



**Australian Government**  
**Australian Maritime Safety Authority**



# Modern Slavery Statement 2022

**Covering the reporting period 1 July 2021 – 30 June 2022**

## **Approval**

This Statement was approved by the Board of the Australian Maritime Safety Authority (AMSA) on 21 September 2022.

A handwritten signature in black ink, appearing to read 'Stuart Richey'.

**STUART RICHEY AM**

Chair

Australian Maritime Safety Authority Board



## AMSA Modern Slavery Statement

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## Foreword



As a leading Government Agency working within the marine sector, the Australian Maritime Safety Authority (AMSA) has national and international responsibilities for seafarer welfare. AMSA acknowledges the important measures that must be taken to combat modern slavery in this sector including all associated supply chains.

AMSA is aware that modern slavery can occur in any industry and that modern slavery risks must be recognised so that business may not exploit individuals for profit. AMSA is committed to ensuring that our procurement practices and all dealings with the maritime community support supply chains that protect the rights of workers.

AMSA is an advocate for combatting modern slavery and ensuring awareness about this important issue. This Statement is a key measure to address modern slavery and other harmful practices and sets out the actions and steps implemented by AMSA to address modern slavery risks.

**STUART RICHEY AM**

**Chair**

**Australian Maritime Safety Authority Board**

**21 September 2022**

## Introduction

### Overview

This is AMSA's third annual Modern slavery Statement, covering the period 1 July 2021 and 30 June 2022.

In the spirit of continuous improvement, it reflects feedback on our previous Statements from the Modern Slavery Business Engagement Section, Australian Border Force.

### What is modern slavery?

The Australian Government estimates that there are at least 1500 modern slavery victims in Australia. The United Nations estimates that at least 40 million people around the globe are forced into modern-day slavery. Those most at risk include women and children who may have little or no capacity to protect themselves. Australia has agreed with the United Nations to attempt to abolish modern slavery by 2030.

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

#### *Serious exploitation*

There are eight types of serious exploitation which combined make up the term modern slavery:

1. Trafficking in persons – the recruitment, harbouring and movement of a person for exploitation through modern slavery
2. Slavery - situations where the offender exercises powers of ownership over the victim including the power to make a person an object of purchase and use their labour in an unrestricted way
3. Servitude – situations where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work
4. Forced marriage – situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony
5. Forced labour - situations where the victim is either not free to stop work or not free to leave their place of work
6. Debt bondage – situations where the victim's services are pledged as a security for a debt and the debt is manifestly excessive of the victim's services, are not applied to liquidate the debt and/or the length and nature of the services are not limited and defined.
7. Deceptive recruiting for labour or services - situations where the victim is deceived about whether they will be exploited through a type of modern service
8. Serious exploitation of children and child labour – situations including enslavement, sexual exploitation, used to produce or traffic drugs, and exposure to dangerous work. Freedom from slavery is a fundamental human right. Under the Australian Government endorsed United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles) entities have a responsibility to respect human rights in their operations and supply chains. This responsibility includes taking action to prevent, mitigate and, where possible, remedy modern slavery in your entity's operations and supply chains.

Other illegal and harmful practices may be present within the supply chain but are not considered modern slavery. Practices like substandard working conditions or underpayment of workers may be indicators of more serious exploitation, corruption and practices which impact on human rights.

## Modern Slavery Act 2018

The Australian Government's *Modern Slavery Act 2018* (the Act) came into force on 1 January 2019 and establishes a mandatory reporting regime for entities

- with consolidated revenue of at least A \$100 million in the reporting period and
- who are either an Australian entity or a foreign entity carrying on business in Australia.

The Act requires reporting of an Annual Modern slavery Statement, (the Statement). The Statement must identify and address the risks of modern slavery in AMSA's global and domestic operations and supply chains, and actions taken to address those risks.

## Mandatory Requirements

There are seven mandatory criteria that AMSA is required to address in the Statement:

1. Identify the reporting entity
2. Describe the reporting entity's structure, operations, and supply chains
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes
5. Describe how the reporting entity assesses the effectiveness of these actions
6. Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement), and
7. Provide any other relevant information.

## Reporting Period 2021-22 and timelines


This Statement covers the 2021-22 Australian financial year (reporting period). Statements from entities are to be published before 31 December 2022.

