

## 1 Purpose

The purpose of this policy outlines how Southern Cross Care (WA) (SCC(WA)) and Southern Cross Housing Ltd (SCH) will ensure that modern slavery does not flourish within our operations, business relationships and extended supply chains. This policy also provides a robust framework to ensure compliance with the reporting requirements of the Act.

## 2 Scope

The term modern slavery describes situations where coercion, threats or deception are used to exploit people and undermine their dignity and freedom. Modern slavery practices violate universally recognised human rights, are crimes and pose a serious business risk to SCC(WA)s operations and reputation.

The Commonwealth [Modern Slavery Act 2018](#) (the Act) and [Guidance](#) defines modern slavery as including eight types of serious exploitation reflected in the Australian Criminal Code Act 1995. Appendix 1 of this Policy outlines the types of modern slavery practices relevant to businesses and global supply chains.

All parts of SCC(WA) and SCH shall comply with this policy and ensure its core principles are implemented. This policy applies to all workers, including direct employees (full-time, part-time and casual), volunteers, interns, consultants, labour hire employees, as well as contractors and sub-contractors and their employees.

For the purposes of this document, SCC(WA) encompasses services provided by Southern Cross Care (WA) Inc, Southern Plus Real Estate, and Southern Cross Housing Ltd (SCH).

## 3 Policy Principles

Catholic social teaching calls for the dignity of work, the rights of workers and advancing the common good. These are the principles that guide this policy.

The following principles inform the implementation of this policy within our organisation:

1. SCC(WA) will not knowingly use or contribute to modern slavery practices in any form.
2. SCC(WA) will actively work to identify and eliminate modern slavery practices from our operations, business partnerships and supply chain.
3. Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or financial) of workers in SCC(WA)s operations or supply chain is unacceptable.
4. SCC(WA) shall comply with all relevant laws and regulations regarding worker recruitment, remuneration, working conditions and freedom of association.
5. SCC(WA)s final purchasing decisions shall not be based on price alone. Ethical business processes are an essential part of our value for money and 'fit for purpose' considerations. This includes consideration of worker living wage mechanisms and responsible recruitment of workers.
6. SCC(WA) will continue to support our suppliers and business partners to assess and address modern slavery risks and take action to improve transparency, traceability and accountability for modern slavery practices and impacts in our collective supply chains.

Our modern slavery risk management program is underpinned by ethical business practices and in consideration of all our stakeholders (including people who are at-risk of and/or experience modern slavery practices). A non-exhaustive list of different types of modern slavery that could be encountered by the organisation can be found in Appendix 1.

## 4 Key Elements of Modern Slavery Risk Management

1. A policy which outlines our commitment to prevent and manage modern slavery within our operations, business partnerships and supply chain, being this policy;
2. Communication of this policy and related program initiatives to staff, business partners and supply chain;
3. Assessment of modern slavery risks within our operations and supply chain and the development of effective, efficient and transparent controls to manage and mitigate risks;

4. Integrating anti-slavery requirements into relevant tenders and contract terms and conditions;
5. Adopting due diligence measures for review of suppliers and business partners coupled with a requirement that they implement systems and processes to effectively manage their own modern slavery risk;
6. Raising awareness, engaging and educating staff and other key stakeholders so they take individual responsibility to identify modern slavery practices and take practical steps to prevent and manage risk; and
7. Implementing a robust contact system escalation protocol and remedy pathway to ensure human rights impacts caused by our activities are effectively addressed.

## 5 Roles and Responsibilities

Role	Responsible for:
SCC(WA) Board	Overall responsibility for ensuring this policy and its implementation complies with relevant Catholic social teachings, and legal and ethical obligations within SCC(WA) business operations.
SCH Board	Overall responsibility for ensuring this policy and its implementation complies with relevant Catholic social teachings, and legal and ethical obligations within SCH business operations.
Executive Management Committee	<p>Responsible for managing modern slavery risk within SCC(WA) and SCH.</p> <p>Endorse and ensure compliance with this policy.</p> <p>Be familiar with legislative requirements associated to this policy.</p> <p>Ensure adequate and appropriate resources are made available to support the policies implementation.</p>
Senior Manager Risk and Assurance	<p>Act as the organisations Modern Slavery Liaison Officer (MSLO).</p> <p>Ensuring awareness within the organisation of this policy.</p> <p>Lead the implementation of this policy and provide regular reporting to the Executive and SCC(WA) and SCH Boards.</p> <p>Engage with relevant external stakeholders to support this policy.</p>
General Manager People	<p>Ensuring all legislation and regulations regarding worker recruitment, remuneration, working conditions and freedom of association are complied with.</p> <p>Engage with relevant external stakeholders to support this policy.</p>
Procurement and Contract Management	<p>Ensure:</p> <ul style="list-style-type: none"> <li>• Anti-slavery clauses shall be incorporated into procurement tenders and contracts which include the right to audit, review documentation and interview workers.</li> <li>• Supplier reviews (including self-assessment questionnaires) shall be undertaken to assess levels of modern slavery risk, commitment and capacity to manage identified risks. This includes any new company that wants to do business with Southern Cross Care (WA).</li> </ul> <p>Engage with suppliers and vendors to promote this policy and assist to develop their capabilities to identify and manage modern slavery risks.</p> <p>Take a risk informed approach to reviewing and identifying vendors and suppliers to ensure compliance to the Modern Slavery Act.</p>
Suppliers and Vendors	<p>Share SCC(WA)s goal and values in relation to ending modern slavery.</p> <p>Support SCC(WA) to assess the levels of risk within their operations and supply chain, and to be open with their commitment and capability to manage modern slavery risks.</p> <p>Demonstrate how they identify, prevent, manage, and mitigate modern slavery risk in their operations and supply chain.</p>

