

# Modern Slavery Statement 2020/2021



## Foreword from the Managing Director

It is a pleasure to submit SBS's Modern Slavery Statement for the 2020/21 reporting period.

SBS is committed to playing its part in reducing the risk of modern slavery in our operations and supply chains. In the 2020/21 reporting period, SBS has again taken a continuous improvement approach to combatting modern slavery as detailed in this Statement. This Statement also describes some examples of the ways in which SBS, as a media organisation, has sought to address the objectives of the Modern Slavery Act and influence consumer behaviour by highlighting modern slavery issues through our extensive TV, radio and digital media services.

We look forward to continuing to progress the conversation and drive change on these issues in collaboration with our industry peers and stakeholders.

This Statement was approved by the SBS Board of Directors in its capacity as principal governing body of SBS at their meeting on 10 November 2021 and is signed by me, James Taylor, in my role as Managing Director of SBS.

A handwritten signature in blue ink that reads 'James Taylor'.

**James Taylor**

Managing Director

Date: 7 December 2021



## 1. Introduction

The Special Broadcasting Service Corporation (ABN 91 314 398 574) (**SBS**) was founded on the belief that all Australians, regardless of geography, age, cultural background or language skills, should have access to high quality, independent, culturally-relevant Australian media.

For more than 45 years, SBS's commitment to the communities it was established to serve has been central to all that it does. As the multicultural and diverse fabric of Australia continues to evolve, SBS continues to invest in initiatives, inspired by the SBS Charter, to deepen its connections with communities, increase respect and understanding within society as a whole, and in doing so contribute to a cohesive society. These objectives are more important than ever as our communities navigate the COVID-19 pandemic.

SBS's commitment to addressing modern slavery risks in its operations and supply chain is wholly consistent with the objectives of its Charter. We recognise that our purchasing power can be used to contribute to positive social changes in Australia and globally. SBS welcomes the opportunity to contribute to the eradication of abhorrent modern slavery practices and to share SBS's second Modern Slavery Statement in accordance with clause 13 of the *Modern Slavery Act 2018* (Cth) (the **Act**).

As a multicultural and Indigenous broadcaster for all Australians, SBS aims to set a positive example within the community. For many years, SBS has demonstrated a commitment to ethical sourcing through its existing Indigenous partnerships, which provide opportunities to promote Aboriginal and Torres Strait Islander cultures, communities and businesses through the procurement of goods and services from businesses owned by First Nations people. In particular, SBS is a member of Supply Nation, an organisation which facilitates connections between government agencies, corporate Australia and First Nations-owned businesses. As a Supply Nation member, SBS has access to a database of verified First Nations businesses in various industries throughout Australia with whom SBS can engage for services. During the reporting period, SBS continued engaging Supply Nation's First Nations businesses for a variety of services including production (Bacon Factory Films, Weeriana Street Media), training (Australian Blackcard), stationery (Muru Office Supplies) and catering (National Centre of Indigenous Excellence), while applying best practice procurement processes when including First Nations businesses in tenders for general operational equipment. In FY2020/21, SBS also introduced and established its inaugural First Nations Staff Advisory Group to lead development of the next SBS Reconciliation Action Plan (**RAP**) 5, which will consider additional procurement initiatives for accredited First Nations suppliers.

## 2. SBS's structure, operations and supply chains

### Structure

SBS was established as an independent statutory authority on 1 January 1978 under the *Broadcasting Act 1942* (Cth). In 1991 the *Special Broadcasting Service Act* (**SBS Act**) came into effect and SBS became a corporation. Today, SBS is a Corporate Commonwealth Entity for the purposes of the *Public Governance, Performance and Accountability Act 2013* (Cth) and is governed by the SBS Act. SBS has a Board of Directors



appointed by the Federal Government, which consists of the Managing Director and non-executive Directors. The SBS Board of Directors is responsible for deciding the objectives, strategies and policies to be followed by SBS in performing its functions. It also ensures that SBS performs in a proper, efficient and economical manner, and with the maximum benefit to the people of Australia. Responsibility for SBS lies within the portfolio of the Minister for Communications, Urban Infrastructure, Cities and the Arts, the Honourable Paul Fletcher MP. SBS does not own or control any other entities. Key platforms and channels of SBS include its five free-to-air television channels in SBS, National Indigenous Television (NITV), SBS VICELAND, SBS Food and SBS World Movies; its streaming service, SBS On Demand; and its SBS Radio service in more than 60 languages, which are covered by this Modern Slavery Statement.

SBS's organisational structure comprises 10 'Divisions' that are made up of teams that deliver and support SBS's activities: Television and Online Content (which includes SBS On Demand, Sport and NITV), Audio and Language Content (ALC), News and Current Affairs (NACA), SBS Media, Technology, Marketing, Corporate Affairs, Legal, Finance, and People and Culture.

## Organisational Structure



Figure 1. Organisational structure as at 30 June 2021\*



1. George Savvides AM was Acting Chair from 3 June 2020. His substantive appointment as SBS Chair commenced on 9 July 2020.
2. Daryl Karp AM concluded her term on the SBS Board on 29 June 2021, having reached the 10-year limit outlined in the SBS Act.
3. Nyunggai Warren Mundine AO was appointed to the SBS Board on 29 October 2020.

## Operations

The principal function of SBS is to provide multilingual and multicultural broadcasting and digital media services that inform, educate and entertain all Australians, and, in doing so, reflect Australia's multicultural society. Accordingly, SBS carries out its core activities within the media sector. SBS's operations also include ancillary activities which support its core activities and its principal function. An overview of SBS's operations is set out in Figure 3 below.

As at 30 June 2021, SBS employs 1,563 employees in total and has operations in Sydney, Melbourne, Canberra, Brisbane, Perth, Adelaide, Darwin and London. In addition to its employees, SBS engages suppliers to provide a variety of goods and services to SBS as contemplated by the SBS Act (see further under supply chains below).

