

Submission
No 32

INQUIRY INTO MODERN SLAVERY ACT 2018 AND ASSOCIATED MATTERS

Organisation: Informed365
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Background

Informed 365 provides real-time, cloud-based CSR solutions for organisations to manage and underpin their social and environmental strategies and objectives. In particular, we deliver three main solutions:

- Supply Chain Management including Modern Slavery
- Business Intelligence / Metrics Tracking
- Climate Change Resilience / Adaptation

Supply Chain Management Application

The supply chain management application allows organisations to track, monitor and engage with their suppliers. The application is aligned with ISO20400, TCFD, CDP and other internationally recognised reporting frameworks and covers Governance, Human Rights (including Modern Slavery), Labour, Environment, Community, Fair Operating Practices, Consumer Issues and Climate Change. The platform can be customised to suit an organisation's exact requirements and it can also draw on existing, historical and third-party data via APIs (Application Programming Interface). It also allows organisations to efficiently manage compliance with regulatory requirements such as the recently introduced Modern Slavery Act and stakeholder expectations.

Australian first shared Modern Slavery platform for the Property Council of Australia

Initial consortium members;

- Abacus Property
- AMP Capital
- Brookfield
- Charter Hall
- Cromwell Property Group
- Dexus
- Frasers Property
- Goodman Group
- GPT
- Investa
- ISPT
- Landcom
- Mirvac
- Stockland
- Vicinity Centres

The collaboration delivers a groundbreaking model for other sectors to follow suit and tackle modern slavery in supply chains.

The platform aims to create resources that are open-source for the entire sector, and that remove the barriers for suppliers to engage with our members on these issues. Suppliers only have to interact with one platform resulting in:

- An efficient and consistent way of reporting that will save suppliers and buyers time
- Consistency and transparency
- Cost savings for both buyers and suppliers

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We would like to provide input to ensure an effective and workable reporting regime **(in blue)**:

In particular we would like to provide feedback to the following questions:

General

1. How can the Anti-Slavery Commissioner best support businesses to comply with the reporting requirement under the Act? What guidance would businesses find helpful in preparing their statements?

Businesses should be able to draw on a similar, consistent application such as the Property Council's ground-breaking shared application. This would ensure consistency and make it easier for organisations to manage and track relevant metrics. The resulting reporting would also be much more relevant and comparable due to the same mechanism.

We are currently in discussions with several other industries such as the Banking / Insurance; Utilities and Telco sectors.

We would suggest that sector specific differences form part of a shared platform that provides enough flexibility to accommodate different circumstances, risks and corporate structures (see below: Question 2)

Please refer to "SCM_I365_Shared_App" document for more detailed information.

Preparing modern slavery statements

2. Does the option of preparing joint statements provide businesses with enough flexibility to accommodate their different circumstances and corporate structures?

As per above we would suggest that industry specific frameworks are developed that allow for the different circumstances to be accommodated. In our experience and having worked with many organisations in different industries we believe that specifically customised, consistent industry sector solutions would be the most appropriate and efficient approach.

3. Should the NSW scheme enable voluntary reporting from businesses falling below the \$50 million turnover threshold and who choose to comply with its requirements?

Yes, most definitely. We are already finding that a considerable number of organisations that provide goods and services to \$50 million plus entities are keen to report on this important matter.

Publishing statements on a public register

4. What are stakeholder views on the public register, and what functions could it include?

The public register increases accountability as submissions will be accessible to all stakeholders including NGOs and activists which in turn should drive the quality of submissions.

5. What would be the easiest way to lodge statements with the Commissioner? Would businesses prefer to upload statements onto the register if this function is made available?

Definitely, we would consider an "upload functionality" to be an absolute minimum. We would also suggest that such a portal would allow stakeholders (both internal and external) to review all annual statements in one single application.

6. How long should statements be available on the register?

As per above we would suggest that all statements are permanently available as it would allow stakeholders to track and monitor progress.

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Exemptions for certain businesses

7. What are stakeholders' views on the exemptions in the draft Regulation for voluntary reporters, subsidiaries of parent entities reporting under the Commonwealth Act?
8. What are stakeholder views on the exemptions in the draft Regulation for charities, not-for-profit organisations and small businesses? Are these appropriate to reduce regulatory burden and at the same time ensuring businesses take seriously their responsibility to combat modern slavery?

Consultation

9. What communication channels can the Commissioner use to raise awareness of the Act's requirements and effectively engage with businesses?

We would suggest that the Commissioner collaborates with key organisations such as industry bodies and associations, government agencies and subject matter experts such as Better Sydney (Robin Mellon), Cleaning Accountability Framework (CAF) and Informed 365.

Monitoring and evaluation

10. How should the Commissioner allow for businesses and civil society to provide feedback on the effectiveness of the reporting requirement?

NGOs, stakeholders and civil society should be able to provide feedback – preferably on the suggested online reporting framework. This would add significant value to and increase effectiveness.

Other

11. What other issues does the Commissioner need to consider to implement a workable system of supply chain reporting under the Act?

As per above we would suggest setting up specific industry specific frameworks where sector specific differences can be accommodated. In our experience there are significant similarities irrespective of the sector which if implemented correctly could easily be compared across any sector.