

Community Partner Modern Slavery Toolkit

20 June 2021

Modern slavery impacts millions of people across the world and here in Australia. Governments, corporates and community organisations all have a critical role to play in combatting the risks of modern slavery.

For The Benevolent Society, our [Modern Slavery Statement](#) recognises our own role in combating modern slavery and that a meaningful modern slavery response requires leadership and an organisation-wide approach. As part of our commitment, we are implementing a number of integrated strategies to prevent and respond to modern slavery risks in our business operations and our supply chains.

The Benevolent Society works with a broad range of community partners, ranging from small local community groups through to large and complex organisations. Our community partners are critical to our work and keep us closely connected with the communities we support.

Every organisation's response to modern slavery will necessarily be different. For large organisations, such as The Benevolent Society, a detailed response is required which considers legal requirements to develop a Modern Slavery Statement. For smaller organisations, appropriate steps to combat modern slavery should be taken that are relevant and meaningful to their size and operations.

We recognise that some of our smaller community partners may require support to start this journey and it is for this reason, we have created this toolkit.

About this Toolkit

This toolkit is intended to support The Benevolent Society's smaller community partner organisations to take small but concrete steps to implement strategies to understand and tackle modern slavery within their own operations, as well as make clear The Benevolent Society's expectations.

This toolkit serves to be useful for community organisations that do not meet the reporting thresholds outlined in modern slavery laws but would like to commence their journey on examining modern slavery within their organisation.

This toolkit outlines:

- What is modern slavery?
- Who is at risk of modern slavery?
- How do you identify modern slavery?
- Why do we care about modern slavery?
- Suggested actions organisations can take
- Where to go for further information/Useful links

Our aim is to continue to build this toolkit based on your feedback so that we can work effectively with our community partners to increase transparency and to reduce the risk of vulnerable people in our operations and supply chains becoming exposed to modern slavery. Feedback can be shared by sending an email to theproperofficer@benevolent.org.au.

We recognise language matters. In this guide, we use the words 'victim' and 'survivor'. Both refer to a person who has experienced or is experiencing modern slavery. We use the word 'victim' when speaking of a person who is experiencing modern slavery, at the time of exploitation. We use the word 'survivor' when speaking of a person who has experienced modern slavery, for instance, when telling their story. We understand there are people who have experienced modern slavery who do not like either word.

This toolkit provides general guidance on modern slavery and is not legal information or advice. The information in this toolkit should be used as a starting point for consideration when examining your approach to modern slavery.

MODERN SLAVERY

What is it?

Modern slavery is a fundamental breach of human rights. Modern slavery is a broad term that can take many forms, some of which are described below. A common theme that applies to all forms of modern slavery is the exploitation of people due to threats, coercion, violence, fraud, deception, abuse of power or of a position of vulnerability.

Modern slavery in Australia

While the number of people in conditions of modern slavery in Australia differ, it is estimated that between 2,000 and 15,000 people are victims of modern slavery.

How prevalent is modern slavery?



40.3 million people around the world are in modern slavery at any given time

Globally, at any given time, there are:



modern slavery disproportionately affects women and girls
71% of victims are women and girls



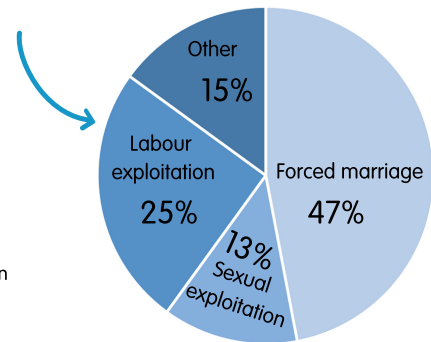
29% of victims are men

15.4 million victims of forced marriage

24.9 million people in forced labour

4.8 million people in forced sexual exploitation

16 million people exploited in global supply chains in the private economy



Source: Global Slavery Index

Source: Anti-Slavery Australia

What are some forms of modern slavery?

Debt Bondage

is when a person is forced to work to pay off a debt or a loan. The person is often tricked in working for little or no pay. Usually the person will have no control over their debt.

Forced Labour

is any work or services where a person is not free to stop work and/or to leave their place of work.

Forced Marriage

is when a person is married without their free and full consent because of coercion, threat or deception or because they're incapable of understanding the nature and effect of the marriage ceremony e.g. age or mental capacity.

Slavery

is when a person is trying to 'own' or exercise ownership over another or when a person is treated like an object which can be bought, sold or traded.

