Impact Metrics for Addressing Modern Slavery in Property and Construction

A guide to understanding and measuring impacts



* adge impact...

In 2024, the Property Council unveiled its Pathway to Respecting Human Rights and Addressing Modern Slavery Risks in collaboration with Edge Impact.

The Pathway offered ten clear, practical steps for businesses in the property and construction industry, and their suppliers, to apply to respect human rights and combat modern slavery.

While implementation is crucial, measuring



Recognising the inherent complexity of impact assessment, the Property Council has collaborated with Edge Impact to develop this Guide to Understanding Impact in Modern Slavery Risk Management. This resource enables organisations to quantify and evaluate their human rights and modern slavery outcomes, transforming good intentions into measurable progress across the property and construction sector.

WHAT DOES THE GUIDE HOPE TO ACHIEVE?

The Guide is structured around four key impact areas: Governance, Supply Chain, Grievance and Remediation, and Collaboration.

Through actionable targets and indicators of success in each impact area, it enables businesses to understand the performance of their actions in managing modern slavery risks in order to work to improve them. This Guide includes:

- An overview of the relevant impact area and its connection to responsible business practices.
- Clear, actionable targets that organisations can aim for within their operations and supply chains.
- Indicators to measure the success of modern slavery risk management, including action and results-oriented KPIs.
- Best practice examples to demonstrate how organisations can operationalise these goals.
- Practical metrics to measure progress toward the intended goals.

Together, these targets and metrics demonstrate an organisation's efforts to make a meaningful impact.

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ACKNOWLEDGEMENTS

This guide is the result of a collaboration between the Property Council and Edge Impact, developed to support the property and construction sector in building meaningful, measurable responses to modern slavery risks.

We thank the members of the Property Council's Modern Slavery Working Group for their insights and guidance throughout. Particular thanks go to Robin Mellon (CEO, Better Sydney) for his facilitation of the group; Natalie Maxwell-Davis and Katie Bjorem (Australian Red Cross) for their frontline perspectives; and to the individuals with lived **experience of exploitation** who generously shared their perspectives. Sincere thanks also to Nick Dexter (Edge Impact) for leading the development of the guide.

Introduction

WHAT IS MODERN SLAVERY?

Around the world, an estimated 50 million people are living in modern slavery every day 12, including 41,000 impacted people in Australia alone. Modern slavery refers to severe forms of labour exploitation, including forced labour, human trafficking, and debt bondage, where coercion, deception, or abuse of vulnerability prevent individuals from refusing or leaving work. The property and construction sector in Australia faces heightened risks due to complex supply chains and subcontracting practices. Businesses are expected to identify, prevent, and mitigate these risks in line with the UNGPs and OECD Guidelines, ensuring their actions effectively protect workers' rights.

WHY IS THIS IMPORTANT TO THE PROPERTY AND CONSTRUCTION SECTOR?

The property and construction sector relies on complex supply chains, subcontracting, and migrant labour, increasing the risk of modern slavery. High-risk factors include raw materials sourced from vulnerable regions and the manual nature of work. Clear, practical guidance on managing these risks and assessing the impact of actions is crucial.

WHY SHOULD BUSINESSES MEASURE THEIR ACTIONS?

Addressing modern slavery risks requires more than just implementing actions — companies must also assess their effectiveness. Measuring impact through clear metrics helps businesses:

- Work to the best of their ability to ensure they respect and uphold human rights
- Identify inefficiencies and opportunities with their approach, so they can continuously review and improve them
- Ensure resources, energy and time are directed at initiatives that will lead to meaningful impact for those at risk and impacted by modern slavery
- Communicate their achievements to stakeholders and build a business case for further investments
- Demonstrate compliance by reporting on the effectiveness of actions under the Modern Slavery Act 2018 (Cth), Modern Slavery Act 2018 (NSW)
- Engage stakeholders by transparently reporting progress and strengthening the case for further investment.

HOW WAS THIS GUIDE DEVELOPED?

The Property Council and Edge Impact collaborated with workers and individuals with lived experience of human rights violations to inform the recommendations in this Guide. Facilitated by the Australian Red Cross, their insights — alongside evidence-based research and broad stakeholder engagement — helped ensure this measurement framework is grounded in accurate and meaningful information.





"To show they're making a real difference, companies should share real stories of how they've improved things for workers. For example, they could talk about how they raised wages for underpaid workers or improved safety in their factories. It's also important for companies to be honest about their challenges. If they say something like, hey, we found problems with how some workers were being treated -[they need to say] here's what we've done to fix it."

