



Australian Government
Australian Maritime Safety Authority

Modern Slavery Statement

December 2020

Covering the reporting period 1 July 2019 – 30 June 2020

Board Audit Risk and Finance Committee endorsement

This report was presented to meeting 152 of the AMSA Board Audit, Risk and Finance Committee on 26/08/2020, and was endorsed to submit to the Board for approval.

Approval

As the representative of the Accountable Authority of the Australian Maritime Safety Authority, I confirm that the AMSA Board has reviewed the AMSA Modern Slavery Statement for the reporting period of 1 July 2019 to 30 June 2020.

As set out in the Statement, AMSA has responded to and met the mandatory reporting criteria, and commits to continual improvement in keeping with the *Modern Slavery Act 2018*.

23 September 2020

A handwritten signature in black ink, appearing to read 'Stuart Richey'.

STUART RICHEY AM
Chairman

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Introduction

Overview

This document is the Australian Maritime Safety Authority's (AMSA) first annual Modern Slavery Statement, covering the period 1 July 2019 and 30 June 2020.

What is Modern Slavery?

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

The Australian Government estimates that there are approximately 1500 victims of modern slavery in Australia at any time. The United Nations estimates that at least 40 million people around the globe are in modern-day slavery. Those most at risk include women and children who may have little or no capacity to protect themselves.

Australia has agreed with the United Nations to attempt to abolish modern slavery by 2030.

Serious exploitation

There are eight types of serious exploitation which combined make up modern slavery:

1. Trafficking in persons – the recruitment, harbouring and movement of a person for exploitation through modern slavery
2. Slavery - situations where the offender exercises powers of ownership over the victim including the power to make a person an object of purchase and use their labour in an unrestricted way
3. Servitude – situations where the victim personal freedom is significantly restricted and they are not free to stop working or leave their place of work
4. Forced marriage – situations 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
5. Forced labour - situations where victims is either not free to stop work or not free to leave their place of work
6. Debt bondage – situations where the victims services are pledged as a security for a debt and the debt is manifestly excessive of the victims' services are not applied to liquidate the debt or the length and nature of the services are not limited and defined.
7. Deceptive recruiting for labour or services - situations where the victim is deceived about whether they will be exploited through a type of modern services
8. Serious exploitation of children and child labour – situations including through enslavement, sexual exploitation, used to produce or traffic drugs or exposure to dangerous work. (the “worst forms”).

Freedom from slavery is a fundamental human right. Under the he Australian Government endorsed *United Nations Guiding Principles on Business and Human Rights* (UN Guiding Principles), entities have a responsibility to respect human rights in their operations and supply chains. This responsibility includes taking action to prevent, mitigate and, where appropriate, remedy modern slavery in your entity's operations and supply chains.

Other illegal and harmful practices may be present within the supply chain, but are not considered modern slavery. Practices like substandard working conditions or underpayment of workers may be indicators of more serious exploitation, corruption and practices which impact on human rights.

Modern Slavery Act 2018

The Australian Government's *Modern Slavery Act 2018* (the Act) came into force on 1 January 2019. The Act establishes a mandatory reporting regime for entities:

- with consolidated revenue of at least A \$100 million in the reporting period, and
- who are either an Australian entity or a foreign entity carrying on business in Australia.

The Act requires reporting of an Annual Modern Slavery Statement (the Statement). The Statement must identify and address the risks of modern slavery in AMSA's global and domestic operations and supply chains, and actions taken to address those risks.

Mandatory Requirements

There are seven mandatory criteria that AMSA is required to address in the Statement:

1. Identify the reporting entity: *page 5*
2. Describe the reporting entity's structure, operations and supply chains: *page 7*
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls: *pages 9-17*
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes: *page 9*
5. Describe how the reporting entity assesses the effectiveness of these actions: *page 9*
6. Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement): *not applicable*
7. Any other relevant information: *pages 21-22.*

Reporting period 2019-20 and timelines

The first Australian Government Modern Slavery Statement covers the 2019-20 Australian financial year (reporting period). Statements from entities were originally due to be published before 31 December 2020, however, because of COVID-19 the first reporting period has been extended to 31 March 2021.


Statements are to be provided to the Modern Slavery Business Engagement unit; Australian Border Force, Department of Home Affairs. Entities who fail to comply with the reporting requirements will be publicly named and may be subject to remedial action to ensure future compliance.

The Modern Slavery Business Engagement Unit expects entities to use a continuous improvement approach in implementing the requirements, and to see demonstrable improvements in the quality of information and the understanding of modern slavery over time.

AMSA's Statement must be approved by the AMSA Board and signed by a responsible member of the AMSA Board, prior to publication.

