



Version	Approved by	Approval date	Effective date	Next review
1.0	President and Vice-Chancellor	7 August 2020	7 August 2020	August 2023
Policy Statement				
Purpose	This Policy sets out the principles the University commits to implement with regard to managing its operations and supply chains to minimise the risks of modern slavery.			
Scope	This Policy applies to all staff and affiliates of the University. The University's commitment to principles which will contribute to minimise the risk of modern slavery extends to the activities and operations of its controlled entities which are expected to adopt this Policy (modified as may be necessary to fit the entity's circumstances).			
Policy Provisions				

1. Introduction

This Policy is an expression of the University's commitment to human rights and the creation of a just and equal society. This Policy also forms part of the University's response to its obligations under the *Modern Slavery Act 2018* (Cth) (Modern Slavery Act), which requires the University to report annually on the steps which it takes to identify, and address, the risks of modern slavery in its operations and supply chains.

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine or deprive them of their freedom. Modern slavery is not the same thing as substandard or dangerous working conditions, or underpayment of workers, though the existence of such conditions in a business or industry may be an indicator of modern slavery also. 'Modern slavery' is defined in the Modern Slavery Act to refer to conduct which either amounts to a serious criminal offence under Australian law or to a violation of international Conventions to which Australia is a party. Under the Commonwealth Criminal Code it is an offence to engage in slavery or slavery like practices, and to exploit others through conduct such as human trafficking; debt bondage; forced labour; deceptive recruiting for labour or services; the sale of children; and forced marriage. In this Policy, we use the term 'modern slavery' to encompass all of the practices to which the Modern Slavery Act refers.

Modern slavery occurs in a wide range of industries and businesses across the world, including in Australia. Certain groups within the community, such as migrants, women and children, are particularly at risk of modern slavery. Modern slavery may involve the exploitation of debt and the use of violence and/or threats of violence (psychological or physical), isolation, deprivation of liberty and the withholding of critical identification documents such as passports.

The University expects all of its staff, its controlled entities, and its affiliates to work together to assist the University to give effect to the principles set out in this Policy.

2. Policy Statement

2.1 The University is committed to ensuring:

- (a) its operations and supply chains do not cause, involve or contribute to modern slavery; and
- (b) its suppliers, relevant stakeholders and others with whom we do business respect and share the University's commitment with regard to minimising the risk of modern slavery.

Working collaboratively with suppliers and other organisations, the University seeks to identify and implement measures which will contribute to the prevention, mitigation and remediation of the risks of modern slavery in its supply chains and operations, even if the University itself has not contributed to these risks.

- 2.2 In giving effect to its obligations under the Modern Slavery Act, and to its principles and values, the University is committed to combating modern slavery through:
- (a) ensuring that its overall policies and procedures effectively address the risk of modern slavery (particularly in areas such as procurement and the handling of complaints),
 - (b) undertaking risk assessments and due diligence to identify suppliers and others with whom we do business who are committed to minimising the risk of modern slavery in their own supply chains and operations,
 - (c) working with suppliers and relevant stakeholders to agree on measures (such as reporting, audits and grievance processes) which will mitigate modern slavery risks,
 - (d) implementing measures designed to remediate identified modern slavery (including working with suppliers and relevant stakeholders to agree on corrective action plans); and
 - (e) evaluating the effectiveness of these measures to drive continual process improvement.
- 2.3 The due diligence which the University will undertake when selecting and continuing relationships with suppliers and other third parties will be proportionate to the level of risk of modern slavery in the context, having regard to:
- (a) the sector in which the third party operates (noting that certain sectors are recognised as having a higher risk of modern slavery);
 - (b) the country or countries in which goods are manufactured and from which services are provided (noting that certain countries are recognised as having a higher risk of modern slavery);
 - (c) the measures taken by the third party in relation to modern slavery risks in its own operations and supply chains; and
 - (d) the complexity and transparency of supply chain(s), including the extent of sub-contracting relationships.
- 2.4 The University will promote awareness of modern slavery through training and the availability of materials to build understanding and provide practical tools to enable University staff and affiliates to identify modern slavery risks so that the University can respond appropriately to those risks.
- 2.5 The University encourages its staff, affiliates and others to raise concerns about modern slavery through its established complaint processes, including the [Complaints Management Procedure \(External\)](#), [Staff Complaint Procedure](#), [Student Complaint Procedure](#) and [Report Wrongdoing Procedure](#).

3. Roles and Responsibilities

- 3.1 The **University Council** is responsible for approving the University's annual Modern Slavery Statement and authorising a member of University Council to sign the Statement.
- 3.2 The University's **Management Board** is responsible for overseeing the steps taken by the University, consistent with this Policy, to identify and address the risks of modern slavery within its operations and supply chains.
- 3.3 The **Deputy Vice-Chancellor, Equity Diversity and Inclusion** is responsible for:
- (a) implementing this Policy;
 - (b) supporting University Compliance Owners to develop protocols, processes and procedures to support compliance with this Policy;
 - (c) preparing the University's Modern Slavery Statement annually with the assistance of University Compliance Owners; and
 - (d) submitting the University's approved and signed Modern Slavery Statement annually to the relevant authority.

Note- University Compliance Owners are responsible for compliance management (including the resourcing, developing, implementing and monitoring of internal controls) to address the obligation for which they are responsible. Refer to the *Legislative Compliance Procedure* for more information on the roles and responsibilities and compliance management.

- 3.4 The **University Compliance Owners** designated in respect of obligations under the Modern Slavery Act are responsible for ensuring the area/s for which they are the University Compliance Owner develop and implement effective protocols, processes and procedures to enable modern slavery risks to be identified and addressed. University Compliance Owners will report on the actions taken in their area each year to assist in the preparation of the University's annual Modern Slavery Statement.
- 3.5 **Managers and supervisors** are responsible for ensuring that all staff within their operational area comply with this Policy and any applicable protocols, processes and procedures prescribed by the relevant University Compliance Owner/s under this Policy.
- 3.6 **Individual staff** are responsible for ensuring that they comply with this Policy and with any applicable protocols, processes and procedures prescribed by the relevant University Compliance Owner/s under this Policy.

Accountabilities				
Responsible Officer	Deputy Vice-Chancellor, Equity Diversity and Inclusion			
Contact Officer	Director of Operations (Equity Diversity and Inclusion)			
Supporting Information				
Legislative Compliance	This Policy supports the University's compliance with the following legislation: Modern Slavery Act 2018 (Cth)			
Supporting Documents	Nil			
Related Documents	Complaints Management Procedure (External) Equity, Diversity and Inclusion Policy Investment Policy Guidance for Reporting Entities - Commonwealth Modern Slavery Act 2018 Legislative Compliance Procedure OECD Due Diligence Guidance for Responsible Business Conduct Procurement Policy Procurement Procedure Report Wrongdoing Procedure Staff Complaint Procedure Student Complaint Procedure UN Guiding Principles on Business and Human Rights			
Superseded Documents	Nil			
File Number	2020/010654			
Definitions and Acronyms				
Modern Slavery	The definition of modern slavery is the same as provided for in the Modern Slavery Act, 2018 (Cth) under Section 4.			
Revision History				
Version	Approved by	Approval date	Effective date	Sections modified
1.0	President and Vice-Chancellor	7 August 2020	7 August 2020	This is a new Policy