

Modern Slavery Policy

Section 1 - Purpose

(1) This policy outlines the commitments and principles aimed at minimising the risks of modern slavery within the operations and supply chains of Charles Sturt University (the University).

(2) The policy supports compliance with the [Modern Slavery Act 2018 \(Cth\)](#) and [Modern Slavery Act 2018 \(NSW\)](#), and outlines the University's:

- a. commitment to identifying and addressing incidents and risks of modern slavery
- b. compliance framework for meeting obligations under the [Modern Slavery Act 2018 \(Cth\)](#)
- c. expectations and approaches to modern slavery prevention.

Scope

(3) This policy applies to all employees, students, affiliates and controlled entities of the University. It also extends to any entity bound to follow this policy by the terms of an agreement with the University (including partners and suppliers).

Section 2 - Policy

Background

(4) The University opposes all forms of modern slavery and respects the dignity, wellbeing and human rights of its employees, workers in its supply chains, and the communities in which it operates, or sources products and services.

(5) Modern slavery is a violation of fundamental human rights and causes significant harm to those affected. It may also pose reputational, financial, commercial, market and operational risks to the University and its controlled entities.

(6) This policy adopts the definition of the term 'modern slavery' as outlined in the [Modern Slavery Act 2018 \(Cth\)](#). Modern slavery covers a range of situations where coercion, threats or deception are used to exploit people and undermine or deprive them of their freedom. It includes exploitative practices such as human trafficking, slavery, forced labour, servitude, child labour, deceptive recruiting for labour or services, removal of organs and slavery-like practices. Slavery and slavery-like practices are also criminal offences under divisions 270 and 271 of the [Criminal Code Act 1995 \(Cth\)](#). However, modern slavery does not include substandard working conditions or underpayment of workers, which are governed in Australia under the [Fair Work Act 2009 \(Cth\)](#), although these practices are also harmful and may be present in some situations of modern slavery.

(7) The University expects all persons to whom this policy applies to collaborate in upholding the principles outlined in this policy.

University commitment

(8) Engaging regionally and globally to drive sustainable prosperity is part of the [University Strategy](#). Accordingly, the University is committed to ensuring that:

- a. University operations and supply chains do not cause, involve, or contribute to modern slavery
- b. all persons to whom this policy applies, and others with whom the University does business, respect and share the University's commitment to minimising modern slavery risks
- c. the effectiveness of measures to ensure continual process improvement is evaluated.

University expectations of employees and others

(9) All persons to whom this policy applies are required to:

- a. observe legislated and best practice requirements to protect against modern slavery and to minimise modern slavery risks
- b. exercise appropriate care when considering agreements or arrangements with organisations exposed to modern slavery risks.

(10) All persons to whom this policy applies are prohibited from:

- a. engaging in, permitting, or inducing any form of modern slavery
- b. hindering any investigation in relation to alleged modern slavery.

(11) The commitments and expectations in this policy are enabled through the following:

- a. Requiring all persons engaging on behalf of the University and its controlled entities with suppliers which have, or may have, exposure to modern slavery to:
 - i. undertake risk-based assessments and due diligence of those suppliers
 - ii. exercise appropriate care when considering agreements or arrangements with those suppliers.
- b. Where the University is itself a supplier, working with entities to whom the University is making, or may make supplies, and providing reasonable assurance in response to due diligence enquiries from those entities about modern slavery risks.
- c. Developing effective, efficient and transparent controls to ensure operations comply with this policy to the extent that it is reasonably possible for the University. This includes but is not limited to:
 - i. setting the expected level of conduct and performing appropriate due diligence of the University's suppliers in accordance with the [Finance Procedure - Procurement](#), and investigating any reports of suspected breaches as outlined in this policy
 - ii. incorporating relevant clauses in the University's tender documents and terms and conditions for supply and service contracts, if applicable.
- d. Where modern slavery risks arise outside the University's direct control, the University will use its influence and leverage, where appropriate, to engage with suppliers, partners, and stakeholders to effect change in their relevant practices.
- e. Establishing policies, procedures, and processes to inform and guide employees and other persons to whom this policy applies in addressing and minimising modern slavery risks. This includes:
 - i. [Clubs Procedure - Affiliation and Operations](#)
 - ii. [Finance Management Policy](#)
 - iii. [Finance Procedure - Procurement](#)
 - iv. [Learning Abroad and OS-HELP Policy](#)
 - v. [Philanthropic Donations and Gifts Received Procedure](#)
 - vi. [Research Policy](#)
 - vii. [University Partnerships Procedure](#)
 - viii. [Third-Party Risk Management Guidelines](#)