AMSA's Modern Slavery Statement

Reporting Period 1 July 2019 – 30 June 2020

Mandatory Criteria	Act Requirement
Threshold	The Australian Maritime Safety Authority (AMSA) is an Australian Entity.
Threshold	AMSA has consolidated revenue in excess of \$100m in the reporting period.
1. Identification	Identify the reporting entity
	 <p>Australian Government Australian Maritime Safety Authority</p> <p>AMSA is a corporate Commonwealth entity, operating under the <i>Public Governance Performance and Accountability Act 2013</i>. It was established by the <i>Australian Maritime Safety Authority Act 1990</i>. It is part of the Department of Infrastructure, Transport, Cities and Regional Development Portfolio of the Australian Government.</p>
2. Organisation	Describe the reporting entity's structure, operations and supply chains
A. Structure	<p>General Structure</p> <p>AMSA's organisational structure is made up of:</p> <ol style="list-style-type: none"> 1. the AMSA Board appointed by the Minister for Infrastructure, Transport and Regional Development and consisting of a: <ol style="list-style-type: none"> I. Chairperson, II. Deputy Chairperson III. Chief Executive Officer IV. person occupying an office in the portfolio department V. five other members, 2. the Executive team, and 3. four operational and service areas: <ol style="list-style-type: none"> I. Operations II. Response III. Standards IV. Corporate Services. <p>Australian Business Number</p> <p>AMSA's hold the ABN 65 377 938 320 number on the Australian Business Register.</p> <p>AMSA does not own or control any other entities.</p>

	<p>Registered office and locations</p> <p>AMSA's head office is 82 Northbourne Avenue, Braddon, ACT, 2612</p> <p>AMSA has a total of 21 office locations across Australia.</p>
<p>B. Operations</p>	<p>Primary Role</p> <p>AMSA is Australia's national agency responsible for maritime safety, protection of the marine environment and maritime aviation search and rescue.</p> <p>AMSA's primary role is to:</p> <ul style="list-style-type: none"> • promote maritime safety and protection of the marine environment • prevent and combat ship-sourced pollution in the marine environment • provide infrastructure to support safe navigation in Australian waters • provide a national search and rescue service to the maritime and aviation sectors • provide, on request, services to the maritime industry on a commercial basis • provide, on request, services of a maritime nature on a commercial basis to the Commonwealth and/or states and territories. <p>AMSA has a role in ensuring international conventions such as to the <i>Safety of Life at Sea (SOLAS)</i> and the <i>Maritime Labour Convention (MLC)</i> are maintained while international vessels are in Australian waters.</p> <p>Employees and representatives</p> <p>AMSA employees approximately 415 staff, including a permanent representative in London, United Kingdom.</p> <p>AMSA also uses delegated officials within relevant State maritime agencies and police forces to enable compliance activities.</p> <p>Countries of operation</p> <p>While AMSA is primarily based in Australia and servicing Australia's territorial waters, it also:</p> <ul style="list-style-type: none"> • conducts education and training campaigns within the pacific region, • assists in regional search and rescue activities where requested, • is responsible for conducting flag state control inspections (Australian ships) in overseas ports, and • has a representative in London attending International Maritime Organization (IMO) meetings. <p>Investments</p> <p>AMSA has a single investment fund with Commonwealth Bank Australia which is to provide a ready source of income in the event of a major pollution incident.</p>

	<p>AMSA’s Stakeholders</p> <p>AMSA’s stakeholders include, but are not limited to:</p> <ul style="list-style-type: none"> • our regulated community—domestic commercial vessel industry, shipping industry and seafarers, • maritime service providers and partners—including navigation, pollution response and maritime and aviation search and rescue, • Australian Government, state and territory governments and their agencies, • the International maritime community, and • the Australian community.
<p>C. Supply chain</p>	<p>Types of supply chains</p> <p>AMSA supply chains are with various suppliers and specialists from Australia and internationally, including those with: expertise in search and rescue, environmental emergencies, regulating domestic commercial vessels and international vessels entering Australian waters.</p> <p>Control of supply chains</p> <p>Supply chains are controlled with strict contracting arrangements as defined by the <i>Commonwealth Procurement Rules</i>.</p> <p>Suppliers to AMSA are required to comply with any laws, statutes, regulations, by-laws, ordinances or subordinate legislation in force from time to time, including in particular but not limited to the:</p> <ul style="list-style-type: none"> • <i>Auditor-General Act 1997</i> • <i>Crimes Act 1914</i> • <i>Criminal Code Act 1995</i> • <i>Disability Discrimination Act 1992</i> • <i>Freedom of Information Act 1982</i> • <i>Environment Protection and Biodiversity Conservation Act 1999</i> • <i>Privacy Act 1988</i> • <i>Public Governance, Performance and Accountability Act 2013</i> • <i>Public Interest Disclosure Act 2013</i> • <i>Racial Discrimination Act 1975</i> • <i>Safety, Rehabilitation and Compensation Act 1988</i> • <i>Sex Discrimination Act 1984</i> • <i>Trade Practices Act 1974</i> • <i>Workplace Gender Equality Act 2012</i> • <i>Work Health and Safety Act 2011</i> <p>Disclosures</p> <p>AMSA contracts valued at or above the relevant reporting threshold value of AUD\$400,000 (GST inclusive) are reported on AusTender: https://www.tenders.gov.au/.</p>

