

MODERN SLAVERY POLICY

Purpose

The policy substantiates the College of Law's commitment to aid in the cessation of all forms of modern slavery. This policy aligns with the College's firm ethical, legal and moral duties. The policy adheres to the intent of protocols, conventions, international conventions related to modern slavery and the Modern Slavery Act (Cth) 2018.

Applicability

This Policy is applicable to Governors, all College Staff, contractors, agents, consultants, suppliers, other affiliates of the College and its wholly owned subsidiaries.

All staff and suppliers need to know about this policy.

1.0 Policy principles

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. The Modern Slavery Act (Cth) 2018 describes the following types of abuse and exploitation:

- Trafficking in persons
- Slavery
- Servitude
- Forced labour
- Forced marriage
- Debt bondage
- The worst forms of child labour
- Deceptive recruiting for labour or services
- Entering into a commercial transaction involving a slave
- Exercising control or direction or providing finance for any transaction involving a slave or the act of slave trading
- Conducting a business involving servitude or forced labour

There are an estimated 40.3 million victims of modern slavery globally. Women and girls are over-represented, comprising 71% of victims and nearly two-thirds of modern slavery victims in the Asia-Pacific region.

Name of Policy	Modern Slavery	Document Type	Policy
Category	Corporate	Information Classification	Public
Owner	Board of Governors	Last Updated (version)	5 October 2021

Related Policy

Compliance Policy
 Grievance (Complaint Management) Procedure
 Purchasing Policy
 Whistleblower Policy

Commitments
2.0 Commitments

The College is committed to respecting human rights, acting ethically in our dealings with partners and suppliers, and taking real action to address any modern slavery risks within the College’s direct control.

The College is committed to:

- Contributing to the end of all forms of modern slavery, both in Australia and overseas, by ensuring its own supply chains and operations do not contribute to modern slavery practices, and to take appropriate action to respond to the humanitarian impacts of modern slavery
- Ensuring that its contractors, suppliers, collaborators business partners and others with whom the College does business respect and share the College’s commitment regarding minimising any risks related to the practice of modern slavery

Due to the nature of its business and the work with its suppliers and contractors, the College has assessed that:

- Its risk is low with respect to matters of modern slavery in our operations and supply chains and is careful to ensure compliance with all applicable laws. This includes but is not limited to ensuring that College of Law employees are managed in accordance with all relevant employment, equal opportunity and anti-discrimination legislation; and making reasonable enquiries of suppliers and independent contractors at the time of engagement and thereafter from time-to-time as reasonably necessary. The College will monitor its obligations and report its findings annually.

Although the College’s risk is low, the College is committed to aiding the fight against modern slavery through the education of its staff,

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students and customers with training and awareness of modern slavery risks, the Modern Slavery Act (Cth) 2018, the College's Modern Slavery Policy, and the continued endeavours to minimize the risk of modern slavery within supply chains and operations.

A key part of supporting ethical standards is enabling College staff and stakeholders (including suppliers) to feel free and safe to speak up when there are reasonable grounds to suspect that the College or its people are not acting ethically or in accordance with laws and obligations. Concerns about compliance or ethical issues or illegal or unethical activities are to be reported in accordance with the Whistleblower Policy.

3.0 Definitions

- **Modern Slavery Act (Cth) 2018:** being the Commonwealth legislation (the Act) enacted by the Parliament of Australia on 29 November 2018 (and may amend time to time).
 - **Modern slavery:** for the purposes of this policy is defined as including the types of serious offenses of exploitation as outlined in Section 1.0
 - **Risk of modern slavery practices:** means the potential for the College to cause, contribute to, or be directly linked to modern slavery through its supply chains and operations.
 - **Suppliers:** is defined as any organisation or person who provides the College with goods or services, including their subcontractors, agents, related entities and consultants.
 - **Supply chains:** is defined as the products and services (including labour) that contributes to the College's own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.
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