

GRS Resource: Instructions for Annual Reporting through the online form

Using the GRS Annual Reporting Form

December 2023

This form should be used by covered entities to report annually against the NSW Anti-slavery Commissioner's Guidance on Reasonable Steps.

Please note that you should also include the information you submit in this form in your entity's formal annual report.

Information submitted through this form may be published on the OASC website.

From 1 July 2024, entities will have separate transactional reporting obligations for Heightened Modern Slavery Due Diligence procurements over \$150,000 (incl. GST). A separate online form should be used to report these procurements within 45 days after the agreement for the relevant procurement becomes effective. More information on this will be provided in 2024.

If you wish to save this form and resume later:

1. Go to https://surveys.dcj.nsw.gov.au/jfe/form/SV_etgqbLCw9bj184S
2. Enter your email address in the fields that appear and click the arrow button.
3. A confirmation screen should appear.
4. You will receive an email from 'GRS Annual Reporting Form'.
5. Click on the link in the email or paste it into your browser. This will open the GRS Annual Reporting Form.
6. Start filling in the form.
7. Once you have progressed past the first page, you should be able to close your browser and return to the form via the link in the 'GRS Annual Reporting Form' email. The data you previously entered will be saved in the form.

Please note:

- Each entity should report the steps it has taken during the reporting period to identify and address modern slavery risks in its own operations and to ensure it did not procure goods or services made with modern slavery.
- Each entity must report individually. Entities may however refer to steps undertaken jointly, or incorporate a joint report by reference.
- Report only those steps taken during the reporting period.
- Report only those activities for which your entity is responsible. For example, endorsing agencies do not need to report on the activities of procuring entities that they endorse.
- For mandatory questions, if you have nothing to report, write 'None.'

Part A. General Information

A.1 Reporting Entity Details

Reporting entity details	Instructions for covered entities
Reporting entity	Provide the name of your organisation.
Reporting period – start date	State the first date of your reporting period.
Reporting period – end date	State the last date of your reporting period.
Name of individual authorising this report	This report should be authorised by the person responsible for the entity’s annual report.
Position of individual authorising report	<ul style="list-style-type: none"> For Government Sector Finance agencies, this will be your ‘accountable authority’ as defined in section 7.12 of the <i>Government Sector Finance Act 2018</i> (NSW). For entities covered by the <i>Local Government Act 1993</i> (NSW), this will be your general manager, in accordance with sections 335(e), 406 and 428 of the <i>Local Government Act 1993</i> (NSW). Other covered entities should refer to relevant legislation and/or policies.
Contact details: <ul style="list-style-type: none"> Contact phone Contact email Confirm contact email 	Provide the contact details of the person authorising the report.
Organisational (shared) email	Provide a shared mailbox where we can contact your organisation if the contact person above is unavailable.

A.2 Procurement Spend Details

A.2.1 Total procurement spend

State your entity’s best estimate of its total procurement spend or value for the reporting period.

A.2.2 Procurement spend by GRS Due Diligence Level

Fill out these fields with your entity’s best estimate of its total procurement spend at each GRS Due Diligence Level (GRS DD Level). Your response for ‘identified procurement spend’ should be a single value representing the total amount spent on all categories of good / service procured at this GRS DD level.

In the ‘Categories procured’ column, list out the categories of good or service your entity procured at each GRS DD Level as far as possible. Use the procurement category taxonomy in the IRIT, if helpful. You should keep records during the year of the GRS DD level associated with different procurement processes.

It is, however, acceptable if the total aggregated spend across the four GRS DD levels does not sum to the amount you entered in A.2.1 (your estimated total procurement spend). The Commissioner anticipates that covered entities will continuously improve their due diligence and record keeping over the coming years.

Part B Annual modern slavery reporting

B.1 Significant operational issues

Under section 31(1)(a) of the *Modern Slavery Act 2018* (NSW), a covered entity's annual modern slavery reporting must contain a statement of the action taken by the entity in relation to any issue raised by the Anti-slavery Commissioner during the year which:

- concerns the entity's operations; and
- is identified by the Commissioner as being a significant issue (**significant operational issue**).

These could include:

- how an entity is addressing risks related to the vulnerability of certain groups;
- how an entity is managing risks associated with the procurement of certain types of goods or services; or
- how an entity has responded to a significant event, such as the COVID-19 pandemic, or a new source of modern slavery risk arising from a regulatory change.