Reporting is to the Department of Home Affairs, Australian Border Force, Modern Slavery Business Engagement unit. Entities who fail to comply with the Act will be publicly named and may be required to undertake remedial activities to ensure future compliance.

The Australian Government expects entities to use a continuous improvement approach in implementing the requirements and to see demonstrable improvements in the quality of information and the understanding of modern slavery over time.



Reporting Period 1 July 2021 – 30 June 2022

Criteria	Act Requirement
Threshold	AMSA is an Australian Entity
Threshold	AMSA has a Consolidated Revenue of at least \$100m in the reporting period
<b>1. Identification</b>	<b>Requirement: Identify the reporting entity</b>
	 <p><b>Australian Government</b> <b>Australian Maritime Safety Authority</b></p> <p>Australian Maritime Safety Authority is a Corporate Commonwealth Entity, operating under the <i>Public Governance Performance and Accountability Act 2013</i>.</p> <p>It was established by the <i>Australian Maritime Safety Authority Act 1990</i>.</p> <p>It is part of the Department of Infrastructure, Transport, Regional Development and Communications Portfolio of the Australian Government.</p>
<b>2. Organisation</b>	<b>Requirement: Describe the reporting entity's structure, operations and supply chains</b>
A. Structure	<p><b>General Structure</b></p> <p>AMSA's organisational structure consists of:</p> <ol style="list-style-type: none"> <li>1. the AMSA Board, appointed by the Minister for Infrastructure, Transport and Regional Development, comprised of: <ol style="list-style-type: none"> <li>(i) Chairperson</li> <li>(ii) Deputy Chairperson</li> <li>(iii) CEO</li> <li>(iv) a person occupying an office in the portfolio department; and</li> <li>(v) five other members.</li> </ol> </li> <li>2. the Executive team, and</li> <li>3. five operational and service areas: <ol style="list-style-type: none"> <li>(i) Operations Division</li> <li>(ii) Response Division</li> <li>(iii) Policy and Regulation Division</li> <li>(iv) Corporate Services Division; and</li> <li>(v) Future Operations Taskforce.</li> </ol> </li> </ol>

	<p><b>Australian Business Number</b></p> <p>AMSA's hold the ABN <b>65 377 938 320</b> number on the Australian Business Register.</p> <p>AMSA does not own or control any other entities.</p> <p><b>Registered office and locations</b></p> <p>AMSA head office is 82 Northbourne Ave Braddon ACT 2612</p> <p>AMSA has another 20 office locations across Australia.</p>
B. Operations	<p><b>Primary Role</b></p> <p>AMSA is Australia's national agency responsible for safety of commercial vessels and ships, preventing and responding to ship based marine pollution and marine search and rescue.</p> <p>AMSA's primary role is to:</p> <ul style="list-style-type: none"> <li>• promote maritime safety and protection of the marine environment</li> <li>• prevent and combat ship-sourced pollution in the marine environment</li> <li>• provide infrastructure to support safe navigation in Australian waters</li> <li>• provide a national search and rescue service to the maritime and aviation sectors</li> <li>• provide, on request, services to the maritime industry on a commercial basis</li> <li>• provide, on request, services of a maritime nature on a commercial basis to the Commonwealth and/or states and territories.</li> </ul> <p>AMSA has a role in ensuring international conventions such as to the <i>Safety of Life at Sea</i> (SOLAS) and the <i>Maritime Labour Convention</i> (MLC) are maintained while international vessels are in Australian waters.</p> <p><b>Employees and representatives</b></p> <p>AMSA has approximately 454 employees, including a permanent representative in London, United Kingdom.</p> <p>AMSA also delegates powers to officials within relevant State maritime agencies and police forces to enable compliance activities.</p> <p><b>Countries of operation</b></p> <p>While AMSA is primarily based in Australia and servicing Australia's territorial waters, it also:</p> <ul style="list-style-type: none"> <li>• conducts education and training campaigns within the Pacific region</li> <li>• assists in regional search and rescue activities where requested; and</li> <li>• is responsible for conducting flag State control inspections (Australian ships) in overseas ports; and</li> </ul> <p>It has 21 offices throughout Australia.</p> <p><b>Investments</b></p> <p>AMSA has investments with several top credit rated banks to provide a ready source of income in the event of a major pollution incident.</p>

