



1. Background

Staying true to our commitment to following Jesus Christ, The Leprosy Mission Australia (TLMA) does not want to see people trapped in slavery. We are aware that modern slavery overwhelmingly impacts people who live in poverty. Many people affected by leprosy are economically disadvantaged and face a higher risk of ending up in slavery. We choose to be an active participant in preventing slavery in all aspects where it may intersect with our organisation.

2. Purpose

The Leprosy Mission acknowledges that several regions that we support through our programmatic partnerships are in high-risk areas for modern slavery, and The Leprosy Mission Shop, which in essence seeks to provide artisans in underprivileged situations with sustainable incomes, also faces risks of modern slavery in its supply chains.

TLMA is committed to limiting risks of modern slavery practices in our business and supply chain.

3. Who this policy applies to

This policy applies to you if you are involved in our organisation, including if you are an employee, director, officer, labour hire staff, contractor or other representative of our organisation or of any business in our supply chain.

If you do not comply with this policy, we may end our business relationship with you and if you are an employee, you may be disciplined or dismissed.

4. What is modern slavery?

Modern slavery is depriving a person of freedom for commercial gain and in violation of fundamental human rights.

It describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Modern slavery involves serious exploitation, not sub-standard working conditions or the underpayment of workers although this may be unlawful for other reasons.

Modern slavery can take many forms including:

- a) Slavery - owning a person, trading in slaves or financing slave trading (ie, human trafficking)
- b) Forced labour - forcing a person to work by coercion or threats (and servitude is when that person's freedom is significantly restricted)
- c) Forced marriage - a marriage without free and full consent - eg, due to lack of understanding or duress/coercion
- d) Debt bondage – a person works to pay off a large debt, for an unlimited time or where the value of the work is not applied to the debt
- e) Deceptive recruiting – a recruiter charges a fee for the job offer, confiscates identity documents, deceives a person about personal freedom or their ability to leave the job
- f) Child labour - not always unlawful but not tolerated by us when it involves exploiting children, depriving them of education, making them work in unsafe working environments

Modern slavery can be complex and multi-faceted and can be difficult to spot.

5. What are indicators of modern slavery practices?

Modern slavery indicators may include where a person:

- a) is not in possession of their own passport, ID or travel documents;
- b) is acting as though they are being instructed or coached by someone else;
- c) allows others to speak for them when spoken to directly;
- d) is dropped off and collected from work;
- e) is withdrawn or appears frightened or have physical indicators of slavery, such as injuries;
- f) unable to contact friends or family freely;
- g) has limited social interaction or contact with people outside their immediate environment;
- h) story contains obvious errors;
- i) acts with hostility or have difficulty in concentrating due to trauma;
- j) has few possessions;
- k) has little or no control over their finances or no access to a bank account, or they are being
- l) significantly overcharged for their accommodation; and
- m) is living in a very poorly maintained and overcrowded place.

These indicators are not exhaustive and do not necessarily mean there are no other modern slavery practices. Sometimes there may be other reasons or circumstances that indicate that something is not right.

6. Managing Modern Slavery Risk

Based on our commitment to reduce modern slavery throughout our supply chains we will endeavour to undertake activities including, but not limited to, those outlined below.

1.1. Social Enterprise

We acknowledge that our Social Enterprise retail operation is an area of potentially elevated modern slavery risk. This is primarily due to the potential for goods sourced from higher risk countries within our supply chains. To mitigate the risks the following activities are carried out:

- Supplier Agreement and Code of Conduct sent to all Social Enterprise Suppliers including contractual obligations for suppliers to address modern slavery risks in their supply chains
- Regular supplier self-assessments, to ascertain levels of compliance and training
- Frequent compliance checks to find out if supplier are maintaining fair trade registration and compliance
- Reviewing our local suppliers and, where relevant, engaging with suppliers that are addressing modern slavery risks
- When on project visits, conduct site visits where is it practical to do so to meet with overseas suppliers and discuss modern slavery risks and mitigations

1.2. International Programs

- Modern slavery discussions with our Project Partners as part of our Quality Assurance Review process

1.3. Internal Operations

- Ongoing review of relevant policies
- Modern Slavery Training for all staff members

- Identifying and addressing modern slavery risks in services supply chains and procurement.

7. What are your responsibilities?

You must take all reasonable steps to ensure our business and supply chain is free of modern slavery practices.

However senior you are and regardless of your business relationship with us, you must pay close attention to high-risk areas, particularly supply chain and outsourcing in jurisdictions without adequate safeguards.

Some areas of the business are likely to have more exposure than others, including procurement and sourcing, human resources, social enterprise, international programs, marketing and fundraising, and finance.

Examples of specific responsibilities include:

- participating in all training, including in this policy;
- leading by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us;
- remaining alert to indicators of slavery (see above);
- using only approved contracts which include modern slavery clauses; and
- obeying our instructions regarding modern slavery.

Turning a blind eye is unacceptable and if you reasonably suspect there may be modern slavery, report it under this policy.

8. How do I report slavery concerns?

If you have a reasonably held suspicion of modern slavery practices, discuss your concerns with the Designated Safeguarding Lead, who will decide a course of action and provide any further advice.

If there is immediate danger call the police — don't tackle a situation on your own as dangerous criminals can be behind modern slavery and human trafficking.

Not all victims may want to be helped and sometimes, reporting a suspected trafficking case puts the potential victim at risk, so it is important that unless there is immediate danger, you discuss your concerns first with the Designated Safeguarding Lead before taking any further action.

Keep your eyes and ears open—your awareness and actions may stop someone, possibly yourself, from being exploited or abused.

9. Policy Review

This Policy will be reviewed in 3 years.

Revision History

Version	Date	Author	Summary
1.0	31/10/2023	Nerida Collard	Policy created and reviewed by Management
1.1	15/11/223	GRC	Reviewed and amended by GRC

Document Approval History

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1.1	4 December 2023	TLMA Board