



This statement has been published on behalf of **BBC Studios Australia Holdings Pty Ltd (ABN: 85 127 624 104, "BBC Studios Australia")** for the financial year ended March 31st 2021, in accordance with the Australian Modern Slavery Act 2018.

Introduction

BBC Studios Australia is a wholly owned Australian subsidiary of **BBC Studios Ltd**, the principal commercial subsidiary of the UK's publicly funded broadcaster the **BBC**. Our purpose is to create and distribute world-class content that informs, educates and entertains, strengthening the BBC both creatively and financially through our commercial activities.

We have a strong commitment to ethical trading and corporate human rights, in keeping with BBC values. Our policies and procedures are largely set by our head office in the UK but they are fully embedded within BBC Studios Australia, with key compliance procedures carried out by our local teams.

BBC Studios General Counsel in our UK head office has executive ownership of ethical trading on behalf of all subsidiaries, including BBC Studios Australia. We also have access to advice from a dedicated team of subject matter experts in the UK to help guide our ethical trading activities.

Our strategy and activities are overseen on a quarterly basis by the **Compliance and Risk Committee**, made up of key members of the company's most senior executives.

We are committed to the principles of cross-industry collaboration in tackling modern slavery and other forms of labour exploitation. Through our parent company, we are a member of the **[TV Industry Human Rights Forum]**, the **[Ethical Trading Initiative]** and **[Sedex]**, all of which are multi-stakeholder initiatives that bring together companies to tackle labour exploitation risks through shared approaches and actions.

Our business

Our commercial activities are divided into two lines of business: **Production & Distribution** and **Branded Services**.

Production & Distribution is responsible for the creation of programmes for the BBC and other content commissioners, as well as the subsequent commercial sale of titles in the UK secondary window and international market. It also licenses the intellectual property relating to our content to specialist third party companies, who produce live events and consumer products based on these programmes.

The Branded Services line brings these programmes to Australian audiences through broadcast on BBC branded channels and services, including **BBC First, BBC Earth, BBC UKTV, Cbeebies, BBC Brit** and **BBC Kids**.

As BBC Studios Australia is a holding company which is used primarily for consolidated reporting, its production and distribution activities in Australia are carried out and managed in Australia through its subsidiary trading company: **BBC Studios Australia Pty Ltd (ABN: 20 129 255 616)**. BBC Studios Australia's other subsidiary: **BBC Studios Productions Australia Pty Ltd (ABN: 47 129 527 082)** is dormant and was inactive for the financial year ending March 31st 2021.

We consulted these subsidiaries in the development of this statement. We note that these subsidiaries operate within the same compliance risk assessment framework as BBC Studios Australia Holdings Pty Ltd and the same consultation process has applied across these entities

Our office is located in Sydney and we have approximately 101 full-time employees.

Our operations and supply chains and associated forced labour risks

The supply chains for our operations and commercial activities are varied and complex. For example:

- Within our office, we use contractor companies for key services such as cleaning and security.
- Within Production, we rely on the services of freelancers to help make our programmes, supported by contractors such as riggers, caterers and security, as well as post-production houses for the editing of the finished programmes.
- In Distribution, we use the services of post-production houses in the UK to deliver our content to Australian broadcasters. For our live events business we work with licensees who contract with venues for our shows, who in turn often contract with labour service providers.
- Within consumer products, we work with a number of licensees who source a wide range of product types from manufacturers in Australia and other countries across the globe, with China the most significant country of origin.

Our research continues to show that the most significant risk of forced labour is within our licensees' global manufacturing supply chains, particularly where migrant workers are commonly employed.

For example, migrant workers in many countries may be required to lodge their identity cards with their employer, thereby restricting their ability to freely leave their employ, or may be subject to mandatory overtime. Migrant workers may also be required to pay recruitment fees to local agents in their home countries in order to secure employment, which puts them at risk of debt bondage.

Our approach to assessing our suppliers is therefore based on where the greatest risk of labour exploitation may be found. For more on this, see *Due diligence and risk management through our ethical trading programme* below.

Our policies in relation to modern slavery and forced labour

Central to the way in which we do business is the **BBC Studios Ethical Trading Policy**, which BBC Studios Australia has also adopted. It is modelled on the ETI Base Code and makes reference to key **ILO Conventions & Recommendations**, in addition to key legislation and frameworks such as the **UK and Australian Modern Slavery Acts** and the **UN Guiding Principles on Business & Human Rights**.

