

World Vision Australia Modern Slavery Statement for the Financial Year 2020/21



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WORLD**

World Vision Australia

Modern Slavery Statement for the Financial Year 2020/21

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 FY21 over \$100m.

This is a modern slavery statement as required under section 13 of the Act (**Statement**) for the financial year 1 October 2020 to 30 September 2021 (**Reporting Period**).

This Statement outlines WVA's continued efforts to tackle 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).

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 to adhering to the ACFID Code of Conduct and 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 as at 30 September 2021 was approximately 510, comprised of 340 full-time, 66 part-time and 104 casual employees.

WVA does not own or control any separate legal entities and is therefore not required to report on the criterion described in section 16(1)(f) of the Act.

World Vision International Partnership

WVA is part of a global network of entities which together form the World Vision Partnership (**WV Partnership**). The WV Partnership delivers 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).

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. We collaborate with people of different faiths and people of no faith 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 partner 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 align 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 approximately 100 countries around the globe, predominantly in Africa, Asia and the Pacific, 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 engages various suppliers to carry out activities that further WVA's charitable purpose, including in the areas of fundraising, marketing, IT, office facilities and employment. WVA does not work directly with many suppliers in sectors which are particularly vulnerable to modern slavery such as extractives, construction or fishing. WVA engages a small number of suppliers in the high risk industries of clothing and apparel, electronics, cleaning and cocoa. WVA has policies and procedures in place as described in this Statement to mitigate the risk of modern slavery affecting its supply chains.

Programs financed by WVA-raised funds are mostly delivered overseas 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 WV programs. All WV Partnership entities are subject to WV Partnership policies (described in section 5 below) that contribute to reducing modern slavery risk by promoting human rights and high ethical standards. In some circumstances, WVA partners with non-World Vision entities for program implementation overseas and enters into appropriate contractual arrangements with these entities which include clauses to mitigate risks of modern slavery.

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

Additionally, WVA engages with a range of private donors and corporate partners that provide voluntary support for our fundraising and advocacy activities. Prior to entering into these partnerships, a thorough due diligence process is undertaken by WVA as further detailed in section 5.

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

WVA uses tools such as the [Global Slavery Index](#) as part of its approach to identifying modern slavery risks in WVA's operations and supply chains. Key areas of risk are discussed below.

Domestic Suppliers

In assessing domestic operations for modern slavery risk, WVA takes the approach of separating operations into high and low risk categories, focusing on high risk categories as a priority. High risk operations include supplier engagements which involve specific high risk countries or industries. Supplier engagements at WVA identified as high risk include events and campaigns involving provision of textiles or fashion items manufactured internationally, procurement of IT or electronic hardware for organisational operations, cleaning services, and supply of agricultural goods such as coffee beans for domestic roastery

operations and cocoa. The remaining domestic operations across the organisation are considered low risk and predominantly relate to local service providers.

Corporate Partners

WVA engages with like-minded corporate partners that share WVA's vision to serve the world's most vulnerable children and wish to support our fundraising and advocacy activities. WVA staff routinely complete a due diligence checklist to identify key risks of prospective partnerships. The due diligence checklist includes comprehensive questions related to child and adult labour, exploitation and specific questions to assist with the identification and assessment of modern slavery risks within the potential partner's supply chains. These questions focus on countries, industries and supply chains with high risks of modern slavery.

During the Reporting Period, our due diligence enquiries identified two organisations with potential modern slavery issues in their respective supply chains. As a result, WVA will not enter into a funding partnership with these entities. Through this due diligence process, WVA also identified two organisations lacking documented policies in relation to human rights and modern slavery. Prior to any ongoing partnership with these entities, WVA would work with these parties to understand their position and processes in relation to the management of modern slavery in their supply chains. At this stage, partnership arrangements with these entities have not progressed.

Field Offices

WVA, through WV Field Offices, operates in certain areas of the world which have a higher risk of modern slavery.

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

Screening and Due Diligence

WVA conducts criminal record checks and working with children checks for key personnel of domestic contractors who have access to children or child data held by WVA. As many modern slavery practices also amount to criminal offences, these checks help to reduce the risk of WVA engaging with parties who have been convicted of crimes that undermine human rights and safeguarding.

WVA conducts due diligence, including modern slavery risk assessment, for suppliers that fall within the scope of WVA's procurement process. Suppliers identified as operating in high risk categories in section 4 above must complete a modern slavery declaration form (if they have not already done so as part of their tender response) to explain their approach to mitigating risks of modern slavery within their organisation and supply chains prior to progressing to further procurement stages.

High risk suppliers must also address on the modern slavery declaration form whether they comply with the United Nations International Labor Organization 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 prohibit modern slavery, and explain the employment conditions they offer to workers.

All prospective corporate partners are assessed in line with WVA's due diligence checklist (discussed in section 4 above) which includes targeted questions to assist with the identification and assessment of modern slavery risk in a prospective partner's business and supply chains. Once completed, the due diligence checklist is then forwarded to WVA's Risk team for review. Whether a relationship with the entity is approved by WVA Risk will depend on a number of factors, including the level of modern slavery risk exposure posed by the entity and the conditions that need to be imposed should the relationship go ahead. If insufficient information has been provided in relation to modern slavery risks, further information is sought from the prospective partner to determine whether the entity meets the high ethical standards that are pre-requisite to WVA entering into a partnership.

