

Modern Slavery Prevention Policy

Purpose

This policy sets out principles to minimise risks of modern slavery in UNSW's functions, operations and supply chains.

Scope

This policy applies to all staff, students and affiliates of the University.

The University's commitment to principles that minimise the risk of modern slavery extends to activities and operations of its controlled entities which are expected to adopt this policy (modified where necessary to fit the entity's circumstances).

The University expects all staff, controlled entities, and affiliates to work together to implement principles in this policy.

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Principles and objectives

1. Introduction

- 1.1. UNSW recognises its responsibility to respect human rights and is committed to the creation of a just and equal society.
- 1.2. This policy supports UNSW's framework for complying with its legislative obligations to report annually on steps taken to identify, prevent, mitigate and remediate risks of modern slavery in its operations and supply chains.

2. Commitment to human rights

- 2.1. UNSW is committed to:
 - minimising our supply chain's involvement or contribution to modern slavery
 - ensuring that its functions and operations do not cause, involve or contribute to modern slavery
 - ensuring that its suppliers, relevant stakeholders and others with whom we do business respect and share the University's commitment to minimise risk of modern slavery.
- 2.2. UNSW will work collaboratively with suppliers and other organisations to build capacity through effective business relationships that prevent human rights abuses within the University's sphere of influence.
- 2.3. UNSW will implement measures to identify, prevent, mitigate and remediate risks of modern slavery in its activities, even if UNSW has not directly contributed to these risks.

3. Combatting modern slavery

- 3.1. UNSW will continuously implement principles, values and obligations under the *Modern Slavery Act 2018* (Cth) to combat modern slavery and:
- ensure all policies and procedures reflect UNSW's commitment to respect human rights and address the risk of modern slavery (particularly in areas of procurement and complaints management)
 - undertake ongoing risk assessments and human rights due diligence to identify actual and potential risks of modern slavery within the supply chains and operations of suppliers and others we engage
 - integrate the results of risk assessments across UNSW functions and actively engage suppliers and relevant stakeholders to agree on measures (such as reporting, audits and grievance processes) which will mitigate modern slavery risks
 - implement appropriate measures to remediate identified instances of modern slavery by working with affected stakeholders, suppliers and independent human rights experts to agree on corrective action plans that prioritise the most severe risks first
 - track and evaluate effectiveness of measures using qualitative and quantitative indicators to treat arising risks and drive continuous improvement.
- 3.2. UNSW will report on actions taken to remediate modern slavery in a manner that does not generate risks for affected stakeholders. If faced with conflicting interests, UNSW will honour human rights and principles of this policy.
- 3.3. UNSW will complete human rights due diligence to select and continue relationships with suppliers and third parties. Due diligence processes will be proportionate to the level of risk of modern slavery in the context of:
- risks of adverse impacts to rights-holders including individuals or social groups
 - third party sector operation (noting certain sectors are recognised as having a higher risk of modern slavery)
 - the country or countries where goods are manufactured and services are provided (noting certain countries are recognised as having a higher risk of modern slavery)
 - measures implemented by suppliers and third parties to mitigate modern slavery risks in their operations and supply chains
 - the complexity and transparency of supply chain(s), including the extent of sub-contracting relationships and subsidiary businesses.
- 3.4. UNSW will promote awareness of modern slavery through training and materials to build understanding and provide practical tools to enable staff and affiliates to identify and address modern slavery risks.
- 3.5. Staff, students, affiliates and members of the community are encouraged to raise concerns, complaints or reports about modern slavery through the University's [complaints management system – CaseIQ](#).

4. Roles and responsibilities

- 4.1. 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.
- 4.2. The University Leadership Team is responsible for overseeing steps taken to identify and address risks of modern slavery in its functions, operations and supply chains.
- 4.3. The Interim Vice-President - Transformation, Planning and Assurance is responsible for:
- implementation of this policy
 - oversight of the University's progress against its Modern Slavery Strategy and Action Plan
 - the preparation of the University's annual Modern Slavery Statement and

- submitting the University's approved and signed Modern Slavery Statement annually to the relevant authority.
- 4.4. The Modern Slavery Working Group is responsible for supporting and maintaining progress against the University's Modern Slavery Strategy and Action Plan.
- 4.5. Managers and supervisors are responsible to ensure all staff in their operational area comply with this policy and any applicable protocols, processes and procedures prescribed by University Compliance Owner/s of this policy.
- 4.6. Individual staff are responsible to ensure they comply with this policy and with applicable protocols, processes and procedures prescribed by the University Compliance Owner/s under this policy.

Version: 1.1

Effective: 29 July 2024

Responsible: Interim Vice-President - Transformation, Planning and Assurance

Lead: Head of Compliance & Privacy Law, Legal and Compliance

Appendix

Legislative compliance

This policy is intended to ensure that UNSW complies with the:

1. *Modern Slavery Act 2018* (Cth)
2. *Modern Slavery Act 2018* (NSW)

Supporting documents

- Complaints Management and Investigations Policy and procedure
- Equity, Diversity and Inclusion Policy
- Guidance for Reporting Entities - Commonwealth Modern Slavery Act 2018 Risk and Compliance Policy
- OECD Due Diligence Guidance for Responsible Business Conduct
- Finance Policy
- Procurement Procedure
- Public Interest Disclosure (Whistleblowing) Policy and procedure
- UN Guiding Principles on Business and Human Rights

Definitions and acronyms	
Modern Slavery	Modern slavery has the same meaning given in section 4 of the Modern Slavery Act 2018 (Cth) (the Act). Modern slavery describes situations where offenders use coercion, violence, threats or deception to exploit victims and undermine their freedom. Modern slavery is not the same as substandard or dangerous working conditions (such as underpayment of workers), though the existence of such conditions may be an indicator of modern slavery. Modern slavery is defined in the Act as conduct which 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.
Affiliate	Affiliates means conferred title holders; agency/labour hire staff; members of University committees; visitors from other universities, and any other person appointed or engaged by the University to perform duties or functions for the University (including volunteers).
University Compliance Owner	A University officer who is responsible for identifying, developing, implementing and monitoring internal compliance controls to manage compliance with a legal obligation per the Risk and Compliance Policy

Version history

- **Version 1.0** approved by President and Vice-Chancellor on 7 August 2020 effective 7 August 2020. New policy.
- **Version 1.1** approved by President and Vice-Chancellor on 29 July 2024 effective 29 July 2024. Updates to align to the United Nations Guiding Principles on Business and Human Rights. Align grievance provisions to the new *Complaints Management and Investigations Policy*. Reflect change in operational responsibility for compliance to the Division of Transformation, Planning and Assurance.