Sexual Exploitation

is when a person is forced to have, watch or perform sex without consent

Servitude

is when a person does not consider themselves free to stop working or to leave their place of work because of coercion, threat or deception.

Worst Forms of Child Labour

Modern slavery is often considered the worst forms of child labour. Child labour involves the employment of children, especially when illegal or considered exploitative.

Human Trafficking

is recruitment, harbouring or movement of a person by means including coercion, threat, fraud and abduction for the purpose of exploitation.

Who is at risk of modern slavery?

Anyone can be a victim of modern slavery. It is a problem that transcends age, gender and ethnicity.

However, modern slavery victims are often vulnerable due to their background or circumstances.

The increased vulnerability of older people, children, women, people with disability,

victims or survivors of domestic violence and people experiencing isolation and loneliness, increases their susceptibility to modern slavery.

How can you identify modern slavery?

Modern slavery can be anywhere, from a car wash to a corporate business.

It is often described as being 'hidden in plain sight' which can make it hard to identify.

There are certain industries however which have high cases of modern slavery. These are:

- Food services
- Hospitality
- Domestic work
- Cleaning
- Some types of manufacturing such as toys and clothing



What are some of the signs that someone might be in modern slavery?

Some of the signs that an individual may be subjected to modern slavery include:

- signs of physical or psychological abuse or malnourishment
- appear frightened, withdrawn or agitated
- withholding of wages or identity documents
- no employment contract, excessive work hours or poor working conditions
- restriction of movement or being isolated from family and community
- poor living conditions and/or living and working at the same address
- groups of workers being kept under control, such as strict supervision and/or transportation by groups.

Why do we care about modern slavery?

Modern slavery in its various forms are illegal practices that affect millions of people around the world. Modern slavery has significant social and economic impacts on individuals and the community in the short, medium and long term. There are a number of compelling reasons why active steps to address risks of modern slavery should be taken.

Eradicating modern slavery is the right thing to do

A fundamental principle governing all human moral frameworks is to respect people and do no harm. Organisations that take their responsibility to respond to modern slavery seriously will alleviate the exploitation of millions of people worldwide.

Improved financial outcomes

Addressing the risks of modern slavery also mitigates against operational risks that disrupt productivity, such as poor working conditions and poor staff health outcomes.

An opportunity to lead and influence

The leading organisations and companies that have made a genuine effort to identify vulnerable workers and mitigate modern slavery risks have built a reputation for innovation and sustainability. Conversely, the failure to address or respond to modern slavery risks can result in brand and reputational damage, which can limit the ability to deliver effective services and recruit and retain quality employees.

Better working conditions and environments

Addressing the risks that contribute to modern slavery include ensuring that organisations have better working conditions and environments for their staff, partners and clients.

Minimise legal risks

Modern slavery is an illegal practice. Steps to address modern slavery minimise legal and corporate risks, including mitigating against potential lawsuits from workers, contractors, governmental agencies and/or clients.

Suggested actions for our community partners

Below are some suggested steps that community partners may wish to take:

- Read The Benevolent Society's Modern Slavery Statement, which is available on our website
- Prepare your own Modern Slavery Statement, or a short 'commitment statement'
- Consider developing organisational policies and procedures relating to modern slavery, human rights, ethical trading and/or whistleblowing.
- Undertake an audit of your own direct and indirect suppliers and subcontractors to identify any potential modern slavery risks within your own supply chain.
- Appoint someone at the executive or officer level to be responsible for modern slavery prevention, including workers' rights, ethical trading and corporate social responsibility.
- Provide training to staff and management on modern slavery, including as part of an induction process for new employees.
- Take urgent action in response to any identified cases or allegations of modern slavery, including providing a grievance mechanism that places victims at the forefront.
- Take proactive steps to embed an organisational culture of trust where workers are valued and treated with dignity and respect and can raise issues without fear of retribution.
- Consider preventative actions to avoid practices which can exacerbate risks of modern slavery, such as low purchase prices, short time frames for product manufacturing and service delivery, poor order forecasting, and poor payment terms.

What to do if you suspect someone is in modern slavery?

1

Be careful that any actions you take do not harm a victim or survivor of modern slavery. Never publicly disclose personal information without informed consent.

2

In emergencies, where there is immediate danger, or where the situation involves a child, call triple zero (000)

3

Call Anti-Slavery Australia on 02 9514 8115 or visit their website: <https://antislavery.org.au/modern-slavery/>. Anti-Slavery Australia can provide free and confidential legal and migration advice to anyone in modern slavery

4

To report modern slavery call the Australian Federal Police on 131 237 or report through their website: <https://www.afp.gov.au/>

What is modern slavery?

