

2023-2024

Modern Slavery Statement

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A blue-tinted photograph of a wooden chair on a sandy beach. The chair is in the foreground, slightly to the right. The background shows a sandy beach with some coastal plants and a bright, cloudy sky. The overall mood is serene and natural.

Our acknowledgement

We acknowledge and respect Victorian Traditional Owners as the original custodians of Victoria's land and waters, their unique ability to care for Country and deep spiritual connection to it. We honour Elders past and present whose knowledge and wisdom has ensured the continuation of culture and traditional practices. Sovereignty has never been ceded. It always was and always will be, Aboriginal land.

Our Modern Slavery Statement

Coliban Water's Modern Slavery Statement (Statement) is provided as a statement under section 14(1) of the *Modern Slavery Act 2018* (the Act) for the period from 1 July 2023 to 30 June 2024 for Coliban Water (ABN 96 549 082 360).

Our commitment to the Act

We are taking a proactive approach to the management of modern slavery risk by increasing the levels of transparency in our operations and supply chains, and working collaboratively with stakeholders, industry, and suppliers.

Coliban Water is committed to ensuring there is no form of modern slavery or human trafficking within our organisation or supply chains. We seek to ensure our employees and supply chains are not subject to behaviour or threats that may amount to modern slavery.

We are committed to ensuring our approach to tackling modern slavery in our own business and through our supply chains is consistent with Coliban Water's disclosure obligations under the Act.

This Statement sets out actions undertaken in 2023/24 to mitigate the risk of modern slavery in our business and to ensure that where possible, our suppliers hold the same ethos.

Coliban Water's commitment to tackling modern slavery was first demonstrated through our participation in the VicWater Social Procurement Working Group (VSPWG), which helped us to prepare to meet requirements of the Act. The VSPWG provided an opportunity to share resources, lessons learnt, and standardise expectations and processes for suppliers in order to mature the industry-wide responses to modern slavery.

Our structure, operations, and supply chains



Coliban Region Water Authority was established on 1 July 1992 under the *Water Act 1989* (Vic) as a Regional Urban Water Authority (Authority). The Authority became the Coliban Region Water Corporation on 1 July 2007, and operates as Coliban Water.



Our shareholder is the Victoria Government. Our responsible Minister for the period of 1 July 2023 until 30 June 2024 was The Hon. Harriet Shing MP, Minister for Water.



Our core business is providing safe drinking water, sewage and rural water services for public health and environmental protection so our communities can sustain themselves.



We provide urban water and sewage services in accordance with the provisions of Part 8- Water supply and Part 9- Sewerage of the *Water Act 1989* (Vic). Rural customers are supplied under Part 4 Division 2 Section 51 of the *Water Act 1989* (Vic).

Our structure, operations and supply chains



What we do

Harvest, store, treat and distribute water.

Collect (reclaim) sewage, including trade waste.

Treat, reuse and dispose of reclaimed water and biosolids.

About us

We manage:

- Infrastructure assets, property, plant, and equipment with a net book value of \$2.16 billion.
- 34 water reservoirs and service basins.
- 2,391 kilometres of potable and non-potable water mains.
- 19 water treatment plants.
- 73 water pump stations.
- 1 recycled water factory and 62 kilometres of recycled water infrastructure.
- 2,071 kilometres of sewer mains.
- 184 sewer pump stations.
- 16 water reclamation plants.
- 396 kilometres of rural supply channels and mains.

Our supply chain

- Professional Services (Engineering, Project Management, Consultancy)
- General contractors
- Civil services
- Maintenance
- Cleaning
- Chemical supply
- Metering
- IT consulting
- Software licenses
- Software maintenance & support
- Computer Hardware
- Legal services
- Recruitment
- Travel
- Security

Our region



Risks of modern slavery practices at Coliban Water

The heat maps, risk scores, and commentary produced by the completion of a supply chain risk assessment by the VSPWG identified that human rights risks, including modern slavery risks, have been identified across all six portfolios of typical water corporation procurement spend.

The categories of spend within each of these portfolios that presented human rights risks are:



Asset Maintenance portfolio

Ongoing operations and maintenance of facilities, including cleaning, grass cutting, and herbicide application/edge treatment.



Construction portfolio

Construction labour (minor and major projects) and offshore engineering services.



Corporate portfolio

Temporary staff, labour hire and traineeship programs, and security.



Customer portfolio

Debt collection services and customer research services.



Equipment and Material portfolio

Mechanical and electrical equipment and chemical products.



Information Technology Consulting portfolio

Offshore information technology services.

Of these categories, offshore engineering and cleaning services presented high human rights risk, including modern slavery.

