

World Vision Australia
Modern Slavery Statement
for the Financial Year 2019/20



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I. Introduction

The *Modern Slavery Act 2018* (Cth) (**Act**) requires organisations with consolidated annual revenue over \$100m to submit an annual statement describing their actions to assess and address modern slavery risks. World Vision Australia ABN 28 004 778 081 (**WVA**) recorded an annual turnover for FY20 over \$100m.

This is a modern slavery statement as required under section 13 of the Act (**Statement**) for the financial year 1 October 2019 to 30 September 2020 (**Reporting Period**).

This Statement outlines WVA's continued efforts towards tackling modern slavery and human trafficking in its supply chain and wider activities.

In this Statement "modern slavery" has the meaning ascribed to it under the Act.

2. Organisational Structure

World Vision Australia

WVA is a Christian relief, development and advocacy organisation. Our focus is on helping the world's most vulnerable children overcome poverty and experience fullness of life.

WVA is regulated by the Australian Charities and Not-for-Profits Commission as a registered charity under the *Australian Charities and Not for Profits Commission Act 2012* (Cth) (**ACNC Act**). We are registered as a public company limited by guarantee under the *Corporations Act 2001* (Cth), which means that the Corporations Act applies but in a manner modified by the ACNC Act.

WVA is a signatory to the Australian Council For International Development (**ACFID**) Code of Conduct, which is a voluntary, self-regulatory sector code of good practice. As a signatory, we are committed and fully adhere to the ACFID Code of Conduct, conducting our work with transparency, accountability and integrity.

WVA is fully accredited by the Australian Government through its Department of Foreign Affairs and Trade. The accreditation process provides the Australian Government and the Australian public with confidence that they are funding a professional, well managed, community-based organisation capable of delivering good development outcomes.

WVA's Board is the ultimate decision-making body of WVA, and is responsible for its overall governance. Our Board oversees the determination and implementation of policies and processes that reflect good corporate governance.

WVA's registered office is located at 1 Vision Drive, Burwood East Victoria 3151.

The total number of WVA employees in 2020 was 372 comprised of 314 full-time and 58 part-time employees.

World Vision International Partnership

WVA is part of a global network of entities which together form the World Vision Partnership (**WV Partnership**) to deliver humanitarian relief and development programs to vulnerable communities across the world. The WV Partnership is not a partnership in the legal sense; it is underpinned by the WV International Covenant of Partnership that documents the foundational arrangements and agreed principles of all WV Partnership entities. In this sense, WVA is a "twin citizen" operating in Australia but also with international commitments (to the extent that they are consistent with Australian laws). Our [Corporate Governance Statement](#) addresses in detail how we respond to the requirements and principles under relevant laws, industry codes and our own policies as they relate to corporate governance.

WVA Core Values and Mission

Our Christian faith is central to our work and we believe that every child has the God-given right to reach their full potential. We serve all people, regardless of religion, race, ethnicity or gender. And we collaborate with people of all faiths – and none – who share common values of compassion, love and mercy.

WVA has a zero-tolerance stance on acts of modern slavery and human trafficking. WVA is pro-active in taking steps to prevent such acts occurring within its own supply chain and to ensure that it only partners with organisations that also observe appropriate ethical standards. As one of the world's largest humanitarian organisations, we use our scale and influence within the WV Partnership to address the entrenched, systemic issues that lead to poverty. WVA's core values and mission aligns with the spirit of the Act and the task of eliminating modern slavery.

3. Operations and Supply Chains

Through community development, humanitarian and emergency relief, and advocacy, WVA is dedicated to helping children, families and communities overcome poverty and injustice.

WVA, through the WV Partnership, operates in nearly 100 countries around the globe, predominantly in Africa, Asia, the Middle East and Eastern Europe. The countries in which WVA operates may be found in our Annual Reports at <https://www.worldvision.com.au/about-us/annual-reports>. WVA also conducts programs involving first nations communities in Australia.