- f. Promoting awareness of modern slavery through training, materials and practical tools to the University's employees, students, affiliates, and controlled entities to help identify and address modern slavery risks.
- g. Preparing and publishing an [annual modern slavery statement](#), approved by the University Council and made in accordance with applicable modern slavery laws. This statement will include details outlining steps taken to identify and remove or mitigate the modern slavery risks in the University's operations and supply chains.
- h. Evaluating and improving the effectiveness of the above measures.

Reporting and investigating modern slavery instances and risks

(12) Internal reporting is critical to the University's ongoing commitments under this policy.

(13) Employees, affiliates and controlled entities are encouraged to report and appropriately escalate concerns about possible modern slavery in the University's operations and/or supply chains at the earliest possible opportunity. Subject to clause 14 or any specific reporting arrangements set out in the policies and procedures listed in clause 11e, reports and concerns should be submitted to an individual's manager to determine next steps or seek guidance. Other persons may raise concerns about potential modern slavery through the [Complaints Management Procedure](#).

(14) If a concern or complaint about possible modern slavery constitutes a report of serious wrongdoing, the University will consider whether it qualifies as a public interest disclosure (PID). If it is deemed a PID, the University will deal with it in accordance with the University's [Public Interest Disclosure \(Whistleblowing\) Policy](#) and [Public Interest Disclosure \(Whistleblowing\) Procedure](#). The University will also ensure compliance with any other applicable and relevant policy such as the [Complaints Management Policy](#).

(15) Both the [Complaints Management Procedure](#) and [Public Interest Disclosure \(Whistleblowing\) Policy](#) allow for confidential reporting, where possible.

Section 3 - Procedures

(16) Nil.

Section 4 - Guidelines

(17) Nil.

Section 5 - Glossary

(18) For the purpose of this policy:

- a. Affiliate – means any person appointed or engaged by the University to perform duties or functions on behalf of the University, including persons holding honorary titles with the University (including visiting and adjunct title holders), contractors and consultants, volunteers working for the University, office holders in a controlled entity, and members of any University committee, board or foundation. An affiliate is not an employee of the University.
- b. Controlled entity – as defined in the policy library glossary.
- c. Employee – refers to all persons employed by the University, including continuing, fixed-term, and casual employees.
- d. Modern slavery - has the same meaning as the [Modern Slavery Act 2018 \(Cth\)](#).
- e. Partner – refers to any organisation or person who is collaborating with the University or participating in a joint venture or research initiative with, or on behalf of, the University.

- f. Supplier – refers to a person who, or organisation that, supplies goods or services to the University or its controlled entities, including as a contractor, consultant, collaborator or similar. It includes their officers, directors, subcontractors, agents, related entities and consultants.
- g. Supply chain – refers to the products and services (including labour), either sourced in Australia or overseas, that contribute to the University's own products and services.

Section 6 - Document context

Compliance drivers	Modern Slavery Act 2018 (NSW)
Review requirements	As per the Policy Framework Policy
Document class	Management

Status and Details

Status	Current
Effective Date	23rd December 2024
Review Date	23rd December 2025
Approval Authority	Vice-Chancellor
Approval Date	23rd December 2024
Expiry Date	Not Applicable
Unit Head	Anthony Heywood University Secretary
Author	Kylie Bennetts General Counsel +61 2 63657660
Enquiries Contact	Office of Governance and Corporate Administration +61 2 63384207

Glossary Terms and Definitions

"Controlled entity" - means an entity that is subject to the control of the University. Note: See also the definition of controlled entity in section 19A of the Charles Sturt University Act 1989 (NSW)