

WESTPAC BANKING CORPORATION  
ABN 33 007 457 141

# Child Safeguarding at Westpac

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Supplement to Westpac  
Group's Human Rights Position  
Statement and Action Plan

JUNE 2023

 **estpac** GROUP

# Accessibility support

At any time, you can inform us how you would prefer to be contacted. If you are deaf and/or find it hard hearing or speaking with people who use a phone, you can reach us through the National Relay Service (NRS). To use the NRS, you can register here: [infrastructure.gov.au/national-relay-service](https://infrastructure.gov.au/national-relay-service).

Visit [Westpac Access and Inclusion](#) for further information on our accessible products and services for people with disability.



# Our position and approach

Our position on child safeguarding is set out in Westpac Group's broader Human Rights Position Statement and Action Plan<sup>1</sup>. This document is intended to provide additional information to interested stakeholders.

Since the AUSTRAC civil proceedings in December 2019, we have continued to build our understanding of existing and emerging risks to children and young people in physical and online environments and our own knowledge in promoting the financial safety of children and young people who access our products and services.

We recognise that the need for a child safe culture extends beyond organisations that engage directly with children and that we have a role to play in identifying, preventing, mitigating, and accounting for our adverse human rights impacts related to children and young people. While we cannot entirely eliminate risks, we can work to enhance existing processes to seek to identify, prevent and mitigate harm, and play a role in advancing the fulfilment of children's and young people's rights where relevant to our business.

Our approach to undertaking due diligence, providing for, or cooperating in remedy, and undertaking stakeholder engagement is aligned with our Board-approved human rights approach. To date, we have considered child safeguarding in an Australian context only; however, our goal is to assess child safeguarding risks and impacts, if any, as part of our annual review of our 'salient human rights issues'.

We are committed to conducting our business in a way that respects the human rights of our people, business partners (including our customers and suppliers), the communities we support and in which we operate, as well as of others who may be impacted by our activities and business relationships.

This includes respect for those internationally recognised child rights set out in the International Labour Organization's (ILO) Conventions *No.182 on the Worst Forms of Child Labour* and *No.138 on Minimum Age*.

**We also seek to deepen our understanding of how we can respect the rights set out in:**

— *UN Convention on the Rights of the Child*<sup>2</sup>

**We are further guided by the:**

- Children's Rights and Business Principles
- Australia's National Principles for Child Safe Organisations
- Australia's National Plan to End Violence against Women and Children 2022 - 2032

We also support the *UN Guiding Principles on Business and Human Rights (UNGPs)* and they form the foundation of our human rights approach.

<sup>2</sup> In particular, Article 12 – respect for children's views, Article 16 – protection of privacy, Article 18 – responsibility of parents, Article 28 – access to education, Article 32 – protection from harmful work, and Article 34 – protection from sexual abuse. Visit *Our Focus Areas: Child safe organisation* and our [Safer Children, Safer Communities program](#) for more information.

<sup>1</sup> Westpac Human Rights Position Statement and Action Plan, May 2023.

## Our role

While our direct engagement with children and young people can be limited, we may be connected to impacts on their rights and wellbeing through:

- Customers exploiting our financial platforms and products.
- Design of products and services that may not fully take into account the interests of children and young people, including those that might need extra care.
- Gaps in screening during customer onboarding and recruitment processes that may increase potential child exploitation risks.
- Occurrences of the worst forms of child labour such as child trafficking, forced or compulsory labour in our supply chain and/or the supply chains of our suppliers and customers.
- Our access to, and handling practices of customer personal information, where the customer is a child or young person.
- Accessing inappropriate information relating to children using Westpac technology.
- Inappropriate interactions with children and young people in physical environments such as our branches or workplaces.

## Our principles

We are committed to strengthening our focus on child safeguarding, in Australia, initially. The principles that guide and inform our child safeguarding approach are:

**Safety by design:** where applicable, we evaluate the fairness and suitability of our products and services for children and young people, including with consideration for any actual or potential risks, adverse impacts or opportunities to create a positive impact.

**Include the voice of children and young people:** when making decisions that may affect their wellbeing, our approach is informed by working with organisations that involve and represent the voices of a diverse group of children and young people, including Indigenous children, those in out-of-home care and those with disabilities.

**Promote responsible financial behaviours for children and their parents and carers:** we seek to encourage safe and responsible spending and saving behaviours while helping to increase financial literacy and awareness.

**Set clear expectations for employees, contractors, and suppliers:** in relation to child safety and wellbeing, which are guided by our [Responsible Sourcing Code of Conduct](#) and [Code of Conduct](#). If an employee or contractor is found not to meet expectations we have a consequence management framework to guide our approach to disciplinary actions.

**Mitigate risks for children across financial transactions:** we will, where applicable, continue to review and refine our approach through risk assessments across our products and services, channels, jurisdictions, and our processes for customer due diligence, payment and risk-based customer screening and transaction monitoring.

**Partner for progress:** we seek to partner with a range of stakeholders to deepen our understanding of their expectations around our child safeguarding practices and to raise our awareness of emerging risks and trends in relation to child rights, protection and safety.

# Child Safeguarding Action Plan

These are the key areas of strategic focus guiding our Action Plan on child safeguarding. We aim to implement the actions in our *Action Plan* by May 2026 unless otherwise specified. Our primary focus will initially be on our Australian operations. We will continue to review our progress and aim to update and refine our *Action Plan* as needed so it remains relevant and aligned with our commitments and ambition.