- AUSTRALIAN RED CROSS LIVED EXPERIENCE PARTICIPANT

How to Use This Guide

Understanding the Metrics Framework

To help organisations measure the effectiveness of their actions in each impact area, this Guide follows a framework of:

INPUTS ACTIVITIES OUTPUTS OUTCOMES IMPACTS Supplier employees report The company updates its Procurement staff Contract templates are Improved purchasing more predictable working procurement policy and revised to include fair demonstrate understanding practices reduce pressure conditions and feel safe delivers ethical sourcing payment terms, clear of ethical sourcing through on supplier businesses, scopes of work, and support decent work for training to commercial and pulse checks or training raising labour concerns without fear of retaliation (% supplier employees, and project teams. modern slavery clauses. assessments (% meeting Staff complete training threshold). improvement from baseline). lower modern slavery risks on ethical sourcing and 80% feel safe raising labour across the supply chain. worker risks. risks without fear of penalty.

Using the **Metrics for Your Business**

These metrics provide voluntary guidance for companies in the property and construction industry to assess and strengthen their modern slavery risk management. Organisations are encouraged to implement metrics based on their current maturity, available resources, and strategic priorities.

APPLYING THE METRICS OVER TIME

Organisations can begin with outputs to establish foundational activities. Over time, tracking outcomes helps measure effectiveness.

SCALABILITY & PHASED IMPLEMENTATION

Companies may choose to adopt a small number of key metrics initially and expand their scope over time. The framework is not prescriptive; organisations can prioritise based on their risk profile, capacity, and level of readiness.

CORE VS. STRETCH ACTIVITIES

Core metrics are designed to remain consistent over time to support longitudinal measurement. Stretch activities offer opportunities to go further - but should build on, rather than replace, core metrics.

SHORT-TERM VS. LONG-TERM CHANGE

Metrics are structured to capture both immediate outputs (such as training completion rates or supplier engagement efforts) and long-term impacts (such as improved worker conditions or supply chain transparency).

CONTINUOUS IMPROVEMENT

The framework is designed for progressive adoption rather than one-off compliance. Organisations are encouraged to review and refine their approach regularly, using the metrics to assess effectiveness and identify areas for improvement. This framework will be updated as metrics become more widely adopted.

Targeted Impact

PILLARS	OVERALL CHANGE TARGETED	IMPACT AREAS	TARGETED IMPACT IN THE PROPERTY AND CONSTRUCTION INDUSTRIES
1. Governance	Companies have effective corporate governance that includes a focus on protecting people.	1.1. Labour rights and protections	More companies have in place processes and procedures to protect labour rights, and to validate that their subcontractors have equivalent protections in place.
		1.2. Strategic commitment and accountability	More companies put protecting people at the heart of their business.
		1.3. Employee awareness	More people know about the risks of modern slavery, how those risks are most likely to affect their roles and responsibilities, and how best to respond.
2. Supply Chain	Companies have supply chain visibility and systems in place to detect and	2.1. Supply chain due diligence	More companies verify that they understand enough about the conditions of workers in our supply chain to be confident they are treated with dignity and respect.
	reduce instances of modern slavery.	2.2. Procurement practices	Companies work with suppliers to assess and adapt their procurement practices to minimise risks to people in their supply chains.
		2.3. Supply chain visibility	Companies have a better understanding of their supply chain, and where people are most vulnerable within them
3. Grievance and Remediation	Companies understand their obligations under legislation to provide	3.1. Grievance mechanisms	People in property supply chains have trusted, effective and easily accessible avenues to raise concerns and seek help.
	grievance mechanisms and remediation avenues.	3.2. Remediation	People who have experienced harm are provided with appropriate remediation.
	Companies learn from and collaborate with at-risk workers and people with lived experience, each other, civil society and government to address modern slavery.	4.1. Learning from lived experience	Companies strengthen and refine their anti-modern slavery response through engagement with at-risk workers and people with lived experience.
		4.2. External collaboration – civil society and government	More companies contribute to a whole-of-industry and community approach to modern slavery through civil society partnerships and government advocacy.

How were the Impact Areas and Metrics chosen?

To ensure this Guide is as accurate and impactful as possible, Edge and the Property Council incorporated learnings from three key inputs to inform them.

1. INFORMED BY LIVED EXPERIENCE

People with lived experience of modern slavery have first-hand experience of the structures, services, systems, and policies that impact them, and have a unique insight into how organisations can best respond to their priorities, needs, and strengths. We partnered with the Australian Red Cross to gain firsthand insight into their experiences.

