

# 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 \(Cth\)](#).
- (7) 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.
- (8) The University expects all persons to whom this policy applies to collaborate in upholding the principles outlined in this policy.

## University commitment

(9) 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, relationships with partners, 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.

(10) In accordance with the University's [Risk Appetite Statement](#), the University adopts a low risk appetite for modern slavery risks across its supply chain, operational activities and partnerships, reflecting its commitment to ethical conduct and compliance with relevant legislation.

## University expectations of employees and others

(11) 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, including guidance from the Australian and NSW anti-slavery commissioners
- b. participate in training and awareness to understand modern slavery risks and mitigation strategies
- c. exercise appropriate care when considering agreements or arrangements with organisations exposed to modern slavery risks
- d. adopt a victim centred approach to treating concerns or issues raised about modern slavery with respect, impartiality, courtesy and sensitivity to reduce the risk of victims being disadvantaged
- e. report and appropriately escalate any issues of concern to their manager at the earliest opportunity.

(12) 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.

## Combatting modern slavery

(13) The commitments and expectations in this policy are the shared responsibility of all who are bound by this policy and are enabled through the following practices and mechanisms:

- a. Operational implementation of modern slavery controls will be delegated to relevant functional leads under the strategic oversight of the Chief Operating Officer.
- b. The University will take reasonable steps to mitigate modern slavery risks, prioritising those with the greatest potential harm.
- c. Undertaking risk assessments and due diligence of suppliers and partners and exercising appropriate care in agreements or arrangements with all suppliers and partners.
- d. Cooperating with and providing reasonable assurance to due diligence enquiries from entities to which the University is a supplier.
- e. Ensuring that recruitment/employment agencies used for appointing staff are subject to risk assessment and due diligence checks.
- f. Ensuring that education agents engaged to recruit international students are subject to appropriate due diligence in line with the [International Education Agent Policy](#).

- g. Ensuring that international student admissions are subject to appropriate genuine student considerations in line with the [Admissions Policy](#) and [Procedure](#).
- h. Ensuring operational compliance with this policy (to the extent that is reasonably possible) through effective, efficient and transparent controls, including but not limited to:
  - i. adopting a risk based approach to setting expectations on the level of conduct and due diligence to be performed on the University's suppliers and partners (see [Finance Procedure - Procurement](#) and [University Partnerships Procedure](#), respectively)
  - ii. investigating reports of suspected breaches (see the 'Reporting and investigating' heading in this policy)
  - iii. incorporating relevant provisions and conditions in tender documents and supply or service contracts.
- i. Using the University's influence and leverage, as appropriate, to engage with suppliers, partners and stakeholders to effect change in their practices where these carry modern slavery risks outside the University's direct control.
- j. 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. [Complaints Management Policy](#)
  - iii. [Complaints Management Procedure](#)
  - iv. [Finance Management Policy](#)
  - v. [Finance Procedure - Procurement](#)
  - vi. [Learning Abroad and OS-HELP Policy](#)
  - vii. [Philanthropic Donations and Gifts Received Procedure](#)
  - viii. [Public Interest Disclosure \(Whistleblowing\) Policy](#)
  - ix. [Public Interest Disclosure \(Whistleblowing\) Procedure](#)
  - x. [Research Policy](#)
  - xi. [Risk Management Procedure](#)
  - xii. [Third-Party Risk Management Guidelines](#)
  - xiii. [University Partnerships Procedure](#)
  - xiv. [Work-Integrated Learning Placement Delivery and Management Procedure](#)
- k. 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.
- l. 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.
- m. Evaluating and improving the effectiveness of the above measures.

## Reporting and investigating

Note: If there is an immediate safety concern for individuals resulting from modern slavery, call Triple Zero (000).

(14) Escalation and reporting is critical to the University's ongoing commitments under this policy. 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.

- a. Individuals that are public officials (including University staff) may raise reports and concerns with a disclosure officer to determine next steps or seek guidance, as per the [Public Interest Disclosure \(Whistleblowing\) Policy](#).

