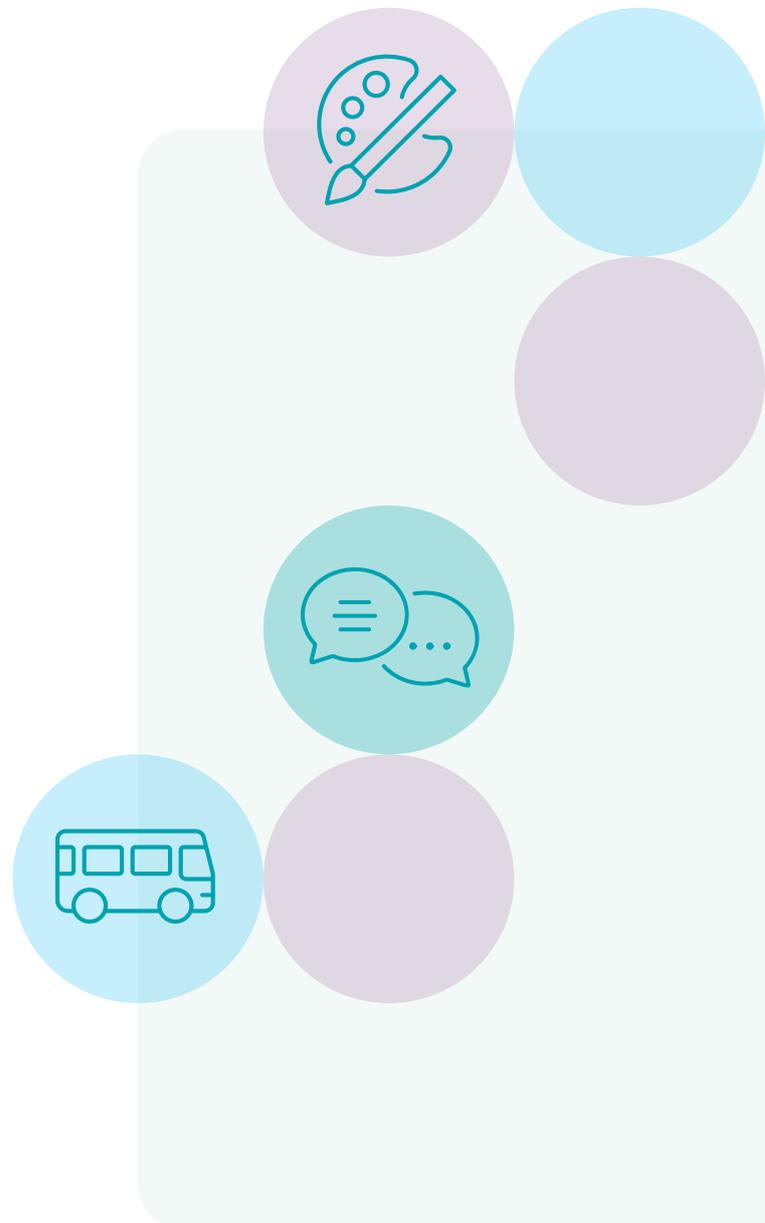
Outcomes

- Increased internal communications, including:
 - developed a new intranet presence that provides accurate information across the procurement lifecycle for procuring officials and contract managers
 - made information more readily available for line areas on the Modern Slavery Act and Procurement Connected Policies
 - maintained good communication and information sharing internally and across agencies (e.g. increased frequency of communication across portfolio on modern slavery risks).
- Increased staff awareness and understanding of modern slavery through regular training and education.
- Improved procurement processes to address modern slavery, including:
 - developed a Procurement Planning Digital Smartform which prompts users to consider modern slavery for high-risk procurements
 - ensured that relevant procurements contained the relevant model modern slavery contract and/or tender clauses
 - implemented a risk-based approach to modern slavery, consisting of an inherent risk review by officials for all procurement activities. Where appropriate, this is followed by consideration of supplier responses to the Modern Slavery Risk Assessment (individual supplier assessment) as part of the value for money consideration processes.

Looking forward

In the next reporting period, the portfolio will continue to focus on:

- increasing risk assessment practices undertaken and embedding good practices
- increasing awareness and availability of training and resources to staff including the model modern slavery tender and contract clauses
- looking at the improvement of contract management processes using digital tools and technology to adequately capture relevant information.



Prime Minister and Cabinet

The Prime Minister and Cabinet portfolio included seven NCEs responsible for the following functions:

- Improving the lives of all Australians, including through coordination of government activities, effective policy advice and development, and program delivery.
- Supporting accountability and transparency in the Australian Government sector through independent reporting to the Parliament, and thereby contributing to improved public sector performance.
- Positioning the APS workforce for the future to ensure it meets the demands and expectations of the Australian Government, Parliament and people.
- Working in genuine partnership to enable the self-determination and aspirations of First Nations communities, in leading and influencing change across government to ensure Aboriginal and Torres Strait Islander peoples have a say in the decisions that affect them.
- Leading the National Intelligence Community and providing advice to the Prime Minister on intelligence matters.
- Supporting the Governor-General in the fulfilment of their responsibilities, including the management and maintenance of the official properties and administration of the Australian honours and awards system.
- Accelerating change to achieve gender equality in Australian workplaces, by providing data backed insights, practical enabling support, tools and research, and accessible pathways to leading practice.

The five areas of highest contract value across the portfolio were:

- temporary personnel services
- audit services
- education and training services
- events management
- travel facilitation.

Risks

The portfolio procured around 10% of its reportable procurement contracts (by value) on goods and services within the high-risk modern slavery categories:

- property management services (including cleaning services) (4%)
- building construction and support and maintenance and repair services (3%)
- ICT hardware (2%)
- medals (1%)
- office furniture (0.04%)
- stationery (0.03%)
- promotional merchandise (0.05%)
- security guard services (0.02%).

Modern slavery risks are considered on a case-by-case basis across the portfolio NCEs and incorporated into each entity's internal procurement policy, processes and guidance, with reference to the guidance provided in the Modern Slavery Toolkit.

The portfolio NCEs have differing levels of maturity in addressing modern slavery risks in supply chains and operations. NCEs generally feel supported by the available resources in the Modern Slavery Toolkit and there has been a continued effort to promote awareness of modern slavery risks among primary suppliers through the inclusion of modern slavery model clauses in contract documentation where required.

A number of initiatives have been implemented across the portfolio NCEs to identify modern slavery risks in procurement processes. Examples include:

- utilising the modern slavery resources available, including the Modern Slavery Statements Register, to consider the profile of suppliers in relation to their modern slavery compliance
- including modern slavery risks in mandatory procurement risk assessments and/or standard agency procurement templates
- including model modern slavery contract clauses in panel work orders and contracts, where determined necessary by a risk assessment and where the head agreement does not already include these clauses
- monitoring open source information to identify modern slavery risks that may impact on procurement activities
- collaborating across government to better understand modern slavery risks and tools.

Response

Training and awareness raising activities

The portfolio continues to focus on increasing awareness of modern slavery risks among procuring officials and suppliers. Examples include:

- including modern slavery training in general procurement training sessions for procuring staff and delegates
- attending external modern slavery consultation meetings and workshops
- promoting awareness of modern slavery through intranet broadcasts and internal information sessions for procuring staff and delegates.