2. DEVELOPED THROUGH STAKEHOLDER ENGAGEMENT

Through multi-stakeholder engagement with working groups, industry experts, at-risk groups, and civil society members, we developed the metrics to align with industry standards, lived experiences, best practice examples of managing modern slavery risks, and challenges and gaps in implementation.

3. BASED ON EVIDENCE

A thorough desktop review to establish a baseline of current practices and metrics used globally and within Australia and the legislative guidelines to address human rights and modern slavery in the property and construction sector, including:

- International guidelines (including the UN Guiding Principles on Business and Human Rights), established principles, industry reports, and sector-specific initiatives.
- Current modern slavery statements from organisations across the sector.
- Data outputs from tools that organisations and non-profit organisations use, including Informed 365, SEDEX, and EcoVardis.



Governance

INDUSTRY-LEVEL LEAD INDICATOR

Percentage of property and construction companies that ensure all workers receive a contract specifying a living wage and their working rights.

ACTIVITY EXAMPLES

Company designs and implements a living wage policy

OUTPUT: IMMEDIATE SHORT-TERM ACTIONS & EFFORTS (0-12 MONTHS)

- Employment/service contracts comply with all applicable national labour laws (e.g., Fair Work Act in Australia) (%)
- Employment/service contracts are aligned with the International Labor Organisation labour standards (%)
- Living wage policy adopted and operationalised, with clear wage-setting criteria, supplier requirements, and compliance mechanisms aligned to a recognised benchmark (e.g. <u>Anker Methodology</u>) (Y/N)
- ① Tier one suppliers who verify that their employees are paid a living wage (%)

OUTCOME: MEDIUM-TERM EFFECTS OF OUTPUT ON PEOPLE (1-3 YEARS)

- Employees that have their basic needs met [measured through an internal engagement survey] (%)
- People in the industry and direct supply chain of a company paid a living wage (%)

IMPACT: LONG-TERM SYSTEMIC CHANGE (3+ YEARS)

- Fewer wage-related breaches reported across the industry (as reported by the Fair Work Ombudsman and relevant regulators)
- More workers in the industry earn a living wage aligned to global benchmarks
- Increased employer transparency and accountability on wage practices

- Company develops and embeds a training program on working rights
- Employees who have received an onboarding of their working rights and entitlements in a language they understand (%). These include working hours, breaks and rest periods, employment contract type, workplace health and safety procedures, and reporting channels and processes
- ① Tier 1 suppliers who provide training to employees on their working rights and entitlements (%)
- ① Tier 1 suppliers that provide contract interpretation and employment guidance in multiple relevant languages (%)

- Employees who feel confident that they understand their rights in relation to working rights and entitlements (%)
- Employees who feel equipped to know what to do if they suspect modern slavery at work or in their day to day lives (%)
- Reduction in working rights and entitlements breaches (as reported by the Fair Work Ombudsman and relevant regulators)

Implementation tip: to establish percentage measures such as this, corresponding questions can be built into existing employee engagement or ESG surveys



Governance

ACTIVITY EXAMPLES

- Company makes a public commitment to upholding all universally recognised human rights [Property Council 'Pathway – Understand and Commit]
- Company establishes roles and responsibilities of appropriate seniority for embedding human rights into culture and operations [Property Council 'Pathway – Understand and Commit]

OUTPUT: IMMEDIATE SHORT-TERM ACTIONS & EFFORTS (0-12 MONTHS)

- Company makes a public commitment to upholding human rights, either through a standalone human rights policy or by incorporating human rights into an existing statement (e.g. Modern Slavery Statement or Code of Conduct) (Y/N)
- Executive roles that include performance metrics relating to human rights and modern slavery (%)
- Business decisions informed by consideration of human rights risk and due diligence (#)
- Company's Modern Slavery Statement includes metrics or KPIs aligned to the four impact pillars of this framework (Governance, Supply Chain, Grievance and Remediation, Collaboration) (Y/N)

OUTCOME: MEDIUM-TERM EFFECTS OF OUTPUT ON PEOPLE (1-3 YEARS)

- Executives who can accurately identify the company's position on modern slavery and human rights, and how it intersects with their roles and responsibilities (%)
- Employees who can identify and explain the company's policies on modern slavery and human rights and how it affects their roles and responsibilities (%)

INDUSTRY-LEVEL LEAD INDICATOR

Percentage of property and construction companies that ensure all workers receive a contract specifying a living wage and their working rights.