AMSA contracts valued at or above AUD\$100,000 (GST inclusive) are published on the AMSA website biannually as required under the Murray Motion: <https://www.amsa.gov.au/about/reporting-and-accountability/tenders-and-contracts>.

Major Suppliers

AMSA’s major suppliers provide services that are listed in the table below. These provide long term and stable supply to enable AMSA to achieve its objectives.

Major Service required	Source country (where known)
Aerial Search and Rescue Services	Australia based
Emergency Towage capability and Aid to Navigation maintenance through a dedicated vessel	Australia based
Travel Services	Australia and international using whole of Government travel arrangements
Labour hire for call centre, ICT and other services	Australian and international recruitment suppliers used for Australian based positions
Contractors for the construction and maintenance of Aids to Navigation (AtoN)	Australia based
Material suppliers to contractors for construction of AtoNs	Australian and international including the Netherlands, Singapore, Japan, China and United Kingdom
Provision of office services and supplies, such as cleaning and office furniture	Australia based (WINC is the primary supplier for office supplies)
Provision of corporate clothing	Australian based contractor, with potential international supply chains
Provision of IT equipment and supplies	Australian distributors using international companies (Dell, Apple, CISCO, HP, Polycom)

3. Risks	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls
	Identified in the risk and control table below.
4. Controls	Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes
	<p>AMSA primarily addresses the risks of modern slavery practices occurring in its operations and supply chains through strict procurement and operational procedures, in line with standard overarching Commonwealth policy.</p> <p>To assist with identification of additional risks, all appropriate AMSA staff will complete the 'Modern Slavery Training for Procurement Officers' when the platform is available. This training, produced by the Australian Government, will assist AMSA in addressing modern slavery Risks by educating staff on:</p> <ul style="list-style-type: none"> • what modern slavery is, • what modern slavery looks like in Government supply chains, • what AMSA can do to further address modern slavery risks, and • how to report concerns about modern slavery practices. <p>These practices have been identified in the risk and control table below.</p>
5. Evaluation	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks
	<p>The incorporation of specific processes and checklists to assess and address risks of modern slavery is a relatively new undertaking for AMSA. To assess the effectiveness of these processes, applied to the entire procurement lifecycle, AMSA will undertake a three-phase effectiveness assessment:</p> <ol style="list-style-type: none"> 1. Assess the number of overall contracts that have completed the initial risk assessment. <i>Note: an initial risk assessment will be incorporated into all future approaches to market. Full compliance will be deemed to be effective.</i> 2. Where higher risks are identified in an approach to market, AMSA's future treatments (as below) will be used to assess the effectiveness of our actions and controls. 3. A qualitative assessment of the impacts of these treatments will be undertaken. <p>AMSA can include statistics on compliance with these requirements in future Modern Slavery Statements.</p> <p>AMSA will continue to assess potential impacts of modern slavery on AMSA business, and to identify areas of concern.</p>

6. Consultation	Describe how the reporting entity consulted on its statement with any entities it owns or controls
	AMSA does not own or control any other entities, and will not be responding to this criterion.
7. Relevant Information	Provide information that you think is relevant
	AMSA has identified our work with the Maritime Labour Convention in the risk assessment below.

