



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

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**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.**

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



**LEGITIMATE**



**ACCESSIBLE**



**PREDICTABLE**



**EQUITABLE**



**TRANSPARENT**



**RIGHTS  
COMPATIBLE**



**BASED ON  
DIALOGUE AND  
ENGAGEMENT**



**A SOURCE OF  
CONTINUOUS  
LEARNING**

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:

- 1 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'.
- 2 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).
- 3 Train personnel** responsible for receiving and processing complaints so they can better identify modern slavery red flags and understand escalation protocols when these arise.
- 4 Assess the current investigation or complaints handling process** for whistleblower incidents and ensure a clear and effective victim centred remedy process is implemented.
- 5 Assess the whistleblowing mechanism** against the UNGPs' effectiveness criteria and strive for continual improvement.

Informed by: [Global Compact Network Australia, Implementing Effective Modern Slavery Grievance Mechanisms: A Guidance Note for Business](#)

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