IMPACT: LONG-TERM SYSTEMIC CHANGE (3+ YEARS)

- Human rights become a standard part of leadership KPIs and business decision-making
- The industry sees broader alignment with international human rights frameworks

 Company assesses modern slavery training needs and develops mandatory training for its employees [Property Council 'Pathway – Train your staff]

- Employees who complete an annual modern slavery training program (%)
- Modern slavery awareness training is available in multiple relevant languages (Y/N)
- ① Tier one suppliers are provided with, and/or deliver, modern slavery training or resources to their workers in multiple relevant languages (%)
- Employees able to correctly identify forced labour indicators, measured through pulse check surveys, and/ or scenario-based assessments (%)
- Employees who can accurately identify modern slavery risks specific to the company's operations (e.g. design, construction) and their role in addressing them, measured through targeted surveys, role-based assessments, and manager evaluations (%)
- Use of reporting to grievance mechanisms (%)

Implementation tip: to establish percentage measures such as this, corresponding questions can be built into existing employee engagement or ESG surveys

 Workers better able to recognise and respond to red flags in their workplace



1.3

Governance

"[Training] helps people understand what exploitation looks like. And it empowers them to protect themselves and others as well, because many workers [don't] really realise that they're being exploited already, especially migrants, you know, 'cause, you don't really have any idea or you don't know yet."

- AUSTRALIAN RED CROSS LIVED EXPERIENCE PARTICIPANT

Action in Practice:Commitment to Human Rights, regardless of size

Demonstrating proactive leadership, the Orion Group, a smaller company in the Australian construction sector, voluntarily opted to report under the Modern Slavery Act 2018 (Cth), choosing to address its modern slavery risks by preparing a standalone document outlining its commitment.

The company also collaborated with Consult Australia to publish the Combatting Modern Slavery Business Guide, aimed at supporting others in the industry in addressing and managing their modern slavery risks.

To ensure all staff understood the gravity and relevancy of modern slavery to their business, Orion Group implemented training and processes to educate their team and establish mechanisms to identify and address potential risks within its operations and supply chains. This initiative underscores the role of smaller enterprises in contributing to the broader industry effort against modern slavery, proving that size is no barrier to being proactive.



Supply Chain

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ACTIVITY EXAMPLES

- Company develops a structured process for supply chain engagement to share understanding of vulnerability and approaches to address it
- Company develops and implements a due diligence process which includes a process for further verification in highrisk categories

OUTPUT: IMMEDIATE SHORT-TERM ACTIONS & EFFORTS (0-12 MONTHS)

- Company has a formal due diligence process that includes high-risk suppliers (Y/N)
- ① % of suppliers assessed and identified as high-risk through due diligence (%)
- Procurement and risk decision-makers receiving targeted training on applying human rights due diligence in sourcing decisions in the last 12 months
- Human rights due diligence influenced project tenders and sourcing decisions (%)
- High-risk suppliers that received onsite or third-party verification of worker conditions (%)

OUTCOME: MEDIUM-TERM EFFECTS OF OUTPUT ON PEOPLE (1-3 YEARS)

- Suppliers implementing changes based on due diligence findings (%)
- Procurement managers understand how to apply human rights due diligence (measured in survey)
- Workers reporting improved conditions following due diligence verification (%)
- Companies using risk data to prioritise actions that reduce harm to workers (%)

IMPACT: LONG-TERM SYSTEMIC

CHANGE (3+ YEARS)

application of due diligence.

INDUSTRY-LEVEL LEAD INDICATOR

Percentage of companies across the industry

that demonstrate supply chain transparency and

- Human rights due diligence becomes a standard and expected part of supplier relationships in the industry (%)
- Workers in high-risk categories experience improved protections across the supply chain (%)
- Industry sees a reduction in reported exploitation linked to verified suppliers (#)



Supply Chain

ACTIVITY EXAMPLES

- Conducted a risk assessment to identify and prioritise opportunities to actively manage risks [Property Council 'Pathway' – Identify key risks and assign responsibilities]
- Developed a policy or checklist that supports decision-makers to address and manage modern slavery risks [Property Council 'Pathway' – Make better purchasing decisions]
- Developed a list of minimum requirements for purchases in high-risk categories [Property Council 'Pathway' – Make better purchasing decisions]

OUTPUT: IMMEDIATE SHORT-TERM ACTIONS & EFFORTS (0-12 MONTHS)

- Contracts in high-risk categories include specific clauses outlining actions to assess and manage modern slavery risks (%)
- Supplier invoices paid on time, with comparison to sector or national benchmarks for small business payments (e.g. 80% within 30 days etc) (%)
- ① Tenders in high-risk categories that include and weight modern slavery risk management as a material evaluation criterion
- ① Contracts include provisions for joint identification and remediation of modern slavery risks (%)