SBS's core activities take place largely in Australia – its focus being to deliver services to Australian audiences - with limited core activities for NACA, ALC and TV & Online Content taking place overseas. **All SBS employees but one are employed in Australia.**

Further details about the composition of SBS's employment workforce as at 30 June 2021 are as follows:

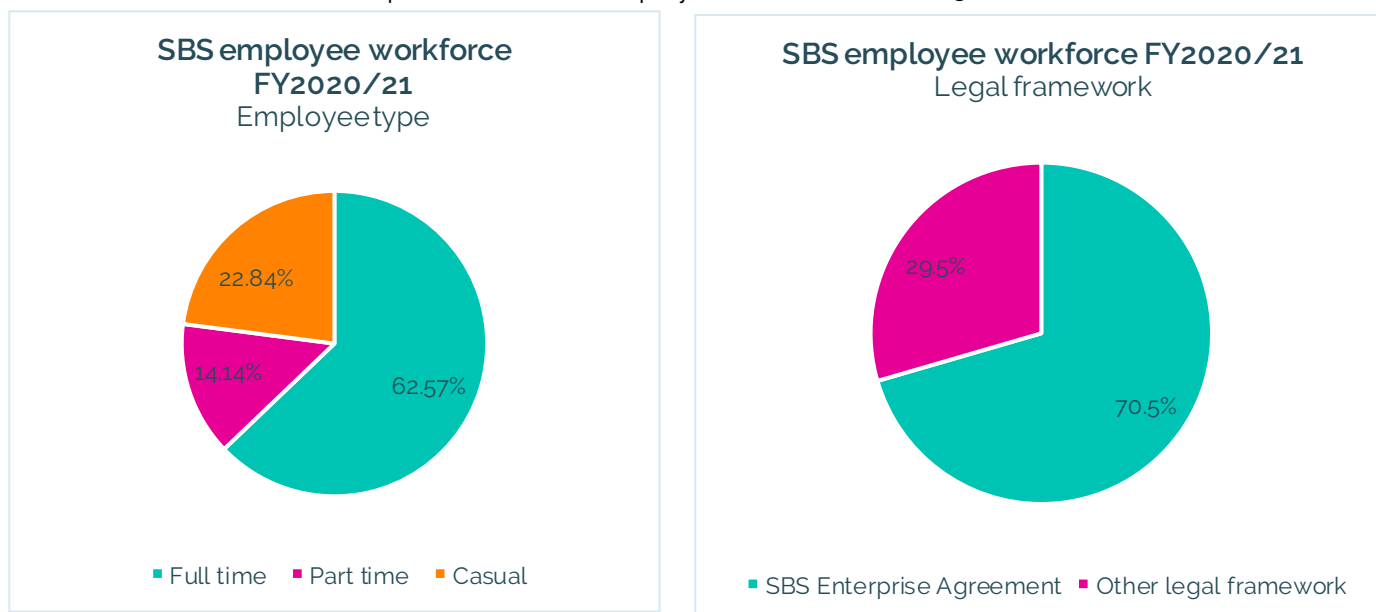


Figure 2. Composition of SBS employee workforce FY2020/21

- Radio + television broadcasting operations
- Technology support for SBS's operational + digital platform infrastructure
- Technology support to SBS employees
- Management of SBS property, equipment + building assets, including repairs + construction
- Overseeing telecommunication, electricity, cleaning + internet services to SBS
- Wardrobe, make-up and hair services for on-air talent
- Project management

- Advertising sales for SBS's radio, television + digital platforms
- Production of brand funded content
- Content distribution
- In-language subtitling

Marketing + publicity activities to support SBS content

- Recruitment + human resources management
- Payroll
- Employee learning + development
- Safety + wellbeing for SBS workers
- Employment relations advice