B.2 Reasonable Steps

Reasonable Steps taken	Form of response	Response mandatory / optional	Instructions for covered entities
1 Commit			
<i>1.1 Stakeholder Engagement</i>			
What steps did your entity take to engage with stakeholders during this reporting period in relation to modern slavery?	Describe steps taken	Mandatory	Describe the steps your entity took, in line with the Guidance on Reasonable Steps (GRS), to engage stakeholders during the reporting period. Explain how your entity sought to engage stakeholders in a manner that was two-way, good faith, safe, responsive, ongoing, and equitable.
Did you engage with external stakeholders on modern slavery risks in this reporting period?	Yes/No	Mandatory	Answer Yes or No.
<i>1.2 Identify salient risks at the organisational level</i>			
What steps did your entity take to identify salient modern slavery risks at the organisational level during this reporting period?	Describe steps taken	Mandatory	Describe the steps your entity took, in line with the GRS, to identify, analyse and improve transparency over salient modern slavery risks across your full range of operational and procurement activities. Describe any Salient Modern Slavery Risk Assessment conducted or updated in this period (or steps towards conducting or updating them) in accordance with the GRS. Efforts to identify and map your entity's risks in specific supply chains from which you procured should be dealt with in your response to Step 2.1.

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Did you conduct or update a Salient Modern Slavery Risk Assessment in this reporting period?	Yes / No	Mandatory Option to upload copy of risk assessment	Answer Yes or No. You may choose to upload a copy of any modern slavery risk assessment you generated during the reporting period.
<i>1.3 Modern Slavery Policy</i>			
What steps did your entity take to adopt a Modern Slavery Policy during this reporting period?	Describe steps taken	Mandatory	Describe the steps your entity took to adopt a Modern Slavery Policy during the reporting period. Your senior governing body <u>must</u> develop and adopt a formal Modern Slavery Policy in 2024. This should align with the GRS and reflect the risks you have identified through your Salient Modern Slavery Risk Assessment. The Policy should be a high-level document that establishes general principles governing your entity's strategic approach to modern slavery. It can be a standalone policy or integrated into existing policies.
Do you have a modern slavery policy, approved by your senior governing body (e.g. Agency Head / Secretary), in place?	Yes / No	Mandatory Option to upload copy of policy	Answer Yes or No. You may choose to upload a copy of your approved modern slavery policy.
Does your modern slavery policy include high-level targets?	Yes / No	Optional	Answer Yes or No. Setting targets ensures that your entity is addressing salient modern slavery risks and gives you a benchmark against which to assess progress.

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<i>1.4 Modern Slavery Risk Management Plan</i>			
What steps did your entity take to adopt a Modern Slavery Risk Management Plan during this reporting period?	Describe steps taken	Mandatory	Describe the steps your entity took to adopt a Modern Slavery Risk Management Plan, in line with the GRS, during the reporting period. A Modern Slavery Risk Management Plan operationalises the commitments made in your entity's Modern Slavery Policy. It should be approved by your entity's senior management. It can be a standalone policy or integrated into existing policies.
Do you have a modern slavery risk management plan, approved by your senior management, in place?	Yes / No	Mandatory Option to upload copy of plan	Answer Yes or No. You may choose to upload a copy of your approved Modern Slavery Risk Management Plan.
Does your plan assign accountability for performance against high-level targets to specific roles?	Yes / No	Optional	Answer Yes or No.
2 Plan			
<i>2.1 Identify and map your supply-chain risks for each procurement</i>			
What steps did your entity take to identify and map your modern slavery risks at the supply-chain level during this reporting period?	Describe steps taken	Mandatory	Describe the steps your entity took, in line with the GRS, to investigate inherent and residual modern slavery risks in the supply chains from which you procured during the reporting period.

Reasonable Steps taken	Form of response	Response mandatory / optional	Instructions for covered entities
<i>2.2 Develop a risk-reducing sourcing strategy</i>			
What steps did your entity take to develop a modern slavery risk-reducing sourcing strategy during this reporting period?	Describe steps taken	Mandatory	<p>Describe your entity's efforts during the reporting period to integrate modern slavery risk into your entity's procurement sourcing strategy or strategies, in line with the GRS.</p> <p>This could include early engagement with suppliers to understand drivers of risk and risk mitigation measures.</p>
In what percentage of procurement processes was modern slavery factored into your entity's sourcing strategy or other procurement planning activities during this reporting period?	Percentage	Optional	<p>You should report this to the best of your knowledge, as a percentage of the <u>total</u> number of procurement processes your entity has undertaken in the reporting period.</p> <p>This should factor in all procurements you are aware of, regardless of value or GRS Due Diligence Level.</p>
3 Source			
<i>3.1 Select appropriate suppliers</i>			
What steps did your entity take to address modern slavery risks when selecting suppliers during this reporting period?	Describe steps taken	Mandatory	<p>Describe the steps your entity took to address modern slavery risks in supplier selection processes during the reporting period.</p> <p>You should report here on your use of the GRS Model Tender Clauses. You could also report on how you incorporated modern slavery criteria into pre-qualification schemes (or selected suppliers who are already part of schemes with these criteria); required suppliers to commit to a code of conduct; issued self-</p>

