

## Five Ways to Adapt Whistleblowing Processes to Better 'Hear and Address' Modern Slavery Grievances





Criterion 4 of the *Modern*Slavery Act 2018 (Cth)
requires reporting entities
to identify actions to
assess and address risk,
including due diligence
and remediation.

This does not mean that businesses need to have a remediation process focused just on modern slavery.

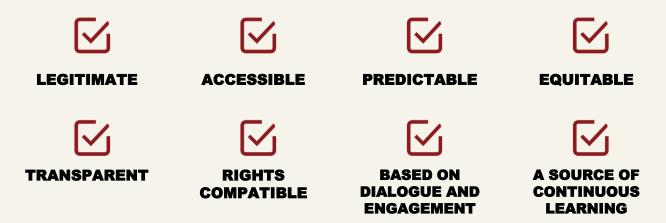
Most reporting entities already have general processes in place to address a range of adverse human rights and other impacts. Often these will take the form of a grievance mechanism such as a whistleblower hotline or 'Speak Up' process.

Adapting these processes is critical to ensuring they can meaningfully hear and address modern slavery-related complaints, including those raised by workers in the supply chain.

Effective remediation processes can help businesses identify issues before they escalate, resulting in better risk management while also strengthening reputation among customers, investors and regulators.



The UN Guiding Principles highlight that effective grievance mechanisms should be:



For example, it is important that grievance mechanisms are confidential and protect workers' privacy, accessible in workers' languages and available to workers outside their working hours.

## **Key Actions:**

- **Expand the scope of the whistleblower policy** to ensure that modern slavery and other human rights complaints are included in the definition of 'Reportable Conduct'.
- **Communicate the whistleblower policy** widely to ensure it is accessible to anyone impacted by the business's activities (e.g. employees and former employees, workers in the supply chain and local communities).
- Train personnel responsible for receiving and processing complaints so they can better identify modern slavery red flags and understand escalation protocols when these arise.
  - Assess the current investigation or complaints handling process for whistleblower incidents and ensure a clear and effective victim centred remedy process is implemented.
- Assess the whistleblowing mechanism against the UNGPs' effectiveness criteria and strive for continual improvement.

Informed by: <u>Global Compact Network Australia</u>, <u>Implementing Effective</u> Modern Slavery Grievance Mechanisms: A Guidance Note for Business