News + current affairs journalism

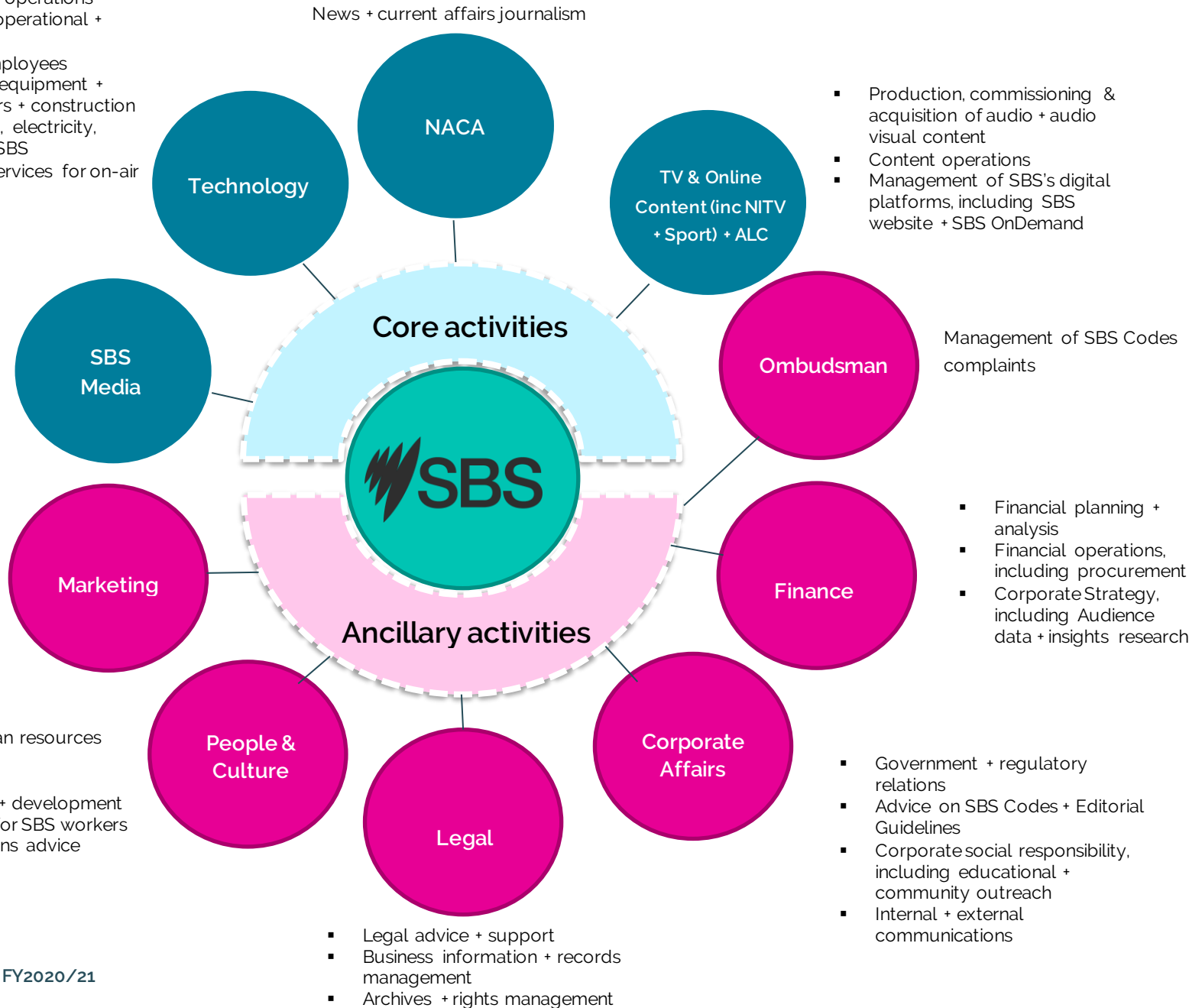


Figure 3. SBS operations FY2020/21

In line with the SBS Value, “we look out for one another”, SBS’s operations are underpinned by:

- robust labour practices, including setting legal compliance and behavioural expectations through employment, labour hire, contractor and other supplier contracts, and appropriate workplace supervision and management;
- workplace policies that prioritise the wellbeing and lawful engagement of all SBS workers (employees and contractors), including the SBS Code of Conduct, Appropriate Workplace Behaviour Policy, the Workplace Health, Safety and Wellbeing Policy and Contractor Management Policy. Training on these policies for SBS employees is compulsory and key elements of these policies are incorporated into the contractor induction that is compulsory for most contractors. Breach of these policies may result in termination
- a suite of wellbeing initiatives for SBS employees, which have been enhanced and amplified during the COVID-19 pandemic, including access to free counselling services, permission to bring pets into the workplace, health checks and health initiative webinars; and
- accessible grievance mechanisms for SBS employees, including anonymously through SBS’s whistleblowing scheme, YourCall.

## Supply chains

SBS procures a diverse range of goods and services that contribute to SBS’s own products and services, either through first tier or indirect suppliers. The main types of goods and services procured by SBS are:

Division	Goods and services procured
<b>TV &amp; Online Content (including NITV and Sport), ALC, NACA</b>	Radio and television equipment Pre-production, production and post-production services Commissioned and acquired content On-air talent services Photography Research International stringer services
<b>Technology</b>	Broadcast operations and other major technology and engineering equipment and services Textiles, make-up, hair products Software and software support services Electronic and telecommunications equipment Fittings and furnishings Property, equipment and facilities repairs, maintenance and cleaning services Construction materials and services Telecommunication, electricity and internet services
<b>SBS Media</b>	On-air talent services In-language translation and interpreting services



<b>Marketing</b>	Photography services Design services Editing services Publicity services
<b>Finance</b>	Financial management software
<b>People &amp; Culture</b>	External recruitment software and services Learning and development software and services
<b>Legal</b>	External legal advice and support Document management services
<b>Cross departmental</b>	Travel, accommodation and transport Office space Insurance Bespoke consultant services Hospitality/catering – food and beverages Stationery SBS-branded merchandise Event planning, management and organisation Learning and development – conferences, courses and events

SBS's suppliers, particularly those providing services, are primarily located in Australia, being the country in which SBS focuses its activities. However:

- Many SBS suppliers source components of their goods or services from overseas. In particular, this includes materials for equipment, software, fittings, furnishings and stationery, ingredients and supplies for hospitality and event planning services, and customer support for telecommunication, electricity, software, internet and insurance services.
- SBS regularly sources acquired audio and audio-visual content, content production services, travel, accommodation, office space and transport from overseas suppliers in the context of SBS's overseas activities and multicultural, multilingual services. For example, ALC has longstanding arrangements with experienced, reputable individual international "stringers" (freelance journalists) all over the world to provide various reporting and production services for ALC's in-language content. A more detailed analysis of the composition of SBS's suppliers is set out in Figures 4 and 5 below.

SBS has long term arrangements with reputable suppliers for telecommunication, electricity and internet services, property, equipment and facilities repairs, maintenance and cleaning.

