

# Modern Slavery Benchmarking Tool

## Performance Results and Recommendations

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**ID:** 175

**Country:** australia

**Industry:** property-construction-real-estate

**Score:** 25

**Total possible score:** 30

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

**Report URL:** <https://cdn.walkfree.org/exports/modern-slavery-report-230622-054940-1898.html>

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**QUESTION:** Responsibility

How can we improve?

Adopt and publish policies that set out the organization's commitment to and principles/standards for addressing modern slavery. These may include:

- Human Rights Policy, Modern Slavery Policy and/or Forced and Child Labor Policy
- Ethical Recruitment Policy and/or Employer Pays Principle
- Procurement Policy and/or Supplier Code of Conduct (including provisions on modern slavery)
- Human Resources policies including complaints handling policy
- Grievance Mechanism and Whistleblower Policy
- Investment Policy or Framework
- Remediation Policy or Framework

**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?

Ensure there is a process for reporting modern slavery risks and incidents internally to the executive and Board. This should include

Ensure there is a process for reporting modern slavery risks and incidents internally to the executive and Board. This should include information regarding:

- number of critical breaches of your policies relating to modern slavery;
- number of modern slavery incidents or grievances;
- responses and remedies proposed or provided in relation to breaches and incidents; and,
- analysis of breaches and incidents, and lessons learned for preventing or mitigating them.

Establish how the organization will report publicly on modern slavery risks and incidents, including complying with legal reporting obligations.

QUESTION: Policy Implementation  
How can we improve? Not Applicable

QUESTION: Reporting  
How can we improve? Not Applicable

QUESTION: Risk Assessment  
How can we improve?

Assess employment practices to ensure workers do not face exploitative treatment, making them vulnerable to modern slavery. Identify any practices that need to be improved.

The full list of checklist questions asked are included below for your reference.

- Are workers paid a living wage?
- Are workers paid their wages and other benefits on time?
- Are workers required to work excessive overtime?
- Do workers pay recruitment fees or other fees to get the job?
- Are workers in situations of debt bondage?
- Do workers have safe and sanitary working and living conditions?
- Do workers have contracts in a language they understand?
- Do workers have access to passport/ID documents at all times?
- Are workers free to leave their employment or accommodation at all times?
- Do we ensure workers' interests are adequately represented, including by respecting worker rights to join trade unions or workers associations?
- Are all workers' ages checked and child labor prevented?
- Does discrimination occur in the workplace?

QUESTION: Our Employment Practices  
How can we improve?

Design and implement an ongoing due diligence process for assessing and addressing modern slavery risks that is approved by the Board and communicated to employees and suppliers. This involves identifying modern slavery risk and incident, taking action in response to what is identified, tracking responses to make sure they are working, and communicating how risk and incidents are addressed. Reporting, policies and risk assessment have been covered above and are part of this process.

Monitoring should be added to build a complete due diligence approach including:

- Asking suppliers questions about their workforce, worksites, labor practices, policies and processes for preventing forced and child labor (e.g. Self-Assessment Questionnaires);
- Visiting the supplier's site or facilities;
- Conducting a social audit;
- Engaging with their workers through surveys, interviews, or other technology such as mobile phone apps (this may be conducted as part of an audit or, ideally, established as a channel for ongoing communication with workers);
- Using other risk assessment tools e.g. traceability and risk mapping tools;
- Engaging with a civil society organization(s) to support understanding of risks.

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? Not Applicable