Procurement and contract management activities

A number of initiatives have been implemented across the portfolio NCEs to identify modern slavery risks in procurement and contract management processes. Examples include:

- encouraging teams to complete the e-Learning modules if procuring goods and services from high-risk categories
- encouraging suppliers to provide statements declaring modern slavery implications in downstream activities
- strengthening internal policy and process guidance to ensure consideration of modern slavery risks are integrated early in the procurement planning stage
- raising awareness of modern slavery risk screening tools and resources including internal guidance on when and where additional modern slavery tender and contract clauses should be used
- participating in the IDCP meetings.

As the lead portfolio agency, the Department of the Prime Minister and Cabinet (PM&C) has undertaken the following additional actions:

- Expanded the PM&C Modern Slavery Working Group to include representatives from other portfolio NCEs to raise awareness and share knowledge relating to modern slavery risks.
- Participated in the table-top exercise facilitated by AGD to explore opportunities to strengthen the management of modern slavery risks for the Commonwealth and provided feedback on the effectiveness of the modern slavery risk screening tool, specifically how the tool could be tailored to different industries.

- Amended the current security services contract to:
 - remove subcontracting clauses and specify that all third-party service providers are to be directly employed by the contracted supplier. This ensures third-party providers are employed under the same industry award to negate the potential for cash in hand payments for second and third tier subcontracted staff
 - incorporate the supplier's 'Human Rights Policy' which underpins the guiding principles to protect human rights for contractors and workers in the extended supply chain. This ensures there are no forms of compulsory or forced labour within the supplier's operations to ensure they are compliant with the requirements of the Modern Slavery Act (where applicable).

Supplier activities

Examples of supplier activities undertaken by portfolio NCEs to increase engagement and raise awareness of modern slavery include:

- PM&C's Contract Management Guide encourages contract managers to work with suppliers to develop a supply chain risk plan to address any geographically, ethically or environmentally unsound aspects (for example, disruption of supply or modern slavery) when managing contracts in high-risk industry sectors
- the Australian National Audit Office (ANAO) have continued to incorporate modern slavery as an unweighted evaluation criterion in the ATM documentation for high-value procurements
- the Australian Public Service Commission (APSC) continues to focus on direct engagement with suppliers to educate them on the Modern Slavery Statements Register and seek statutory declarations or statements that there are no modern slavery risks involved in their supply chains.

Response activities

The portfolio is committed to improving its approach to managing modern slavery responses noting all NCEs are at different stages of maturity.

Portfolio NCEs have complaint mechanisms to enable affected stakeholders to raise complaints or concerns of a general nature.

- For example, the APSC has a Workplace Relations/ Health and Safety Committee for any staff to discuss modern slavery as a workplace issue; and a procurement complaints mailbox for suppliers to raise any issues including modern slavery.

Measuring effectiveness

Participation in cross-agency forums, as well as the PM&C Modern Slavery Working Group meetings, and data collection, contributes to the assessment of the maturity of portfolio NCEs.

Portfolio NCEs continue to assess the effectiveness of actions taken to raise awareness of modern slavery risks. Examples include:

- monitoring use of the modern slavery risk screening tool, where required
- monitoring use of model clauses in contracts, where required
- evaluation of training sessions that include modern slavery
- monitoring completion of e-Learning modules, where required
- monitoring engagement with suppliers including use of the Supplier Questionnaire, where required.

Outcomes

Outcomes for the reporting period include:

- increased use of modern slavery tender and contract clauses in procurement processes
- increased engagement and collaboration across the portfolio NCEs to ensure the portfolio stays informed of new requirements and best practice.

Looking forward

The portfolio is committed to improving its approach to managing modern slavery responses noting all NCEs are at different stages of maturity.

The portfolio will continue to:

- promote awareness of modern slavery risks in procurement activities
- collaborate with other agencies through interdepartmental meetings to enhance understanding and stay up to date with modern slavery practices and resources
- enhance procurement policy and process guidance in response to modern slavery requirements and share learnings across the portfolio and government.

Planned actions across the portfolio NCEs for the next reporting period:

- PM&C will continue to engage and collaborate with other NCEs to:
 - further develop and refine internal guidance to assist staff in utilising materials from the Modern Slavery Toolkit
 - review reporting practices on modern slavery in procurement
 - continue to refine and deliver modern slavery in procurement training sessions to raise awareness and promote the Modern Slavery Toolkit.

- PM&C will develop an overall plan to assist the department in managing and responding to alleged instance/s of modern slavery and will share this plan with its portfolio NCEs and the IDCP.
- the ANAO will continue to assess risk relating to modern slavery in high-value, high-risk procurements. Ongoing training and implementation of risk assessments, risk management and model clauses in contracts will be maintained to provide effective identification, management, and engagement with modern slavery risks in procurements undertaken by the ANAO.
- the APSC aims to increase focus on ensuring all staff involved in the sourcing of goods and services from the targeted high-risk categories have completed the relevant training. In addition, the APSC is focussing on contracts awarded for property services including cleaning and construction services, by requesting suppliers to provide a declaration that there are no modern slavery impacts on all arrangements they have entered into on behalf of the Commission.
- the National Indigenous Australian Agency (NIAA) is focusing on offering training and resources to all staff within the agency. As intranet guidance is updated, the goal is to enhance the visibility of the Modern Slavery Toolkit to ensure the NIAA is prepared to address any risks that may emerge in the future. Additionally, the NIAA's procurement team is committed to engage with staff early during the procurement planning phase to ensure modern slavery risks are considered from the outset.
- the Office of the Official Secretary to the Governor-General will continue with their existing assessments and monitor any significant contract or procurement changes.
- the Workplace Gender Equality Agency (WGEA) plans to ensure increased capability is achieved with roll out of the e-Learning modules to train relevant staff. In addition, the WGEA propose to increase linkage to information on modern slavery through tender and contract clauses and embed risk mitigation into the procurement and contract management processes.

Development of a survey tool to assist in measuring effectiveness

To assist in measuring effectiveness, PM&C will develop a survey tool to assess the business areas' understanding and use of the Modern Slavery Toolkit. The tool will be completed by procuring officials, when undertaking a procurement of \$80,000 or more, in a high-risk industry sector. Feedback provided in the survey will be used to identify gaps and inform further improvements to internal policies, guidance and templates.

The survey template will be shared with portfolio NCEs and the IDCP.

Social Services

Social Services is responsible for achieving the Commonwealth's social policy outcomes and delivering social security priorities through policy advice, program administration and research. The portfolio included five NCEs during the reporting period.

Social Services' supply chains involve a diverse range of products and services, provided by a wide variety of suppliers through contractual agreements. The portfolio operates in a devolved procurement environment, where business areas are responsible for contracts that they are managing, including the assessment and reporting of potential risks for modern slavery. In addition, the Department of Social Services (DSS) provides a level of procurement support to both the NDIS Quality and Safeguards Commission and the Domestic, Family and Sexual Violence Commission.

During the reporting period, Social Services entered into approximately 2,412 contracts, with a total procurement value of approximately \$2.2 billion. Potential risks of modern slavery were considered by the portfolio agencies when entering into these arrangements.

Across the portfolio, the five highest categories, by contract value were:

- ICT and computer services
- telephony services
- property leases and rentals
- temporary personnel/ recruitment
- psychologists services.

Risks

The portfolio's supply chains involve a diverse range of products and services, provided by a wide variety of suppliers through contractual agreements. High-risk areas in the Social Services portfolio align with the five key risk areas described in **Section 2**.