OUTCOME: MEDIUM-TERM EFFECTS OF OUTPUT ON PEOPLE (1-3 YEARS)

- Suppliers reporting stable and predictable commercial relationships (%)
- Projects with documented supplier engagement prior to contract variations being issued (%)
- Suppliers feel able to raise delivery or workforce risks without commercial penalty (measured in annual contract management meetings)

IMPACT: LONG-TERM SYSTEMIC CHANGE (3+ YEARS)

- Widespread adoption of ethical procurement practices across the industry (%)
- Reduction in labour risks linked to commercial pressure in construction supply chains (#)
- Suppliers using ethical procurement standards as a competitive advantage (%)

Company has a process in place for understanding more about their supply chain [Property Council 'Pathway' – Monitor and evaluate your suppliers]

- Tier 1 suppliers mapped by the company and assessed for modern slavery risk (%)
- Tier 2 and Tier n suppliers mapped by Tier 1 suppliers in high-risk categories (%)
- Company has identified suppliers using labour hire or migrant labour in Tier 1 (%)
- Company assesses geographic and product category human rights risks using a structured tool or risk register (Y/N)
- ⊕ Company publishes a summary of its mapped supply chain and visibility efforts in its modern slavery statement (Y/N)

- Companies achieve full Tier 1 and priority Tier 2 visibility in high-risk categories (%)
- Workers in mapped high-risk suppliers included in monitoring or engagement programs (# or %)
- Company initiates engagement or follow-up action with suppliers flagged as high-risk (%)
- High-risk suppliers are subject to engagement or improvement plans informed by worker consultation (%)
- Improved supplier transparency enables better protection for at-risk workers across the supply chain (%)
- Earlier identification of vulnerable workers leads to timely intervention and reduced harm (#)

Purchasing

Supply Chain

"We should also look for like certain patterns where it could indicate... exploitation...like workers relying on employer provided housing."

- AUSTRALIAN RED CROSS LIVED EXPERIENCE PARTICIPANT

Action in Practice: An Action Plan to Drive Impact

Club Assist, a provider of automotive battery services, has taken significant steps to combat modern slavery within its supply chains. Understanding that its global reach meant it had heightened risks of modern slavery, the company engaged SD Strategies to facilitate workshops across its Asia-Pacific and North American operations, resulting in the creation of a modern slavery action plan and a three-year roadmap aligned with reporting requirements.

Emphasising sustainable procurement, Club Assist worked closely with its procurement team to engage and educate high-priority suppliers, conducting desktop audits to assess compliance. To ensure ongoing compliance and improvement, they conduct regular, comprehensive deepdive supplier assessments, develop corrective action plans where needed, and provide ongoing training for staff, contractors, board members, and suppliers, reflecting a holistic approach to ethical procurement.

This work resulted in a formal modern slavery action plan, with outcomes including improved supplier awareness, corrective actions addressing identified risks, and ongoing training embedded into procurement practices.



Grievance and Remediation

INDUSTRY-LEVEL LEAD INDICATOR

Improvement in survivor-reported outcomes of actions and remedy.

ACTIVITY EXAMPLES

- Companies map available ways for people to speak up
- Companies make anonymous feedback channels available to all staff and suppliers [Property Council 'Pathway' – Help People Speak Up]

OUTPUT: IMMEDIATE SHORT-TERM ACTIONS & EFFORTS (0-12 MONTHS)

- Managed sites (including construction sites, corporate offices, and assets under management) with access to posters or information about the channels available for raising issues anonymously (%)
- Managed sites with access to posters or information about the channels available for raising issues anonymously in multiple languages relevant to their
- (%) workforce's demographic
 - Supplier sites (Tier 1 and beyond) that provide
- ⊕ information on raising grievances (#)
 - High-risk Tier 1 suppliers provide workers with access to an independent grievance or whistleblower channel, in addition to internal HR mechanisms (%).