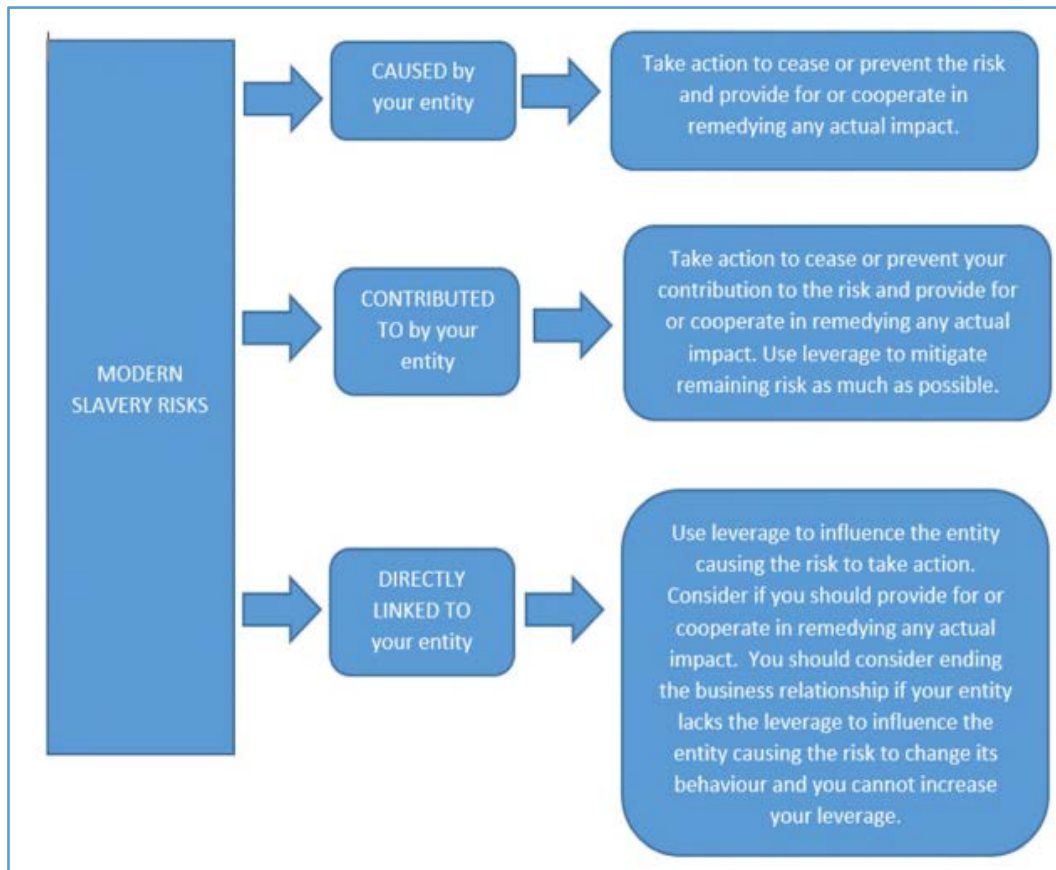
Risk Assessment

Risks of modern slavery practices

AMSA's operations and supply chains cross many industries and sectors - from call centre labour hire to search and rescue operations, stationery to construction of AtoNs. These industries and sectors have complex multi-tiered downstream supply chains that span various industries and countries.

It is unlikely that AMSA's current known and immediate supply chain has risks which meet the threshold for serious exploitation as defined by the *Modern Slavery Act 2018*.

AMSA uses the Department of Home Affairs's Cause, Contribute and Linked (CCL) model to limit the risk of modern slavery in our supply chains. Using the model helps AMSA understand and focus on those items we directly control or contribute to, as opposed to those items where we have less control.



Appendix 1 describes a list of modern slavery indicators which can be used to identify the risks represented by our major suppliers, including:

- Sector and Industry Risks
- Product and Service
- Geographic risk
- Entity Risk

The result of assessing the indicators and applying the CCL model is a risk and control table - which will be added to as AMSA continually improves its awareness and understanding of the risks of modern slavery.

AMSA acknowledges that:

- visibility of the risks of modern slavery practices in our full downstream supply chains is limited
- modern slavery risks to AMSA will change over time as operational requirements change and our understanding of our supply chains improves
- there is a risk that identified contracts/supply chains may have links to modern slavery further down the supply chain that are outside of AMSA's visibility and control.

Generic Controls

AMSA has a range of generic controls to ensure that, where possible, our suppliers do not increase or contribute to the risk of modern slavery. These controls include:

- inclusion of standard Australian Government Terms and Conditions, including model IT clauses in AMSA's contracts
- use of AMSA contract terms and conditions by preference, identifying specific legislative compliance requirements
- whole of government purchasing agreements including travel, fleet leasing, and
- specific onsite contract management and monitoring of major contracts.

Future Actions

Screening tool

As detailed in the Department of Home Affairs '*Addressing Modern Slavery in Government Supply Chains Toolkit*', AMSA will develop a simple risk screening tool to be used in procurement activities to improve identification of potential modern slavery risks, and to identify potential high risk procurements. This tool will be added to the existing "Initial Contract Risk Assessment" checklist that is completed as part of all approaches to market.

The additions to the "Initial Contract Risk Assessment" will consider the overall risks of modern slavery as follows:

Step 1:

Identify the broad operations and overall supply chain structure of the procurement/contract through a broad mapping exercise to identify:

- the general sector and industry involved,
- the product/s and service/s required/provided,
- the geographic region where the production/labour typically occurs for the sector or industry involved, and
- the type of entity likely to be involved.