It is a public document that can be viewed on our website and it forms part of all contracts with suppliers and licensees. It is reviewed regularly and updated as necessary.

The policy sets our requirements on labour standards within the supply chains of our licensees and suppliers and includes the requirement for appropriate remedy where workers' rights have been breached.

It is prefaced by a list of minimum standards that suppliers must meet, the first of which addresses forced labour.

Due diligence and effective risk management through our Ethical Trading Programme

BBC Studios operates an **Ethical Trading Programme** in order to assess and mitigate forced labour risks.

The programme incorporates principles of due diligence and risk management, using independent data sources to help identify those areas of our operations and supply chains where risks of exploitation may be greater. These risks will often depend on the geographical region and/or sector where our activities are taking place and so we manage our response accordingly.

Our approach is one of continuous improvement, as we acknowledge that not everyone will immediately be able to meet our standards in full. However, we take a zero-tolerance approach to the most serious rights abuses, as set out in our minimum standards. These issues must be addressed before BBC Studios can begin to work with a supplier.

The wide range of products made by our licensed consumer products businesses are sourced from manufacturers all over the world, often in countries where the risk of poor labour practices may be higher. As such, the factories that form these supply chains are a key area of focus for the business. While the licensing model means we do not select the factories ourselves, we work closely with our licensees to assess their chosen factories and to identify and rectify areas of concern.

As part of this ongoing assessment process, BBC Studios utilises independent ethical audits for sites located in higher risk countries and sectors and employment profile assessments (EPAs) in lower risk territories. EPAs help identify any risk indicators of forced labour and other serious issues to determine if further due diligence may be required.

All first tier manufacturing sites must go through this assessment process and our product approval system is linked to our ethical policy database; if a site has not been approved then production approval cannot be granted. This direct link helps drive the effectiveness of our programme by motivating licensees and suppliers to make real improvements to working conditions within their supply chains.

Our programme also includes the use of secondary, forensic assessments to enhance our due diligence procedures. These assessments are carried out by independent labour standards experts and are often accompanied by members of our internal team, though see below for the impact of Covid-19 on this activity.

Our actions in the last financial year

In 2020/21, BBC Studios Australia undertook the following actions to further mitigate the risks of exploitation within our operations and supply chains:

Covid-19 response

Coordinated by the central ethical trade team, BBC Studios sought to identify those business areas and supply chains where the pandemic may have led to a heightened risk of labour rights violations, including health and safety or forced labour.

We collaborated closely with partners and industry organisations to develop a pragmatic yet robust response to the risks, ensuring that worker welfare remained the focus of any decision making. To support this work, Covid-19 specific guidance was developed for both our consumer products and labour service supply chains.

TV production supply chain grievance mechanism

For many years BBC Studios has had in place a whistleblowing hotline that is available to all staff (whether internal or external) who wish to raise concerns about misconduct, malpractice or any type of wrongdoing that may impact others.

In early 2021, we started to focus on promoting the hotline to those in ancillary roles and/or employed by third parties. We worked with one of our Australian productions to raise awareness of the hotline as a grievance mechanism for anyone working on the production, whether or not they were directly employed by BBC Studios.

This piece of work has emphasised the availability of the mechanism to all workers on set and highlighted the issues that should be reported, including forced labour. Feedback via an anonymous survey provided useful insights that will be built on going forward.

Mandatory training

In October 2020, we introduced new **Code of Conduct** e-learning, which is mandatory for all employees and freelancers across the BBC Studios Group. As part of a general introduction to key company policies, it provides an overview of our modern slavery policies and mitigation practices.

The central ethical team was also able to provide targeted support and guidance to colleagues in BBC Studios Australia via video calls and continued to provide a range of ethical trading guidance documents for both colleagues and external partners.

Looking ahead

As the impact of Covid-19 will continue to be felt across many key sourcing countries in the coming year, managing emerging risks in our consumer products supply chains will remain a priority for BBC Studios. In those areas where restrictions have or are easing, we will look to resume any work that may have slowed or been put on hold owing to the pandemic.

Updated Ethical Trade training to support the Code of Conduct training is also planned to be introduced in the coming year.

BBC Studios will continue to engage with industry organisations to support and participate in collaborative responses whenever possible.

This statement has been approved by the [[BBC Commercial Holdings Board](#)] at their meeting on 13th July, 2021.

DocuSigned by:

E079ACD040D84CA...

28 September 2021

Martyn Freeman

General Counsel, BBC Studios