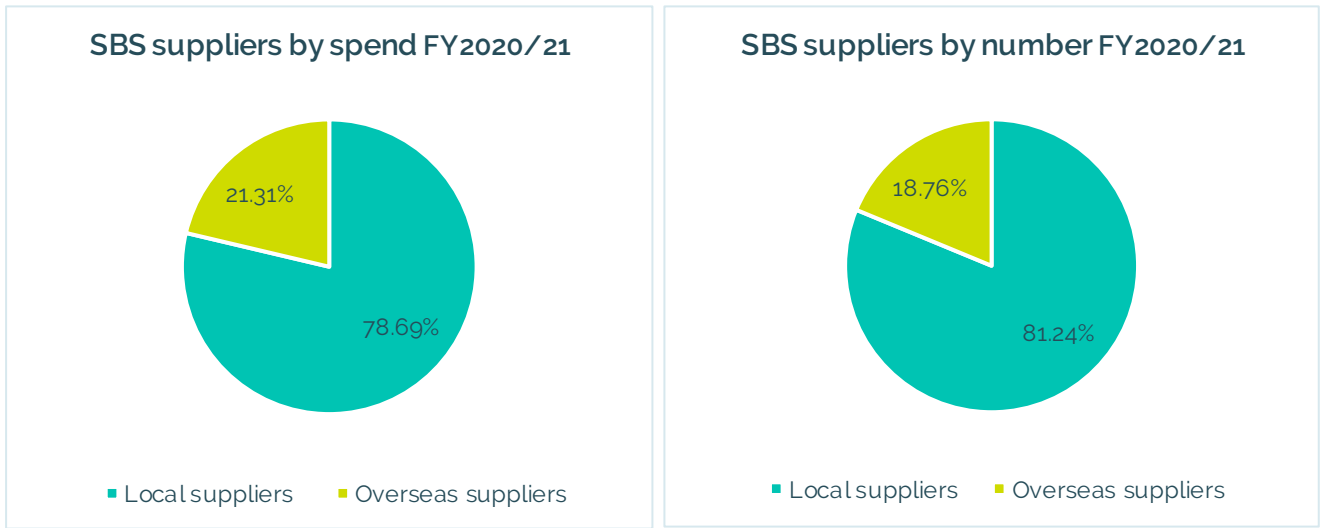


Figure 4. Composition of SBS suppliers FY2020/21



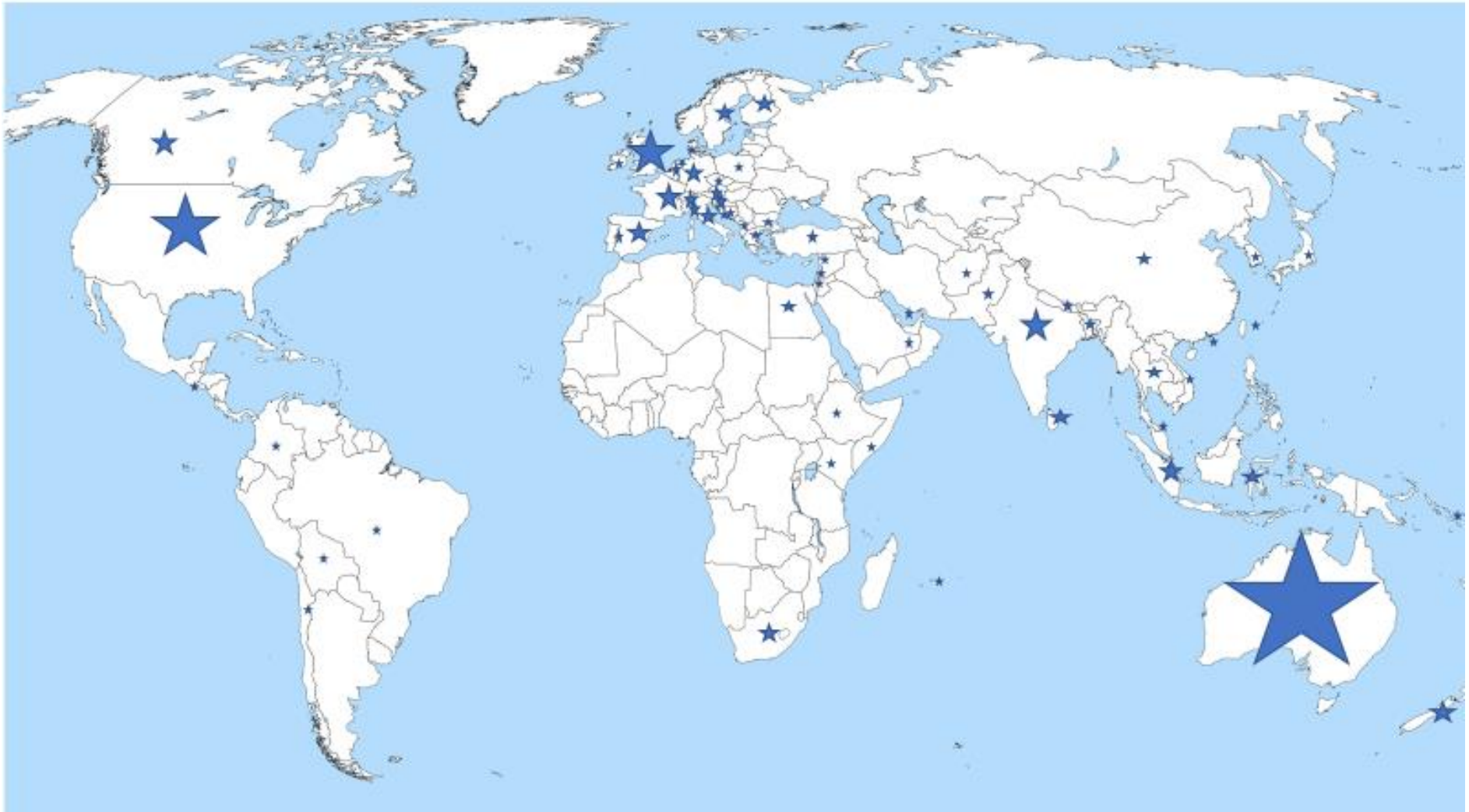


Figure 5. Distribution of SBS suppliers FY2020/21 – size indicative of number

## Impact of the COVID-19 pandemic on SBS's operations and supply chains

The COVID-19 pandemic impacted SBS's operations and supply chains during the 2020/21 reporting period in a number of ways.