Step 2:

Use the matrix below to help identify modern slavery risks across the categories of:

- Sector and industry risks
- Product and services risks
- Geographic risks
- Entity risks

SECTOR AND INDUSTRY RISKS

Consider whether there is a high prevalence of modern slavery in the particular industry or sector.

Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes. Typically if the sector or industry that you will be dealing with is informal and unregulated, with little visibility over lower tier suppliers, it will be considered a high risk. Further, industries or sectors that involve seasonal, low-paying, low-skilled or dangerous/hazardous work may also carry a higher risk.

For example, industries that are recognised as high-risk globally include extractives, textiles and fashion, fishing, electronics, cleaning and agriculture.

PRODUCT AND SERVICES RISKS

Consider whether there is a high prevalence of modern slavery associated with the particular good or service.

Certain products and services may have high modern slavery risks because of the way they are produced, provided or used. For example, bricks, cobalt, cotton and rubber are recognised as high risk products globally. Similarly, services such as cleaning that often involve lower wages and manual labour may have high modern slavery risks.

The [Global Slavery Index](#) provides a list of the top 15 products imported by G20 countries that have a high risk of modern slavery.

GEOGRAPHIC RISKS

Consider whether there is a high prevalence of modern slavery in the location that the production or service is sourced or produced from.

Some countries may have higher risks of modern slavery due to poor governance, weak rule of law, conflict, corruption, displacement, state failure to protect human rights, migration flows and socio-economic factors like poverty or widespread discrimination.

The [Global Slavery Index](#) and the [Freedom House List](#) provide information on higher-risk countries.

SUPPLY CHAIN MODEL RISKS

Consider whether the nature of the supply chain model likely to be involved carries a greater risk of modern slavery.

Generally, the larger and more complex the supply chain is, the harder it can be for a supplier to identify and monitor modern slavery practices.

Sub-contracting and the use of labour recruiters in the supply chain will also increase the risks of modern slavery, especially where recruitment fees are charged.

Where risks are identified, further investigation will be undertaken in conjunction with the Risk and Compliance team.

Approaching the Market

Where significant modern slavery risks are identified at the 'Initial Contract Risk Assessment' additional safeguards will be integrated into tender processes and documentation.

1. Planning stage:

Significant risks will be mitigated as far as possible through the procurement process:

- Conditions for participation (terms and conditions) will include clauses related to modern slavery as defined by the Commonwealth Modern Slavery Act Guidance for Reporting Entities.
- Statement of Requirements will be modified to include relevant clauses to ensure compliance with particular technical, labour or employment standards (for example the International Labour Organisation's Labour Standards)
- Where very significant risks are identified the Statement of Requirements will also include a supplier questionnaire as per the Australian Government Modern Slavery Toolkit.

2. Evaluating submissions:

The Procurement Evaluation Plan will be tailored to include evaluation criteria that assess the supplier's proposed approach to addressing modern slavery risks when evaluating and assessing their tender submission (including responses to the supplier questionnaire where used).

The evaluation process will include assessment of:

- any modern slavery clauses where any non-compliance would render the supplier as non-compliant and excluded from the tender process,
- evaluation of compliance with the draft conditions of contract and any specifications (as applicable) relating to modern slavery compliance, having regard to the evaluation criteria, and
- investigation of costs that appear to be abnormally low that give rise to modern slavery concerns

3. Contract negotiation:

Procurement officers will consider including specific clauses that guard against modern slavery risks in contracts with suppliers. The Commonwealth ClauseBank includes pre-drafted contract terms that can be added to existing AMSA contract when appropriate. These clauses are incorporated without change in order to preserve the legal integrity of the contract terms.

4. Contract management:

Contract managers will work in collaboration with suppliers to incorporate measures safeguarding against potential modern slavery risks and monitor progress, and will implement action plans to mitigate the risks identified.

AMSA will assess any requirement for drafting new clauses for approaches to market and contract documentation to ensure supplier's obligations with regard to modern slavery are captured. AMSA will consider the inclusion of key performance indicators in high risk contracts on a case-by-case basis.

Where appropriate AMSA will also work collaboratively with suppliers to raise the awareness of modern slavery risks in their operations and supply chains. AMSA will clearly communicate its expectations to suppliers including how to identify, address and report modern slavery issues.

Due Diligence

Where a risk of modern slavery is identified AMSA will continue to provide education to staff on any potential risks/impacts and possible controls. This may include closer due diligence of suppliers, any subcontractors and major suppliers.