Reasonable Steps taken	Form of response	Response mandatory / optional	Instructions for covered entities
			assessment questionnaires; or requested copies of suppliers' modern slavery policies or statements.
In what percentage of competitive procurement processes were the Model Tender Clauses used during this reporting period?	Percentage	Optional	<p>You should report this as a percentage of the <u>total</u> number of competitive procurement processes your entity has undertaken in the reporting period, to the best of your knowledge.</p> <p>This should factor in all procurements you are aware of, regardless of value, GRS Due Diligence Level or which Model Tender clause was used.</p> <p>Report uses of adapted / amended versions of the Model Tender Clauses only where key obligations (notably clauses 1.2 and 1.3) are not fundamentally altered or removed.</p>
<i>3.2 Adopt a shared responsibility approach to contracting</i>			
What steps did your entity take to adopt a shared responsibility approach to modern slavery risks, in contracting during this reporting period?	Describe steps taken	Mandatory	<p>Describe the steps your entity took in line with the GRS to adopt the shared responsibility approach to modern slavery risks in contracting during the reporting period.</p> <p>You should report here on your use of the GRS Model Contract Clauses.</p>
In what percentage of competitive procurement processes were the Model Contract Clauses used during this reporting period?	Percentage	Optional	You should report this as a percentage of the <u>total</u> number of competitive procurement processes your entity has undertaken in the reporting period, to the best of your knowledge. This should factor in all procurements you are aware of, regardless of value,

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			<p>GRS Due Diligence Level, or which GRS Model Contract Clause was used.</p> <p>Report uses of adapted / amended versions of the Model Contract Clauses only where key obligations (notably clauses 1.2, 1.5, 1.7 and 1.8) are not fundamentally altered or removed.</p>
4 Manage			
<i>4.1 Monitor and evaluate supplier performance</i>			
<p>What steps did your entity take to monitor and evaluate supplier performance relating to modern slavery, during this reporting period?</p>	<p>Describe steps taken</p>	<p>Mandatory</p>	<p>Describe the steps your entity took, in line with the GRS and its Modern Slavery Risk Management Plan, to monitor supplier performance throughout the term of their agreement.</p> <p>This could include periodic audits, other ongoing supplier and worksite assessments and evaluations, supplier self-assessment questionnaires (SSAQs), use of KPIs, worker voice mechanisms, workers surveys, engagement with unions and worker organisations, and digital tools.</p>
<p>Has your entity required any of your Tier 1 suppliers to undergo an audit addressing modern slavery risks in this reporting period?</p>	<p>Yes / No</p>	<p>Mandatory</p>	<p>Answer Yes or No.</p> <p>Include only audits that involve some form of worksite evaluation or direct engagement with workers. Supply chain screening tools that rely exclusively on identifying negative news coverage should not be counted for the purpose of this response.</p>

Reasonable Steps taken	Form of response	Response mandatory / optional	Instructions for covered entities
			Audits should only be counted where your entity had access to the results.
What percentage of your Tier 1 suppliers underwent an audit addressing modern slavery in this reporting period?	Percentage	Optional	<p>You should report this as a percentage of the <u>total</u> number of Tier 1 suppliers your entity had active contracts with during the reporting period, to the best of your knowledge.</p> <p>Include only audits that involve some form or worksite evaluation or direct engagement with workers should be counted. Supply chain screening tools that rely exclusively on identifying negative news coverage should not be counted for the purpose of this response.</p> <p>Audits should only be counted where your entity had access to the results.</p>
During the reporting period, what percentage of your Tier 1 suppliers' workforce were surveyed about their working conditions?	Percentage	Optional	<p>Report the proportion of workers in the workforce of your Tier 1 suppliers who were surveyed about their working conditions, during the reporting period.</p> <p>You should report this as a percentage of the <u>total</u> number of workers working for your Tier 1 suppliers, to the best of your knowledge.</p> <p>Include surveys on working conditions conducted by you, your suppliers, or authorised third parties. Only include surveys where you had access to the results.</p>
What percentage of your Tier 1 suppliers' workforce are temporary migrant workers?	Percentage	Optional	Report the proportion of workers in the workforce of your Tier 1 suppliers who were, in the reporting period, temporary migrant workers.

