



Save the Children Australia's Modern Slavery Statement
For the financial year 1 January to 31 December 2021

Modern Slavery Position

Save the Children Australia (**SCA**) welcomed the introduction of the *Modern Slavery Act 2018* (Cth) as it is consistent with SCA's own values and mission. Save the Children is the world's leading independent organisation for children. Modern slavery, including trafficking, forced labour, as well as forced recruitment for armed conflict, prostitution, pornography and other illicit activities represents some of the worst children's rights violations in existence. Save the Children works with many children around the world who have experienced or are at risk of these forms of slavery. As a collective movement, we help address the root causes of modern slavery, as well as support rehabilitation of those affected and protect them from further harm.

SCA's structure, operations and supply chain

SCA is a charitable organisation registered in Australia as a public company limited by guarantee. SCA is one of 30 members of the Save the Children Association, a Swiss entity. SCA directly implements projects in Australia, Papua New Guinea, Solomon Islands, Tonga and Vanuatu. Save the Children International (a UK entity) implements international projects in non-member countries around the world on behalf of the members of the Save the Children Association.

SCA is the parent company of a number of entities whose missions align with that of Save the Children, including the Save the Children Impact Fund Ltd, Child Wise Ltd, the Centre for Evidence and Implementation Ltd and Library For All Ltd. These entities operate from Singapore, United Kingdom, New Zealand, United States, Sweden and Norway.

SCA's main operations consist of fundraising, campaigning, advocacy on child rights and protection, and implementing programs in the fields of health, education and child protection in Australia and overseas. Our fundraising activities include selling second-hand clothing in opportunity shops around Australia. In addition, the operations of some of SCA's controlled entities include consulting and research, impact investing and providing training on child safeguarding. SCA has over 1000 employees.

SCA's supply chain includes partners and contractors we work with to deliver programs for children; property services including cleaning, maintenance, utilities, waste management, and security contractors; travel services, including fleet and airline providers; information, communication and technology suppliers; equipment purchases for offices and programs; and clothing retailers who donate excess stock to our opportunity shops.

Risks of modern slavery practices in the operations and supply chains of SCA and entities it controls

As a rights-based organisation, SCA is committed to respecting and safeguarding human rights in all organisational decisions and actions.

SCA and its related entities are not involved in manufacturing, mining or agriculture, which are typically high-risk activities for modern slavery. As a charity primarily conducting fundraising, advocacy and providing services, SCA has assessed the risk of modern slavery within its direct business operations to be low. The operations and supply chains of SCA's related entities have also been assessed as relatively low risk for modern slavery. However, SCA recognises that there are risks of



modern slavery in all sectors and SCA is committed to taking steps to eliminate, as far as possible, the risk of modern slavery taking place in our organisation and supply chains.

Actions taken by SCA and the entities it controls to assess and address these risks, including due diligence and remediation processes

SCA is committed to ensuring there is no modern slavery in our supply chains or any part of our business. During the 2021 reporting period, SCA took the following actions to assess and address the risk of modern slavery in our organisation and supply chains:

- Continued to seek advice regarding the development and refinement of our modern slavery framework as it matures.
- Continued to map our suppliers to assess the risk of modern slavery in our supply chains, noting that this has been more challenging than anticipated and as a result, progress has been incremental.
- Continued conversations with suppliers about modern slavery, including encouraging a number of suppliers to adopt their own modern slavery approaches.
- Formally approved a Modern Slavery Policy which is communicated to employees via SCA's intranet.
- Drafted a set of Supplier Minimum Standards to be provided to suppliers.
- Continued to review various supply contracts to ensure appropriate modern slavery provisions have been inserted.
- Raised awareness of the importance of modern slavery with employees involved in procurement.
- Made a submission to the Department of Foreign Affairs and Trade (DFAT) on the International Strategy on Human Trafficking and Modern Slavery, highlighting our support for the proposed objectives of the strategy and offering recommendations for tackling trafficking and modern slavery of children.
- Contributed to the Solomon Islands Third Cycle Universal Periodic Review by making a submission to DFAT supporting advocacy efforts to act on human trafficking

In addition to the steps outlined above, SCA's wider policy framework addresses modern slavery risks in the following ways:

- Code of Conduct – This is the key staff ethical policy which sets out expectations for the personal and professional behaviour of all SCA employees, volunteers, ambassadors, consultants and visitors. It states that we endorse the concept of human rights in general and children's rights in particular, and commit to respecting and safeguarding those rights in all decisions and actions.
- Child Safeguarding Policy – The Child Safeguarding Policy sets out standards for staff and partners regarding identifying and reporting child exploitation and abuse.
- Donation Acceptance and Refusal Policy – This Policy governs the acceptance of donations in situations where there is a perceived risk to SCA's programming, reputation, financial position or brand in accepting a donation.
- Staff & Partner/Supplier Vetting Guidelines – These Guidelines outline SCA's approach to vetting new partners and suppliers. The vetting activities performed in accordance with these Guidelines may assist SCA to identify partners or suppliers who have committed modern slavery offences.
- Whistleblower Policy and complaints mechanism – The Whistleblower Policy and publicly available complaints mechanism on the SCA website allow anyone to raise concerns



anonymously, including concerns about modern slavery. This policy framework also applies to the entities SCA controls.