The introduction by the Department of Treasury and Finance Victoria of mandatory State Purchase Contracts for specific groups of goods and services in January 2022 contributes to mitigating risk for Coliban Water in the areas of information technology, temporary staffing, and professional advisory services.

When selecting a supplier from a State Purchase Contract, their compliance with the Supplier Code of Conduct is visible to the buyer.

Actions to assess and address these risks

We recognise that to eradicate modern slavery, dedication is required to make a difference to people's lives.

Actions completed in 2022/23



Complete

Continued the incorporation of the principles of the Act into our procurement policy, procedures and templates, including tendering templates.



Complete

Work with existing major suppliers to ensure they have procedures in place to mitigate potential risks and deal with grievances.

We completed this by exploring the modern slavery policies and procedures of our key strategic partners and suppliers.

In some cases, Coliban Water was provided with a copy of each organisation's Modern Slavery Policy documentation, and we will continue to work with suppliers to ensure their practices work to mitigate risks.



Complete

Enhanced engagement with our suppliers and partners:

- Continue to work on building awareness and capability to manage labour rights and modern slavery risk within our supply chain by following up on our provision of the VicWater supplier education material to all of our existing suppliers.
- Continued with the mandatory requirement for all new Coliban Water suppliers to review the modern slavery educational materials, formally commit to the Supplier Code of Conduct, consider their modern slavery risk, and contact us if they have any concerns about their supply chain.

Assessment of the effectiveness of these actions

In 2023/24, Coliban Water focused on mitigating risks associated with modern slavery by enhancing the capabilities of our suppliers and the individuals responsible for procurement decisions and supplier relationship management. This initiative was aimed at creating a robust framework to prevent, identify, and address any potential issues related to modern slavery within our supply chain.

To support this objective, we utilised the VSPWG toolkit. This toolkit provided a comprehensive suite of educational materials and established a structured resolution process for addressing grievances. The deployment of these resources has been positively received and has contributed to raising awareness and understanding of modern slavery issues among our stakeholders.

Despite these efforts, it is important to note that no instances of potential modern slavery risks have been reported to Coliban Water to date. While this is a promising outcome, it presents a challenge in assessing the real-world effectiveness of our engagement strategies and tools. The absence of reported incidents makes it difficult to gauge whether our initiatives have been successful in practice.

Looking ahead, we are committed to refining our approach to enhance our understanding of how our major suppliers manage modern slavery risks. Our future actions will involve a more targeted strategy, focusing on in-depth engagement with key suppliers. By working closely with these suppliers, we aim to gain clearer insights into their practices and risk management processes. This will enable us to evaluate the effectiveness of our educational and support mechanisms more accurately and make any necessary adjustments to strengthen our overall approach to combating modern slavery.

Planned from Actions from 2023/24

Communication

Communicate with suppliers via survey regarding how they manage their own modern slavery risks.



We implemented this strategy for our key partners, which enhanced our visibility and enabled us to identify and address areas requiring follow-up.

Collaboration

Collaboration with other Water Corporations



Engaging in discussions and conducting benchmarking against other Modern Slavery Statements has proven effective.

Education & Documentation

To ensure compliance with the Act, Modern Slavery is included as a condition of tendering in all documents.



We will maintain the inclusion in Part A Conditions of Tendering, as it has proven effective and enhanced visibility for suppliers.

Actions adopted in 2023/24 - Ongoing



Employment Policies

Employment policies at Coliban Water help ensure all recruitment policies are consistent, applied fairly, and reduce the risk of modern slavery for our people.



Organisational Policies

All organisational policies are assessed against the *Human Rights Act 2006*, prior to being applied



Employee Inductions

Modern slavery is included in employee inductions as well as our procurement procedures and templates, including tendering templates.



Collaboration

Ongoing collaboration with suppliers is important for building trust, transparency, and to reduce the risk of negative impacts to people in our supply chains.

Actions that remain in place or will be adopted in 24/25 or beyond

Target Date
30 June 2025

- Communicate with suppliers regarding how they are managing their own Modern Slavery risks.
- Communicate with suppliers flagged as having high- risk activities.
- Ensure compliance with the Act is included as a condition of tendering in all tendering documents and conduct audits to ensure compliance.
- Continue to provide Modern Slavery education to all new Coliban Water suppliers and employees.
- Add Modern Slavery risk assessment to the pre-planning stage of procurement lifecycle.
- Customise tender documentation to meet the outcomes of this risk assessment.

Consultation Process

We do not own or control any other entities and therefore this criterion is not applicable.

Approval

This statement was approved by the Board of Coliban Water in its capacity as principal governing body of Coliban Water on 18 October 2024.

A handwritten signature in black ink that reads "Bob Cameron". The signature is written in a cursive style with a period at the end.

Bob Cameron
Chair