During the reporting period, the portfolio has undertaken a number of actions in support of identifying potential risks of modern slavery throughout the procurement lifecycle:

- Incorporating the consideration of modern slavery risk in the risk assessment templates during the procurement planning stage.

- Maintaining a portfolio Procurement Cross Agency Working Group (CAWG) to improve consultation and knowledge sharing between agencies on all elements of procurement. This approach supports all agencies to identify better ways to embed modern slavery considerations and risk identification/mitigation when undertaking procurement. These discussions include both NCEs and CCEs alike.
- Providing all portfolio contract officers undertaking procurement processes with advice and guidance around the consideration of potential risks of modern slavery.
- For procurements that are at a higher risk of modern slavery, mandating contracts include key performance indicators, requirements for staff to complete modern slavery training and a Risk Management Plan. These are actively monitored by the NCE via their respective Contract Management Plan.

Response

Training and awareness raising activities

Over the reporting period, the portfolio continued to commit to training and awareness through actions including, but not limited to:

- circulating communications to all procurement officials to ensure they remain aware of potential modern slavery risks, and drawing attention to the training that is readily available to all staff
- promoting the e-Learning modules.

Procurement and contract management activities

Across much of the portfolio, modern slavery risks are identified and communicated at the request for quote stage, however it is recognised that this needs to maintain a focus for the life of the procurement and supplier engagement.

During the reporting period, the portfolio undertook procurement and contract management activities to address risks of modern slavery:

- Requiring procuring officials to consider risks of modern slavery in all procurements undertaken through answering specific, and targeted questions throughout the procurement process.

- Reminding contract managers to consider modern slavery risks throughout the life of the contract, especially when there is a contractual change. Procurement documents are updated to reflect changes, where appropriate, to ensure they remain accurate and appropriate.
- Maintaining an awareness and commitment to ensure modern slavery risk identification is embedded into policies and procedures, both current and developing.
- Mandating of additional reporting requirements from suppliers, or provision of evidence by suppliers that appropriate considerations have been applied, as appropriate.
- Services Australia has implemented modern slavery business rules to assist procurement officials to consistently use modern slavery contract clauses and promote the use of modern slavery risk assessments by procuring business areas, as required.
- The NDIS Quality and Safeguards Commission is reviewing its current templates and internal policies to ensure compliance with modern slavery requirements and the broader Commonwealth Resource Management Framework is upheld.

Supplier activities

The portfolio considers its communication with both suppliers and any of their respective arrangements with subcontractors. Doing so supports transparency of supply chains and amplifies the supplier's obligations towards addressing modern slavery risks in all procurement activities. This is undertaken through the life of the contract, from request for quote stage through to conclusion of the contract. This includes using the Supplier Questionnaire in instances where medium to high-risks of modern slavery are identified through application of a risk assessment.

For Services Australia, the identification of risks may be through its modern slavery business rules, or a risk assessment. For example, Services Australia have incorporated biannual ethical sourcing updates into the governance meeting schedule with their supplier of corporate uniforms. By engaging on an ongoing basis, Services Australia is aware of its supplier's modern slavery risk mitigation actions and the effectiveness of these.

Outcomes

- Improved procurement processes:
 - Procuring officials who enter into a contract in one of the identified high-risk areas are required to undertake an assessment, which includes the modern slavery risk screening tool, to determine whether there is a medium or high-risk to the services.
 - Procuring officials are also encouraged to include a risk assessment into the lower risk procurements.
- Identification of a need to build staff capability through training and to capture data to improve practice and reporting at the NDIS Quality and Safeguards Commission.

Looking forward

The portfolio will continue to focus on:

- working collaboratively with our officers and suppliers to raise awareness of potential modern slavery risks in procurements undertaken
- raising areas of concern or work being undertaken through monthly portfolio Procurement CAWG discussions that other portfolio agencies can leverage from
- applying a consistent approach in mandating training that all central procurement officials will be required to undertake. Each agency either has, or is in the process of including the Modern Slavery Toolkit into respective e-Learning platforms
- working collaboratively across the portfolio to target training in high-risk areas, including ICT, property/construction, security and textiles.

Services Australia will identify strategic suppliers in high-risk industries of modern slavery and request their completion of the Supplier Questionnaire. Doing so will support a greater opportunity to evaluate Services Australia's modern slavery risks.

A new risk model for procurement will be implemented at the NDIS Quality and Safeguards Commission from 1 July 2024. This risk model will support improved identification of risk and treatment for procurement processes.

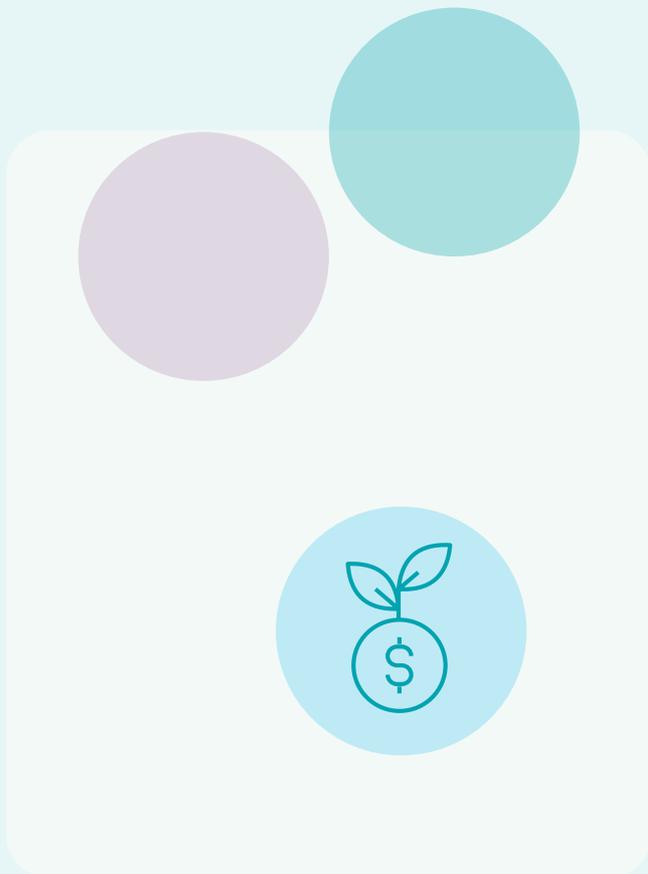


Treasury

The Treasury portfolio undertakes a range of activities aimed at achieving strong sustainable economic growth for the good of Australians. This entails providing advice to portfolio Ministers as well as the effective implementation and administration of policies that fall within the portfolio Ministers' responsibilities. The Treasury portfolio included 14 NCEs during the reporting period.

During the reporting period, the five areas of highest contract value were:

- labour hire - temporary personnel services
- professional engineering services
- legal services
- software and maintenance services
- debt management (including syndication and registry management).

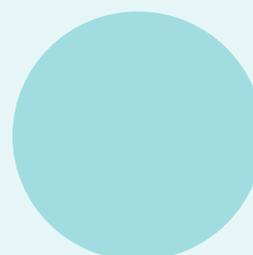


Risks

High-risk areas in the Treasury portfolio align with the five key risk areas described in **Section 2**. Specific to the Royal Australian Mint, the highest level of modern slavery risk is assessed as being the upstream supply chain for coin blanks and components.