WVA's suppliers are predominantly located in Australia. WVA uses various suppliers to enable it to carry out activities to further its charitable purpose, including in the areas of fundraising, marketing, IT, office facilities and employment. WVA does not work directly with any suppliers in sectors which are particularly vulnerable to human trafficking such as construction, farming or hospitality. However, WVA remains vigilant and has policies and procedures in place to mitigate the risk of human trafficking and modern slavery affecting its supply chain.

Programs financed by WVA-raised funds are mostly delivered in-country by WV Partnership entities (each a **Field Office**), with appropriate technical, oversight and other support provided by WVA. Each Field Office engages local suppliers in the course of implementing our programs. All WV Partnership entities are subject to WV Partnership policies described below. In some circumstances, WVA partners with non-World Vision entities for program implementation overseas.

Additionally, WVA operates a social enterprise wholesale Fairtrade coffee roastery and Little Things Cafe businesses in Australia under the registered business name "Change Coffee" and "Little Things Coffee"

All projects and programs funded by WVA undergo regular monitoring and evaluation to measure progress and capture outcomes for children and communities. Our evaluations provide important insights that help us further improve programming and report to our supporters on impact. Our Annual Reports provide a comprehensive overview of our annual activities and a summary of key statistics and financial results. These Reports describe where we obtain our financial resources and how we apply those funds, in delivering our programs. They are available at <https://www.worldvision.com.au/about-us/annual-reports>

Before engaging with major non-bilateral or non-multilateral donors and corporate partners, WVA considers the commitments or actions taken by these parties to minimise the risk of modern slavery in their operations and supply chains, through a thorough due diligence process which includes specific questions on how these parties address the risk of modern slavery activities in their operations.

4. Risks of modern slavery practices in WVA's operations and supply chains

For the Reporting Period WVA mapped out its operations and supply chains to identify functions and activities that carry a greater risk of involving modern slavery activities. WVA identified the following key areas:

Domestic Suppliers

In assessing domestic operations for modern slavery risk, WVA separated operations into high and low risk categories, focusing on high risk categories as a priority. High risk operations included operations which touched specific countries or industries. Operations identified as high risk included Events and Campaigns involving provision of textiles or fashion items manufactured internationally, any provision of IT or electronic hardware for organisational operations, cleaning services if provided internationally, and supply of agricultural goods for example provision of Coffee beans for domestic roastery operations. The remaining operations across the organisation are considered low risk and predominantly relate to domestic service suppliers.

Corporate Partners

The Due Diligence Checklist in operation at WVA prior to revisions being made to address the requirements of the Act already included comprehensive questions related to child and adult labour and potential exploitation. WVA's Due Diligence Checklist was updated once the Act came into operation to incorporate more specific questions to assist with the identification and assessment of modern slavery risks and issues within potential partners supply chains, focusing on high risk countries, industries and supply chains.

As all partners reviewed in the last years included an assessment on child and adult labour and potential exploitation, for the Reporting Period WVA reviewed all corporate partners who had provided cash donations over a set monetary threshold and who had not been reviewed in the last three years.

The Australian and New Zealand Industry Classification Codes recorded by WVA for each of the partners reviewed was then reconciled with the High Risk Industry categories for modern slavery. Based on this reconciliation four corporate partners were identified as being "High Risk" from a modern slavery perspective. Of these four entities, two operate in the mining and extractives industry, one in the retail sector, and one in agriculture & forestry.

The two partners operating in the mining and extractives industry are large organisations who themselves are subject to the Act.

Field Offices

WVA, through Field Offices, operates in certain areas of the world which have a higher risk of modern slavery such as South East Asia and Africa.

5. Actions taken by WVA to assess and address modern slavery risks

Due Diligence and Screening

WVA conducts Criminal Record Checks and Working With Children Checks for all key personnel of domestic contractors who have access to children or child data held by WVA.

WVA conducts due diligence, including modern slavery risk assessment and remediation for all potential suppliers as part of the procurement process. Suppliers identified as high risk categories in section 4 are required to complete a modern slavery questionnaire to explain their approach to mitigating risks of modern slavery in the candidates supply chains prior to progressing to further procurement stages.

High risk suppliers must also address on the modern slavery questionnaire whether they comply with the United Nations ILO Conventions on the elimination of all forms of forced or compulsory labour and the effective abolition of child labour, whether they have policies and procedures in place that prohibits modern slavery, and detail employment conditions offered to workers.

