

# **Eliminating Modern Slavery Tool Kit**

## **Tool 1: Procurement Planning Questions**

**Queensland Government Procurement**

**Eliminating Modern Slavery Toolkit - Tool 1: Procurement Planning questions**

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v1.0	March 2022	Published
v1.1	January 2026	Key updates include: <ul style="list-style-type: none"> <li>The toolkit has been rewritten to enhance simplicity and clarity.</li> <li>Refreshed DHPW corporate branding.</li> <li>Alignment with the Queensland Procurement Policy 2026.</li> </ul>

**The State of Queensland (Department of Housing and Public Works) 2026.**

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**Contact us**

We are committed to continuous improvement. If you have any suggestions about how we can improve this document, or if you have any questions, contact us at [socialprocurement@hpw.qld.gov.au](mailto:socialprocurement@hpw.qld.gov.au).

**Disclaimer**

This document is intended as a guide only for the internal use and benefit of government agencies. It may not be relied on by any other party. It should be read in conjunction with the Queensland Procurement Policy, your agency's procurement policies and procedures, and any other relevant documents.

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**Administration**

Version 1.1 of this document replaces all previous versions of this document and takes effect immediately.

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## How to Use This Tool

Procurement officers can use this tool as a guide to prompt relevant questions, considerations, and actions at various stages of the procurement process. It aims to raise awareness of modern slavery, identify potential risks, and support actions that contribute to its prevention.

The questions provided can be tailored and applied as needed, using a risk-based approach that considers the specific circumstances of the procurement and the potential modern slavery risk factors involved.

When considering modern slavery risks during each stage of the procurement process, it is essential to integrate due diligence and ethical practices to ensure compliance with the [Modern Slavery Act 2018](#) (Cth) and Queensland Government procurement policies.

This tool breakdowns what to consider at each stage:

1. Awareness and understanding of Modern Slavery
2. Planning and Specifications
3. Evaluation and Selection
4. Contract Award
5. Contract Management

### 1. Awareness and Understanding of Modern Slavery

#### Key Considerations:

- Have you reviewed the guidance material on [Eliminating Modern Slavery in Government Supply Chains?](#)
- Have you discussed with suppliers their understanding of modern slavery risks in supply chains and their approach to addressing them?
- Have you shared information or training resources with suppliers, such as those listed in the [Eliminating Modern Slavery in Government Supply Chains](#) guide?

#### Actions:

- Ensure procurement staff and stakeholders are trained to identify and address modern slavery risks.
- Promote awareness of modern slavery risks and compliance requirements among suppliers.
- Engage suppliers in discussions about their understanding of modern slavery and provide them with relevant training resources.

### 2. Planning the Procurement

#### Key Considerations:

- Determine whether the goods and services to be procured carry significant modern slavery risks and whether these risks can be mitigated through the procurement process.
- Assess risks as far down the supply chain as possible, and at a minimum, determine the level of risk in large suppliers.
- Engage with the market early in the procurement planning stage to identify modern slavery risks and understand the maturity of the market in addressing these risks. This will help inform the preparation of tender documentation.
- Review Modern Slavery Statements published by suppliers (large business with an annual consolidated revenue of \$100 million) in the sector to identify baseline actions and risk mitigation measures. These statements are available on the *Modern Slavery Statements Register* at [modernslaveryregister.gov.au](https://modernslaveryregister.gov.au).

**Actions:**

- Consider using [Appendix 1: Modern Slavery Risk Screening](#) to assign a modern slavery risk classification to the procurement.
- Factor modern slavery risks into the tender documentation, including specifications and evaluation criteria.
- Tailor actions and requirements to the identified risk level, ensuring they are proportionate and achievable for suppliers of all sizes and types.
- Include the [Queensland Government Supplier Code of Conduct 2026](#) that sets out the expectations that government has of businesses that want to sell their goods or services to the government, and outlines what constitutes a responsible supplier including expectations in relation to Modern Slavery.
- For high-risk procurements, consider requiring suppliers to complete the [Tool 4 - Modern Slavery Supplier self-assessment](#) as part of the application process. Make it clear that responses will not exclude suppliers from the tender process but will help assess risks and facilitate engagement.

### 3. Preparing the Approach to Market

**Key Considerations:**

- Use information gathered during early market engagement to prepare procurement documentation.
- Develop specifications that reflect the modern slavery risk classification of the procurement.
- Include appropriate [modern slavery-related clauses](#) in the draft contract, proportionate to the identified risk level.

