

Modern Slavery Prevention Policy

Section 1 - Purpose and Context

(1) Western Sydney University respects the dignity, wellbeing and human rights of its employees, workers in its supply chains, and the communities in which the University operates or from which it sources products and services.

(2) The purpose of this policy is to set out the University's approach for Modern Slavery prevention, its commitment to identifying incidents and addressing risks of Modern Slavery to its business and supply chains, and to ensure it meets its responsibilities under the [Modern Slavery Act 2018 \(Cth\)](#).

(3) Modern Slavery is a criminal offence under Division 270 and 271 of the [Criminal Code Act 1995 \(Cth\)](#), and is a violation of fundamental human rights.

(4) Modern slavery poses genuine and significant harm to those affected. It may also result in reputational, financial, commercial, market and operational risk to the University and any of its related, associated or controlled Entities.

(5) Modern slavery does not include practices like 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.

(6) This policy applies to all employees of the University and its entities.

Section 2 - Definitions

(7) For the purposes of this policy, the following definitions apply:

- a. Employee means anyone employed by Western Sydney University and its entities. This includes academic staff, professional staff and senior staff on continuing, fixed term and casual contracts.
- b. Entity means an associated entity, controlled entity or entity as defined in the [Controlled and Associated Entities Governance Framework](#).
- c. Modern Slavery includes but is not limited to:
 - i. child labour: where children are exploited through slavery or similar practices, including for sexual exploitation, hazardous work which may harm their health and safety, or in the production or trafficking of drugs;
 - ii. debt bondage: where a person's services are pledged as security for a debt and the debt is manifestly excessive, the person's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined;
 - iii. forced labour: where a person is either not free to stop working or not free to leave their place of work;
 - iv. forced marriage: where coercion, threats or deception are used to make a person marry or where the person does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
 - v. servitude: where the personal freedom of a person is significantly restricted and they are not free to stop working or leave their place of work;

- vi. slavery: where a person exercises powers of ownership over another, including the power to make a person an object of purchase and to use their labour in an unrestricted way; and
 - vii. trafficking: recruitment, harbouring and movement of a person for exploitation.
- d. Supplier means a person who, or organisation that, supplies goods or services to the University either as part of a commercial arrangement under the University's [Procurement Policy](#), or otherwise.
- e. Supply Chains means the products and services (including labour), either sourced in Australia or overseas, that contribute to the University's own products and services.

Section 3 - Policy Statement

(8) The University is committed to undertaking due diligence to identify incidents and assess risks of Modern Slavery, as well as remedial action to address and mitigate any adverse human rights impacts in any part of its business processes (such as sourcing and procurement) and supply chains.

(9) The University is committed to ensuring it takes into account fundamental human rights principles of the United Nations' [Universal Declaration of Human Rights](#) and [The Ten Principles of the UN Global Compact](#).

(10) The University is committed to working with its Suppliers to address any identified Modern Slavery incident or risk, working with other entities that may consider the University a Supplier, and to providing reasonable assurance in response to all due diligence enquiries.

Part A - Expectations of, and Commitment to, University and Entity Employees

(11) The University prohibits any of its employees from:

- a. engaging in, permitting, or inducing any form of Modern Slavery from occurring; or
- b. hindering any investigation in relation to alleged Modern Slavery.

(12) If an employee breaches this policy they could face disciplinary action, which may include termination of employment as well as legal action in the most severe circumstances.

(13) Employees will be provided with the appropriate training and instruction in relation to the University's zero-tolerance for inaction towards Modern Slavery in any part of its business. Such training and instruction will address how to identify, report, and respond to any potential Modern Slavery incident or risk.

(14) In order to measure and ensure the continued effectiveness of its commitments, the University will seek feedback and encourage reporting of suspected and actual policy breaches in accordance with the procedures set out in this policy.

(15) The University is committed to providing a safe and fair working environment for all its employees, in line with other policies, including but not limited to the [Discrimination, Harassment, Vilification and Victimisation Prevention Policy](#) and the [Health Safety and Wellbeing Policy](#), and at least the minimum labour standards of the communities that the University operates in and sources from.

Part B - Expectations of, and Due Diligence Relating to, Suppliers to the University

(16) To reduce the exposure to Modern Slavery risks, the University is committed to the continued development of effective, efficient and transparent controls to verify that its business is being conducted in compliance with this

policy, to the extent that it is reasonable for the University to do so. This includes but is not limited to:

- a. setting the expected level of conduct, and performing appropriate due diligence of the University's Suppliers in accordance with the [Procurement Policy](#), and, if applicable, investigations of any reports of a breach as per the procedures set out in this policy; and
- b. incorporating relevant clauses in the University's standard terms and conditions for supply and service contracts, if applicable.

Part C - Commitment to Modern Slavery Prevention

(17) The University is committed to:

- a. the implementation and periodic review of this Policy, which formally records the University's commitment to ensuring its business practices, employees, and suppliers engage in the ongoing identification of incidents and assessment of risks relating to Modern Slavery, within the University's business and supply chain; and
- b. the publication of the University's annual Modern Slavery Statement in accordance with the [Modern Slavery Act 2018 \(Cth\)](#).

Section 4 - Procedures

(18) Internal reporting is critical to the University's ongoing commitments under this Policy. Employees can report a breach or suspected breach of this Policy pursuant to the University's [Whistleblowing \(Reporting Corruption and Other Serious Wrongdoing\) Policy](#). All reports, and any associated investigations, will be treated as confidential as set out in that policy.

(19) If an employee is unsure about whether a particular act or arrangement with any employees or suppliers (including their workers) constitutes a form of Modern Slavery as defined in this policy, the employee should raise this with the University's Disclosure Coordinator, as defined by the [Whistleblowing \(Reporting Corruption and Other Serious Wrongdoing\) Procedures](#).

(20) When confronted with an actual or potential Modern Slavery incident or risk, the Disclosure Coordinator should consider whether the incident or risk may give rise to obligations under the University's business continuity or crisis management plans and, if so, refer the matter to the Senior Deputy Vice-Chancellor or the Vice-President, Strategy and Governance so that a crisis management process can be put in place.

Section 5 - Guidelines

(21) [Whistle Blowing at Western Sydney University webpage](#) - Includes information about reporting a breach or suspected breach of this policy.

Status and Details

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