WVA developed documentation in regard to the four entities in WVA's partnership list assessed as being high risk from a modern slavery perspective (refer to section 4 above). Documentation included a Modern Slavery Questionnaire that partners were asked to complete, a letter informing them of WVA's requirement that all partners abide by WVA's Modern Slavery Act Compliance Protocols, and amendments to existing agreements to incorporate contractual obligations to comply with WVA's Modern Slavery Act Compliance Protocols.

Agreements

WVA enters into written agreements with suppliers, contractors, corporate/fundraising affiliates and program implementation partners on appropriate terms and conditions to ensure that high level of transparency, accountability and ethics is upheld by third parties with whom we work. Contractual obligations include, for example, assurances that the supplier employs practices consistent with those under relevant employment and labour laws, and for suppliers assessed as having a higher risk of modern slavery activities such as cleaners and caterers, a specific letter of assurance of compliance.

During the Reporting Period WVA developed new contractual clauses and Modern Slavery Act Compliance Protocols to address and minimise the risk of modern slavery in its supply chains. WVA's template contracts include these modern slavery provisions. Amongst other things, WVA's Modern Slavery Act Compliance Protocols set out actions WVA requires suppliers to take to prevent modern slavery activity and the process for engaging with WVA if a supplier identifies a case of modern slavery.

WVA also updated its tender processes and request-for-proposal templates to require respondents to explain their approach to mitigating risks of modern slavery in their supply chains.

Remediation process

WVA takes a "survivor-centered" approach to reported breaches of WVA's Child and Adult Safeguarding Policy, prioritising the interests of the survivor who has suffered harm. Section 6 of this Statement includes further detail on WVA's grievance procedures. For more information on our grievance procedures please refer to WVA's [Complaints Policy](#) on our website.

WVA contracts with suppliers, corporate partners and implementation partners include dispute resolution provisions if a concern arises during the engagement. The dispute resolution provision contains an escalation mechanism that, depending on the type of engagement, includes (for example) escalation to the Executive Leadership Team, or in certain instances, to WVA's Chief Executive Officer, to consider appropriate remediation action incidents of modern slavery in their supply chain. Remedial action may include ending our business relationship with entities that do not adequately address modern slavery risks.

Policies

WVA implements a range of policies that contribute to assessing and addressing risks of modern slavery in our operations and supply chains, including the following:

i. WVA Policies

Child and Adult Safeguarding Policy (and Guidelines) – WVA subscribes to the WV Partnership Child and Adult Safeguarding Policy described below under the heading "Relevant WV Partnership Policies to which WVA subscribes".

Contract and Procurement Policy – requires WVA to manage its contracting and procurement practices in such a way as to uphold high ethical standards and fulfil procurement due diligence on suppliers, including in relation to modern slavery and compliance with the Act.

Risk Management Policy – Board Policy which sets out organisational approach to identify key risks and maintain adequate controls to manage those risks in a pro-active manner.

Protected Disclosure Policy – Board policy which establishes an environment and culture where WVA staff and other relevant parties feel safe to speak up when there are reasonable grounds to suspect that WVA, its directors or employees are not acting ethically or in accordance with laws and obligations in relation to WVA. This includes reporting any concerns in relation to modern slavery which may be taking place within WVA's business or supply chain.

Code of Conduct Policy – Board policy which establishes WVA's commitment to ethical and legal conduct, requires adherence by staff to Australian laws and organisational policies.

ii. Relevant WV Partnership Policies

WV Child and Adult Safeguarding Policy – prohibits sexual exploitation and other behaviour consistent with meaning of modern slavery activities. It also prohibits hiring children in any form of child labour i.e. work that is mentally, physically, socially, or morally dangerous and harmful to children, or that interferes with their schooling. The policy applies to all employees, interns, volunteers, and Board members. WVA also applies appropriate standards to external parties,

including visitors, community volunteers, contractors, partners, and others affiliated with partners or contractors, to address safeguarding risks relating to their engagement with WV's work. All WV employees, volunteers, interns, and Board members sign an acknowledgement that they know, understand and will follow the safeguarding policy. Refer to "Agreements" above in regard to WVA's dealing with contractors and suppliers.