**Actions:**Conditions of offer and contract:

- Include conditions related to modern slavery mitigation, remediation, and due diligence in conditions of offer and contract. These conditions should ensure that potential suppliers have the legal, commercial, technical, and financial abilities to fulfil procurement requirements.
- Be reasonable and proportionate, ensuring that conditions can be met by suppliers of all sizes and types. Smaller suppliers may have less capacity to respond to modern slavery risks compared to larger businesses.
- If the sector is less equipped to address modern slavery risks, consider starting with basic conditions at this stage.

Specifications:

- Include modern slavery risk management in specifications where risks are relevant to the subject matter of the contract.
- Specifications can describe performance and functional requirements, as well as compliance with technical, labour, or employment standards (e.g., International Labour Organisation's Labour Standards).
- Specifications must be relevant to the procurement requirement and proportionate to the risk profile. For example, in textile production procurement involving subcontracted workers offshore, modern slavery risks may be relevant. Industry-specific labour or employment standards could be included in the contract as compliance requirements.
- Determine what evidence suppliers must provide to demonstrate compliance with specifications. Evidence must be proportionate to the risk classification.

## 4. Evaluating Submissions

### Key Considerations:

- Procurement officers should develop and incorporate appropriate evaluation methodologies to ensure modern slavery issues are meaningfully considered in the evaluation process.
- Consider the supplier's proposed approach to addressing modern slavery risks, including their responses to the Modern Slavery [Supplier self-assessment questionnaire](#).
- Evaluate the supplier's compliance with the draft conditions of contract and specifications relating to modern slavery compliance, having regard to the evaluation criteria.
- Ask suppliers to explain any costs that appear abnormally low. If the supplier's answers are unsatisfactory or raise modern slavery concerns, discuss this further with the supplier and consider this when evaluating submissions.

### Actions:

- Ensure evaluation criteria include modern slavery compliance as a mandatory requirement for high-risk procurement.
- Verify compliance with the Queensland Government Supplier Code of Conduct and other relevant legislative requirements.
- Investigate abnormally low costs to ensure they do not indicate modern slavery risks.
- Engage suppliers in discussions to clarify any concerns or discrepancies in their submissions.

## 5. Contract Negotiation

### Key Considerations:

- Include specific clauses that guard against modern slavery risks in contracts with suppliers. [Tool 2 - Sample Modern Slavery Contract Clauses](#) provides sample clauses with specific wording referencing modern slavery that can be inserted into agency templates and contract terms and conditions.
- Use existing Government standard contract terms for low-risk classifications. For medium-high risk classifications, or where no standard terms exist, include relevant Modern Slavery Contract Clauses with graduated obligations proportionate to the risk classification.
- At contract renewal and review stages, encourage continuous improvement in suppliers' responses to modern slavery. For example: Require suppliers to meet additional requirements, such as training all new commercial and recruitment staff on modern slavery risks within six months of joining.

### Actions:

- Tailor contract terms to address modern slavery risks proportionate to the risk classification of the procurement.
- Use sample contract clauses for procurements.
- Encourage suppliers to continuously improve their modern slavery compliance practices during contract renewals.

## 6. Contract Management

### Key Considerations:

- Fostering a positive and collaborative relationship with the supplier is key to managing ongoing modern slavery risks.
- Work in collaboration with suppliers to incorporate measures safeguarding against potential modern slavery risks and monitor progress.
- Put action plans in place to mitigate identified risks.
- Monitoring processes may already be required by the contract, including certain information requirements. However, procurement officers should consider additional measures such as:
  - Regular contract management meetings.
  - Audits.
  - Key performance indicators (KPIs) to manage modern slavery risks throughout the contract lifecycle.
- Any measures must be proportionate and relevant to the risk classification of the procurement.

### Actions:

- Establish performance measures to monitor progress against managing modern slavery risks.
- Set up clear communication and reporting lines with suppliers as part of proactive contract management and supplier relationship management processes.
- Require suppliers to regularly report on modern slavery risks, such as completing the [Tool 4: Supplier Self-assessment Questionnaire](#) annually.
- Conduct site visits or audits where necessary to monitor compliance.
- Develop a clear process for reporting and responding to suspected incidents of modern slavery.
- Consider establishing a modern slavery allegations register or utilising the complaints management system register.
- Implement a business continuity plan to ensure safe service delivery if modern slavery risks are identified or cases are reported.
- Maintain a diverse range of suppliers to ensure resilience and continuity.