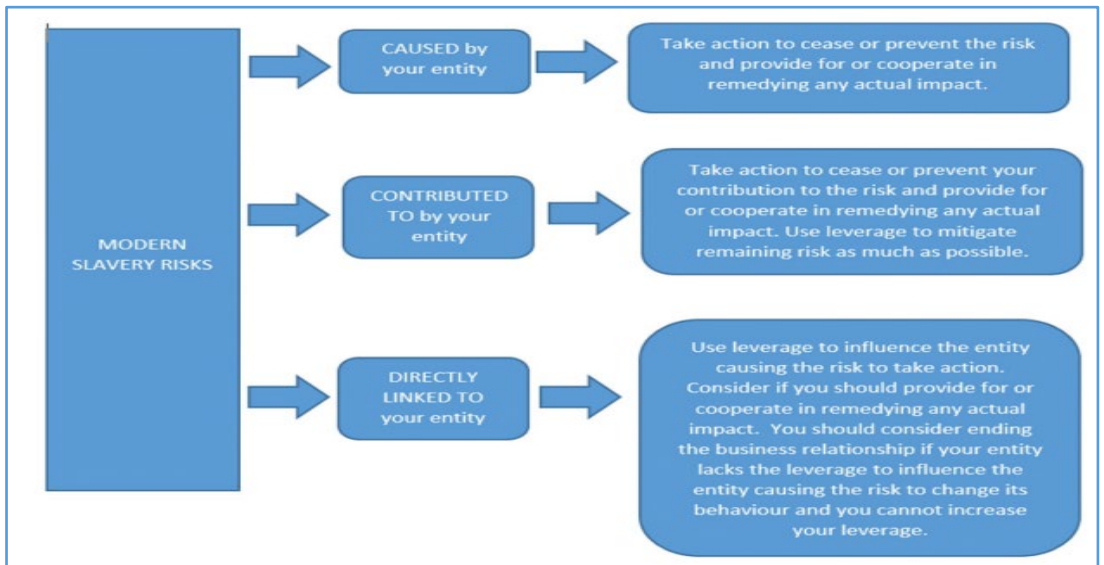


	<p><b>AMSA’s Stakeholders</b></p> <p>AMSA’s stakeholders include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• our regulated community - domestic commercial vessel industry, shipping industry and seafarers</li> <li>• Maritime service providers and partners—including navigation, pollution response, maritime and aviation search and rescue and contractors</li> <li>• Australian Government, state and territory governments and their agencies</li> <li>• International maritime community; and</li> <li>• the Australian community</li> </ul>										
C. Supply chain	<p><b>Types of supply chains</b></p> <p>AMSA’s supply chains are with various suppliers and specialists from Australia and internationally, including those with expertise in search and rescue, environmental emergencies, maintaining aids to navigation, and regulating domestic commercial vessels and international vessels entering Australian waters.</p> <p><b>Control of supply chains</b></p> <p>Supply chains are controlled with strict contracting arrangements as defined by the <i>Commonwealth Procurement Rules</i>.</p> <p>Suppliers to AMSA are required to comply with any laws, statutes, regulations, by-laws, ordinances, or subordinate legislation.</p> <p><b>Disclosures:</b> AMSA contracts valued at or above AUD\$400,000 (GST inclusive) are reported on AusTender: <a href="https://www.tenders.gov.au/">https://www.tenders.gov.au/</a>.</p> <p>AMSA contracts valued at or above AUD\$100,000 (GST inclusive) are published on the AMSA website biannually as required under the Murray Motion: <a href="https://www.amsa.gov.au/about/reporting-and-accountability/tenders-and-contracts">https://www.amsa.gov.au/about/reporting-and-accountability/tenders-and-contracts</a>.</p> <p><b>Major suppliers</b></p> <p>Major services are listed in the table below. These services provide long term and stable supply, enabling AMSA to achieve its objectives.</p> <table border="1" data-bbox="406 1339 1527 2018"> <thead> <tr> <th data-bbox="406 1339 911 1406"><b>Major service required</b></th> <th data-bbox="911 1339 1527 1406"><b>Source country (where known)</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="406 1406 911 1518">Aerial Search and Rescue Services</td> <td data-bbox="911 1406 1527 1518">Australia based</td> </tr> <tr> <td data-bbox="406 1518 911 1742">Emergency Towage Capability and Aid to Navigation (AtoN) maintenance through a dedicated vessel</td> <td data-bbox="911 1518 1527 1742">Australia based</td> </tr> <tr> <td data-bbox="406 1742 911 1921">Travel Services</td> <td data-bbox="911 1742 1527 1921">Australia and international using the whole of Government travel arrangements</td> </tr> <tr> <td data-bbox="406 1921 911 2018">Labour hire for call centre ICT and other services</td> <td data-bbox="911 1921 1527 2018">Australian suppliers used for Australian based positions</td> </tr> </tbody> </table>	<b>Major service required</b>	<b>Source country (where known)</b>	Aerial Search and Rescue Services	Australia based	Emergency Towage Capability and Aid to Navigation (AtoN) maintenance through a dedicated vessel	Australia based	Travel Services	Australia and international using the whole of Government travel arrangements	Labour hire for call centre ICT and other services	Australian suppliers used for Australian based positions
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Labour hire for call centre ICT and other services	Australian suppliers used for Australian based positions										