Modern slavery is a fundamental breach of human rights.

Modern slavery is a broad term that can take many forms, some of which are described below. A common theme that applies to all forms of modern slavery is the exploitation of people due to threats, coercion, violence, fraud, deception, abuse of power or of a position of vulnerability.

Form of Modern Slavery	Brief Description	What it could look like
Human Trafficking	This has taken on a number of meanings, but most people associate human trafficking with the physical movement of people across or within borders. It involves recruiting, transporting, transferring, harbouring and/or receiving a person.	A person is brought from one country into another under the false assumption they will work in a restaurant as a waitress. When they arrive, instead of working in a restaurant the person is taken to a brothel and is forced to work and cannot leave.
Slavery	This is when someone is trying to 'own' or exercise ownership of another person.	A person makes another person the subject of a commercial transaction, that is, that person is being bought or sold.
Servitude	This is when a person doesn't consider themselves to be free to stop providing services or labour or to even leave their place of work or a location.	A person is forced to work around the clock on a range of never-ending domestic chores with the added responsibility of looking after the children in the family. They cannot leave the house on their own free will. On the outside, this might look like 'live-in help' or a babysitter/nanny arrangement. The above scenario is considered domestic servitude. Domestic servitude is when a person is forced to work in a private household performing domestic chores and childcare duties.
Forced Marriage	This is when someone is married without that person's consent or understanding of the nature and effect of a marriage. The marriage has taken place	A person is forced into a marriage due to threats of harm to their family.

	without that person's free and full consent.	
Forced Labour	This involves any work or services where a person is not free to stop work and/or to leave their place of work.	A person is forced to work long hours for little or no pay in very poor conditions under threats of harm to their family.
Debt Bondage	This is when a person is forced to work to pay off a debt or a loan. The person is often tricked in working for little or no pay. Usually the person will have no control over their debt.	A person is promised a seemingly wonderful job in another country and takes a loan to cover travel costs. Once in that country, the job isn't at all what was expected and that person is forced to work to pay off their debt. The person has no idea of the size of the debt but it feels like that the debt is not shrinking but in fact getting bigger.
Deceptive Recruiting for Labour Services	This is when a person is deceived by a labour recruiter and is induced into providing labour or services where their freedoms are severely limited.	A person is ticked by a labour recruiter that they can go and work for a construction company in a different country where they will be paid well and have weekends off work. When they arrive however, they work long hours 6 days a week and have half of their wage deducted to pay back a debt they owe for their travel.
Worst Forms of Child Labour	Modern slavery is often considered the worst forms of child labour. Child labour involves the employment of children in an industry or business, especially when illegal or considered exploitative.	A child is involved in illicit activities such as trafficking drugs, gambling and organised crime.
Sexual Exploitation	This is when a person is forced to have, watch or perform sex without consent.	A person is forced by their partner to have sex with multiple other people even though they have said they did not want to do that.

It's important to note that whilst there are these recognised forms of modern slavery, there are enormous overlaps between them.

Who is at risk of modern slavery?

Anyone can become a victim of modern slavery. Modern slavery is a problem that transcends age, gender and ethnicities. There is no typical modern slavery victim and the length of time victims are exploited can vary. However, modern slavery victims are often vulnerable to exploitation due to their background or circumstances.

The vulnerability of many of individuals supported by human services organisations, including older people, children, women, people with disability, victims and survivors of domestic violence and people experiencing isolation and loneliness, increases their susceptibility to modern slavery and other abuses.

COVID-19 has also had its own impacts in pushing more people towards modern slavery. The economic and social disruption caused by the COVID-19 pandemic has created new risks and abuses, increased vulnerability and the risks of exploitation, and disrupted anti-slavery response efforts by governments and organisations alike.

How do you identify modern slavery?

Modern slavery can be anywhere, from a car wash to a corporate business. It is often described as being 'hidden in plain sight' which can make it hard to identify.

Modern slavery practices present significant social and human rights impacts. Many Australian businesses and organisations may be unaware of the risk that they have slavery in their business or supply chains. Statistically, the incidence of modern slavery within Australia appears to be relatively low, but it is likely that the statistics reflect a low level of awareness of the issues, and the actual incidence may be much higher, both domestically and overseas.