AMSA will continue to monitor modern slavery issues and their potential impact and consider the possible inclusion of relevant clauses in AMSA contracts as appropriate.

Risk and Control table

	Major Identified Suppliers	3. Risks: Describe the risks of modern slavery practices	4.Controls: Actions taken by AMSA to control or address risks
Cause	AMSA's direct operations	AMSA has eliminated the risks from our direct employment contracts and agreements	AMSA's Enterprise Agreement is negotiated with workers and is assessed against the Australian Government requirement of <i>the Fair Work Act 2009</i> . AMSA has a dispute resolution processes for staff.
Contribute	Travel Services	AMSA has eliminated the direct risk of modern slavery through travel arrangement services. A remote risk remains, caused by suppliers to the whole of Government travel arrangement that have not been fully assessed They include: <ul style="list-style-type: none"> • QBT (Australian owned). QBT belongs to the GlobalStar group - an international travel management company. • 18 airlines. • AOT Group – a subsidiary of HelloWorld Travel. Helloworld has a Corporate Responsibility Statement which includes upholding the UN Global Compact. 	Use of whole of Australian Government travel arrangements (agreed by AMSA in 2020).

	Major Identified Suppliers	3. Risks: Describe the risks of modern slavery practices	4. Controls: Actions taken by AMSA to control or address risks
		<ul style="list-style-type: none"> • Hertz is subsidiary of Hertz Global Holding, an American company. It includes the brands Hertz, dollar car rental, Thrifty, Firefly and Donlen. Hertz has a Corporate Social Responsibility report available, but does not specifically look at modern slavery. • Diners Club is a subsidiary of Citigroup family of companies. Citigroup has a commitment to respect human rights, including identifying labour risks, risks related to resettlement and indigenous peoples. 	
	Aerial Search and Rescue Services	<p>There is no risk that the current crew or workforce of the main contractor are subject to any risk of modern slavery.</p> <p>There was a slight linked risk that the construction of the aircraft provided for AMSA's dedicated use may have included indentured labour, servitude, or debt bondage.</p>	AMSA has generic controls in place, and conducts regular audits and reviews on major contracts.
	Emergency Towage capability and Aid to Navigation maintenance through a dedicated vessel	<p>There is no risk that the current crew are subject to any risk of modern slavery.</p> <p>There was a slight linked risk that the vessel procured and built for AMSA's dedicated use (the <i>Coral Knight</i>) may have included elements of indentured labour.</p>	AMSA has generic controls in place, and conducts regular audits and reviews on major contracts.

	Major Identified Suppliers	3. Risks: Describe the risks of modern slavery practices	4. Controls: Actions taken by AMSA to control or address risks
		<p>There is a slight Linked risk that items of equipment used to supply emergency towage capabilities may be manufactured using elements of indentured labour.</p> <p>There is a slight perception risk that crews on vessels which AMSA uses as secondary towage may be subject to situations which are deceptive in nature, and may appear akin to servitude.</p>	
	Contractors for the construction and maintenance of AtoN	<p>There is no risk that the employees of AMSA primary contractor could be working under modern slavery conditions.</p> <p>There is a remote linked risk that third party contractors may be subjected to modern slavery.</p>	<p>AMSA has generic controls in place, and conducts regular audits and reviews on major contracts.</p> <p>The primary contractor is required to be certified to Quality, Environmental and Occupational Health and Safety Standards.</p>
	Labour hire for call centre ICT and other services	There is no risk that AMSA's labour hire agreements could be considered modern slavery.	<p>AMSA has terms and conditions in place with employment agencies.</p> <p>These agencies must protect the rights of their employees, including labour hire staff.</p>
	Other contracts	There is a remote risk that that AMSA contributes to modern slavery practices through its engagement of suppliers to deliver products and services through agreed contractual arrangements.	<p>AMSA engages suppliers through strict procurement activities compliant with the Commonwealth Procurement Rules, including strong adherence to probity principles.</p> <p>Contracted suppliers are required to comply with any laws, statutes, regulations, by-laws, ordinances or subordinate legislation.</p>