- b. Students and other persons external to the University may raise concerns about potential modern slavery through the [Complaints Management Policy](#).
- (15) The [Complaints Management Policy](#) and [Public Interest Disclosure \(Whistleblowing\) Policy](#) allow for confidential and/or anonymous reporting, where possible.
- (16) Modern slavery can also be reported to [antislavery@dcj.nsw.gov.au](mailto:antislavery@dcj.nsw.gov.au) for confidential support and assistance from the NSW Anti-slavery Commissioner.
- (17) Concerns and complaints about modern slavery will be:
- recorded in the University's [Incident and Risk Management System](#) as a modern slavery concern
  - assessed and, where they constitute a report of serious wrongdoing and meet the definition of a public interest disclosure (PID), be dealt with in accordance with the [Public Interest Disclosures Act 2022 \(NSW\)](#) and the University's [Public Interest Disclosure \(Whistleblowing\) Policy](#) and [Procedure](#).
- (18) Where appropriate, incidents and complaints associated with modern slavery should be escalated to:
- the Executive Leadership Team
  - the Audit and Risk Committee (by the Risk and Compliance Unit).
- (19) Modern slavery risks and controls will be reviewed on a regular basis as part of the Modern Slavery Risk Management Plan.
- (20) In alignment with its risk appetite, the University takes reasonable steps to mitigate modern slavery risks, prioritising those that pose the greatest potential harm. A risk-based approach is applied when determining remediation actions. Modern slavery risks that fall outside the University's risk appetite must be endorsed by the Audit and Risk Committee and approved by the Council, in accordance with the University's [Risk Appetite Statement](#).

## Roles and responsibilities

Role	Responsibility
University Council	Approve the Modern Slavery Policy and the annual Modern Slavery Statement. The Council authorises a member of the University Council to sign the Modern Slavery statement.
Executive Leadership Team (ELT)	Monitor compliance with the Modern Slavery Act and this policy, including steps taken to identify and mitigate risks of modern slavery as outlined in the University's Modern Slavery Risk Management Plan. Where relevant, implement modern slavery training and awareness programs for Line 1 staff within the scope of ELT member delegated responsibilities. Where appropriate, escalate matters for consideration to the Audit and Risk Committee.
Chief Operating Officer (COO)	Coordinate the University's engagement with the Anti-slavery Commissioner ensuring consistent representation and responsiveness to regulatory expectations. Lead the design, review and governance of the Modern Slavery Policy, in collaboration with relevant portfolios/functional teams. Contribute to the implementation of this policy within the COO's portfolio. Provide strategic oversight of modern slavery compliance across the University. Ensure appropriate delegation to functional leads and coordinate with Risk and Compliance Unit on reporting and assurance. Contribute to the delivery of staff and student training on antislavery awareness within the COO's portfolio. Prepare the University's annual Modern Slavery Statement with support from functional leads and Risk and Compliance Unit; and submit the approved and signed statement to the relevant authority.

Role	Responsibility
Provost and Deputy Vice-Chancellor (Academic)	Implement this policy as it relates to the academic portfolio, including: 1. ensuring appropriate risk-based assessments and due diligence is performed on workplace environments supporting student work-integrated learning programs, and 2. undertaking risk assessments and due diligence of partners, including domestic and international education partners.
Deputy Vice-Chancellor and Vice-President (Research)	Implement this policy as it relates to the research portfolio, including performing risk-based assessments and due diligence on research partnerships and collaborations with external parties where funding and/or ethics approval is sourced outside of the University.
Pro Vice-Chancellor (International)	Implement this policy as it relates to the University's international strategy and undertaking risk assessments and due diligence of international agents.
University Secretary	Approve the Modern Slavery Risk Management Plan.
Director, Risk and Compliance	Design and implement the Modern Slavery Risk Management Plan in collaboration with portfolio leaders. Coordinate risk-based assurance activities to support the design and operating effectiveness of controls mitigating modern slavery risks.
University Ombudsman	Manage and investigate reports of modern slavery within the operations of the University and its controlled entities in line with the University's <a href="#">Public Interest Disclosure (Whistleblowing) Policy</a> , <a href="#">Public Interest Disclosure (Whistleblowing) Procedure</a> , and the <a href="#">Complaints Management Policy</a> .

## Section 3 - Procedures

(21) Nil.

## Section 4 - Guidelines

(22) Charles Sturt University Modern Slavery Risk Management Plan.

## Section 5 - Glossary

(23) 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. Public official - means:
  - i. an employee of the University including an employee of an entity that is controlled by the University
  - ii. a person having public official functions or acting in a public official capacity whose conduct or activities an integrity agency is authorised by another Act or law to investigate

- iii. a statutory officer
- iv. a person providing services or exercising functions on behalf of the University, including a contractor, subcontractor or volunteer
- v. an employee, partner or officer of an entity that provides services, under contract, subcontract or other arrangement, on behalf of the University or exercises functions of the University, and are involved in providing those services or exercising those functions.
- g. 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.
- h. 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

<b>Compliance drivers</b>	<a href="#">Modern Slavery Act 2018 (NSW)</a>
<b>Review requirements</b>	As per the <a href="#">Policy Framework Policy</a>
<b>Document class</b>	Governance

## Status and Details

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## 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)