OUTCOME: MEDIUM-TERM EFFECTS OF OUTPUT ON PEOPLE (1-3 YEARS)

- Increase in workplace-related grievances raised through formal and informal channels (#)
- Workers report confidence in the grievance process ensuring fair and timely resolution - collected directly from workers via multilingual site-based tools such as Rapid (%)
- Company employees that feel they will be treated fairly and remain safe if they use these pathways (%)

IMPACT: LONG-TERM SYSTEMIC CHANGE (3+ YEARS)

 Workers feel safe and supported to speak up when concerns arise

- Deployment of toolbox talk material on grievance channels
- Employees trained on the company's grievance system (%)
- Cases escalated within allocated response time (#)
- Tier 1 supplier contracts that include a requirement to notify the head contractor within 48 hours of becoming aware of any serious labour risks within their operations or supply chain
- ① Contracts for tier one suppliers that include practical incentive for the identification and reporting of unethical business conduct (%)

- Increase in grievances raised that are escalated due to indicators of modern slavery (#)
- Reduction in time taken to respond to issues raised (%)
- Issues are surfaced and addressed early, reducing long-term harm
- Grievance data improves company oversight and accountability



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Grievance and Remediation

INDUSTRY-LEVEL LEAD INDICATOR

Improvement in survivor-reported outcomes of actions and remedy.

ACTIVITY EXAMPLES

- Companies establish a process for responding to and remediating incidents of modern slavery [Property Council 'Pathway' – Respond to Exploitation]
- Examples of remediation may include providing safe accommodation [beds], emergency financial assessment [#], vocational training [#] and employment coaching for survivors of modern slavery [#]

OUTPUT: IMMEDIATE SHORT-TERM ACTIONS & EFFORTS (0-12 MONTHS)

- Employees who have received baseline awareness training on the company's approach to remediation (%)
- Average time allocated to investigate and rectify issues (time)
- Type of remedial action provided in cases (type)
- Survivors provided with an appropriate form of remediation, based on the nature of the harm and the company's relationship to the incident [remediation type select from activity column] (#/%)
- Contracts that include provisions for shared responsibility — where both the company and supplier are expected to collaborate in remediating identified cases of modern slavery

OUTCOME: MEDIUM-TERM EFFECTS OF OUTPUT ON PEOPLE (1-3 YEARS)

- Grievances received responded to with practical remedial action (i.e., not an apology) (%)
- Cases resolved within allocated timeframe in the past year (%)
- Cases remediated in partnership with supplier (#)
- Survivors of modern slavery access meaningful support and stable employment (#)

IMPACT: LONG-TERM SYSTEMIC CHANGE (3+ YEARS)

- Survivors regain financial independence and long-term security
- Industry practices reduce the likelihood of re-exploitation



Grievance and Remediation

"If someone would have told me that you can report it anonymously, I would have done it. I was so mad at them. So mad at them. I wanted to report it, but I didn't know how to report it."

- AUSTRALIAN RED CROSS LIVED EXPERIENCE PARTICIPANT

Action in Practice: Valuable Inputs from Workers' Voices

With many direct and contracted employees within their operations, the GPT Group wanted to ensure their modern slavery response mechanisms were as productive as possible. The business engaged the Australian Red Cross to conduct ethical engagement sessions with retail and office cleaning and security contractors, providing valuable, first-person inputs to inform recommendations that would make these systems more trusted and effective.

By actively involving worker representatives and a reputable humanitarian organisation, GPT Group ensured that its grievance and remediation mechanisms were delivering genuine impact to the people who needed them most. This commitment to improving workplace protections and addressing potential modern slavery risks in its operations puts workers first and ensures their voices are heard.



© Collaboration

INDUSTRY-LEVEL LEAD INDICATOR

Percentage of companies participating in industry-wide modern slavery coordination initiatives.

ACTIVITY EXAMPLES

Participating in and supporting industry modern slavery initiatives

- Engaging with people with lived experience
- Publishing worker voice case studies as part of annual Modern Slavery Statement

OUTPUT: IMMEDIATE SHORT-TERM ACTIONS & EFFORTS (0-12 MONTHS)

- Hours spent in multi-stakeholder engagement (#)
- Volunteer hours contributed by employees to charities or survivor support programs (#)
- Financial or in-kind contributions (e.g., sponsorships, grants) to modern slavery-focused organisations (#)
- Joint initiatives undertaken with NGOs, industry bodies, or regulators (#)
- Supplier training sessions co-hosted with external experts (#)
- Research or advocacy reports co-authored with external partners (#)
- Shared supplier audits or risk assessments conducted through industry collaboration (#)

OUTCOME: MEDIUM-TERM EFFECTS OF OUTPUT ON PEOPLE (1-3 YEARS)

- Published case studies in modern slavery statement, sustainability report or on corporate website (Y/N)
- Workers and/or PWLE engaged to gather feedback and insights to inform modern slavery initiatives (#)
- Stakeholder feedback post-engagement (qualitative)

IMPACT: LONG-TERM SYSTEMIC CHANGE (3+ YEARS)