Role	Responsible for:
All Staff and contractors	<p>Ensure that the identification, prevention, management, and mitigation of modern slavery risk is a core responsibility of all workers.</p> <p>Business operations or relationships that knowingly support, facilitate, or encourage worker exploitation or modern slavery practices are strictly forbidden.</p> <p>Any actual or suspected activity that could breach this policy must be reported immediately to the MSLO.</p>

## 6 Reporting Suspected or Discovered Modern Slavery

Internal reporting of actual or potential modern slavery risks by workers is expected. Workers shall immediately report any suspected violations of the policy or other illegal or unethical conduct. Information is confidential and there shall be no retribution or retaliation for reports made in good faith.

Suppliers are also required to report suspected or actual modern slavery practices, indicators, or red flags immediately without fear of retribution, retaliation or loss of business with us. SCC (WA) commits to working with our suppliers to address issues, ensure effective remedy and implement prevention measures.

If a supplier or any other person outside SCC(WA) provides information to a staff member about suspected or actual modern slavery practices, indicators or red flags within our organisation or supply chain, the information must be immediately passed onto their line manager for escalation to the MSLO.

## 7 Non-compliance with this Policy

Workers who breach this policy will face disciplinary action. This could, in the most severe circumstances include dismissal for misconduct or gross misconduct and if warranted legal proceedings may be commenced.

SCC(WA) retains the right to terminate its relationship with individuals, suppliers and organisations working on its behalf or engaged by it if they breach this policy.

## 8 Legislation and Supporting Documents

### 8.1 Legislation and Standards

- Modern Slavery Act 2018 (Cth)
- Privacy Act 1988 (Cth)
- Corporations Act 2001
- Government Directives, as applicable.
- All relevant Australian Standards.

### 8.2 Related SCCWA Policy and Procedures

- SCC(WA) Information Management Framework
- SCC(WA) Risk Management Framework
- SCC(WA) Procurement Plan
- SCC(WA) Purchasing Policy
- SCC(WA) Delegation Matrix

9 Document Control

Rev	Owner	Sections Modified	Date Reviewed	Next Date	Review
1.0	Senior Manager Risk, Assurance and Procurement	First Release	10/10/2024	10/10/2027	

## Appendix 1: Types of Modern Slavery

### 9.1 Debt bondage (or bonded labour)

Debt bondage is the most common form of slavery. This occurs when a person is forced to work to pay off an excessive debt unfairly imposed on them by a recruitment agent or employer. The person works for little or no pay, with no control over their debt. Over time, the value of their work becomes greater than the original debt. Examples of debt bondage are associated with recruitment fees, travel, visas, work materials or schemes where a person has to pay to get a job.

### 9.2 Deceptive recruiting for labour or services

Deceptive recruiting occurs when a victim is misled about the job they are recruited for, and it leads to them being trapped in modern slavery.

Types of deceptive conduct used by recruiters include offering exaggerated rates of pay, reasonable work hours and inclusions of accommodation, food, transport and other expenses.

### 9.3 Forced Labour

Forced labour is any work or service which people are forced to do against their will under threat of penalty. A victim is not free to stop working or to leave their place of work because of physical and/or psychological coercion. This may include threats and violence against themselves, other workers, family members or others.

### 9.4 Human Trafficking

Within Australia this is defined as “*the recruitment, transportation, transfer, harbouring or receipt of a person through means such as threat or use of force, coercion, deception, or abuse of power or vulnerability; for the purpose of exploiting that person*”. Human trafficking is a serious crime which often, ends up with the trafficked people being exploited through modern slavery, forced labour, servitude, debt bondage, organ removal or other forms of exploitation.

### 9.5 Worst Forms of Child Labour

The worst forms of child labour include where children are:

- Exploited through slavery, forced labour or similar practices.
- Engaged in hazardous work which may harm their health, safety, or morals.
- Used to produce or traffic drugs.

The worst forms of child labour can occur in a variety of contexts and industries. This may include orphanage trafficking and slavery in residential care institutions, as well as child labour in factories and manufacturing sites, mining, and agriculture.

Importantly, not all child labour is illegal if the correct controls are in place such as children being engaged in the light physical labour only, not be subjected to hazardous work, and where working hours are limited and outside school time etc.

### 9.6 Slavery or slavery like offences

Slavery is defined in the Australian Criminal Code Act 1995 (Section 270) as where the ‘*powers attaching to the right of ownership are exercised*’: people are de-humanised to the point where they are literally owned by others.

Slavery is the exploitation and control of others through coercion, such as:

- Restricting where people live, work, move or communicate with others
- Using threats or actual violence against the person or their family
- Forcing them to work, withholding food or water, pay and other forms of abuse

Examples include men forced to work on farms or construction sites, women in cleaning or children in factories - they don't have the choice to live in freedom and with dignity.

People who are trapped in modern slavery are often manipulated in schemes that do not allow them to escape, to ask for help or to gain an understanding that they are in fact victims of criminal activity. Slavery is a major issue for Australian businesses both within Australia and in extended supply chains.