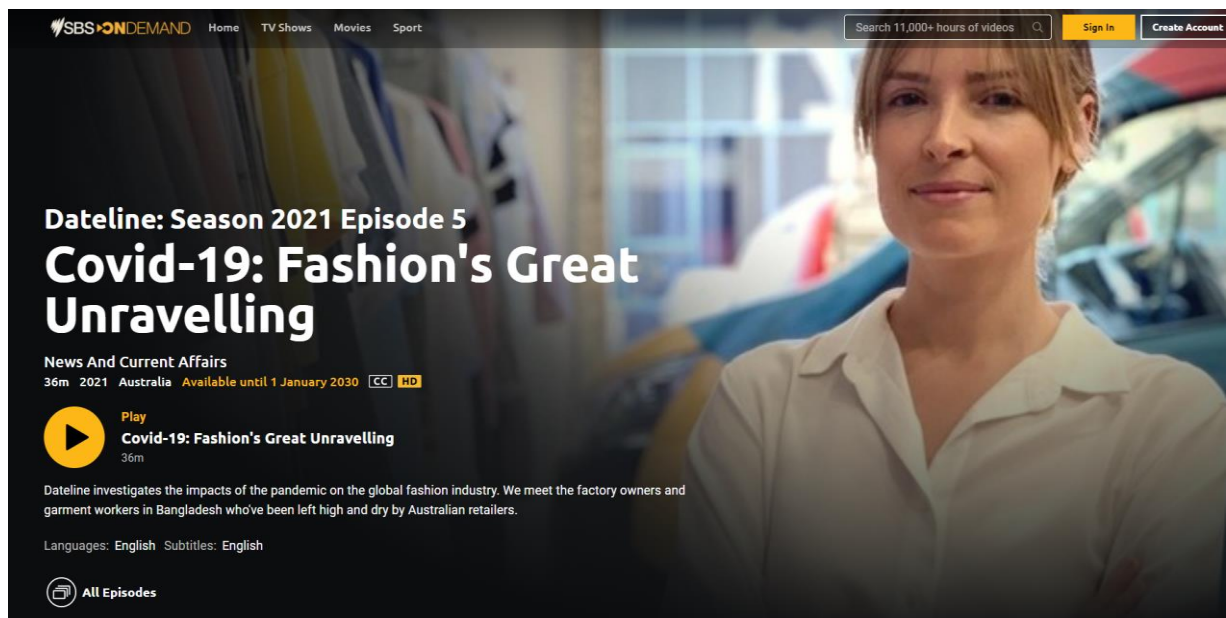
- **Reprioritisation of activities:** SBS redesigned and reprioritised some of its core operations to prioritise the safety and wellbeing of its workers and to meet the evolving needs of its audience, within the challenging constraints posed by the pandemic. For example, SBS pivoted to prioritise crucial projects including a COVID-19 multilingual portal to help communicate key health information to audiences. Technology solutions were also implemented to enable agile working across the organisation and office cleaning services were increased. Production of certain programs was postponed while other productions were relocated interstate. Non-essential property projects were postponed and in-person community engagement activities were reduced. These changes had flow-on impacts for our supply chains.
- **Limited events:** With a significant number of SBS workers working from home and limited external events permitted due to public health orders, SBS held very few in-person events, thereby reducing the need to procure hospitality/food and beverage, merchandise and event planning services.
- **Limited travel:** Similarly, domestic and international travel restrictions reduced the need to procure travel, accommodation and transport services. Some of SBS's overseas activities continued but with the assistance of additional contractors located in overseas countries instead of local travelling SBS workers.

SBS acknowledges the real impacts of COVID-19 on operations and supply chains globally and the additional risks it presents to vulnerable workers worldwide. Those impacts have been felt by SBS's suppliers across many industries, including those identified above, and particularly given ongoing economic uncertainties. In an effort to reduce the risk of labour practices being compromised and therefore the impact on vulnerable workers from COVID-19, SBS has:

- **Maintained supplier relationships and fostered open communication with suppliers about COVID-19 impacts**
  - SBS has maintained open communication with suppliers about the impacts of COVID-19. SBS has endeavoured to work with suppliers whose own supply chains and sourcing of materials have been adversely affected by the pandemic, accommodating changes to timeframes for delivery and the availability of products, content or events to minimise risk of detrimental impacts on vulnerable workers.
  - Where feasible, SBS has postponed rather than cancelled financial and contractual commitments with ongoing contractors and other suppliers to provide some assurance regarding future work and ease financial pressure.
  - SBS has also provided periods of payment relief and/or reductions to certain suppliers in good faith recognition of the economic impact on their businesses as a result of the pandemic.
  - Where SBS has required additional services from a supplier as a result of COVID-19, such as cleaning services, SBS has engaged closely with the supplier to ensure that appropriate precautions and protective equipment have been provided to minimise risk of detrimental impacts on the supplier's workers.



- **Driven awareness of COVID-19 impacts on vulnerable workers.** SBS has highlighted to Australian audiences through its own investigative and produced content the potential for compromised labour practices, including modern slavery, as a consequence of the pandemic:



SBS's Dateline program produced and aired a documentary in early 2021 about the heightened risk of modern slavery in the textiles industry in Bangladesh during COVID-19:  
<https://www.sbs.com.au/ondemand/video/1876811843844/dateline-s2021-ep5-covid-19-fashions-great-unravelling>



SBS News published an article in March 2021 about the prevalence and forms of modern slavery in Australia, and the role Australians can play to combat it – including the importance of ethical consumerism:  
<https://www.sbs.com.au/news/australia-s-modern-slaves-are-a-real-mix-and-they-are-suffering-in-silence>

### 3. Modern slavery risks

#### What we've done

During the previous reporting period, SBS carried out a robust three-step scoping and mapping exercise identifying and assessing its operations and supply chains to examine whether any of them **cause, contribute to or are directly linked** to any potential modern slavery risks. SBS has not identified any of its operations or supply chains that cause or contribute to modern slavery risks by being complicit in, facilitating or incentivising modern slavery.