Actions taken by the portfolio to assess and address risks of modern slavery in its operations and supply chains include but are not limited to:

- using the United Nations Standard Products and Services categories of procurement to assess the highest risk of modern slavery in the portfolio's supply chains
- utilising the available tools such as the Global Slavery Index, the Responsible Sourcing Tool, and the Modern Slavery Statements Register to assess risks of modern slavery including:
 - sector and industry risks
 - product and service risks
 - geographic risks
 - supply chain model risks
- completing a modern slavery risk assessment for procurements over \$10,000 (GST inclusive) to ascertain the risk of modern slavery in supply chains
- undertaking a more in-depth assessment where an initial risk assessment, including consideration of the industry sector, indicates a higher risk
- assessing modern slavery risk in all high-risk procurements, including through the use of the Supplier Questionnaire, or a response from potential suppliers addressing how they manage, understand and have oversight of their supply chain:
 - This information is considered as part of the evaluation of their response
- encouraging procuring officials to search the Modern Slavery Statements Register when they are considering a supplier for a high-value procurement.



Response

Training and awareness

The portfolio continued to focus on increasing awareness of modern slavery risks among procuring officers. Some of the training and awareness activities undertaken this reporting period include but are not limited to:

- hosting the e-Learning modules on Treasury's online learning platform
- delivering staff training which includes modern slavery
- promoting guidance for all conducting procurement on the Procurement Intranet pages
- participating in the Treasury Portfolio Modern Slavery Working Group
- circulating internal policies on modern slavery risk assessment to all procurement staff across the entity
- integrating modern slavery considerations into existing training materials and guidance, including a brief overview of what constitutes modern slavery and the steps involved to integrate modern slavery considerations into the Australian Competition and Consumer Commission's (ACCC) procurement processes.

Procurement and contract management activities

The portfolio continued to focus on improving procurement and contract management practices to address risks in our supply chains:

- The central procurement team conducting a compliance review process at regular intervals throughout the life of a procurement, with documentation signed off by the approving delegate
- Integrating modern slavery clauses into procurement processes, including ATM and contract documents, as required and based on the level of risk:
 - This includes supplier questionnaires for relevant contracts.

- Embedding modern slavery considerations in the procurement and contract management framework. For example, the Australian Office of Financial Management's (AOFM) Procurement and Contract Management framework does the following to assist in identifying procurement risks:
 - provides guidance materials on supply chain risks to staff conducting procurements
 - incorporates a comprehensive procurement risk checklist, which considers both financial and non-financial risks to the AOFM and assists procurement officers (someone who conducts a procurement) or contract managers in assessing procurement risks
 - requires periodic formal risk assessments of existing and new contractual relationships; and
 - requires that medium to high-risk contracts be subject to a quarterly risk review.
- Encouraging contract managers to regularly review their contract/s.
- Updating the internal procurement process manual to require officers to complete the modern slavery risk screening tool when planning for a new procurement or renewing an existing contract.
- Requiring officers to obtain completed Modern Slavery Supplier Questionnaires where they assess the risk as high and, depending on the response received, consider including model modern slavery contractual clauses.
- Including a checkbox in Treasury's Financial Management Information System Procurement Request Form asking Treasury's procuring officials to confirm they have considered modern slavery risks as part of their procurement activity (this is for everything valued at \$10,000 (GST inclusive) and above).
- Explaining modern slavery requirements to procuring officials at the Australian Bureau of Statistics (ABS) on a case-by-case basis.
- Where applicable, requesting legal review of the draft contract and ATM documents to ensure modern slavery clauses are inserted.
- Advising IT contract managers to examine suppliers' annual modern slavery statements to verify the extent to which they are managing the risk of modern slavery and to include modern slavery in their risk assessments for procurement related to hardware supplies.
- Advising evaluation teams on how to assess supplier information and how suppliers manage modern slavery risk.
- Conducting regular audits and reviews on major contracts.

Supplier activities

Over the reporting period, the portfolio continued to focus on increasing engagement with suppliers. Some of the supplier activities included, but are not limited to:

- discussing risk with relevant suppliers at the time of contracting to raise visibility of modern slavery risks and improve transparency of management activities. Due diligence is undertaken on suppliers, such as organisational statements and policies, using the Modern Slavery Statements Register and other publicly available information.
- clear communication with suppliers regarding expectations and mechanisms to report any detected risks of modern slavery, including by ensuring modern slavery issues are specifically addressed in approaches to market and supplier contracts and other relevant mechanisms.

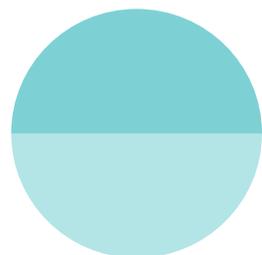
Grievance processes

- Treasury's website outlines avenues to make procurement related complaints
- There are a number of avenues and processes in place within the ABS to raise concerns about workplace issues. Complaints/concerns would be raised via the central Procurement Team in regard to modern slavery.
- The ACCC is considering and communicating with other agencies through working groups to develop remediation strategies and/or grievance mechanisms.
- The ACCC will continue to enhance its procurement reference material and promote awareness of modern slavery requirements, including risk identification.
- Regular engagement between the Procurement Team and internal stakeholders to discuss the procurements and any concerns. The Australian Prudential Regulation Authority (APRA) actively promotes a speak up culture and provides mechanisms enabling employees to anonymously report any concerns. All submissions reviewed by the Chief Risk Officer (CRO) and APRA Members as appropriate. APRA uses a range of contract templates. This includes the Commonwealth Contracting Suite, which provides details of the Complaints Handling process to raise concerns.
- Stakeholders can email complaints to ASIC. Complaint handling information is available on ASIC's public website. All complaints received by this inbox will be investigated by a dedicated compliance officer within ASIC.
- The Australian Taxation Office website outlines avenues to make procurement related complaints.

Case example: Public expectations

The Inspector-General of Taxation publishes a Statement of Business Ethics on its external website. This statement explains that it sets expectations about the types of supplier behaviour and reputations that are expected, and that officers conduct procurements within the regulatory, integrity and probity requirements that form the Commonwealth's procurement framework.

The statement requires procuring officials to make reasonable enquiries that the procurement is carried out with consideration to relevant regulations and/or regulatory frameworks, including, but not limited to tenderers' practices regarding modern slavery.



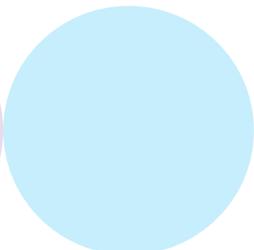
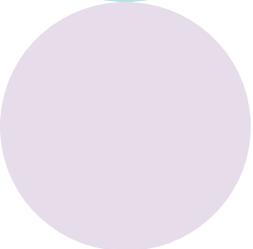
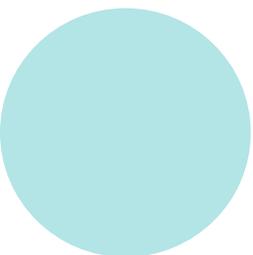
Outcomes

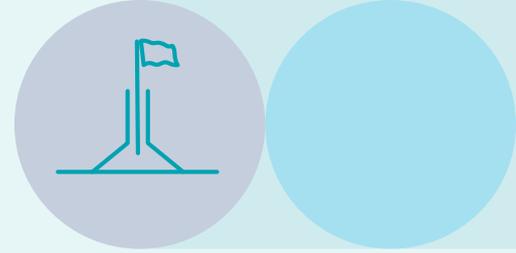
- Increased staff capability to assess and consider risks of modern slavery. For example, procuring officials within the Australian Bureau of Statistics are more aware of, and assess and consider, the risk of modern slavery when undertaking procurements. This practice is embedded in procurement processes as 'standard practice'.
- Increased awareness of the available modern slavery tools and resources.
- Improved supplier transparency regarding own and downstream supply chains, and actions to support policy through collaborative and open relationships with suppliers.