Contractors for the construction and maintenance of AtoN	Australia based
Material suppliers to contractors for construction of AtoNs	Australian and international including the Netherlands, Singapore, Japan, China and United Kingdom
Provision of office services and supplies, such as cleaning and office furniture	Australia based (WINC is the primary supplier for office supplies)
Provision of corporate clothing	Australian based contractor with potential international supply chains
Provision of IT equipment and supplies	Australian distributors using international companies (Dell, Apple, CISCO, HP, Polycom)

**3. Risks** Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls



AMSA’s operations and supply chains cross many industries and sectors from call centre labour hire to search and rescue operations, stationery to construction of Aids to Navigation (AtoNs). These industries and sectors have complex multi-tiered downstream supply chains that span various industries and countries.

AMSA has conducted a risk assessment on major contracts and supply chains. This assessment is based on the following risk matrix:

	Negligible	Minor	Medium	High	Catastrophic
Almost Certain	Moderate	Moderate	High	Extreme	Extreme
Likely	Low	Moderate	High	High	Extreme
Possible	Low	Low	Moderate	High	High
Unlikely	Very Low	Low	Moderate	Moderate	High
Rare	Very Low	Very Low	Low	Moderate	Moderate

## AMSA Risk Assessment

Risk <sup>1</sup>	Contracts/supplies	Description
Very Low	<ul style="list-style-type: none"> <li>AMSA's direct operations (i.e., employees)</li> <li>Travel Services</li> <li>Aerial Search and Rescue</li> <li>Emergency Towage Capability</li> <li>Dedicated AtoN maintenance</li> <li>General AtoN maintenance (various contracts)</li> <li>Corporate clothing</li> <li>Office furniture</li> <li>International sector of the maritime industry</li> </ul>	<p>AMSA has effectively eliminated the risks associated with these contracts /supplies through various means including:</p> <ul style="list-style-type: none"> <li>AMSA's Enterprise Agreement</li> <li>Whole of Government arrangements (including panels)</li> <li>Generic contractual terms and conditions (including modern slavery clauses)</li> <li>Strict procurement activity in accordance with the <i>Commonwealth Procurement Rules</i></li> <li>Working closely with suppliers to address any modern slavery risks</li> </ul> <p>Risks associated with the international sector of the maritime industry are addressed through the <i>Maritime Labour Convention 2006</i> (the Convention) which sets out standards and regulations for the working and living conditions of seafarers.</p> <p><b>Note: AMSA is satisfied that, through its operations under the Maritime Labour Convention and the Fair Work Act, that the risk potential to cause, contribute to or be directly linked to modern slavery is very low.</b></p>
Low	<ul style="list-style-type: none"> <li>Materials supplied for AtoN maintenance</li> <li>Search and rescue and emergency towage supplies</li> </ul>	<p>A low risk exists regarding parts of vessels that AMSA uses and goods procured overseas (i.e., equipment, vessel parts, unique building materials/minerals etc) – they may include elements of indentured labour.</p>
Moderate	<ul style="list-style-type: none"> <li>Provision of ICT equipment and supplies</li> </ul>	<p>The industry which manufactures computer components has a history of indentured labour and servitude which AMSA is aware of.</p> <p>AMSA will continue to look to minimise this risk over time.</p>
High	Nil	NA
Extreme	Nil	NA