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			You should report this as a percentage of the <u>total</u> number of workers working for your Tier 1 suppliers, to the best of your knowledge.
What percentage of workers engaged by your Tier 1 suppliers in the last reporting period paid or incurred a fee to secure their engagement?	Percentage	Optional	<p>Report the proportion of workers engaged, during the reporting period, in the workforce of your Tier 1 suppliers who paid or incurred a fee to secure their engagement.</p> <p>You should report this as a percentage of the <u>total</u> number of workers engaged by your Tier 1 suppliers during the reporting period, to the best of your knowledge.</p> <p>Include all workers that paid or incurred recruitment fees (as defined in the GRS), including where they paid those fees prior to the last reporting period.</p>
<i>4.2 Develop supplier capabilities</i>			
What steps did your entity take to develop supplier capabilities relating to modern slavery risks during this reporting period?	Describe steps taken	Mandatory	<p>Describe the steps your entity took (where appropriate and subject to resources) to develop suppliers' capabilities around modern slavery.</p> <p>You should report both on steps your entity undertook independently, and by collaborating with relevant stakeholders, peers and experts.</p>
What percentage of your entity's Tier 1 suppliers reported that they had participated in modern slavery training during this reporting period?	Percentage	Optional	Report the proportion of your entity's Tier 1 suppliers who reported that they (or their relevant personnel) had participated in modern slavery training during the reporting period.

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			You should report this as a percentage of the <u>total</u> number of your Tier 1 suppliers during the reporting period, to the best of your knowledge.
5 Remedy			
<i>5.1 Provide or enable access to effective grievance mechanisms</i>			
What steps did your entity take to provide or enable access to effective modern slavery grievance mechanisms during this reporting period?	Describe steps taken	Mandatory	Describe the steps you took to enable or provide access to a modern slavery grievance mechanism, in line with the GRS, during the reporting period. You may provide access to a dedicated grievance mechanism, as a single entity or in collaboration with others, or enable access to an effective grievance mechanism provided by others.
How many complaints relating to modern slavery associated with your operations or the goods or services you procure were lodged during the reporting period, whether with your organisation's grievance mechanism(s) or with others?	Number	Optional	Report the number of complaints lodged during the reporting period which related to modern slavery associated with your operations or the goods or services you procure. Report this number to the best of your knowledge. You should keep a record of all complaints submitted through any grievance mechanism that you provide or enable access to which, to the best of your knowledge, relate to modern slavery.

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<i>5.2 Take safe immediate steps to remedy harm</i>			
What steps did your entity take to safely and immediately remedy modern slavery harms to which you were connected during this reporting period?	Describe steps taken	Mandatory	<p>Describe the steps your entity took in line with the GRS to safely and immediately address modern slavery harms to which you were connected, during the reporting period.</p> <p>This could include steps taken through a grievance mechanism, establishment or use of a standard operating procedures for responding to instances of modern slavery in your operations or supply chains, or activation of contractual material breach clauses.</p>
<i>5.3 Use leverage to remediate deficient practices</i>			
What steps did your entity take to use leverage to remediate deficient modern slavery risk management practices during this reporting period?	Describe steps taken	Mandatory	Describe your efforts to use leverage to support suppliers to address and remediate weaknesses in their modern slavery risk management practices, in line with the GRS, during the reporting period.
In how many procurement contracts or arrangements was a material breach related to modern slavery formally notified during this reporting period?	Number	Optional	<p>Report the number of times your entity formally notified a supplier, during the reporting period, that you had identified a material breach of contract relating to modern slavery.</p> <p>Clause 1.8 of the Model Contract Clauses deals with material breach and termination.</p>