Looking forward

The portfolio will continue to focus on promoting the e-Learning modules and increasing the use of the Modern Slavery Toolkit:

- The ACCC intends to:
 - increase the number of risk assessments undertaken and further detail sought on high-risk / high-value procurements
 - increase the use of tools including the modern slavery tender and contract clauses to embed risk mitigation into the procurement and contract management process
 - continue to enhance its procurement reference material and promote awareness of modern slavery requirements, including risk identification.
- The AOFM will continue to review and refine existing practices in response to assessments of modern slavery risk exposures.
- The APRA is looking to utilise the Supplier Questionnaire over the next reporting period.
- The Australian Taxation Office will participate in portfolio forums focused on procurement issues including risk identification and management.
- The Commonwealth Grants Commission will continue to participate in the Treasury Portfolio working group.
- The Inspector-General of Taxation and Taxation Ombudsman will aim to improve data collation on procurement risk assessment and contracts to improve capacity to record and report on data relevant to modern slavery risk in public procurement across the entity.
- The Productivity Commission will continue to educate and inform all staff on modern slavery. For those involved in procurements, they will be asked to consider modern slavery in their risk assessments.
- When risk is identified, the Productivity Commission will aim to include the Supplier Questionnaire in the tender documentation, and relevant clauses in contracts to ensure compliance from suppliers.





Parliamentary Departments

The parliamentary departments support the functions of the Australian Parliament and the work of parliamentarians through the provision of professional services, advice and facilities, the ongoing maintenance of Australian Parliament House; making the building, and the important activity that takes place within it, accessible.

There are four parliamentary departments, all of which are NCEs: Department of Parliamentary Services, Department of the House of Representatives, Department of the Senate, and Parliamentary Budget Office, each with distinct but overlapping roles and responsibilities.

Procurement activities within the parliamentary departments are decentralised, and each parliamentary department has its own procurement advisory processes. This includes consideration of modern slavery risks for all significant procurement processes, particularly those arrangements that fall under the Commonwealth's five key risk areas.

Given the breadth of the parliamentary departments' roles and responsibilities, the supply chains from which goods and/or services are procured are vast. Staff are encouraged, prior to conducting a procurement process to consider supply chain operations to better understand the market and industries that goods and/or services are being sourced from. These supply chains are often made up of a complex network of activities and in many instances the parliamentary departments do not procure directly from the manufacturer. Therefore, influencing supply chain operations can be difficult. However, the parliamentary departments recognise the opportunity to work with suppliers to respond to and address modern slavery risks.

During the reporting period, the five areas of highest contract value for new contracts were:

- building and construction support, maintenance, and repair services
- temporary personnel services
- ICT hardware and software
- professional services – legal, audit, engineering, architectural, advisory services
- printing and photographic and audio and visual equipment.

Risks

High-risk areas in the parliamentary departments align with the five key risk areas described in **Section 2**.

The parliamentary departments ensure to engage with well-established and regulated suppliers when procuring building and/or construction maintenance services, engaging with small to medium enterprises and local suppliers, wherever possible. Visibility of modern slavery practices in downstream supply chains is limited and highly reliant upon individual contract managers manually collecting data and reviewing modern slavery risks associated with subcontracting and downstream outsourcing.

During the planning phase of any procurement activity, officers are encouraged to:

- assess and address risks of modern slavery in procurement and contract supply chains, where appropriate
- identify high-rated risk industries, and work with suppliers to assess and address the risks of modern slavery in their operations via clauses, and reportable actions if and when required.

Response

Training and awareness raising activities

Over the reporting period, the parliamentary departments continued to commit to training and awareness through encouraging procuring officials to:

- familiarise themselves with the Modern Slavery Act
- utilise the Modern Slavery Toolkit, where appropriate
- complete the e-Learning modules.

Procurement and contract management activities

- Encouraging procuring officials to highlight and manage modern slavery risks on a case-by-case basis and ensure that they embed risk information into their contract management processes.
- Working with supply chains via contract management activities to identify, manage, monitor and address any adverse impacts on human rights/modern slavery if identified and/or reported.

Supplier activities

The parliamentary departments did not undertake any supplier engagements directly related to modern slavery during the reporting period, as a proportionate number of contracts were established under existing standing offer arrangements. However, for future contracts and/or standing offer arrangements, which the parliamentary departments establish themselves, they will seek to increase supplier interactions and engagements to better address modern slavery risks.

Outcomes

Increased awareness of modern slavery risks in its operations and supply chains:

- The parliamentary departments are already aware of several upcoming procurement activities for FY2024–25 that will fall within higher risk industries for modern slavery, namely the textiles (linen) and labour hire (hospitality) industries.

Improved procurement and contract management process:

- Pre-planning has already commenced to ensure modern slavery risks and concerns are addressed correctly during the procurement process and as part of any subsequent contractual arrangements. Measures to address risk of modern slavery include:
 - increased use of the Modern Slavery Toolkit to ensure risks are correctly identified at the commencement of a procurement process
 - use of evaluation criterion relating to modern slavery, requiring potential tenderers to clearly detail how they identify, assess and address risks of modern slavery practices in the operations and supply chains used in the provision of the goods and/or services
 - use of appropriate model modern slavery contract clauses, issued with ATM documentation to ensure potential tenderers are aware of contractual obligations the Commonwealth will require of them in relation to modern slavery.

Looking forward

The parliamentary departments will continue to focus on actively educating their staff and contract managers on the importance of managing modern slavery risks throughout the term of contracts they manage (where appropriate) and actively engage with suppliers to focus on supply chain integrity to reduce slavery from global operations and supply chains. In the future the parliamentary departments may seek to mandate modern slavery training as part of its procurement and contract management training. This will include developing a greater understanding of the nature of modern slavery risks in global supply chains.

Further, to assist in measuring effectiveness, in the future the parliamentary departments will seek to:

- implement a post-training questionnaire to staff and relevant stakeholders
- modify systems to better track if a procurement activity has modern slavery considerations and what/how actions have been taken (for example, inclusion of the applicable model modern slavery contract clauses), to assist in better reporting data
- recruit a subject matter expert to support future training and reporting capabilities within the parliamentary departments.



Section 4

Looking forward

In the next reporting period, the Commonwealth will enter into the *review* phase of its reporting strategy.

Effectiveness

The Commonwealth will consider the overall effectiveness of its approach to addressing modern slavery risks by assessing its actions against the Performance Review Framework developed by the Australian Institute of Criminology during the *discovery* phase.

This *review* phase will be reflected in the next Commonwealth Modern Slavery Statement 2024–25 (sixth annual Commonwealth Statement).

For this phase of action, the following elements will also be considered:

- NCEs continuing to progress their actions and reporting built over the previous five years, including AGD's progression of whole of Commonwealth work
- commencing planning for the future direction of government action.

Further details of the Performance Review Framework are provided in **Section 2**.

As part of the SNAP project, the Commonwealth will continue to identify and understand potential opportunities to strengthen the management of modern slavery risks in public procurement and activity. The findings of the current state assessment will help to inform the next work plan to address modern slavery risks in Australian Government supply chains and operations.