STRENGTHENING A FOCUS ON CHILD SAFEGUARDING				
	Safety by design in products and services related to children and young people	Child labour risks in our supply chain	Child exploitation risks across financial transactions	Strengthening grievance mechanisms and approach to remedy for children and young people
<b>OBJECTIVES</b>	Design our products and services for children and young people so they are fit for purpose and promote safe and responsible financial behaviours	Identify, mitigate, and manage risks related to child labour across our supply chain	Put measures in place to mitigate risks associated with customers potentially exploiting our products for criminal purposes, including for example, child exploitation or abuse	Strengthen our grievance mechanisms for children and young people, where appropriate, so they are effective and fit-for-purpose and inform the role we play in remedy
<b>ACTIONS</b>	<ol style="list-style-type: none"> <li>Take steps to better integrate safety by design principles into our product and lifecycle process.</li> <li>Design product and service features for children and young people and their parents and carers that promote safe and responsible financial behaviours and prevent misuse.</li> </ol> <p><i>In pursuing this action, we recognise that children and young people are increasingly accessing financial products and services, both in physical and online environments, participating in decision-making around money management as well as generating income in non-traditional ways making it important to reduce their exposure to harm.</i></p>	<ol style="list-style-type: none"> <li>Manage and monitor modern slavery risks including child labour risks in our supply chain.</li> <li>Undertake due diligence in areas of our supply chain which are at higher risk of modern slavery (including the worst forms of child labour).</li> </ol> <p><i>In pursuing this action, we recognise that a total of 3.3 million children are estimated to be in situations of forced labour highlighting the need to continue to focus on addressing potential child labour in our supply chain.</i></p>	<ol style="list-style-type: none"> <li>Integrate and enhance consideration for child sexual exploitation and abuse across our financial crime processes.</li> <li>Prioritise the reporting of all suspected cases of child sexual exploitation to AUSTRAC within one business day of a suspicion being formed<sup>3</sup>.</li> </ol> <p><i>In pursuing this action, we recognise that while we can't entirely eliminate the risks of customers potentially exploiting our products for criminal purposes, through our regulatory frameworks, we have and will continue to put measures in place to mitigate these risks including through risk assessments across products, channels and jurisdictions, customer due diligence, payment and risk-based customer screening and transaction monitoring.</i></p>	<ol style="list-style-type: none"> <li>Review and seek to strengthen the effectiveness<sup>4</sup> of our grievance mechanisms and our approach to remedy with an initial focus on children (minors) and young people.</li> </ol> <p><i>In pursuing this action, we recognise that child-friendly grievance mechanisms can be an important source of information for the bank on a child and young person's daily experiences and are particularly important for those who are more marginalised and at risk of having their rights violated (e.g., children and young people in out of home care, in remote locations, victims of violence).</i></p>

<sup>3</sup> AUSTRAC deadline for reporting is within three business days. Visit <https://www.austrac.gov.au/business/how-comply-and-report-guidance-and-resources/reporting/suspicious-matter-reports-smrs/submitting-your-smr>.

<sup>4</sup> With reference to the effectiveness criteria set out in the UN Guiding Principles on Business and Human Rights, UN Guiding Principle 31, which outlines that grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning and based on engagement and dialogue.

## Feedback, complaints and questions<sup>5</sup>

### For our current and former employees

including contractors and temporary staff, we have processes for reporting matters of concern in the ordinary course of business, including through our whistleblowing channels and via our human resources and risk and compliance teams. Our [Speaking Up Policy](#) also provides guidance on how to raise a concern about suspected or actual unethical or illegal behaviour, including human rights concerns, confidentially. It outlines several channels for raising concerns including via the Whistleblower Hotline. Call 1800 989 569 or visit our [Concern Online system](#).

### For our suppliers

we have a [Supplier Advocate](#) hub which acts as the voice for suppliers through which they may raise queries or concerns.

### For current and former suppliers and their workers

our [Speaking Up Policy](#), including our [Whistleblower channels](#), are also available to raise concerns about suspected or actual unethical or illegal behaviour where it has significant implications for Westpac.

### For our customers

we strive to provide the best possible service and to do our best to resolve any concerns quickly and fairly. Concerns may be raised in-person, over the phone or online using our [feedback and complaints form](#).

The Group also has a [Customer Advocate](#) who can be contacted by completing a [secure feedback form](#) and whose role is to listen to customers and recommend changes be made to bank policies, procedures and processes where appropriate.

### For our community

any member of the public (including those who may be impacted through a business partner, such as a customer) is able to raise human rights concerns by visiting our [feedback and complaints form](#) or contacting Westpac Group Sustainability at [sustainability@westpac.com.au](mailto:sustainability@westpac.com.au).

## Counselling and support services

If you or someone you know is impacted by child sexual abuse and online child sexual exploitation there are support services available.

- Child Protection Helpline. Call 132 111.
- Kids Helpline. Free, private, and confidential, telephone and online counselling service specifically for young people aged between 5 and 25 in Australia. Call 1800 551 800 for help.
- Australian Childhood Foundation. Call 1800 176 453 or 03 9874 3922. Counselling for children and young people affected by abuse.

<sup>5</sup> The Supplier Advocate hub and Customer Advocate contacts operate in Australia only. Certain locations operate region-specific feedback and complaints mechanisms.

# Disclaimer

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## ACKNOWLEDGMENT OF INDIGENOUS PEOPLES

Westpac acknowledges the First Peoples of Australia and recognises their ongoing role as Traditional Owners of the land and waters of this country. We acknowledge Westpac’s Aboriginal and Torres Strait Islander employees, partners, and stakeholders, and pay our respects to their Elders, both past and present.

We also acknowledge the Indigenous Peoples in the other locations where we operate.



## Contact us

For questions and comments,  
please contact Westpac Group Sustainability



[sustainability@westpac.com.au](mailto:sustainability@westpac.com.au)



[westpac.com.au/sustainability](http://westpac.com.au/sustainability)