SBS continued its work in the 2020/21 reporting period to examine potential direct links it may have to modern slavery risks, taking a risk-based approach to focus on the following activities:

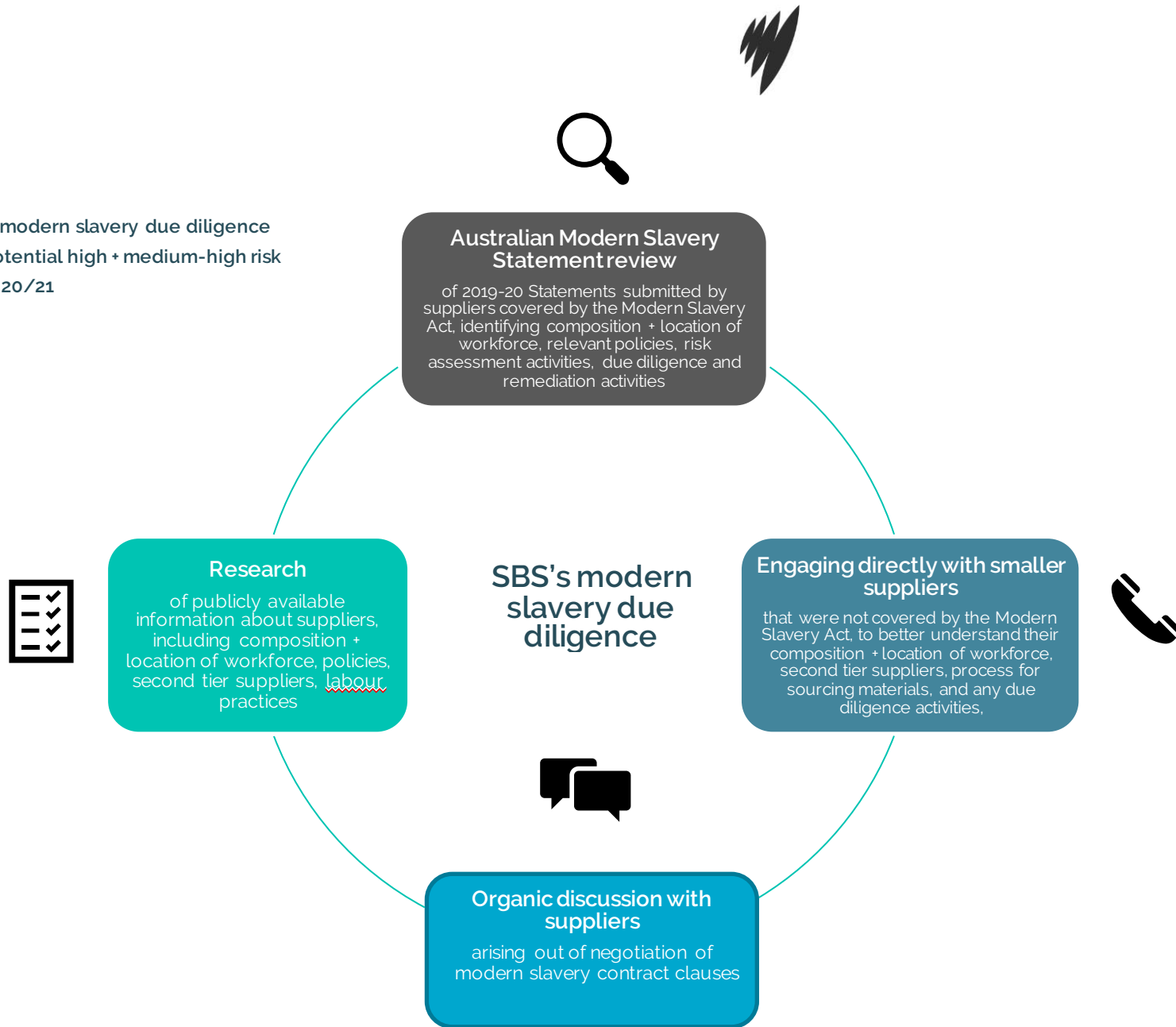
#### *Steps 1 and 2: Further scoping and identifying potential modern slavery risks in SBS operations and supply chains*

SBS expanded its scoping and risk identification exercise to encompass additional supply chains not previously considered. These included ongoing **textiles, hair and makeup products and merchandise** and additional ongoing **technology and food and beverage** suppliers: (a) due to their associated industry or sector risk of modern slavery outlined in the Government's guidance material and other industry guidance; and (b) to begin identifying and considering potential indirect suppliers in the operations and supply chains of SBS.

#### *Step 3: Refined mapping of modern slavery risks by risk level*

SBS undertook further due diligence of the **24 suppliers identified by SBS in the previous reporting period as carrying a potential medium-high or high modern slavery risk** due to their geographic or industry/sector risk, **plus the additional suppliers referred to above**. Due diligence activities for this group of suppliers are set out in Figure 6 below.

Figure 6. SBS's modern slavery due diligence activities for potential high + medium-high risk suppliers, FY2020/21



## What we found

As a result of SBS's due diligence activities in the 2020/21 reporting period, **SBS considers that the potential modern slavery risks identified among this small group of suppliers are in most cases being appropriately addressed and mitigated by those suppliers**, such that they pose a **low actual modern slavery risk** to SBS.

As such, SBS is confident that the **likelihood of it being directly linked to modern slavery risks or practices through its operations or supply chains is low**.

## Where we're going



Figure 7. SBS roadmap for identifying and assessing modern slavery risks in supply chains, FY2019/20 and 2020/21



## 4. SBS's response to modern slavery

SBS has made considerable progress building on its previous work in reviewing, assessing and addressing potential modern slavery risks arising from its operations and supply chains during the 2020/21 reporting period. Its activities comprised:

- **More in depth scoping and assessing SBS's operations and supply chains and due diligence:** SBS expanded its scoping and assessment activities to include textiles and merchandise suppliers and additional technology and food and beverage suppliers given the associated sector risks. SBS then conducted further robust due diligence on each previously identified potential high and medium high-risk supplier plus those additional suppliers, which included review of their Australian modern slavery statements where applicable, plus additional research and direct contact with suppliers.
- **Training:** SBS developed and delivered an online bespoke modern slavery training module to SBS employees who engage contractors or who are otherwise involved in procuring goods and services for SBS. The purpose of the training is to help staff to recognise what modern slavery is and why it matters, to identify modern slavery risks in SBS's operations and supply chains, to explain the purpose of SBS's modern slavery contract clauses and to engage in dialogue with suppliers about modern slavery. Over **94% of required staff have successfully completed the module** (which involves correctly answering 5 questions to test their understanding) and the remainder will do so during the next reporting period. The module also directs staff to engage with SBS's modern slavery intranet portal for more information.
- **Modern slavery contractual clauses:** SBS continued to roll out its tailored modern slavery clauses into new contracts with suppliers and to identify the need for modern slavery clauses in upcoming contracts due for renewal. At a minimum, SBS's modern slavery clauses put suppliers on notice of SBS's obligation to comply with the Modern Slavery Act, grant permission to SBS to conduct due diligence and audits, and require suppliers to cooperate honestly and in good faith with SBS's due diligence activities. These clauses are included in all applicable SBS contract templates, including contractor agreements and goods and services agreements. SBS has already had valuable dialogue with suppliers about modern slavery in the course of contractual negotiation prompted by inclusion of such clauses. Relevant SBS employees have also been trained and directed to refer new or renewing contracts to Legal to incorporate modern slavery clauses. This approach aims to help ensure that SBS's modern slavery requirements will be reflected in all new or renewed key supplier engagements.
- **Updated Code of Conduct:** SBS updated its Code of Conduct for SBS workers to expressly include compliance with the Modern Slavery Act, emphasising the importance to SBS of combatting modern slavery in its operations and supply chains and setting expectations for the role that employees and contractors play in that endeavour. The updated Code of Conduct will be published and form part of SBS's employee and contractor induction in the next reporting period.
- **Modern slavery working group:** SBS continued to run a modern slavery working group comprising representatives from Legal, People & Culture, TV & Online Content, Finance, Technology, Corporate Affairs, ALC, Corporate Services and NACA, led by Legal. This group met on a number of occasions during the reporting period to discuss SBS-wide and Division-based risks and staff engagement, plan and review modern slavery actions and deliverables, and consider industry guidance.



- **Collaborating with industry:** Members of the modern slavery working group attended external modern slavery workshops and conferences to enhance SBS's understanding of effective strategies to combat modern slavery and best practice reporting trends. As part of this initiative, working group members attended the UN Global Compact Network's Modern Slavery Community of Practice, which brought together key industry advisors and ABF representatives to reflect on learnings from the first Australian modern slavery reporting period.
- **Dedicated modern slavery intranet portal:** SBS continued to update its dedicated modern slavery online portal to provide key resources and information to employees on modern slavery laws and obligations. This portal includes information about modern slavery, relevant modern slavery news and current affairs related content produced by SBS (including about COVID-19 impacts on vulnerable workers, discussed above), links to updated contract templates containing modern slavery clauses, relevant external links to further modern slavery resources, details for internal contacts and links to report allegations of modern slavery to SBS's whistleblowing service.
- **Whistleblowing hotline:** SBS's contracted independent whistleblowing service continues to enable employees to report any allegations of modern slavery in SBS's supply chains safely and securely via an independent whistleblowing platform. Information on the hotline, including contact details, are available on the modern slavery intranet portal.
- **Publication of Modern Slavery Statement:** SBS's Modern Slavery Statement for the 2019/2020 reporting period was endorsed by the SBS Board. This Statement has been published on the SBS website accessible to the public and will be referred to in SBS's Annual Report for FY 2020/21.

## 5. Effectiveness of actions

The effectiveness of actions taken to address modern slavery risks is difficult to quantify. However, SBS recognises that a continuous improvement approach necessarily entails mechanisms through which to review, assess and measure the effectiveness of actions taken. To that end, SBS undertook the following actions in the 2020/21 reporting period to assess how effective and impactful its actions to date have been:

- **Reporting on the number of employees who completed training on modern slavery as part of their contractor engagement training.** As noted above, **over 94% of SBS employees whose roles involve engaging contractors or otherwise procuring goods or services for SBS have completed modern slavery training.** The in-built knowledge test, which required 100% correct answers to complete the training, also illustrated a high degree of staff awareness and understanding of the Act, SBS's modern slavery approach and how to navigate modern slavery issues with suppliers.
- **Reviewing direct feedback from suppliers on modern slavery.** SBS observed that its direct engagement with smaller suppliers, either in response to targeted modern slavery due diligence enquiries or as an organic result of contractual negotiation about modern slavery clauses,





provided SBS with immediate feedback on suppliers' modern slavery awareness and gave SBS the opportunity to improve suppliers' understanding of modern slavery. SBS encountered some hesitancy from smaller suppliers and challenges with transparency in supply chains that it will continue to navigate. A summary of the effectiveness of SBS's overall due diligence activities is set out in Figure 8 below.

- **Reviewing effectiveness of actions.** As part of its continued improvement approach, SBS's modern slavery working group have considered the effectiveness of SBS's actions on an ongoing basis, including considering the above two actions and learnings from industry collaboration.