Review of the Commonwealth's procurement procedures and supply chains

To further the Commonwealth's efforts to tackle modern slavery under the Modern Slavery Act, the Commonwealth will undertake a review of Commonwealth procurement procedures and supply chains.

Continuous improvement

The Commonwealth takes a continuous improvement approach to the actions it takes to assess and address those risk of modern slavery in its supply chains and operations.

Looking forward this will involve:

- finalising modern slavery risk management tools and methodologies for the Commonwealth to be integrated into NCEs' current processes
- developing guidance for NCEs on supplier engagement to promote open conversations with suppliers
- implementing a targeted engagement strategy, to improve NCEs' understanding of risks of modern slavery and how to respond to these, including by leveraging ongoing learnings to further strengthen capability across the Commonwealth.

The details of each portfolio's forward-looking actions are provided in **Section 3**.

Section 5

Consultation

Section 16(1)(f) of the *Modern Slavery Act 2018 (Cth)* requires the reporting entity to describe the process of consultation with any entities that the reporting entity owns or controls. This section describes the Commonwealth’s process of consultation to prepare this Commonwealth Statement.

Mandatory Criterion 6: Consultation

This Commonwealth Statement was developed in consultation with 101 NCEs, which are outlined on page 12. During the reporting period, consultation on this Commonwealth Statement took place through multiple forums, workshops and regular engagements with individual NCEs.

Engagement between NCEs and AGD occurs through the IDCP and other interactions during the reporting period. The IDCP is chaired by AGD, and comprises membership of over 35 NCEs across the Commonwealth, with each portfolio represented.

The Attorney-General’s Department

AGD is the whole-of-Government domestic policy lead on modern slavery and administers the Modern Slavery Act. In this capacity, AGD chairs the IDCP and coordinated the development of this Commonwealth Statement.

101 Non-corporate Commonwealth Entities

During this reporting period, there were 101 NCEs (refer to page 12) that were required, under the Modern Slavery Act, to report on their actions to identify, assess and address risks of modern slavery in their supply chains and operations. All NCEs are subject to the Commonwealth Procurement Rules, which require officials undertaking procurement activities to comply with the reporting requirements stipulated by the Modern Slavery Act.

Interdepartmental Committee on Modern Slavery in Public Procurement

The IDCP provides oversight and input into the Commonwealth’s actions to identify, assess and address modern slavery risks in its procurement processes. It also guides the strategic direction of each Commonwealth Statement.

The lead portfolio agencies coordinated consultation with the NCEs within the portfolio to ensure this Commonwealth Statement accurately reflects the activities within each portfolio.

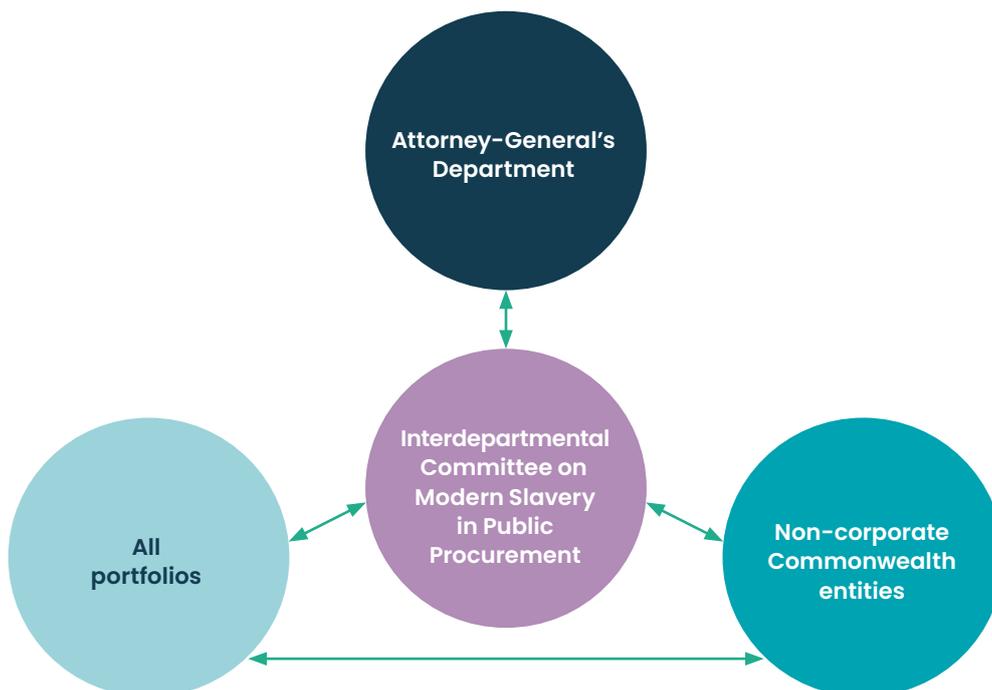


Figure 8. Process of consultation to develop this Commonwealth Statement.

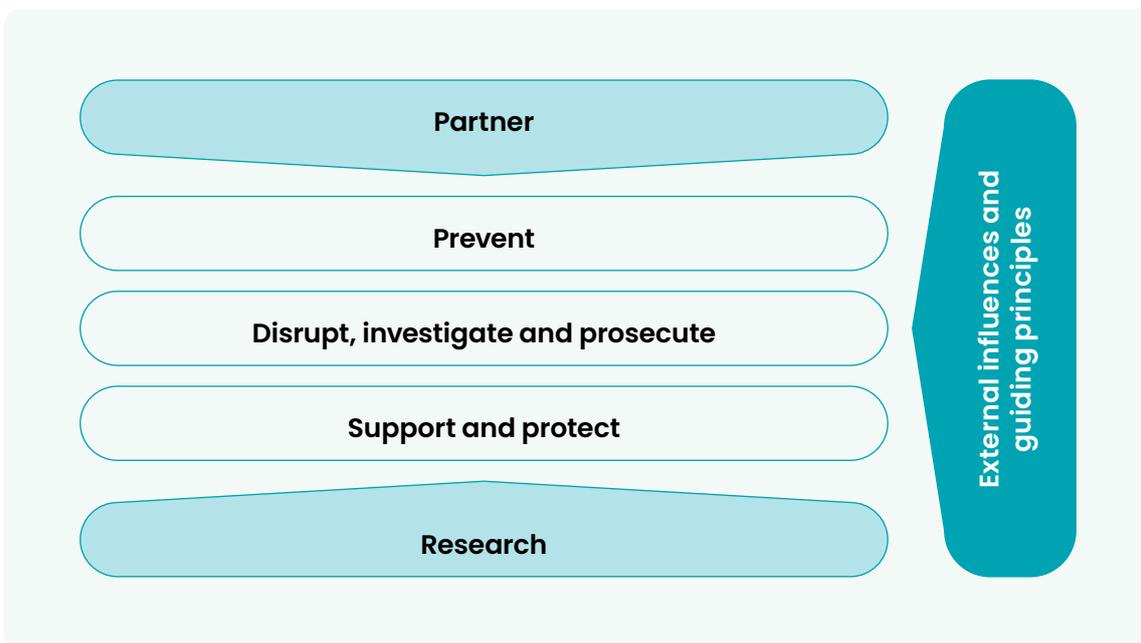
Section 6

Related activities

Section 16(1)(g) of the *Modern Slavery Act 2018 (Cth)* allows for reporting entities to include any other information that the reporting entity thinks is relevant. This section outlines other actions the Commonwealth is taking to combat modern slavery, both domestically and overseas.