SCA has for several years been involved with the following organisations and initiatives which address modern slavery issues. For example:

- SCA made a submission to the inquiry conducted by the Australian Parliament’s Joint Standing Committee on Foreign Affairs, Defence and Trade into establishing a Modern Slavery Act (the **Joint Standing Committee Inquiry**) in Australia and appeared at a public hearing for the inquiry.
- SCA was a founding member of Rethink Orphanages, a global cross-sector coalition working to prevent unnecessary child institutionalisation that highlights orphanage trafficking as a form of modern slavery involving children.
- SCA contributed to a report by Rethink Orphanages regarding recommendations made in the Joint Standing Committee Inquiry’s final report, “Hidden in Plain Sight”.
- SCA edited and co-authored a book titled “Modern Day Slavery and Orphanage Tourism” and has engaged in public advocacy on these issues.
- SCA made a submission to the Department of Foreign Affairs and Trade on the International Strategy on Human Trafficking and Modern Slavery, highlighting our support for the proposed objectives of the strategy and offering recommendations for tackling trafficking and modern slavery of children.
- SCA has collaborated with other civil society organisations on advocacy activities aimed at ending modern slavery.
- Child Wise Ltd (SCA’s wholly owned subsidiary) developed training for a client on the safeguarding of children and vulnerable adults in international contexts. The training covered the obligations of businesses under the *Modern Slavery Act 2018* (Cth).

Process of consultation with entities SCA owns or controls

SCA and its controlled entities are closely integrated and receive support from the same central finance, human resources, risk, safeguarding, business services, technology, and legal teams. The actions we have taken to assess the risk of modern slavery in our supply chain and operations are based on a holistic assessment of the activities and operations of SCA and its related entities. All SCA group Policies, Guidelines and Procedures are developed and approved in accordance with the SCA Policy Framework. This Framework includes a process for mandatory consultation, which includes consultation with all SCA controlled entities.

Effectiveness of actions taken to date

We believe the actions taken to date provide a good foundation for SCA and its controlled entities to develop its modern slavery program. Our progress has been slower than anticipated due to impacts on resourcing as a result of the pandemic and staff turnover.

We recognise the importance of this work to our mission and have allocated sufficient resources to advance progress in the 2022 reporting year.

Looking forward

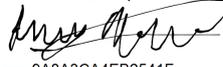
Modern slavery is a multi-faceted issue requiring ongoing attention. Having regard to the challenges experienced in the last reporting periods, SCA has committed additional resources in 2022 to progress this very important work. Our key areas of focus for the 2022 reporting period are to:



- Continue mapping of current suppliers and identify 'high risk' categories.
- Undertake a risk assessment of current partners/suppliers to identify those that are 'high risk'.
- Further develop our approach to due diligence, and any assessment tools we can use on new suppliers.
- Arrange for formal approval of the Supplier Minimum Standards and a set of Modern Slavery Guidelines to further assist in identifying and mitigating risks of modern slavery in SCA's operations.
- Communicate the Supplier Minimum Standards to new suppliers at the beginning of each new relationship.
- Continue to raise awareness and build the capacity of employees to understand modern slavery issues and understand their role in helping to mitigate the risks of modern slavery within SCA's operations and supply chains.
- Review the Partner/Supplier Vetting Guidelines to strengthen the consideration of modern slavery requirements.
- Align modern slavery due diligence with broader procurement process.
- Continue to update our contract templates to include a modern slavery clause.

SCA as an organisation is committed to continuing to protect, respect and fulfil the human rights of all people, particularly children, through our actions to eradicate modern slavery.

This Modern Slavery Statement was approved by SCA's Board on 26 May 2022.

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Larry Kamener

Chair of the Board

30 June 2022

This statement is made by Save the Children Australia (ACN 006 610 035 with its registered office at 33 Lincoln Square South, Carlton, Victoria 3053) and constitutes our modern slavery statement for the financial year ended 31 December 2021.