<sup>1</sup> before controls

	<p><b>It is unlikely that AMSA’s current known and immediate supply chain has risks which meet the threshold for serious exploitation as defined by the Act.</b></p> <p><b>Appendix 1</b> describes a list of modern slavery indicators which can be used to identify the risks of our major suppliers. They consider:</p> <ul style="list-style-type: none"> <li>• Sector and industry risks</li> <li>• Product and service</li> <li>• Geographic risk</li> <li>• Entity risks</li> </ul> <p>The result of assessing the indicators and applying the Department of Home Affairs’ Cause, Contribute and Linked (CCL) model is an <b>internal risk and control table</b> which AMSA will update as it improves its awareness and understanding of the risk of modern slavery.</p> <p>AMSA acknowledges that:</p> <ul style="list-style-type: none"> <li>• visibility of the risks of modern slavery practices in our full downstream supply chains is limited</li> <li>• modern slavery risks to AMSA will change over time as operational requirements change and our understanding of our supply chains improves; and</li> <li>• identified contracts/supply chains include a risk that there may be links to modern slavery further down the supply chain that are outside of AMSA’s control and that are not visible to AMSA.</li> </ul>
<p><b>4. Controls</b></p>	<p><b>Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes</b></p>
	<p><b>Generic Controls</b></p> <p>AMSA has a range of controls to ensure that where possible our suppliers do not contribute to the risk of modern slavery, including:</p> <ul style="list-style-type: none"> <li>• inclusion of terms and conditions relating to modern slavery in AMSA request for tender (RFT) and evaluation documentation</li> <li>• use of AMSA contract terms and conditions by preference identifying specific legislative compliance requirements</li> <li>• utilising whole of government purchasing agreements and panels including Travel, Digital Marketplace and Fleet leasing</li> <li>• specific onsite contract management and monitoring of major contracts; and</li> <li>• specific thresholds established to determine appropriate levels of contract management</li> </ul> <p><b>Due Diligence and Remediation Process</b></p> <p>Where a risk of modern slavery is identified AMSA will continue to provide education to staff on any potential risks/impacts and possible controls. This may include closer due diligence over suppliers, any subcontractors and major suppliers.</p> <p>AMSA continues to identify ongoing areas of concern to determine any specific areas that should be more closely monitored, including additional clauses in contracts and other procurement documentation as appropriate.</p>

AMSA processes and procedures have helped to assess and identify any potential risks in our approaches to market, contracts and supply chains. Whilst no specific risks or issues have been identified, AMSA is confident that our controls ensure that there is a continued very low risk of modern slavery - and that where risks are present - they will be identified and mitigated.

**5. Evaluation** Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks

AMSA has implemented two key actions - outlined in our first Modern slavery Statement:

Actions from 20/21 Statement	Action Taken	Effectiveness of Action Taken
<p>1. The Procurement Team will develop an additional module in the procurement training program to help staff identify potential modern slavery risks, and will educate applicable staff on:</p> <ul style="list-style-type: none"> <li>- what modern slavery is</li> <li>- what modern slavery looks like in Government supply chains</li> <li>- what AMSA can do to further address modern slavery risks, and</li> <li>- how to report concerns about modern slavery practices.</li> </ul>	<p>AMSA has included reference to Modern slavery in the procurement training program.</p> <p>Training covers new clauses added to the RFT and contract documents and explains the need to address the risks of Modern slavery practices.</p>	<p>AMSA is confident that there is an adequate understanding of what Modern slavery means, and how to address any related issues.</p> <p>No non-compliances have been identified during tender processes over the reporting period.</p>
<p>2. In the future AMSA will look to:</p> <ul style="list-style-type: none"> <li>- streamline and further embed modern slavery considerations into procurement practices</li> <li>- harmonise data collection and reporting on modern slavery risks and actions to capture, analyse and report with a higher degree of granularity</li> <li>- undertake more detailed mapping of suppliers, including identification of major shared suppliers</li> </ul>	<p>AMSA continues to streamline and update related procurement processes.</p> <p>If evidence is found of modern slavery AMSA will capture data and report these activities to Australian Border Force as required.</p>	<p>No instances of modern slavery identified within current contracts or AMSA's supply chain over the reporting period.</p>