WV Partnership Global Supply Chain Management Procurement Manual – sets out principles of sustainable procurement, including in relation to social impact. It includes a Supplier Code of Conduct, revised in 2020, requiring suppliers of, among others, Field Offices to observe international labour conventions and comply with WV's Child and Adult Safeguarding Policy and Protocols.

WV Partnership Guide to Humanitarian Standards – a comprehensive guide that explains risk of human trafficking, directs staff to engage socially responsible businesses and ensure that procedures are in place to provide a safe working environment and appropriate remuneration.

WV Partnership Disaster Management and Conflict Response Policy – sets out humanitarian principles that underpin and drive all of WV's work, and affirms, among other things, principled humanitarian action and humanitarian protection: WV will protect lives, rights and livelihoods of children, their families and communities as reflected in the provisions of international humanitarian law, human rights, refugee law, the United Nations Convention on the Rights of the Child and other relevant UN Conventions.

The WV Partnership is committed to a number of external international humanitarian standards and protocols, including the Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disasters, United Declaration of Human Rights, and the UN Convention on the Rights of the Child. Our programs and advocacy are based on these international standards.

WVA partners with WV Field Offices overseas to implement programs in-country. Field Offices are also bound by the WV Partnership Policies, which contributes to mitigating risk of modern slavery in this aspect of WVA's supply chain. World Vision International monitors compliance by Field Offices with WV Partnership policies and provides regular reports to WVA on their capacity building including safeguarding and other areas that relate to modern slavery practices. WVA's project management system has a flag on the safeguarding checklist that requires WVA's country incident managers to check on the quarterly progress of the Safeguarding action plan with the relevant Field Office.

Training

During the Reporting Period WVA conducted procurement and contracting training for all staff in key roles, including at executive level, with purchasing or decision-making power. Training included a focus on due diligence under WVA's Contract and Procurement Policy and relevant procedures, as well as specific requirements under the Act.

WVA information security staff are required to complete safeguarding training annually, and the balance (including volunteers and Board members) are required to complete such training every two years.

Change Coffee – Fair Trade Certification

Cocoa is a high-risk industry for modern slavery. WVA addresses this risk by purchasing certified Fairtrade cocoa and coffee for its social enterprise coffee business, Change Coffee.

Change Coffee is 100% Fairtrade certified. Our coffee and cocoa are Fairtrade certified, traded, audited, and sourced from Fairtrade producers.

6. How WVA assesses the effectiveness of actions being taken to assess and address modern slavery risks

The WV Partnership has a global grievance procedure for staff. WVA has an independent whistle-blowing hotline, and a confidential employee assistance program to encourage staff (and contractors in the case of whistle-blowing) to report on a confidential and anonymous manner any wrongdoing.

All potential Corporate Partners are reviewed in line with WVA's revised Due Diligence Checklist with a risk assessment and possible partnering recommendation provided. All Due Diligence Checklists are then forwarded to Risk for review. If insufficient information has been provided in relation to Modern Slavery risks then further information is sought from the entity. Whether a relationship with the entity is approved will depend on a number of factors, including the level of modern slavery risks exposure posed by the entity and the conditions that need to be imposed should the relationship go ahead.

WVA continues, and will continue, to review all existing partners against the Due Diligence Checklist as their review dates fall due.

WVA is committed to safeguarding of children and vulnerable adults. During the Reporting Period WVA had a dedicated Safeguarding team with a Safeguarding focal point with expertise in preventing and responding to abuse and sexual exploitation. Our safeguarding practices are embedded in WVA and the broader WV Partnership processes including incident management.

WVA conducts regular audits regarding compliance with policies and the effectiveness of its processes, including modern slavery. WVA periodically reviews and updates its policies and processes.

7. Other relevant information

Going forward, WVA remains committed to keeping its policies, procedures and training under review and updating these as needed in order to maximise the contribution it makes to efforts to tackle modern slavery and human trafficking internationally.

This statement has been approved by the board of World Vision Australia and signed on their behalf



Shannon Adams

Chair of the Board of WVA