	Major Identified Suppliers	3. Risks: Describe the risks of modern slavery practices	4.Controls: Actions taken by AMSA to control or address risks
Linked	Provision of IT equipment and supplies	<p>There is a moderate risk that the original manufacture of IT equipment may use indentured labour, or labour which is unable to freely leave their position, or are in debt bondage.</p> <p>There is a moderate industry risk that the original source material to manufacture IT equipment used indentured labour, or labour which is unable to freely leave their position, or are in debt bondage - and may include child labour.</p>	<p>The industry which is used to manufacture computer components has a history or indentured labour and servitude which AMSA is aware of.</p> <p>AMSA itself has little control over the risk presented by mining supply chains supporting IT manufacture.</p> <p>Ethical procurement at a whole of Government level is required to change industry behaviour.</p>
	Corporate Clothing	<p>There is a slight risk that this contract may contribute to modern slavery practices through arrangements with corporate clothing suppliers who may focus on minimising production costs by using indentured labour, debt bondage or servitude.</p>	<p>The industry which manufactures clothing is known to have a history of indentured labour and servitude.</p> <p>AMSA has little control, but will continue to work with suppliers to ensure that clothing is sourced from socially responsible manufacturers.</p>
	Provision of office services and supplies, such as cleaning and office furniture	<p>There is a remote risk that suppliers of cleaning services may contribute to modern slavery practices through its recruitment practices and/or the use of trafficked personnel.</p>	<p>AMSA's contracting processes include compliance with Australian legislation with employee rights.</p> <p>We acknowledge our responsibility for the welfare of those working in our offices as a person undertaking business under the WHS Act.</p>

	Major Identified Suppliers	3. Risks: Describe the risks of modern slavery practices	4. Controls: Actions taken by AMSA to control or address risks
		There is a slight risk that AMSA uses items manufactured outside Australia that may include exploitation of people and resources.	AMSA's primary supplier has committed to corporate responsibility, which includes being socially responsible and working with their suppliers to meet a supplier code of conduct and ethical sourcing requirements.
	Material suppliers to contractors for construction of AtoNs	There is a moderate risk that suppliers of AtoN materials which require unique or difficult to obtain materials are subject to modern slavery practices - specifically rare minerals mining. The company mining and manufacture of materials is not required to be disclosed on AMSA contracts, and AMSA practically has no control over the contractors' procurement processes.	AMSA's current contracts contain clauses to encourage compliance with relevant Australian legislation. AMSA will continue to work with suppliers to ensure, where possible, materials are sourced ethically and meet corporate social requirements in relation to modern slavery.
Other	MLC and SOLAS requirements	Many risks associated with the international sector of the maritime industry are addressed through the <i>Maritime Labour Convention 2006</i> (the Convention) which identifies a basic standard and regulations for the working and living conditions of seafarers. Australia is a signatory to the Convention.	AMSA has implemented and is responsible for regulating the Convention through the <i>Navigation Act 2012</i> and associated delegated legislation such as Marine Order 11 (Living and working conditions on vessels) 2015 (Marine Order 11). AMSA is satisfied that, through its operations under the Convention and the Fair Work Act, the potential risk to cause, contribute to or be directly linked to modern slavery in the maritime workforce is very low.

	Major Identified Suppliers	3. Risks: Describe the risks of modern slavery practices	4. Controls: Actions taken by AMSA to control or address risks
		<p>The Convention was developed under the International Labour Organization, and came into force internationally on 20 August 2013. The Convention consolidates existing labour conventions relating to the rights, freedoms, safety and introduces modern standards for the employment and living conditions of seafarers at sea.</p> <p>AMSA has a memorandum of understanding (MOU) with the Office of the Fair Work Ombudsman in relation to the Convention. The MOU establishes a system of shared responsibilities, including maritime inspections and compliance actions as required by the Convention, ensuring that vessels in Australian waters are provided with similar conditions to Australian crewed Domestic vessels.</p>	

Appendix 1: Table of Risk Indicators

Type of Risk	Indicators
<p>Sector and industry risks</p> <p>Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes.</p>	<ul style="list-style-type: none"> • Use of unskilled, temporary or seasonal labour. • Use of short-term contracts and outsourcing. • Use of foreign workers or temporary or unskilled labour to carry out functions which are not immediately visible because the work is undertaken at night time or in remote locations, such as security or cleaning. • Use of child labour in hazardous conditions, such as underground, with dangerous machinery or tools, in unhealthy environments (including where they are exposed to physical or sexual abuse), or for long hours. • Recruitment strategies by suppliers, their agents or labour hire agencies target specific individuals and groups from marginalised or disadvantaged communities. • Direct engagement with children, including through orphanage tourism and other forms of ‘voluntarism’ (including through companies’ social investment and corporate social responsibility programs).
<p>Product and services risks</p> <p>Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.</p>	<ul style="list-style-type: none"> • Cost requirements or delivery timeframes might require suppliers to engage in excessive working hours, make cost savings on labour hire or rapidly increase workforce size. • The development of the product or delivery of the services has been reported as involving labour exploitation by international organisations or Non-Government Organisations (NGO). • Children are often used in the development of the product or delivery of the service, such as carpet weaving. • The product or components of the product are made in countries where there is a high risk of labour exploitation reported by international organisations or NGOs.

