

Coliban Water

Modern Slavery Statement 2022/23



This Policy Statement recognises that the region's Traditional Owners have been the custodians of the land and water for thousands of generations. Coliban Water acknowledges that Traditional Owners have unique knowledge and connection to this land and water. We actively seek strong partnerships with Traditional Owners so that our decisions are better informed to help deliver the goals and aspirations that they hold for their culture and country.

Coliban Water's Modern Slavery Statement

The Coliban Water Modern Slavery Statement (Statement) is provided as a statement under section 14(1) of the Modern Slavery Act 2018 (Act) for the period from 1 July 2022 to 30 June 2023 for Coliban Water ACN 149 633 116.

Coliban Water's Commitment to the Act

Coliban Water is taking a proactive approach to the management of modern slavery risk by increasing the levels of transparency in our operations and supply chains and working collaboratively with stakeholders, industry and suppliers.

Coliban Water is committed to ensuring that there is no form of modern slavery or human trafficking within our organisation or supply chains. Coliban Water seek to ensure that its staff and supply chains are not subject to behaviour or threats that may amount to modern slavery.

Coliban Water is committed to ensuring that our approach to tackling modern slavery in our own business and throughout our supply chains is consistent with Coliban Water's disclosure obligations under the Act.

This Statement sets out actions undertaken in 2022/23 to mitigate the risk of modern slavery in our business and to ensure that in so far as possible, our suppliers hold the same ethos.

Coliban Water's commitment to tackling modern slavery was first demonstrated through our participation in the VicWater Social Procurement Working Group (VSPWG) in order to adequately prepare us to meet requirements under the Act. The VSPWG provided an opportunity to share resources, lessons learned and standardise expectations and processes for suppliers in order to mature the industry-wide responses to modern slavery.

Coliban Water's Structure, Operations and Supply Chains

Coliban Region Water Authority was established on 1 July 1992 under the Water Act 1989 (Vic) as a Regional Urban Water Authority (Authority). The Authority became the Coliban Region Water Corporation on 1 July 2007 and operates as Coliban Water. Our shareholder is the Victoria Government. Our responsible Minister for the period of 1 July 2022 until 30 June 2023 was The Hon. Harriet Shing MP, Minister for Water.

Coliban Water's core business is providing safe drinking water, sewerage and rural water services for public health and environmental protection so that the communities we serve can sustain themselves.

We provide urban water and wastewater services in accordance with the provisions of Part 8- Water supply and Part 9- Sewerage of the Water Act 1989 (Vic). Rural customers are supplied under Part 4 Division 2 Section 51 of the Water Act 1989 (Vic).

Our services include:

- Water Harvesting
- Water Storage
- Water Treatment
- Water Distribution
- Urban wastewater collection
- Treatment, re-use and disposal, including trade waste
- Water purchase
- Recycled Water
- Rural water supply

The assets we manage to deliver our services include a net book value of infrastructure assets, property, plant and equipment of \$2.16 billion, covering:

- 396 kilometres of rural supply channels and mains
- 2,071 kilometres of sewer mains
- 34 water reservoirs and service basins
- 2,391 kilometres of water mains (potable and non-potable)
- 184 sewer pump stations
- 18 water treatment plants
- 73 water pump stations
- 1 recycled water factory
- 62 kilometres of recycled water infrastructure
- Approximately 260 megalitres of recycled water supplied
- 16 water reclamation plants

Risks of Modern Slavery practices in Coliban Water's operations and supply

The heat maps, risk scores and commentary produced by the completion of a supply chain risk assessment by the VSPWG identified that human rights risks, including modern slavery risks, have been identified across all six portfolios of typical water corporation procurement spend. The categories of spend within each of these portfolios that presented human rights risks are outlined below:

- Asset Maintenance portfolio: Ongoing operations and maintenance of facilities (including cleaning), grass cutting, herbicide application/edge treatment;
- Construction portfolio: Construction labour (minor and major projects) and offshore engineering services;
- Corporate portfolio: Temporary staff, labour hire and traineeship programs, security;
- Customer portfolio: Debt collection services, customer research services;
- Equipment and Material portfolio: Mechanical and electrical equipment, chemical products;
- Information Technology Consulting portfolio: Offshore IT Services.

Of these categories, offshore engineering and cleaning services presented high human rights risk, including modern slavery.

The introduction by Department of Treasury and Finance Victoria of mandatory State Purchase Contracts for specific groups of goods and services in January 2022 contributes to mitigating risk for Coliban Water in the areas of IT, temporary staff, and professional advisory services. When selecting a supplier from a State Purchase Contract, their compliance with the Supplier Code of Conduct is visible to the buyer.

Actions taken to assess and address these risks

We recognise that to eradicate modern slavery, dedication is required to make a difference to people’s lives and as such, we completed the following actions across the 2022/23 financial year:

Action	Status
Continued the incorporation of the principles of the Act into our procurement policy, procedures and templates, including tendering templates.	Completed
Work with existing major suppliers to ensure they have procedures in place to mitigate potential risks and deal with grievances. This was completed by exploring the modern slavery policies and procedures of Coliban Water’s key strategic partners and suppliers. In some cases, Coliban Water were provided with a copy of each organisation’s Modern Slavery Policy documentation and Coliban Water will continue to work with suppliers to ensure their practices work to mitigate risks.	Completed
Enhanced engagement with our suppliers and partners: <ul style="list-style-type: none"> • Continue to work on building awareness and capability to manage labour rights and modern slavery risk within our supply chain by following up on our provision of the VicWater supplier education material to all of our existing suppliers. • Continued with the mandatory requirement for all new Coliban Water suppliers to both review the modern slavery educational materials, formally commit to the Supplier Code of Conduct, consider their modern slavery risk and contact us if they have any concerns about their supply chain. 	Completed

Actions that were completed in 2022/23 and remain ongoing include:

Action	Status
Employment policies at Coliban Water help to ensure all recruitment policies are consistent, applied fairly and reduce the risk of modern slavery for our people.	Ongoing
All organisational policies are assessed against the Human Rights Act 2006, prior to being applied.	Ongoing
Modern slavery is included in employee inductions as well as our procurement procedures and templates, including tendering templates.	Ongoing
Continuous collaboration with suppliers throughout our relationship is important for building trust, transparency and reducing the risk of negative impacts to people in our supply chains.	Ongoing

The following actions remain in place or will be adopted over the 2023/24 financial year and beyond:

Action	Target Date
Communicate with suppliers (potentially via survey) regarding how they are managing their own modern slavery risks.	30 June 2024
Ensure compliance with the Act is included as a condition of tendering in all tendering documentation and conduct audits to ensure compliance.	Ongoing
Continue to provide modern slavery education to all new Coliban Water suppliers and employees.	Ongoing

Assessment of the effectiveness of these actions

Coliban Water's intent in 2022/23 was to mitigate risk by building the modern slavery capability of our suppliers and the individuals involved in making procurement decisions and managing relationships with suppliers. The use of the VSPWG toolkit to provide educational materials and provide a resolution process for grievances proved to be valuable and was well received. No instances of potential risk have been communicated to Coliban Water which is a positive outcome, however as such, it is difficult to ascertain if our engagement or tools have been effective in practice. We are hopeful that our future actions, including a more targeted approach with our major suppliers and further engagement with our suppliers will provide more insight into how they are managing their modern slavery risks and enable us to measure the effectiveness of our education and support processes.

Approval

This Statement was approved by the Board of Coliban Water in their capacity as principal governing body of Coliban Water on xxx.



Bob Cameron
Board Chairperson

Date: 15 December 2023