Modern slavery can occur in every industry and sector. However, there are several sectors and services in Australia where there are higher risks of modern slavery, such as cleaning, hospitality and food supply, domestic work and some types of manufacturing such as toys and clothing. Australia is also a destination country for human trafficking.

There are also certain business practices that enable modern slavery. These include the use of complex supply chains, imposing tight deadlines to produce goods and services, the use of a sub-contracted workforce, and financial incentives to keep labour costs low and competitive. There is often no clear boundary between modern slavery and other serious abuses. Poor labour practices, such as delayed payment of wages, excessive working hours or verbal threats, can push workers into conditions of modern slavery if combined with other factors. Further, modern slavery is often linked to other crimes and activities that adversely impact human rights, such as corruption, environmental damage and other forms of abuse such as abuse of older people, child abuse and domestic violence.

Some of the signs that an individual may be subjected to modern slavery include:

- signs of physical or psychological abuse or malnourishment

- appear frightened, withdrawn or agitated
- withholding of wages or identity documents
- no employment contract, excessive work hours or poor working conditions
- restriction of movement or being isolated from family and community
- poor living conditions and/or living and working at the same address
- groups of workers being kept under control, such as strict supervision and/or transportation by groups.

While your organisation may not directly employ these people, you should consider whether you have an ethical and/or legal obligation to report any suspicion of modern slavery.

Why do we care about modern slavery?

Modern slavery in its various forms are illegal practices that affect millions of people around the world. According to the Global Slavery Index, 40.3 million people around the world are trapped in modern slavery. In Australia, it is estimated that 15,000 people live in conditions of modern slavery on any given day.

Modern slavery has significant social and economic impacts on individuals and the community in the short, medium and long term. There are a number of compelling reasons why organisations such as The Benevolent Society and our community partners should take active steps to address risks of modern slavery.

- **Eradicating modern slavery is the right thing to do:** A fundamental principle governing all human moral frameworks is to respect people and do no harm. Consistent with the vision and purpose of organisations such as The Benevolent Society, organisations that take their responsibility to respond to modern slavery seriously will alleviate the exploitation of millions of people worldwide.
- **An opportunity to lead and influence:** The leading organisations and companies that have made a genuine effort to identify vulnerable workers and mitigate modern slavery risks have built a reputation for innovation and sustainability. Conversely, the failure to address or respond to modern slavery risks can result in brand and reputational damage, which can limit the ability to deliver effective services and recruit and retain quality employees.
- **Better working conditions and environments:** Addressing the risks that contribute to modern slavery include ensuring that organisations have better working conditions and environments for their staff, partners and clients.
- **Improved financial outcomes:** In addition to contributing to more effective and efficient workplaces and service delivery, addressing the risks of modern slavery also mitigates against operational risks that disrupt productivity, such as poor working conditions and poor staff health outcomes.

- **Minimise legal risks:** Modern slavery is an illegal practice. Steps to address modern slavery, including increased due diligence, transparency and accountability, are all valuable to minimise legal and corporate risks, including mitigating against potential lawsuits from workers, contractors, governmental agencies and/or clients.

Suggested actions for our community partners

Consistent with The Benevolent Society's modern slavery commitments, we place paramount importance on working with community partners and suppliers who treat their obligations towards modern slavery with the same importance. A coordinated, holistic response is essential to effective action against modern slavery.

While many of our community partners have already embarked on their journeys to combat modern slavery, we understand that some of our community partners are at the beginning of their journey and may require support to identify their first steps. Below are some suggested steps that community partners may wish to take:

- Read The Benevolent Society's Modern Slavery Statement, available at <https://www.benevolent.org.au/about-us/legal-and-privacy-policy>.
- Prepare your own Modern Slavery Statement, or a short 'commitment statement'.
- Consider developing organisational policies and procedures relating to modern slavery, human rights, ethical trading and/or whistleblowing.
- Undertake an audit of your own direct and indirect suppliers and subcontractors to identify any potential modern slavery risks within your own supply chain.
- Appoint someone at the executive or officer level to be responsible for modern slavery prevention, including workers' rights, ethical trading and corporate social responsibility.
- Provide training to staff and management on modern slavery, including as part of an induction process for new employees.
- Take urgent action in response to any identified cases or allegations of modern slavery, including providing a grievance mechanism that places victims and survivors at the forefront.
- Invite a survivor to meaningfully engage in conversation with your organisation. Consider elements of safety, support, purpose, respect and compensation when doing so.
- Consider preventative actions to avoid practices which can exacerbate risks of modern slavery, such as low purchase prices, short time frames for product manufacturing and service delivery, poor order forecasting, and poor payment terms.