	<ul style="list-style-type: none"> • The services are provided in countries where there is a high risk of labour exploitation reported by international organisations or NGOs. • The product is made from materials or using services reported to involve a high risk of labour exploitation by international organisations or NGOs.
<p>Geographic risks</p> <p>Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio economic factors like poverty. A number of organisations issue public reports evaluating governance, corruption and rule of law in countries around the world. You can use these reports to identify higher risk countries for modern slavery.</p>	<ul style="list-style-type: none"> • The country has not ratified international conventions relevant to modern slavery, such as: the International Convention to Suppress the Slave Trade and Slavery (1926); ILO Convention (No. 29) concerning Forced or Compulsory Labour (1930); the Supplementary Convention on the Abolition of Slavery, the Slave Trade and Practices similar to Slavery (1956); the Protocol to Suppress, Prevent and Punish Trafficking in Persons, Especially Women and Children (2000); ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (1999). • The country is reported to have a high prevalence of modern slavery or labour rights violations, other human rights violations and/or child labour by international organisations or NGOs. • The country has inadequate protections for workers, including no or weak capacity to effectively monitor workplace standards and enforce compliance with national standards. • Law enforcement agencies are reported to be hostile to workers in at risk industries. • The country forces parts of the population to work for development purposes, for example to assist in construction or agriculture. • The country is reported to have weak rule of law by international organisations or NGOs, including due to corruption, conflict and/or political instability. • The country has a high prevalence of people who are vulnerable to exploitation because they are impoverished, displaced or subject to severe discrimination

<p>Entity risks</p> <p>Some entities may have particular modern slavery risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.</p>	<ul style="list-style-type: none"> • Entity has previously been reported as noncompliant with human rights or labour standards, including by media or NGO sources. • Entity’s procurement and sourcing processes appear poorly managed or inefficient. • Entity has complex or opaque supply chains. • Workers appear to have little information about workplace entitlements and protections and there is a general lack of information about workplace standards. • Audit results for the entity appear unreliable or conflict with other sources of information about the supplier, such as NGO reports. • Staff recruitment costs by labour hire companies or recruiters are not covered by the company, meaning that recruitment expenses such as travel may be improperly imposed on workers. • Entity provides residential care for children overseas.
<p>Indicators of modern slavery</p> <p>A combination of these signs may indicate a person is in a situation of modern slavery and that further investigation and assessment is required. You should also consider that some groups may be at higher risk of being impacted by modern slavery, such as women and migrant workers.</p> <p>For example, women can be disproportionately impacted by modern slavery due to structural disadvantages, including lack of access to education.</p>	<ul style="list-style-type: none"> • The suspected victim or victims are: <ul style="list-style-type: none"> ○ living at the workplace, or another place owned/controlled by their employer ○ underpaid or not paid at all ○ required to work excessive hours ○ confined or isolated in the workplace or only leave at odd times ○ guarded at work or in their accommodation ○ isolated in remote locations that are difficult to access and/or restricted from contacting or interacting with people outside the workplace (for example, their phones are confiscated or they are supervised when in public) ○ managed by an intermediary or third party who ‘holds’ or ‘invests’ their money for them ○ subject to different or less favourable working conditions than other workers because of their country of origin, gender or other factors • unable to terminate their employment at any time

	<ul style="list-style-type: none">○ appear to be servicing a debt to an employer or a third party (such as a recruitment agent)○ appear to be subjected to, or threatened with, violence, emotional, sexual, verbal or physical abuse and/or degrading treatment in connection with their employment○ appear to be subjected to intimidation, such as threats to their family or close relations in connection with their employment • appear to have false travel or personal documents and/or are not allowed access to these documents because they are being held by an employer or third party○ appear to have been deceived about the conditions of their employment○ are not provided with contracts in a language and format that they can easily understand○ are not informed of, or do not appear able to understand the terms and conditions of their employment○ are not provided with any protective equipment, training or means to refuse to participate in dangerous work practices, or refuse to handle known toxic materials or hazards○ do not have permission to work because they are from another country or appear to be working in breach of visa requirements
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Information source: Commonwealth Modern Slavery Act Guidance for Reporting Entities

Appendix 2: References

1. Department of Home Affairs, [Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities](#)
2. [AMSA Corporate Plan 2019-20](#),
3. [AMSA Board](#) and [Organisation Structure](#) – AMSA website
4. Australian Maritime Safety Authority Act 1990
5. Public Governance, Performance and Accountability Act 2013
6. *Maritime Labour Convention, 2006: [A Guide to the implementation of the MLC 2006 in Australia](#)*,
7. *United Nations Guiding Principles on Business and Human Rights*