Contracts

WVA enters into written agreements with suppliers, contractors, corporate partners and program implementation partners on appropriate terms and conditions to ensure that a high level of transparency, accountability and ethics is upheld by third parties with whom we work. Contractual obligations include,

for example, assurances that the counterparty employs practices consistent with those under relevant employment and labour laws, a requirement for the counterparty to take reasonable steps to minimise the risk of modern slavery in its supply chains, and a commitment to WVA's Modern Slavery Act Compliance Protocols (discussed below). For service providers assessed as having a higher risk of unlawful employment activities such as cleaners, WVA obtains a specific letter of assurance of contractual compliance from the provider in relation to employment practices.

Where a third party has access to children or adult beneficiaries of WV programs or personal data about those individuals, the counterparty is contractually bound to comply with WVA's Safeguarding Behaviour Protocols to minimise risk of sexual exploitation and other forms of harm and slavery-like practices.

During the Reporting Period, WVA developed a Supplier Code of Conduct that sets out the minimum legal, ethical, social and environmental standards WVA expects its suppliers to meet. The Supplier Code of Conduct is incorporated by reference in WVA's standard form supplier contracts and includes a range of measures to address and minimise the risk of modern slavery in WVA's supply chains, including a requirement for suppliers to adhere to WVA's Modern Slavery Act Compliance Protocols. Amongst other things, these Protocols identify the actions WVA requires suppliers to take to prevent modern slavery and the process for engaging with WVA if a supplier identifies a case of modern slavery. The Supplier Code of Conduct also requires WVA's suppliers to commit to human rights, fair employment practices and ethical business activities in their supply chains. Specific standards are detailed in the Supplier Code of Conduct in relation to areas such as working conditions, wages, immigration, lawful subcontracting and how to report concerns via WVA's complaints or whistleblowing mechanisms. Collectively, these measures contribute to WVA assessing and addressing modern slavery risk in its supply chains by establishing contractually binding, high standards of conduct for suppliers to satisfy.

Additionally, WVA's procurement process and key tender document templates require tenderers to explain their approach to mitigating risks of modern slavery in their supply chains. Responses provided are taken into consideration when evaluating and selecting successful candidates.

Remediation process

WVA has a range of remediation mechanisms and processes in place to address various instances of human rights violations, including cases of modern slavery.

WVA has an independent whistle-blowing hotline, to encourage staff, contractors and range of other eligible parties to report misconduct in a confidential and anonymous manner. WVA also has confidential employee assistance program to encourage staff to raise grievances about misconduct within WVA. The WV Partnership maintains similar global grievance procedures.

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. This Policy prohibits a range of behaviour that is consistent with the meaning of modern slavery (see section 5.ii below). For more information on our grievance procedures please refer to WVA's [Complaints Policy](#) and [Child and Adult Safeguarding Policy](#) on our website.

WVA's standard form contracts with suppliers, corporate partners and implementation partners typically include dispute resolution provisions (including an escalation mechanism) if a concern arises during the engagement. Remedial action may include ending our business relationship with entities that do not adequately address modern slavery risks or take appropriate action to respond to a case of modern slavery within their business or supply chains.

Policies

There are a range of policies that contribute to assessing and addressing risks of modern slavery in operations and supply chains within WVA and the WV Partnership, including the following:

i. Relevant WVA Policies

Contract and Procurement Policy – requires WVA to manage its contracting and procurement practices in a manner that upholds high ethical standards. This policy also requires staff to conduct procurement due diligence on suppliers, including in relation to modern slavery and compliance with the Act.

Child and Adult Safeguarding Policy – WVA subscribes to the WV Partnership Child and Adult Safeguarding Policy described below under section 5.ii.

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

Protected Disclosure Policy – 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 applicable 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 – 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 Partnership Global Supply Chain Management Procurement Manual – sets out principles of sustainable procurement, including in relation to social impact. It includes a WV Partnership supplier code of conduct requiring suppliers of Field Offices to observe international labour conventions and comply with WV's Child and Adult Safeguarding Policy and Protocols.

WV Child and Adult Safeguarding Policy – prohibits sexual exploitation, illegal, unsafe or abusive behaviour toward child and adult beneficiaries of WV programs, exploitative transactions, 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, suppliers, partners, and others affiliated with partners or contractors, to address safeguarding risks relating to their engagement with WV's work. All WVA employees, volunteers, interns, and Board members sign an acknowledgement that they know, understand and will follow the safeguarding policy.

WV Partnership Guide to Humanitarian Standards – a comprehensive guide that explains the 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 WV's humanitarian work, and affirms, among other things, principled humanitarian action and humanitarian protection e.g.: 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 Non-Governmental Organisations 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 discussed above, 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. Further, WVA's project management system requires WVA's country incident managers to check on the quarterly progress of the safeguarding action plan with the relevant WV Field Office.

Training

WVA routinely conducts procurement and contracting training for staff in key roles with purchasing or decision-making power. When this training is undertaken, it includes a focus on due diligence under WVA's Contract and Procurement Policy and relevant procedures, as well as specific requirements under the Act.

All WVA staff are required to complete safeguarding 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

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

WVA is committed to approaching its modern slavery obligations with a mindset of continuous improvement and seeking opportunities to better its practices and procedures over time. Moving forward, WVA has recently established a working group of key internal stakeholders that meet on a regular basis to assess whether our modern slavery practices and procedures are effective.

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 tackle modern slavery and human trafficking.

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



Shannon Adams
Chair of the Board
World Vision Australia