What to do if you suspect someone is in modern slavery?

Anti-Slavery Australia provides a 4-step process which should be undertaken if you suspect or have been told that someone is or may be a victim of modern slavery.

1. Be careful that any actions you take do not harm a victim of modern slavery. Never publicly disclose personal information without informed consent.
2. In emergencies, where there is immediate danger, or where the situation involves a child, call triple zero (000).
3. Call Anti-Slavery Australia on 02 9514 8115 or visit their website: <https://antislavery.org.au/modern-slavery/>. Anti-Slavery Australia can provide free and confidential legal and migration advice to anyone in modern slavery.
4. To report modern slavery call the Australian Federal Police on 131 237 or report through their website: <https://www.afp.gov.au/>.

Where to go for more information/useful links

More information about Modern Slavery

- Anti-Slavery Australia: <https://antislavery.org.au/>

Anti-Slavery Australia's website contains a lot of useful information on modern slavery. Anti-Slavery Australia is also a place where you can refer suspected cases of modern slavery.

- My Blue Sky: <https://mybluesky.org.au/>

My Blue Sky is a website run by Anti-Slavery Australia. It provides information on prevention of forced marriage. My Blue Sky also offers legal advice and referral pathways for victims of forced marriage.

- Walkfree: <https://www.walkfree.org/>
- 2018 Global Slavery Index: <https://www.globalslaveryindex.org/>
- Easy Read Guide on Modern Slavery: <https://www.benevolent.org.au/about-us/legal-and-privacy-policy> (navigate to the Modern Slavery section)

The Benevolent Society has published an easy read guide on modern slavery.

Modern Slavery Statements

- Australian Government's Online Register for Modern Slavery Statements: <https://modernslaveryregister.gov.au/>

Under the Modern Slavery Act 2018 (Cth), all Australian businesses, and entities with an annual consolidated revenue of at least \$100 million must submit an annual modern slavery statement to the Australian Border Force. These statements should **identify** and **address** modern slavery risks in the business or entities supply chain and operations. You can view all submitted modern slavery statements through the online register.

Modern Slavery Toolkits and Learning Opportunities

- 'Modern slavery in public procurement' e-learning module: https://modernslaveryregister.gov.au/static/elearning/modern_slavery_in_public_procurement/index.d477c4664192.html#/
- University of Nottingham Anti-Slavery Partnership Toolkit: <https://iasctoolkit.nottingham.ac.uk/>

Human Rights and Modern Slavery

- UN Guiding Principles on Business and Human Rights:
https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf
- OECD Due Diligence Guidance for Responsible Business Conduct:
<https://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm>

Human Trafficking & Modern Slavery Indicators

It is important for everyone, but especially important for those who work with vulnerable peoples and groups to be aware of potential signs and indicators someone is experiencing or is a victim of modern slavery.

The Australian Federal Police has published a list of indicators broken up into general and specific modern slavery crimes. You can find this list here: <https://www.afp.gov.au/what-we-do/crime-types/human-trafficking/human-trafficking-slavery-indicators>.

Referral Pathways

If you suspect that someone is a victim of modern slavery it is important to know how to address the situation. Before you take any action, it is important that you do not publicly disclose any personal information without consent. In emergencies, or when there is immediate danger, or a child is involved contact triple zero. Below are links to organisations which help victims of modern slavery.

- Anti-Slavery Australia provides free legal and migration services:
<https://antislavery.org.au/contact/>
- Australian Red Cross provides case workers, financial support, access to health and accommodation services, and counselling to victims of human trafficking, forced labour, and forced marriage: <https://www.redcross.org.au/stpp>
- Australian Federal Police can be contacted if you suspect someone is a victim of trafficking by either phoning or emailing them: Phone: 131 237, Email: NOSSC-Client-Liaison@afp.gov.au

Video Resources

- [Domestic servitude in Australia](#)
- [Prosecuting modern slavery in the United Kingdom](#)

- [Orphanage Trafficking in Nepal](#)

Audio Resources

- [Human trafficking and modern slavery in Asia](#)
- [Modern slavery](#)
- [Preventing human trafficking](#)
- [International efforts to end modern slavery](#)

Modern Slavery News Updates

- For up-to-date news updates on modern slavery legislation amendments, articles, and cases visit the following links:
 - <https://theconversation.com/au/topics/modern-slavery-24838>
 - <https://news.un.org/en/tags/modern-slavery>