

# Global Health Modern Slavery Policy

## 1. Purpose of policy

This policy affirms our commitment to contribute to ending all forms of modern slavery and outlines our approach to reducing the risk of modern slavery practices within our supply chains and operations.

It is consistent with our Ethical Framework, that expects a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations. It is also consistent with the Fundamental Principles and broader Movement policies. As a result, this Modern Slavery Policy is part of the Global Health Ethical Framework.

This Policy also supports the intent of international conventions, treaties and protocols relevant to combatting modern slavery and the *Modern Slavery Act (Cth) 2018*

<https://www.ohchr.org/EN/ProfessionalInterest/Pages/UniversalHumanRightsInstruments.aspx>.

## 2. Context

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. There are an estimated 40.3 million victims of modern slavery globally. Women and girls are over-represented, comprising 71 per cent of victims and nearly two-thirds of modern slavery victims are in the Asia-Pacific region, 2017 Global Estimates of Modern Slavery (ILO and Walk Free, 2017). Available from: [https://www.ilo.org/global/publications/books/WCMS\\_575479/lang--en/index.htm](https://www.ilo.org/global/publications/books/WCMS_575479/lang--en/index.htm).

Global Health commits to contribute to ending all forms of modern slavery, both in Australia and overseas, by ensuring our own supply chains and operations don't contribute to modern slavery practices, and to take appropriate action to respond to the humanitarian impacts of modern slavery.

## 3. Scope of policy

This Policy applies to all People in Global Health.

## 4. Definitions

**Modern Slavery Act 2018 (Cth)** being the Commonwealth legislation (the Act) enacted by the Parliament of Australia on 29 November 2018 (and may be amended from time to time).

**Modern slavery** for the purposes of this policy is defined as including eight types of serious exploitation and outlined in Section Modern Slavery Act (Cth) 2018. Available from:

<https://www.legislation.gov.au/Details/C2018A00153>.

**Operations** is defined as activity undertaken by Global Health Limited.

**Risks of modern slavery practices** means the potential for Global Health to cause, contribute to, or be directly linked to modern slavery through its supply chains and operations.

**Global Health** refers to Global Health Limited and Working systems Limited two Australian registered companies.

**Global Health Staff** include any current:

- Members of a Governance Body (members of the Global Health Board and their Committees)

- Volunteers.
- Employees;
- Members; and
- Contractors.

**Suppliers** is defined as any organisation or person who provides us with goods or services, including their subcontractors, agents, related entities and consultants.

**Supply chains** is defined as the products and services (including labour) that contribute Global Health products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

## 5. What is modern slavery

Modern slavery is defined by the *Modern Slavery Act (Cth) 2018* Modern Slavery Act (Cth) 2018. Available from: <https://www.legislation.gov.au/Details/C2018A00153>, to include eight types of serious exploitation and which can be understood as:

- **trafficking in persons**, which is the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs;
- **slavery**, which is where the offender exercises powers of ownership over the victim;
- **servitude** which is where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work;
- **forced labour**, which is where the victim is either not free to stop working or not free to leave their place of work;
- **forced marriage**, which is where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
- **debt bondage**, which is where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;
- **the worst forms of child labour**, which involves situations where children are: exploited through slavery or similar practices, including for sexual exploitation; or engaged in hazardous work which may harm their health or safety, or used to produce or traffic drugs; and
- **deceptive recruiting for labour or services** which is where the victim is deceived about whether they will be exploited through a type of modern slavery, [Department of Home Affairs. Commonwealth Modern Slavery Act 2018: Guidance for reporting entities \(2018\)](https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf). Available from <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>

It can also extend to:

- entering into a commercial transaction involving a slave;
- exercising control or direction over, or providing finance for, any commercial transaction involving a slave or act of slave trading;
- conducting a business involving servitude or forced labour (including exercising control over the business or providing finance to it);

## 6. Global Health approach to limiting the risk of modern slavery practices.

Where applicable, Global Health will work to reduce modern slavery within our supply chains and operations, and we expect all organisations we engage with to do the same.

## **6.1 Supply Chain**

### **Global Health Supplier Code of Conduct**

We expect all existing and new Suppliers operate in full compliance with the laws and regulations in the jurisdiction where the goods are sourced, procured or services are performed.