 Greater industry and public awareness that modern slavery exists in Australia and the supply chains of Australian companies, as measured through Anti-Slavery Commissioner reports and Global Slavery Index, Australian Council of Superannuation Investors Modern Slavery Review of ASX200 modern slavery statements

- Collaboration with worker representatives
- Meetings the company had with worker representatives to co-develop goals to increase worker protections (#)
- Pre-emptive partnerships formed with partners across industry (#)
- Published case studies of where partners provide feedback on the impact of the collaboration (Y/N)
- Increase in worker protections introduced as a result of collaborative initiatives (#)
- Reduction in reported instances of modern slavery linked to the property and construction industry, informed by Anti-Slavery Commissioner reports, Fair Work Ombudsman investigations, Global Slavery Index and worker-reported data from grievance mechanisms



IN PARTNERSHIP WITH

© Collaboration

INDUSTRY-LEVEL LEAD INDICATOR

Percentage of companies participating in industry-wide modern slavery coordination initiatives.

ACTIVITY EXAMPLES

 Participating in and supporting industry modern slavery initiatives

OUTPUT: IMMEDIATE SHORT-TERM ACTIONS & EFFORTS (0-12 MONTHS)

 Case study examples of ongoing participation with organisations that help people speak up such as the Australian Red Cross, Salvation Army, Unions, etc.

OUTCOME: MEDIUM-TERM EFFECTS OF OUTPUT ON PEOPLE (1-3 YEARS)

- Beds (safe accommodation places) provided / supported (#)
- Jobs / roles / positions provided / supported (#)
- Training places / education packages provided / supported (#)

IMPACT: LONG-TERM SYSTEMIC CHANGE (3+ YEARS)

- Civil society partnerships increase system-wide support for at-risk workers
- Industry-wide improvements are accelerated through shared learning
- Public trust improves as companies demonstrate social leadership





Action in Practice:Setting an industry standard for Human Rights

Cbus Property, a prominent Australian property investor and developer, identified cleaning as a high-risk sector for worker exploitation and potential modern slavery within its own supply chain. To mitigate these risks, Cbus Property partnered with the Cleaning Accountability Framework (CAF), a multi-stakeholder initiative dedicated to improving labour practices in the cleaning industry.

In late 2019, Cbus Property achieved its first 3-Star CAF certification for its asset at 720 Bourke Street, Docklands, marking a significant milestone in ensuring ethical labour practices. In 2024, the business became the first building owner in Australia to have all its buildings and shopping centres certified by the CAF. This ongoing collaboration has led to increased transparency and accountability within their cleaning supply chains, promoting fair treatment and improved working conditions for cleaners, demonstrating an uncompromising commitment to respecting human rights.



Reporting Framework Mapping

HOW TO USE THIS PAGE:

This framework is designed to help organisations map their own internal reporting journey. It provides examples of metrics (outputs), outcomes, and longer-term impacts aligned with the Property Council modern slavery pillars.

ORGANISATIONS SHOULD USE THIS PAGE TO:

- Prioritise focus areas based on their risk profile, capacity, and strategic goals
- Align on what success looks like, linking short-term actions to meaningful change
- Select a tailored set of KPIs, rather than trying to report on everything in this guide

PILLARS	ACTIONS	YOUR OUTPUTS (DIRECT ACTIONS & CONTRIBUTIONS)	YOUR OUTCOMES (SHIFTS IN PRACTICE & POLICY)	YOUR IMPACT (LONG-TERM SYSTEMIC CHANGE)
1. Governance and Leadership	e.g. Integrate modern slavery oversight into board/risk structures	e.g. # of board briefings on modern slavery risks, % of leadership trained on human rights due diligence	e.g. %increaseinleadershipintegratingmodern slavery into decision-making	e.g. Modern slavery governance embedded into company-wide policies & strategic planning
2. Supply Chain Due Diligence	e.g. Map high-risk suppliers and embed modern slavery expectations into sourcing and contract processes	e.g. # of supplier audits conducted, # of procurement contracts with modern slavery clauses	e.g. % increase in high-risk suppliers completing due diligence processes	e.g. Reduction in supply chain risks, increased supplier transparency
3. Grievance and Remediation	e.g. Develop a remediation plan for modern slavery cases	e.g. # of worker grievances reported & addressed, # of workers trained on reporting mechanisms	e.g. % of grievances resolved within a defined timeframe, % of workers who feel confident using grievance mechanisms	e.g. Increase in trust & use of worker grievance mechanisms, sustained reduction in worker exploitation cases
4. Collaboration and Industry Engagement	e.g. Partner with NGOs and experts to strengthen worker protections	e.g. # of partnerships with NGOs, # of joint advocacy efforts on modern slavery	e.g. % of industry adopting best practices due to engagement	e.g. Sector-wide policy changes, increased worker protections across supply chains

