

Modern Slavery Benchmarking Tool

Performance Results and Recommendations

ID: 209

Country: australia

Industry: technology-communications

Score: 23

Total possible score: 30

Referrer: <https://www.walkfree.org/resources/>

Report URL: <https://cdn.walkfree.org/exports/modern-slavery-report-230804-063212-1828.html>

Created at: 2023-08-04 14:32:12

Survey ID: 24990

QUESTION: Responsibility

How can we improve? Not Applicable

QUESTION: Strategy

How can we improve?

Embed modern slavery policies into operational procedures and contractual provisions relating to:

- Your organization's workforce (HR policies, employment contracts, ethical recruitment policy);
- Suppliers, recruitment agencies and contractors (recruitment policies/Employer Pays Principle, procurement procedures, supplier code of conduct, contracts);
- Contractual provisions that, amongst other things, enable monitoring (e.g. audits, inspections, reporting of grievances) and require suppliers to assess their own suppliers modern slavery risk and commit to managing it.

Inform relevant departments (such as HR, Procurement, Legal and Risk) and all suppliers and other business relationships (such as joint venture partners) of modern slavery policies, procedures and contractual provisions. Conduct training for current employees and suppliers, and as part of employee induction or supplier onboarding to increase awareness and improve compliance.

Establish a monitoring framework and process to track implementation and develop responses and remedies for breaches such as Self-Assessment Questionnaires, audits and inspections, worker and supplier engagement, and corrective action plans.

QUESTION: Policy Commitment

How can we improve? Not Applicable

QUESTION: Policy Implementation

How can we improve? Not Applicable

QUESTION: Reporting

How can we improve?

Identify the specific type of modern slavery risks if possible (such as forced labor, child labor, debt bondage, deceptive recruitment practices, etc), where it occurs in your operations and value chain, what its relevant indicators are (such as loss of freedom of movement, failure to check worker age, payment of recruitment fees, or complaints about contract substitution, etc), and whether you cause, contribute or are directly linked to the risk.

Prioritize the salient risks in your modern slavery risks for attention based on severity and likelihood:

- Assess the severity of the impact on the people affected, considering how grave the impact would be, how widespread (i.e., how many people would it affect) and how hard it would be to remediate the resulting harm; and,
- Consider the likelihood of risk occurring (noting that the most severe risks should be prioritised even if there is a low likelihood of occurring).

QUESTION: Risk Assessment

How can we improve? Not Applicable

QUESTION: Our Employment Practices

How can we improve? Not Applicable

QUESTION: Supplier engagement and due diligence

How can we improve? Not Applicable

QUESTION: Purchasing practices

How can we improve? Not Applicable

QUESTION: Grievance mechanisms

How can we improve? Not Applicable

QUESTION: Response and Remediation

How can we improve?

Develop a remediation framework that clearly sets out steps to take to investigate and remediate a breach or an incident. It involves:

- responding to individuals that have been harmed; and,
- preventing and mitigating potential harms.

Investigation includes collecting and verifying information (ensuring witnesses or interviewees are protected from retaliation or reprisal), identifying if harm has occurred and developing responses to address it.

Consider these principles as part of the framework:

- Remediation should aim to “make good” the harm and restore the individual or group to the position they were in before suffering harm. This may involve a range of actions, such as facilitating access to health, legal or psychosocial services, repatriation or financial compensation.
- Your role in providing remediation will depend on how you are connected to the harm – i.e., whether your activities caused, contributed to or were directly linked to it. It may involve providing remedy directly or using your leverage to require others to take action.
- Consider the channels by which breaches or incidents might be identified or received including due diligence and grievance mechanisms.

The remediation framework should also:

- Assign responsibility for leading and managing the framework;
- Ensure the executive and Board are kept informed throughout the process;
- Require reviewing the breach or incident following remediation to identify lessons learned and the mitigation and prevention actions required, including ongoing due diligence regarding the risks related to the breach or incident.