

# Modern Slavery Prevention Procedure

## 1 Purpose

To outline the University's processes for identifying, assessing, managing and reporting Modern Slavery risks within its operations and supply chains in accordance with the *Modern Slavery Act 2018* (Cth) (the Act).

## 2 Scope

This procedure applies to all University Members, Students, University Partners and entities owned or controlled by the University.

## 3 Procedure Overview

This procedure outlines the processes for identifying, assessing, managing and reporting Modern Slavery risks within the University's operations and supply chains.

The term Modern Slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. It is a criminal offence under Division 270 and 271 of the *Criminal Code Act 1995* (Cth) and is a violation of fundamental human rights.

The Act defines Modern Slavery as including eight types of serious exploitation:

- Trafficking in persons;
- Slavery;
- Servitude;
- Forced marriage;
- Forced labour;
- Debt bondage;
- Deceptive recruiting for labour or services; and
- The worst forms of child labour.

Modern Slavery does not include practices such as substandard working conditions or underpayment of workers. However, these practices are also illegal, harmful, and may be present in some situations of Modern Slavery.

## 4 Procedures

All University Members, Students, University Partners and entities owned or controlled by the University must consider the potential for Modern Slavery risks in the University's operations and supply chains and minimise the potential of Modern Slavery by reporting any concerns or complaints in accordance with Section 4.4 of this procedure.

[Walk Free](#), an international human rights group focussed on the eradication of Modern Slavery, produces the [Global Slavery Index](#), a report providing national estimates of Modern Slavery for 160 countries. It provides a country-by-country breakdown, sharing insights into Modern Slavery prevalence by geographical location, the level of action governments are taking to address the issue, as well as identifying high-risk products and industries. Information from the Global Slavery Index and other sources including anti-slavery not-for-profit groups is used to inform the University's Modern Slavery prevention activities and has been incorporated into resources such as the University's Annual Compliance Training.

### 4.1 Identification

In giving effect to its obligations under the Act, and to its principles and values, the University is committed to combating Modern Slavery through the following objectives.

1. Increasing awareness and minimising the potential of Modern Slavery in University business activities. A Modern Slavery awareness learning module is included as part of the University's Annual Compliance Training - a mandatory training program designed to ensure that all University Employees are aware of their responsibilities as an Employee, and the aspects of the Act which are applicable to their employment at UniSQ.
2. Supporting University Members and line managers to consider Modern Slavery risks in the University's operations, supply chains, geographical locations, and sectors/industries, with specific guidance sought through the University's Modern Slavery Working Group or appropriate University functions as necessary. In accordance with the Enterprise Risk Management Procedure, line managers will manage operational risks within their areas of responsibility and refer any Modern Slavery risks to the University's Modern Slavery Working Group for incorporation into the Modern Slavery Risk Register.
3. Annually reviewing the Modern Slavery Risk Register to identify new and emerging risks and liaising with relevant University stakeholders to identify suitable controls for mitigating such risks.
4. Supporting the University's Modern Slavery Working Group to liaise with key

stakeholders to improve education, awareness and risk management activities, facilitating engagement through risk workshops, training, and University-wide communications.

5. Supporting the University's Modern Slavery Working Group to consult with the Senior Leadership Group and other key stakeholders to develop the annual Modern Slavery Statement, to be approved by the University Council and submitted to the Online Register for Modern Slavery Statements by 30 June each year. The prescriptive process for developing the University's Modern Slavery Statement is provided in the Finance and Business Solutions' local procedure 'Preparation of the Annual Modern Slavery Statement'.

## 4.2 Assessment

The University will undertake appropriate assessment of risks including due diligence of Contractors, Suppliers and University Partners, and will assess any Modern Slavery risks identified during operational activities. Due diligence activities may include, but are not limited to, supplier questionnaires, risk assessments, contract management activities, and maintaining awareness of industry and legislative updates pertaining to Modern Slavery.

Any third-party requests for information related to the University's approach to Modern Slavery will be referred to the University's Modern Slavery Working Group for completion. This may include requests such as supplier questionnaires.

## 4.3 Management

The University, through its line managers, will implement suitable controls for Modern Slavery risks identified within their areas of responsibility, and refer any risks beyond the scope of their responsibility to the University's Modern Slavery Working Group and their supervisor, as appropriate. Any risks identified and proposed controls will be incorporated into the Modern Slavery Risk Register and the University's annual Modern Slavery Statement as appropriate.

University Employees, and other key stakeholders at the University's request, will undertake Modern Slavery training through (at a minimum) the University's Annual Compliance Training module and participate in risk identification and management activities.

## 4.4 Reporting

Modern Slavery concerns or complaints involving the University should be reported in accordance with the University's Complaints Management Procedure. Circumstances which do not involve the University should be reported to the Australian Federal Police.

All Modern Slavery concerns or complaints reported to the University will be triaged by the Director (Integrity and Professional Conduct) (which should also be assessed under the University's Corrupt Conduct and Public Interest Disclosure regulator obligations), and when appropriate, forwarded to the University's Modern Slavery Working Group and relevant

University Members (as required) for investigation in accordance with the University's Modern Slavery Remediation Process.