Key Terms

AT-RISK WORKERS	People who belong to a group or have circumstances that may place them at a greater risk of vulnerability in understanding and receiving their workplace rights and entitlements.
DUE DILIGENCE	An ongoing and structured process for identifying and addressing modern slavery risks in your direct operations or supply chain.
GRIEVANCES	Complaints or concerns raised by individuals who are being exploited through forced labour, trafficking, or other forms of modern slavery or human rights abuses. The grievances are often against their employer or companies involved in their supply chain.
GRIEVANCE MECHANISMS	A structured process that allows individuals in a business's supply chain and direct operations to raise concerns about human rights abuses, including modern slavery, and seek remedy.
INDICATORS OF MODERN SLAVERY	Signs or potential risks that may indicate modern slavery is occurring within a business operations or supply chain.
LIVED EXPERIENCE LEADERSHIP	Provided by a person with lived experience who drives change and collaborates with organisations and systems by sharing and connecting their personal and professional experiences.

LIVING WAGE	A theoretical income that allows a person to earn enough money to afford shelter, food, and life necessities for themselves or their family.
MINIMUM WAGE	The lowest minimum wage that an employer can legally pay their employee. Minimum wage is based on the country where the business is based and varies significantly between countries.
MODERN SLAVERY	Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery can include debt bondage, deceptive recruiting for labour or services, forced labour, forced marriage, servitude, slavery, trafficking in persons, and the worst forms of child labour.
MULTI-STAKEHOLDER ENGAGEMENT	Engaging with different groups and individuals to address challenges and opportunities through participation and collaboration.
REMEDIATION	The process of providing a context-specific and appropriate response to individuals impacted by modern slavery and taking action to prevent and reduce the risk of future harm.
UNIVERSALLY RECOGNISED HUMAN RIGHTS	The universal human rights of every person, and basic standards to identify and measure inequality and fairness.
WORKING RIGHTS AND ENTITLEMENTS	The basic legal standards and protections that an employer is legally obligated to provide to employees, including minimum wage, safe working conditions, and protection against unfair dismissal.



Further Resources

AUSTRALIAN GOVERNMENT, GUIDANCE FOR REPORTING ENTITIES [PAGE 54- 56 **AND APPENDIX 87**]

Guidance for mandatory reporting requirements on modern slavery and human trafficking.

CENTRE FOR SOCIAL IMPACT. THE COMPASS

Tools and guides for helping build a more effective social impact system.

GLOBAL FUND TO END MODERN SLAVERY (GFEMS), MEANINGFUL ENGAGEMENT OF PEOPLE WITH LIVED EXPERIENCE

A framework and assessment for measuring and increasing lived experience leadership across the spectrum of engagement.

ORGANISATION FOR ECONOMIC **COOPERATION AND DEVELOPMENT** (OECD), DUE DILIGENCE GUIDANCE FOR **RESPONSIBLE BUSINESS CONDUCT**

Guidelines to support enterprises with due diligence to identify, prevent or mitigate adverse impacts.

OFFICE OF THE NSW ANTI-SLAVERY **COMMISSIONER, GUIDANCE ON REASONABLE STEPS (GRS)**

Government direction on what constitutes 'reasonable steps' to manage modern slavery risks in operations and supply chains.

EDGE IMPACT X PROPERTY COUNCIL, PATHWAY TO RESPECTING HUMAN RIGHTS AND ADDRESSING MODERN SLAVERY RISKS

PROPERTY COUNCIL, HUMAN RIGHTS **AND MODERN SLAVERY**

A list of resources on human rights and modern slavery relevant to the property and construction industry.

AUSTRALIAN RED CROSS, LIVED **EXPERIENCE FRAMEWORK**

Guide for helping organisations to better represent, support and centre its people with lived experience of modern slavery and other human rights violations.

UNITED NATIONS GUIDING PRINCIPLES, **IMPLEMENTING THE UNITED NATIONS** "PROTECT, RESPECT AND REMEDY" **FRAMEWORK**

A framework outlining how businesses can prevent and address human rights.

UNIVERSITY OF TECHNOLOGY SYDNEY (UTS), SOCIAL IMPACT TOOLBOX

A free set of resources to help all businesses to understand and improve their social impact.

