

GRS Announcement: Development of a Shared Implementation Plan and Revised Timeline for HMSDD Reporting

May 2024

In December 2023, the NSW Anti-slavery Commissioner published the first version of the [Guidance on Reasonable Steps to Manage Modern Slavery Risks in Operations and Supply-Chains](#) ('Guidance' or 'GRS'), along with supporting resources. The Guidance took effect from 1 January 2024.

Since January 2024, the Commissioner has consulted extensively with covered entities. Based on these discussions, the Commissioner has decided to:

1. Develop a Shared Implementation Plan with and for NSW Government agencies by June 2025
2. Postpone detailed transactional reporting for Heightened Modern Slavery Due Diligence procurements ('HMSDD reporting') to an indicative date of 1 July 2025, and
3. Publish additional GRS Resources in 2024-25.

Developing a Shared Implementation Plan for NSW Government agencies

Over FY2024-2025, the Commissioner will support NSW Government agencies to develop a **GRS Shared Implementation Plan for NSW Government agencies**. The Shared Implementation Plan will set clear, realistic, targets aligned with a maturity framework for achievement of each of the 7 Reasonable Steps in the GRS. It will aim to identify collective approaches and capabilities and focus on whole-of-government and collaborative solutions wherever possible. The Commissioner, acting in consultation with the NSW Procurement Board, will convene a Working Group (**SIP Working Group**). The SIP Working Group will discuss specific topics, identify needs, and agree timelines and strategies for implementation of the GRS, including a maturity framework and shared capability development. The Commissioner will aim to submit a Direction requiring conformance to the Shared Implementation Plan to the NSW Procurement Board in **June 2025**.

Please note: The Shared Implementation Plan will only cover and bind agencies subject to the *Public Works and Procurement Act 1912* (NSW). It will not, for example, apply to local government entities, State owned corporations, Local Aboriginal Land Councils, or universities. In future years, the Commissioner may work with other groups of covered entities to develop additional implementation plans, should this approach prove effective in improving modern slavery due diligence and reporting across NSW Government agencies.

What do I need to know?

- All covered entities should familiarise themselves with the GRS and continue to implement the 7 Reasonable Steps in line with their risks and capabilities.
- **If you are subject to the *Public Works and Procurement Act 1912* (NSW)**, reach out to the relevant Department in your portfolio of agencies, to find out more about the Shared Implementation Plan and SIP Working Group. You can also [sign up](#) to the Commissioner's Due Diligence News & Resources Distribution List to stay updated on any GRS-related developments.

A Revised Timeline for HMSDD Reporting

What is HMSDD Reporting?

Version 1.0 of the GRS (December 2023) outlined an expectation that covered entities will file an online report about each contract the entity is a party to that commences on or after 1 July 2024, has a value of AU \$150,000.00 (incl. GST) or more, and requires Heightened modern slavery due diligence on the GRS Due Diligence Level scale (see *Appendix L of the GRS*).

This HMSDD reporting is separate from the requirement to include information about reasonable steps in your formal annual report.

The Commissioner notes feedback from covered entities about growing compliance burdens on NSW government procurement personnel arising from multiple statutory reporting regimes. With this in mind, and to ensure adequate time for covered entities to prepare for effective implementation of HMSDD reporting, the Commissioner has decided to **postpone the introduction of detailed HMSDD reporting**.

Over the next year, the Commissioner will collaborate with the SIP Working Group and other covered entities to develop detailed HMSDD reporting arrangements, including an electronic reporting arrangement, integrated as far as possible with existing systems. The Commissioner will aim, tentatively, to roll out transactional reporting of HMSDD procurements on **1 July 2025**. This date will be confirmed in early 2025, to allow covered entities adequate time to prepare.

More details about reporting arrangements will be announced in the coming months, with significant notice to allow covered entities to integrate compliance into relevant policies and procedures.

Automated Disclosure of HMSDD Procurements via Buy.NSW Contract Register

Meanwhile, disclosure of certain HMSDD transactions will be integrated within the [register of contract award notices](#) currently maintained on the eTendering website (soon to be integrated with Buy.NSW). This register is used by NSW Government agencies to submit details of procurements over AU \$150,000 as required by the *Government Information (Public Access) Act 2009* (NSW).

From 1 July 2024, an additional disclosure field will be added to the contract award notice: *'Is this a heightened modern slavery due diligence procurement [Yes / No]'*. This field is automatically populated 'Yes' for procurements in product categories corresponding to a 'High' GRS Inherent Modern Slavery Risk Level.

Covered entities that do *not* submit contract award notices through Buy.NSW may include equivalent disclosures of HMSDD procurements in their Contracts Registers, or equivalent, at their discretion.

What do I need to know?

- The Commissioner has postponed the introduction of detailed HMSDD Reporting until an indicative date of **1 July 2025**.
- From 1 July 2024, contract award notices published on the Buy.NSW contract register will automatically disclose whether a contract relates to a HMSDD procurement.

Note: This revised timeline does not affect covered entities' statutory annual reporting obligations. Ensure you report annually on your modern slavery risk management efforts within the deadlines applicable to your entity. For more detail on annual reporting, see Appendix K to the GRS and [GRS Resource: Instructions for Annual Reporting](#).

Additional GRS Resources

The Commissioner will publish the following additional GRS Resources in 2024:

Resource	Expected Publication
GRS Resource: Developing a Modern Slavery Policy (incl. template Modern Slavery Policy) eLearning Module: An Introduction to Modern Slavery and Your Obligations	May 2024
eLearning Module: Reasonable Step 1 (Commit)	July 2024
GRS Resource: Using the Inherent Risk Identification Tool eLearning Module: Prioritisation of Risk	September 2024
eLearning Module: Reasonable Steps 2 to 4 (Plan, Source, & Manage)	November 2024
GRS Resource: Engaging Stakeholders and People with Lived Experience GRS Resource: Developing a Modern Slavery Risk Management Framework	December 2024
GRS Resource: Effective Grievance Mechanisms	March 2025
GRS Resource: Establishing a Victim-centred Reporting Protocol	March 2025
eLearning Module: Reasonable Steps 5 & 6 (Remedy & Report)	April 2025
eLearning Module: Reasonable Step 7 (Improve)	June 2025

Where can I find more information?

For information and resources related to the GRS, visit the Commissioner's Due diligence and reporting webpage at <https://dcj.nsw.gov.au/legal-and-justice/our-commissioners/anti-slavery-commissioner/due-diligence-and-reporting.html>

For advice and support relating to the matters covered in this Announcement, or for other queries related to the GRS, contact the Office of the NSW Anti-slavery Commissioner at GRS@dcj.nsw.gov.au