	<p><b>Continuous improvement and future actions</b></p> <p>AMSA:</p> <ul style="list-style-type: none"> <li>- will identify occurrences of modern slavery through the specific clauses contained within Approach to Market documents (sourced through Department of Finance 'Clausebank'). In addition, AMSA contract managers will continue to work with current providers to minimise any issues relating to modern slavery, supported by the Procurement Team</li> <li>- is committed to providing ongoing procurement training sessions to relevant staff, including information on modern slavery</li> <li>- maintains a list of potential risks in an internal modern slavery risk and control table, strengthening AMSA's understanding of, and capacity to, address and mitigate modern slavery risks</li> <li>- continues to review policies and procedures and consider amendments to include references to modern slavery, including procurement and contract templates</li> <li>- will establish a mechanism within contracts to support confidential reporting of modern slavery risks and incidences in operations and supply chains</li> <li>- will provide an approximate breakdown on the largest areas of expenditure, and specific actions implemented in these areas to address modern slavery; and</li> <li>- will develop specific metrics to demonstrate our performance addressing occurrences of modern slavery and other harmful practices if required.</li> </ul>
<p><b>6. Consultation</b></p>	<p><b>Describe how the reporting entity consulted on its statement with any entities it owns or controls</b></p>
	<p>AMSA does not own or control any other entities.</p>
<p><b>7. Relevant Information</b></p>	<p><b>include information that you think is relevant</b></p>
	<p>AMSA has identified our work with the Maritime Labour Convention in the risk assessment under <b>Criterion 3 - Risks</b>.</p>

## Appendix 1 Table of Risk Indicators<sup>2</sup>

Type of Risk	Indicators
<p><b>Sector and industry risks</b></p> <p>Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes.</p>	<ul style="list-style-type: none"> <li>• Use of unskilled, temporary or seasonal labour.</li> <li>• Use of short-term contracts and outsourcing.</li> <li>• Use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible because the work is undertaken at nighttime or in remote locations, such as security or cleaning.</li> <li>• Use of child labour in hazardous conditions, such as underground, with dangerous machinery or tools, in unhealthy environments (including where they are exposed to physical or sexual abuse), or for long hours.</li> <li>• Recruitment strategies by suppliers, their agents or labour hire agencies target specific individuals and groups from marginalised or disadvantaged communities.</li> <li>• The sector involves direct engagement with children, including through orphanage tourism and other forms of 'voluntourism' (including through companies' social investment and corporate social responsibility programs).</li> </ul>
<p><b>Product and services risks</b></p> <p>Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.</p>	<ul style="list-style-type: none"> <li>• Cost requirements or delivery timeframes might require suppliers to engage in excessive working hours, make cost savings on labour hire or rapidly increase workforce size.</li> <li>• The development of the product or delivery of the services has been reported as involving labour exploitation by international organisations or NGOs.</li> <li>• Children are often used in the development of the product or delivery of the service, such as carpet weaving.</li> <li>• The product or components of the product are made in countries where there is a high risk of labour exploitation reported by international organisations or NGOs.</li> </ul>

<sup>2</sup> As per the Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities

Type of Risk	Indicators
	<ul style="list-style-type: none"> <li>• The services are provided in countries where there is a high risk of labour exploitation reported by international organisations or NGOs.</li> <li>• The product is made from materials or using services reported to involve a high risk of labour exploitation by international organisations or NGOs.</li> </ul>
<p><b>Geographic risks</b></p> <p>Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty. Several organisations issue public reports evaluating governance, corruption and rule of law in countries around the world. You can use these reports to identify higher risk countries for modern slavery.</p>	<ul style="list-style-type: none"> <li>• The country has not ratified international conventions relevant to modern slavery, such as: the International Convention to Suppress the Slave Trade and Slavery (1926); ILO Convention (No. 29) concerning Forced or Compulsory Labour (1930); the Supplementary Convention on the Abolition of Slavery, the Slave Trade and Practices similar to Slavery (1956); the Protocol to Suppress, Prevent and Punish Trafficking in Persons, Especially Women and Children (2000); ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (1999).</li> <li>• The country is reported to have a high prevalence of modern slavery or labour rights violations, other human rights violations and/or child labour by international organisations or NGOs.</li> <li>• The country has inadequate protections for workers, including no or weak capacity to effectively monitor workplace standards and enforce compliance with national standards.</li> <li>• Law enforcement agencies are reported to be hostile to workers in at risk industries.</li> <li>• The country forces parts of the population to work for development purposes, for example to assist in construction or agriculture.</li> <li>• The country is reported to have weak rule of law by international organisations or NGOs, including due to corruption, conflict and/or political instability.</li> <li>• The country has a high prevalence of people who are vulnerable to exploitation because they are impoverished, displaced or subject to severe discrimination</li> </ul>