Suppliers must use their best endeavors to ensure that there is no modern slavery in their supply chains and operations. In the event Suppliers identify any occurrence of, or material risk of modern slavery in their supply chains or operations they are to take practical and effective steps to address that occurrence or risk. Suppliers must notify Global Health as soon as practicable of any occurrence of, or material risk of modern slavery they have identified and notify relevant authorities where appropriate.

### **Contractual terms**

Our contractual terms expect compliance with Australian modern slavery laws and those foreign modern slavery laws that apply in the location(s) in which they operate.

### **Supply chain mapping and risk assessment**

We will continually assess our suppliers and seek information that will provide us with a greater understanding of the risk of modern slavery within a supplier's supply chains or operations and enable us to work with a supplier to reduce the risks identified. We will actively and progressively improve our understanding and oversight of all tiers of our supply chains.

## **6.2 Operations**

### **Modern Slavery Policy**

Global Health maintains a Modern Slavery Policy (this Policy) outlining our approach to reducing the risk of modern slavery practices within our supply chains and operations. The Policy provides guidance on the steps Global Health takes to work with suppliers to reduce risks and the range of supports available for when a Global Health person becomes aware that someone is at risk of or affected by modern slavery practices.

### **Incorporating modern slavery into other policies**

When existing policies undergo policy review or new policies are under development, policy owners are required to identify existing modern slavery commitments that can be enhanced, or where modern slavery protections can be incorporated.

### **Ethical Investments**

The Ethical Screening of Investments Guidelines and Procedures (FIN33) seeks to ensure that the investment of Global Health funds is consistent with the Fundamental Principles. As such, no investment should knowingly be made in companies who engage in activities or services which could be directly viewed as considerably compromising these Fundamental Principles.

### **Human Resources**

We are committed to ensuring the health, safety and wellbeing of our workforce and we maintain a suite of policies that are informed by and compliant with Australian workplace and occupational health and safety law.

### **Partnership Screening**

Global Health will complete a partnership screening before entering into a partnership with another organisation.

Prospective partners automatically disqualify from public association with Global Health if they are knowingly or deliberately engaged in activities that are counter to:

- The our objectives and Fundamental Principles;
- Principles of International Humanitarian Law;
- Internationally recognised standards of human rights, labour rights and protection of health; and/or
- Are involved in the manufacture or sale of arms, ammunition, tobacco or pornography.

### **6.3 Communications, Engagement and Training**

Global Health staff will be provided documentation and training opportunities to enhance their understanding of the causes and humanitarian impact of modern slavery, the Modern Slavery Policy and our approach to limiting the risk of modern slavery within our supply chains and operations.

Global Health Staff with purchasing responsibilities are provided additional training on the contractual terms and supporting suppliers to undertake due diligence.

Global Health Staff who initiate and/or periodically review relationships with third parties are provided with training to apply the central and whole of organisation due diligence tool and processes.

### **6.4 Continuous improvement approach to reducing the risk of modern slavery**

We are committed to applying a continuous improvement approach to how we reduce the risk of modern slavery practices within our supply chains and operations.

We will seek feedback from Global Health Staff, Suppliers, Partners and other parties in regard to the success or otherwise of the actions we have taken to reduce the risk of modern slavery.

## **7. Reporting Concerns of modern slavery**

### **7.1 Reporting unethical or unlawful conduct**

A key part of supporting ethical standards is enabling Global Health Staff and Other People (including Suppliers and Partners) to feel free and safe to speak up when there are reasonable grounds to suspect that Global Health or Global Health Staff are not acting ethically or in accordance with laws and obligations.

### **7.2 Responding to concerns of modern slavery practices**

The often-hidden nature of modern slavery practices means it can be difficult to identify and can be difficult for people to report. It is important to respond in a way that is safe, ethical and respects the dignity and rights of the person at risk or affected by modern slavery practices.

There are a range of supports available for when a Global Health person becomes aware that someone is at risk of or affected by modern slavery practices, regardless of if this occurs within Global Health supply chains and operations or in the broader community.

In Australia, the Australian Federal Police is responsible for investigating suspected cases of modern slavery and can be contacted on 131 237 to discuss or report a suspected case. Contact can be made anonymously. In an emergency and if someone is in immediate danger, please call Triple Zero (000) for police assistance.