## Appendix 1 - Modern Slavery Risk Screening

Procurement Officers can use this process for initial screening of modern slavery risks within Queensland Government procurement of goods and services. Certain sectors, such as construction, textiles and cleaning services, are inherently considered high-risk, though modern slavery can occur anywhere.

Before awarding a contract or renewing an existing one, procurement officers must consider the general risk profile of the procurement or the supplier regarding modern slavery compliance. This screening is designed to differentiate between low, medium, and high-risk procurements, helping to determine the necessary level of due diligence.

This risk screening tool is intended for use at the beginning of a new procurement or when assessing existing contracts.

- **Goal:** To establish a general risk classification (low, medium, or high).
- **Focus:** The general risk of the procurement itself, not a detailed, in-depth analysis of a specific supplier.
- **Outcome:** Procurements classified as medium or high risk must proceed to a more detailed risk assessment.
- **Important Note:** This is general guidance only. Specialist support should be sought for any activity classified as high risk.

### Initial Screening Steps

Follow these three steps for the initial modern slavery risk screening:

#### Step 1: Identify Broad Procurement/Contract Structure

Conduct a high-level mapping exercise to understand the broader context of the procurement/contract:

- **Sector and Industry:** Identify the general field of activity.
- **Products/Services:** Determine the goods or services being required/provided.
- **Geographic Region:** Determine where the production or labour for this sector/industry typically occurs.
- **Entity Type:** Identify the nature of the entity likely to be involved (e.g., SME, large corporation).

#### Step 2: Use the Matrix to Identify Specific Risks

Use the following categories to assess potential modern slavery risks. A procurement is generally considered high-risk if it scores highly in two or more categories.

Risk Category	Key Considerations for High Risk	Supporting Resources
High risk business models	<p>The business model has:</p> <ul style="list-style-type: none"> <li>• Procurement and sourcing processes appear poorly managed or inefficient</li> <li>• There are complex or unclear supply chains</li> <li>• Little information is available from the employer to workers about workplace entitlements and protections, and workplace standards</li> <li>• Audit results for the business appear unreliable or conflict with other sources of information about the supplier, such as media or community organisation reports.</li> </ul>	N/A

<b>High risk categories</b>	<ul style="list-style-type: none"> <li>• Use of unskilled, temporary or seasonal labour (e.g. fruit picking, farming)</li> <li>• Use of short-term contracts and outsourcing</li> <li>• 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 (e.g. government office building cleaners)</li> <li>• 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</li> <li>• Recruitment strategies by suppliers, their agents or labour hire agencies target specific individuals and groups from marginalised or disadvantaged communities (e.g. student visa holders with restricted visa conditions for work).</li> </ul>	<a href="#">Global Slavery Index</a>
<b>High risk industries</b>	Understand which products and workforce-related risks in high-risk industries	<a href="#">Global Slavery Index</a>
<b>High prevalence locations</b>	Understand the likelihood of indirect exposure to modern slavery in Queensland Government procurement spend may be higher because of proximity and particularly where products, labour or raw materials in the supply chain are being sourced from neighbouring countries.	<a href="#">Global Slavery Index</a>

### Step 3: Assess Overall Risk Level

Balance the risks assessed in Step 2 to determine the overall risk level, using both the guidance below and your own professional judgement.

- **Scoring Guide:** Assign a score of 1 (Low), 2 (Medium), or 3 (High) for each of the four risk categories.
- **Overall Risk Thresholds (General Guideline):**
  - Score 1–4: Low Risk procurement
  - Score 5–8: Medium Risk procurement
  - Score 9–12: High Risk procurement

## Next Steps for High-Risk Procurements

If a procurement is rated high risk (generally where two or more categories score high):

- Factor the identified risks into the procurement documentation from the early stages.
- Collaborate with suppliers to monitor compliance, provide support, and work together to identify, minimise, and mitigate modern slavery risks. This partnership fosters a shared understanding and proactive management of supply chain risks. Require suppliers to provide a copy of their Modern Slavery Statement and/or complete [Tool 4 – Supplier self-assessment questionnaire](#) during the tender stage to understand existing mitigation strategies and necessary contract management.