Mandatory Criterion 7: Related activities

The Australian Government’s work to address modern slavery risks in Commonwealth supply chains and operations sits within a broader strategy of work to combat modern slavery. This work is underpinned by the *National Action Plan to Combat Modern Slavery 2020–25*, which sets out a work program of 46 action items that address the Australian Government’s five strategic priorities:



Key work undertaken during the reporting period

In addition to the actions undertaken across the Commonwealth as detailed in **sections 1–5**, complementary work undertaken during the reporting period to address modern slavery in Australia and abroad includes:

Reform

- Establishing Australia’s first Australian Anti-Slavery Commissioner, with the introduction of the Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Bill 2023 in November 2023, which the Australian Parliament passed on 28 May 2024, and received Royal Assent on 11 June 2024. The Commissioner will work across government, industry and civil society to promote compliance with the Modern Slavery Act, engage with victims and survivors of modern slavery, and help fight modern slavery in Australia and abroad.
- Introduction of several reforms to prevent worker exploitation in its worst forms, for instance:
 - The *Migration Amendment (Strengthening Employer Compliance) Act 2024 (Cth)* creates new criminal offences for misusing migration rules to exploit temporary migrant workers in the workplace, power to prohibit employers who have engaged in serious, deliberate and repeated exploitation from employing additional temporary migrants for a period of time and additional reporting requirements for prohibited employers.
 - Additional reforms including mobility for seasonal migrant workers, trialling enhanced protections against visa cancellation where a worker has been subject to workplace exploitation, and piloting a substantive temporary visa to extend stay in Australia to pursue workplace justice.
 - Progressing a harmonised approach to labour hire regulation that would enable consistent labour hire licensing laws across Australia.

- Continuing work through the Standing Council of Attorneys-General (SCAG) to tackle the issue of forced marriage through a coordinated national response, including by developing a model to enhance civil protections and remedies for individuals in or at risk of forced marriage.
- Publishing the report of the Targeted Review of Modern Slavery Offences in Divisions 270 and 271 of the *Criminal Code Act 1995* (Cth), in August 2023. The Targeted Review made 22 findings. The Australian Government has considered the findings report and has agreed to develop potential legislative reforms to address the findings of the Review. The government will undertake targeted consultations on proposed reforms in due course.
- Legislating to increase sanctions for wage underpayment under the Fair Work Act. The Australian Government's *Fair Work Legislation Amendment (Closing Loopholes) Act 2023* (Cth) established a new criminal offence for intentional underpayment. This offence will commence on the later of 1 January 2025, or the day after the Voluntary Small Business Wage Compliance Code is first declared by the Minister for Employment and Workplace Relations. The government also increased maximum civil penalties for breaches of underpayment-related provisions of the Fair Work Act, for bodies corporate that are not small business employers, the *Fair Work Legislation Amendment (Closing Loopholes No. 2) Act 2024* (Cth).
- Progressing a harmonised approach to national labour hire regulation in partnership with states and territories so that labour hire workers are protected irrespective of where they work. A model for a harmonised approach was agreed by a majority of Workplace Relations Ministers in December 2023 following an interjurisdictional working group process. \$2 million was committed in the 2024–25 Budget to the Victorian Government to support the establishment of a Project Office. Project Office work to date includes the development of funding and cost recovery estimates, development of governance arrangements and progressing a model law.

Engagement

- Appointing a Modern Slavery Expert Advisory Group with a new Terms of Reference during the reporting period, to provide expert advice on the operation of the Modern Slavery Act. The first meeting of the new Expert Advisory Group took place in March 2024.
- Chairing the Intergovernmental Network on Modern Slavery in Public Procurement, with membership from procurement officers across federal and state and territory governments.
- Providing targeted guidance and support to businesses to meet their reporting obligations under the Modern Slavery Act through face-to-face, virtual and telephone engagement, and through a helpdesk for reporting entities.
- Implementing education, awareness-raising and outreach to the community, targeting individuals vulnerable to forced labour, including international students, migrants, and workers in regional and rural communities.
- Delivering awareness-raising and training for frontline responders on indicators of human trafficking and slavery – resulting in increased disruptions, proactive identification and referral of suspected cases of modern slavery to law enforcement agencies.
- Developing enhanced guidance to engage, empower and support those with lived experience of modern slavery.
- Delivering a national social media human trafficking awareness-raising campaign in conjunction with World Day Against Trafficking in Persons.
- Progressing development of a new website to support the provision of online information, tools, and resources on modern slavery.

International

- Co-chairing (with Indonesia) the Bali Process on People Smuggling, Trafficking in Persons and Related Transnational Crime, and the Bali Process Government and Business Forum (GABF). The Bali Process is the key regional forum for policy engagement, information sharing and practical cooperation on people smuggling, human trafficking and modern slavery.
- Attending the Bali Process GABF Tech Forum to explore technology-driven solutions to human trafficking and modern slavery held 10 August 2023 in Bali, Indonesia.
- Co-chairing (with Indonesia) the Bali Process Working Group on Trafficking in Persons Ninth Annual Meeting and Regional Event on Victim Protection and Partnerships in November 2023 in Bangkok, Thailand.
- Working with key partner countries in the region to strengthen law and justice frameworks and responses to combat human trafficking and other forms of modern slavery, including by co-delivering workshops and providing desk-based technical assistance.
- Presenting on the Modern Slavery Act and establishment of the Australian Anti-Slavery Commissioner at 12th UN Forum on Business and Human Rights.
- Co-chairing (with Indonesia) the Bali Process 18th Steering Group and 17th Ad Hoc Group Senior Officials Meetings in Kuala Lumpur, Malaysia 2–3 May 2024.
- Attending the Bali Process GABF Sri Lanka Summit to discuss regional challenges, best practices, and actionable solutions in combatting human trafficking, particularly focusing on the Asia-Pacific region held in Colombo, Sri Lanka.
- Successful completion of a two-year funding partnership (2022–24) with the International Labour Organization's Office for Pacific Island Countries in Suva, to help build capacity of Pacific Island Countries to ratify, implement and report on International Labour Standards, including those addressing forced labour and child labour.

Support and protect

- Establishing the Forced Marriage Specialist Support Program which will become operational in early 2025.

Investigation and prosecution

- Significant prosecutions occurred for modern slavery offences through dedicated efforts of law enforcement and criminal justice agencies.
- For the period 1 July 2023 to 30 June 2024, the Office of the Director of Public Prosecutions (Cth) had conduct of eight modern slavery prosecutions commenced in that period and successfully prosecuted two matters resulting in convictions.

[Note: The first offender was convicted of facilitating the exit of another person from Australia with the use of deception resulting in obtaining that person's compliance in respect of their exit, contrary to section 271.2(1A) of the *Criminal Code* (Cth). The second offender was convicted of causing a person to enter into or remain in forced labour, contrary to section 270.6A of the *Criminal Code* (Cth) and conducting a business involving forced labour, contrary to section 270.6A(2) of the *Criminal Code* (Cth), in a small business context. Both offenders have appealed their convictions which are yet to be determined.]