Upon completion of the investigation, appropriate actions will be implemented to rectify substantiated issues involving the University.



Depending on the nature of the concern or complaint, the Director (Integrity and Professional Conduct) or University's Modern Slavery Working Group will notify the Vice-Chancellor's Executive of potential or actual risks, and the outcomes of the investigation. If required, the Vice-Chancellor (or nominee) will notify appropriate external agencies of the issues identified and take further action as necessary. Such information will also be included in the University's annual Modern Slavery Statement.

## 5 References

[Global Slavery Index](#)

[Modern Slavery Act 2018 \(Cth\)](#)

## 6 Schedules

This procedure must be read in conjunction with its subordinate schedules as provided in the table below.

## 7 Procedure Information

<b>Accountable Officer</b>	Deputy Vice-Chancellor (Enterprise Services)
<b>Responsible Officer</b>	Chief Financial Officer
<b>Policy Type</b>	University Procedure
<b>Policy Suite</b>	<a href="#">Code of Conduct Policy</a>
<b>Subordinate Schedules</b>	

<b>Approved Date</b>	2/12/2024
<b>Effective Date</b>	2/12/2024
<b>Review Date</b>	2/12/2029
<b>Relevant Legislation</b>	<a href="#">Criminal Code Act 1995 (Cth)</a> <a href="#">Modern Slavery Act 2018 (Cth)</a>
<b>Policy Exceptions</b>	<a href="#">Policy Exceptions Register</a>
<b>Related Policies</b>	<a href="#">Complaints Management Policy</a> <a href="#">Employee Diversity and Inclusion Policy</a> <a href="#">Enterprise Risk Management Policy</a> <a href="#">Flexible Work and Working Arrangements Policy</a> <a href="#">Procurement Policy</a> <a href="#">Recruitment, Selection and Appointment Policy</a>
<b>Related Procedures</b>	<a href="#">Complaints Management Procedure</a> <a href="#">Employee Health and Wellbeing Procedure</a> <a href="#">Enterprise Risk Management Procedure</a> <a href="#">Flexible Work and Working Arrangements Procedure</a> <a href="#">Procurement Procedure</a> <a href="#">Recruitment, Selection and Appointment Procedure</a> <a href="#">Research Management Procedure</a>
<b>Related forms, publications and websites</b>	<a href="#">Procurement Guideline</a> <a href="#">Modern Slavery Prevention Road Map</a> <a href="#">Modern Slavery Remediation Process</a> <a href="#">Modern Slavery Training</a> <a href="#">Queensland Government Supplier Code of Conduct 2023</a> <a href="#">Modern Slavery Statements Register</a>

Preparation of the Annual Modern Slavery Statement (local procedure)

[UniSQ Modern Slavery webpage](#)

## Definitions

### Terms defined in the Definitions Dictionary

#### [Employee](#)

A person employed by the University and whose conditions of employment are covered by the Enterprise Agreement and includes persons employed on a continuing, fixed term or casual basis. Employees also include senior Employees whose conditions of employment are covered by a written agreement or contract with the University.

#### [Procurement](#)

The entire process by which all classes of materials, facilities and services are obtained by the University. This can include the functions of planning, design, establishing standards, evaluating risk, writing specifications, selecting Suppliers, developing contracts and method of payment and subsequent disposal.

#### [Student](#)

A person who is enrolled in a UniSQ Upskill Course or who is admitted to an Award Program or Non-Award Program offered by the University and is: currently enrolled in one or more Courses or study units; or not currently enrolled but is on an approved Leave of Absence or whose admission has not been cancelled.

#### [Supplier](#)

An organisation known to be capable of supplying the required Goods and/or Services.

#### [University](#)

The term 'University' or 'UniSQ' means the University of Southern Queensland.

#### [University Members](#)

Persons who include: Employees of the University whose conditions of employment are covered by the UniSQ Enterprise Agreement whether full time or fractional, continuing, fixed-term or casual, including senior Employees whose conditions of employment are covered by a written agreement or contract with the University;

members of the University Council and University Committees; visiting, honorary and adjunct appointees; volunteers who contribute to University activities or who act on behalf of the University; and individuals who are granted access to University facilities or who are engaged in providing services to the University, such as contractors or consultants, where applicable.

### [University Partners](#)

A third-party entity which is partnering with the University on any activity. This may include activities carried out by Suppliers or Contractors which may or may not be recorded in a formal agreement.

### **Definitions that relate to this procedure only**

#### **Modern Slavery (as defined in the Act):**

*Modern Slavery* means conduct which would constitute:

- a) an offence under Division 270 or 271 of the *Criminal Code*; or
- b) an offence under either of those Divisions if the conduct took place in Australia; or
- c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

Note: In 2018, the text of international agreements in the Australian Treaty Series was accessible through the Australian Treaties Library on the AustLII website (<http://www.austlii.edu.au>).

### **Keywords**

Human Rights, Forced, Servile, Labour, Marriage, Debt, Bondage, Trafficking, Slavery, Servitude, Child, Exploitation, Vulnerable, Fair work, Procure, Procurement, Purchase, Purchasing Supply, Chain, Supplier, Person, Risk, Deception, Deceptive, Recruit, Good, Product, Service

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