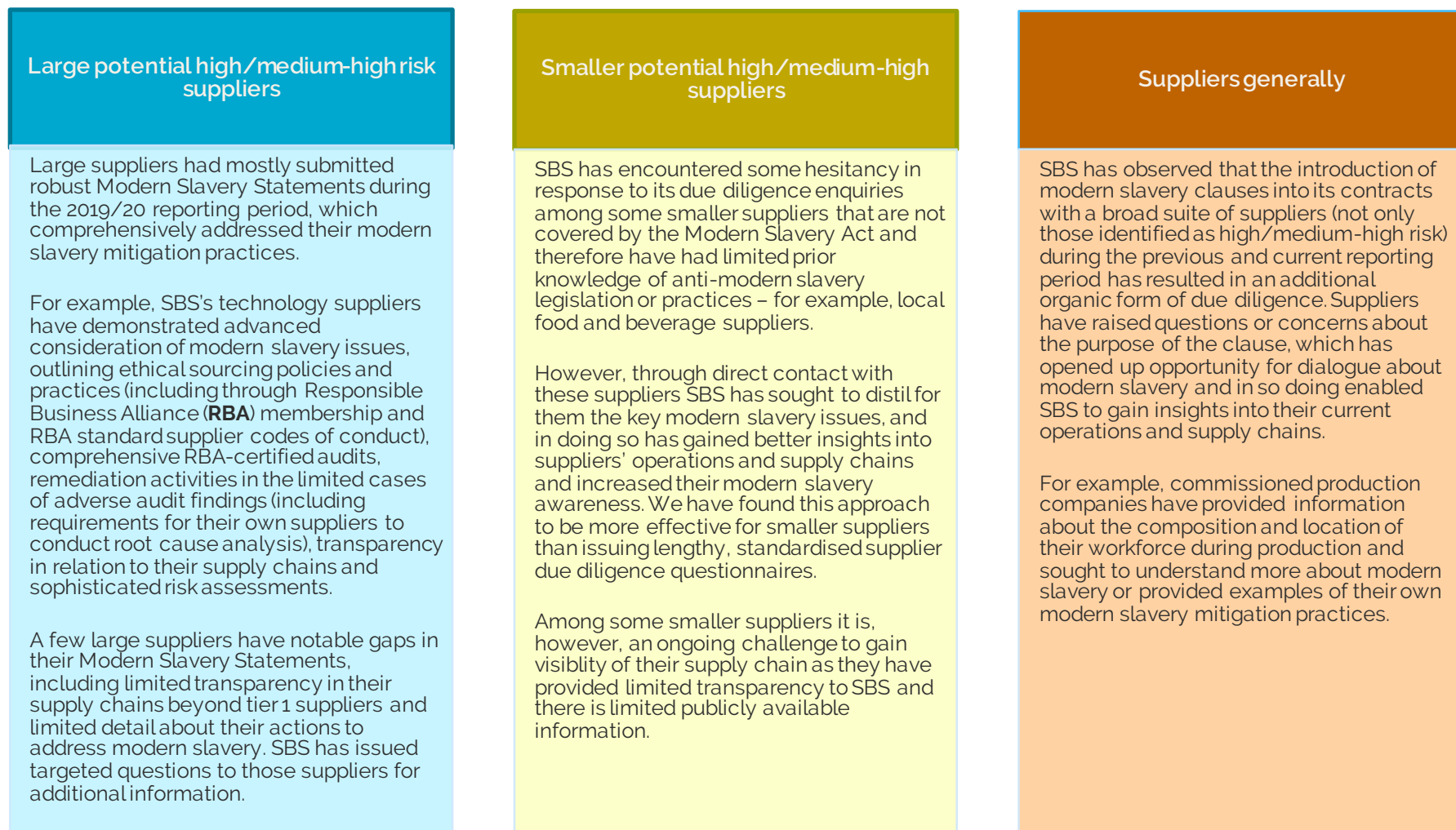


Figure 8. Summary of overall effectiveness of SBS's modern slavery due diligence activities

Reflecting upon the roadmap which SBS established in its Modern Slavery Statement for the previous reporting period, SBS has largely been successful in achieving what it set out to do, providing strong foundations for SBS to now focus on refining its learnings, implementing best practices and continuing to take further steps to address modern slavery in its operations and supply chains.

## 6. Impact of COVID-19

SBS has outlined earlier in this Statement the impacts of COVID-19 on its operations and supply chains, and the steps it has taken to mitigate the impact of COVID-19 on vulnerable workers.

In terms of impacts of COVID-19 on SBS's modern slavery response during the 2020/21 reporting period, key impacts included the following:

- **Lack of face to face training:** As with most training during 2020/21, SBS pivoted to online modern slavery training for relevant SBS employees rather than face to face training, given most employees were working from home for the majority of the reporting period. Online training has its limitations, including the missed shared learnings from participant questions in a face to face training environment and online training fatigue following a period of other intensive online training.
- **Limited supplier engagement in due diligence:** Less engagement from time and resource-pressed suppliers made conducting due diligence more difficult. As noted above, 2020/21 has been a difficult year for many of SBS's suppliers, with some small businesses in particular necessarily focused on simply keeping their businesses afloat. SBS has taken into account these circumstances and considered the level of modern slavery risk presented by such suppliers in determining the degree of due diligence required at this time.
- **Reduced engagement of certain suppliers:** The impacts of COVID-19 meant that SBS engaged less of its occasional suppliers for hospitality/food and beverage, merchandise, travel, transport and accommodation services in particular. Consequently, SBS did not pursue modern slavery due diligence enquiries with suppliers in such areas unless they had an ongoing relationship with SBS, but intends to re-engage with them if or when those services are required again.

## 7. Future roadmap: 2021/22 reporting period

Building on the strong foundations laid during the 2019/20 and 2020/21 reporting periods, SBS's working group for the 2021/22 reporting period will continue to take a continuous improvement approach to its modern slavery obligations with a focus on:

- scoping of new suppliers as well as ongoing review and due diligence of existing suppliers to ensure continuous improvement of supply chain knowledge (including potential identification of indirect suppliers);
- further assessment of key risk areas including geographic risks from additional overseas suppliers;



- continuing to respond to the ongoing and evolving impacts of COVID-19 on SBS and on the industry, including its large and small business suppliers;
- greater focus on regular engagement and collaboration with industry stakeholders and other parties to share learnings and best practices post 2020/21 reporting period, including identifying further opportunities for partnership and building relationships with business peers, civil society stakeholders, industry bodies and multi-stakeholder bodies;
- continuing to develop and maintain trusted relationships with suppliers to increase transparency and improve supplier awareness of modern slavery risks;
- increasing staff communications and driving staff engagement with the modern slavery intranet portal; and
- considering and developing additional mechanisms and actions to measure effectiveness of SBS's response and implement improvements.