Type of Risk	Indicators
<p><b>Entity risks</b></p> <p>Some entities may have particular modern slavery risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.</p>	<ul style="list-style-type: none"> <li>• Entity has previously been reported as noncompliant with human rights or labour standards, including by media or NGO sources.</li> <li>• Entity's procurement and sourcing processes appear poorly managed or inefficient.</li> <li>• Entity has complex or opaque supply chains.</li> <li>• Workers appear to have little information about workplace entitlements and protections and there is a general lack of information about workplace standards.</li> <li>• Audit results for the entity appear unreliable or conflict with other sources of information about the supplier, such as NGO reports.</li> <li>• Staff recruitment costs by labour hire companies or recruiters are not covered by the company, meaning that recruitment expenses such as travel may be improperly imposed on workers.</li> <li>• Entity provides residential care for children overseas.</li> </ul>
<p><b>Indicators of modern slavery</b></p> <p>A combination of these signs may indicate a person is in a situation of modern slavery and that further investigation and assessment is required. You should also consider that some groups may be at higher risk of being impacted by modern slavery, such as women and migrant workers.</p> <p>For example, women can be disproportionately impacted by modern slavery due to structural disadvantages, including lack of access to education.</p>	<ul style="list-style-type: none"> <li>• The suspected victim or victims are: <ul style="list-style-type: none"> <li>○ living at the workplace, or another place owned/controlled by their employer</li> <li>○ underpaid or not paid at all</li> <li>○ required to work excessive hours</li> <li>○ confined or isolated in the workplace or only leave at odd times</li> <li>○ guarded at work or in their accommodation</li> <li>○ isolated in remote locations that are difficult to access and/or restricted from contacting or interacting with people outside the workplace (for example, their phones are confiscated or they are supervised when in public)</li> <li>○ managed by an intermediary or third party who 'holds' or 'invests' their money for them</li> <li>○ subject to different or less favourable working conditions than other workers because of their country of origin, gender or other factors • unable to terminate their employment at any time</li> </ul> </li> </ul>

Type of Risk	Indicators
	<ul style="list-style-type: none"> <li>○ appear to be servicing a debt to an employer or a third party (such as a recruitment agent)</li> <li>○ appear to be subjected to, or threatened with, violence, emotional, sexual, verbal or physical abuse and/or degrading treatment in connection with their employment</li> <li>○ appear to be subjected to intimidation, such as threats to their family or close relations in connection with their employment • appear to have false travel or personal documents and/or are not allowed access to these documents because they are being held by an employer or third party</li> <li>○ appear to have been deceived about the conditions of their employment</li> <li>○ are not provided with contracts in a language and format that they can easily understand</li> <li>○ are not informed of, or do not appear able to understand the terms and conditions of their employment</li> <li>○ are not provided with any protective equipment, training or means to refuse to participate in dangerous work practices, or refuse to handle known toxic materials or hazards</li> <li>○ do not have permission to work because they are from another country or appear to be working in breach of visa requirements.</li> </ul>

## Appendix 2: References

1. Department of Home Affairs, [Commonwealth Modern slavery Act 2018 Guidance for Reporting Entities](#)
2. [AMSA Corporate Plan 2021-2022](#)
3. [AMSA Board](#) and [Organisation Structure](#) – AMSA website
4. Australian Maritime Safety Authority Act 1990
5. Public Governance, Performance and Accountability Act 2013
6. *Maritime Labour Convention, 2006: [A Guide to the implementation of the MLC 2006 in Australia](#)*,
7. *United Nations Guiding Principles on Business and Human Rights*