Reasonable Steps taken	Form of response	Response mandatory / optional	Instructions for covered entities
<i>5.4 Withdraw responsibly</i>			
<p>What steps did your entity take to withdraw responsibly during this reporting period, in connection to modern slavery risks?</p>	<p>Describe steps taken</p>	<p>Mandatory</p>	<p>Describe any steps you took to withdraw from a relationship with a supplier or business partner in connection to a modern slavery risk during the reporting period , in line with the GRS.</p> <p>Note that this should be a last resort. You should describe:</p> <ul style="list-style-type: none"> • failed attempts at preventing or mitigating severe impacts, • why adverse impacts were irremediable, • why there is no reasonable prospect of change, or • the severe adverse impacts or risks that were identified, and the supplier's / partner's failure to take immediate action to prevent or mitigate these. <p>You should also address how you took account of the importance of the relationship to your entity, the legal implications of remaining in or ending the relationship, and whether disengagement might increase modern slavery risks to people.</p>
<p>How many procurement contracts or arrangements were terminated on modern slavery grounds during the reporting period?</p>	<p>Number</p>	<p>Optional</p>	<p>Report how many times your entity terminated a contract or arrangement with a supplier or a business relationship on modern slavery grounds during the reporting period.</p>

Reasonable Steps taken	Form of response	Response mandatory / optional	Instructions for covered entities
6 Report			
<i>6.1 Establish a victim-centred reporting protocol</i>			
What steps did your entity take to establish a victim-centred modern slavery reporting protocol during this reporting period?	Describe steps taken	Mandatory	Describe your entity's efforts to design and implement protocols to report suspected modern slavery to support services or, where appropriate, authorities, in line with the GRS. Describe how the protocol: protects the interests of victim-survivors through confidentiality and other safeguards; includes sufficient resources to ensure victim-survivors' welfare; assigns responsibility for oversight of responses and reporting; and is communicated internally within your entity.
Do you have a modern slavery reporting protocol in place that prioritizes the interests of the victim/survivor?	Yes / No	Mandatory	Answer Yes or No.
<i>6.2 Report on your modern slavery risk management efforts</i>			
What steps did your entity take to report on your modern slavery risk management efforts during this reporting period?	Describe steps taken	Mandatory	Describe your entity's steps to report annually in line with the GRS and to submit a copy of your entity's annual reporting information using the OASC's online template. Describe also any transaction-level reporting your entity has undertaken. From 1 July 2024, your entity will also have obligations to report Heightened modern slavery due diligence procurements with a value of AUD \$150,000 (including GST) or more within 45 days of the

Reasonable Steps taken	Form of response	Response mandatory / optional	Instructions for covered entities
			procurement contract or other agreement coming into effect. These details are to be submitted through a separate online form which will be developed in 2024 by the Office of the Anti-slavery Commissioner.
Did your entity report on modern slavery in its prior Annual Report?	Yes / No	Mandatory	Answer Yes or No. Note that the statutory reporting requirements came into force as of 1 July 2022.
During the period, did your entity comply with its obligations to report heightened modern slavery due diligence procurements valued at \$150,000 (inc. GST) or more within 45 days?	Yes / No	Mandatory	Answer Yes or No. For all reporting on activities occurring up to 30 June 2024, answer 'Yes' (as these obligations only commence on 1 July 2024).
7 Improve			
<i>7.1 Learn lessons from your performance and others'</i>			
What steps did your entity take to learn lessons from your modern slavery performance and others' during this reporting period?	Describe steps taken	Mandatory	Describe your entity's efforts during the reporting period to review its performance in identifying, managing and remedying modern slavery risks in line with the GRS. You should explain how you factored in information and feedback identified through grievance mechanisms and stakeholder engagement efforts. You could describe progress towards high-level targets in your Modern Slavery Policy and Risk Management Plan.

Reasonable Steps taken	Form of response	Response mandatory / optional	Instructions for covered entities
Has your entity updated its modern slavery policies or procedures based on stakeholder feedback or lessons from a grievance mechanism during this period?	Yes / No	Mandatory	Answer Yes or No.
<i>7.2 Train your workforce</i>			
What steps did your entity take to train your workforce during this reporting period?	Describe steps taken	Mandatory	Describe the efforts your entity took to train its workforce on modern slavery risk management during the reporting period.
What percentage of your workforce received modern slavery training in the period?	Percentage	Mandatory	Report how much of your workforce received modern slavery training during the reporting period. Report this as a percentage of your total employee and contractor workforce during the reporting period, to the best of your knowledge.
<i>7.3 Cooperate with the Anti-slavery Commissioner</i>			
What steps did your entity take to cooperate with the Anti-slavery Commissioner during this reporting period?	Describe steps taken	Mandatory	Describe any steps your entity took to cooperate with the NSW Anti-slavery Commissioner during the reporting period. This could include participation in events or training organised by the Anti-slavery Commissioner; responses to inquiries from the Anti-slavery Commissioner; or direct cooperation, for example to adapt the MTCs or MCCs to specific procurement processes.