Abbreviations

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|---------------|---|
| ABF | Australian Border Force |
| ACCC | Australian Competition and Consumer Commission |
| ACIAR | Australian Centre for International Agricultural Research |
| ADF | Australian Defence Force |
| AFP | Australian Federal Police |
| AGD | Attorney-General's Department |
| ANAO | Australian National Audit Office |
| AOFM | Australian Office of Financial Management |
| APRA | Australian Prudential Regulation Authority |
| APS | Australian Public Service |
| APSC | Australian Public Service Commission |
| ARC | Australian Research Council |
| ASIC | Australian Securities and Investments Commission |
| ASSEA | Asbestos and Silica Safety and Eradication Agency |
| ASX | Australian Stock Exchange |
| ATM | Approach to Market |
| CAF | Cleaning Accountability Framework |
| CAWG | Cross Agency Working Group |
| CCA | Climate Change Authority |
| CCEs | Corporate Commonwealth entities |
| CRO | Chief Risk Officer |
| DAFF | Department of Agriculture, Fisheries and Forestry |
| DCCEEW | Department of Climate Change, Energy, the Environment and Water |
| DEWR | Department of Employment and Workplace Relations |
| DFAT | Department of Foreign Affairs and Trade |
| DISR | Department of Industry, Science and Resources |
| DPS | Department of Parliamentary Services |
| DSS | Department of Social Services |
| ESG | Environmental, Social and Governance |

| | |
|-----------------|--|
| FWC | Fair Work Commission |
| FWI | Fair Work Inspectors |
| FY | Financial Year |
| GABF | Government and Business Forum |
| GST | Goods and Services Tax |
| ICT | Information and Communications Technology |
| IDCP | Interdepartmental Committee on Modern Slavery in Public Procurement |
| ISO | International Standard for Organization |
| JLL | Jones Lang LaSalle |
| LSPs | Legal services providers |
| MoU | Memorandum of Understanding |
| NCEs | Non-Corporate Commonwealth Entities |
| NDIS | National Disability Insurance Scheme |
| NIAA | National Indigenous Australian Agency |
| NSW | New South Wales |
| OFWO | Office of the Fair Work Ombudsman |
| PM&C | Department of the Prime Minister and Cabinet |
| PPE | Personal protective equipment |
| PSCP | Property Services Coordinated Procurement |
| PSP | Property Service Providers |
| QR code | Quick-Response Code |
| RFT | Request for Tender |
| SCAG | Standing Council of Attorneys-General |
| SNAP | Supply Network Analysis Program |
| SPB | Strategic Procurement Branch within the Department of Health and Aged Care |
| STPP | Support for Trafficked People Program |
| TEQSA | Tertiary Education Quality and Standards Agency |
| UNGPs | United Nations Guiding Principles on Business and Human Rights |
| WGEA | Workplace Gender Equality Agency |
| WHS | Work Health and Safety |

Glossary

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|--|---|
| ANSI/ASIS PSC | A management standard for quality of private security company operations. |
| Australian Government | Australian Government, also referred to as the federal government or Commonwealth government, is the national government of Australia. |
| Commonwealth | In this Commonwealth statement, the Commonwealth refers to the 101 non-corporate Commonwealth entities as a collective term. |
| Commonwealth Statement | This fifth Commonwealth Modern Slavery Statement, published pursuant to the <i>Modern Slavery Act 2018</i> (Cth), covering the period 1 July 2023 to 30 June 2024. |
| e-Learning modules | <p>The term, e-Learning modules, refers to the three e-Learning modules which are publicly available on the Modern Slavery Statements Register.</p> <ol style="list-style-type: none">1. Modern Slavery in Public Procurement2. Identifying and Assessing Modern Slavery3. Managing Modern Slavery Risks |
| Modern slavery | <p>Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.</p> <p>Practices that constitute modern slavery can include:</p> <ul style="list-style-type: none">• human trafficking• slavery• servitude• forced labour• debt bondage• forced marriage• the worst forms of child labour. <p>Modern slavery is a term used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. These practices are also harmful and may be present in some situations of modern slavery.</p> |
| Modern Slavery Act | The <i>Modern Slavery Act 2018</i> (Cth) entered into force on 1 January 2019. It established a national Modern Slavery Reporting Requirement. |
| Model modern slavery contract clauses | <p>The Australian Government has developed a suite of model modern slavery contract clauses for inclusion in government procurement contracts to ensure suppliers respond to modern slavery risks and support the Government's efforts to address modern slavery in its own supply chains.</p> <p>The clauses were drafted for use with the Commonwealth Contracting Suite (CCS) templates when applicable and are included in the Department of Finance's Commonwealth ClauseBank, a 'bank' of pre-drafted contract terms and conditions that Commonwealth agencies may use in procurements greater than \$200,000.</p> |
| Model modern slavery tender clauses | The Australian Government has developed model modern slavery tender clauses to set out its expectations for suppliers about identification and mitigation of modern slavery risks in the delivery of goods and/or services, and support the Commonwealth's compliance with the Commonwealth Modern Slavery Act 2018. |
| Modern Slavery Statements Register | The Modern Slavery Statements Register houses modern slavery statements provided by entities reporting under the Modern Slavery Act. |
| Modern Slavery Toolkit | <i>Addressing Modern Slavery in Government Supply Chains: A Toolkit of resources for Government procurement officers</i> |

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| Non-corporate Commonwealth entities (NCEs) | <p>Non-corporate Commonwealth entities are legally and financially part of the Commonwealth. They include departments of state, parliamentary departments and listed entities.</p> <p>NCEs are established under power that comes from the Constitution, usually through legislation and the exercise of executive power. NCEs form part of the executive government, and are accountable to the Parliament. NCEs are subject to the PGPA Act, which further clarifies the financial and corporate governance arrangements of these bodies.</p> |
| Public Governance, Performance and Accountability Act 2013 | The <i>Public Governance, Performance and Accountability Act 2013</i> (Cth) (PGPA Act) establishes a coherent system of governance and accountability for public resources, with an emphasis on planning, performance and reporting. |
| Property Service Providers | Property Service Providers are responsible for providing core leasing services and facilities management services to NCEs and additional services as negotiated. |
| Reporting period | 1 July 2023 to 30 June 2024 |
| Reporting strategy | The Commonwealth has a planned six-year program of work to continuously improve its response to modern slavery. The planned program of work has four phases of action across six years – the foundation phase, the discovery phase, the implementation phase, and the review phase. |
| Small to medium enterprise (SME) | An Australian or New Zealand firm with fewer than 200 full-time equivalent employees. When assessing the number of employees a firm has, employees of any associated entities (as defined in s 50AAA of the <i>Corporations Act 2001</i> (Cth)) to the firm are included. Associated entities to a firm include a firm’s parent company, a firm’s subsidiaries, and any related bodies corporate to the firm. |
| Supply Network Analysis Program (SNAP) | Department of Defence’s Supply Network Analysis Program uses open source intelligence data collection, big data analytics and augmented intelligence to map supplier networks and identify risk exposures. |
| Supplier Questionnaire | The Supplier Questionnaire is a tool within the Modern Slavery Toolkit to assist Australian Government agencies to assess their suppliers’ policies and practices to identify, assess and mitigate modern slavery risks in their supply chains and operations. |
| The Panel | Whole of Australian Government Legal Services Panel |
| Whole of Australian Government Arrangements | Whole of Australian Government Arrangements are arrangements that are set up for Commonwealth entities to use when procuring certain goods or services. These are either coordinated or cooperative procurements, some of which are mandatory for use, and generally result in overarching contracts or standing offer (panel) arrangements. |
| Whole-of-government | Whole-of-government in this Commonwealth Statement is a compound adjective referring to non-corporate Commonwealth entities. |

