Modern Slavery Policy

Section 1 - Purpose

(1) The University of Canberra (University) is a reporting entity as defined in the Modern Slavery Act 2018 (Cth) and is required to comply with obligations pursuant to the Modern Slavery Act 2018, including the submission of the Modern Slavery Statement.

(2) The purpose of this Policy is to codify the University's commitment to deliver a strong response to Modern Slavery by seeking to ensure that the University itself, its Partners, Suppliers, Contractors, and others with whom the University does business, respects and shares the University's commitment to minimising the risks of Modern Slavery.

Section 2 - Scope

(3) This Policy applies to all:

a. staff;
b. students;
c. affiliates;
d. controlled entities; and
e. suppliers, partners and contractors.

Section 3 - Principles

(4) Modern Slavery encompasses situations where coercion, threats or deception are used to exploit people and undermine or deprive them of their freedom.

(5) In accordance with the Modern Slavery Act 2018 and divisions 270 and 271 of the Criminal Code Act 1995 (Cth), Modern Slavery includes:

a. Trafficking in persons, which is the recruitment, harbouring and movement of a person by means of coercion, threat, deception, fraud, and abduction for the purposes of exploitation through modern slavery. Exploitation includes:
    i. the prostitution of others or other forms of sexual exploitation;
    ii. forced labour or services;
    iii. slavery or practices similar to slavery;
    iv. servitude; or
    v. the removal of organs;
b. slavery, which is where the offender exercises powers of ownership over the victim including:
    i. the power to make the person an object of purchase; and
    ii. the power to use their labour in an unrestricted way;
c. servitude, which is where the victim's personal freedom is significantly restricted, and they are not free to stop

working or leave their place of work;

d. forced labour, which is where the victim is either not free to stop working or not free to leave their place of work;
e. forced marriage, which is where:
    i. coercion, threats or deception are used to make a victim marry; or
    ii. the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony;
f. debt bondage, which is where the victim's services are pledged as security for a debt (owed by the victim or by another person) and:
    i. the debt is manifestly excessive;
    ii. the victim's services are not applied to liquidate the debt; or
    iii. the length and nature of the services are not limited and defined;
g. deceptive recruiting for labour or services, which is where the victim is deceived about whether they will be exploited through a type of modern slavery.
h. Modern Slavery can also extend to the worst forms of child labour, including situations where children are:
    i. exploited through slavery or similar practices, including for sexual exploitation;
    ii. engaged in hazardous work which may harm their health or safety; or
    iii. used to produce or traffic drugs.
i. The term "Modern Slavery" is only used to describe serious exploitation.
    i. It does not include practices like substandard working conditions or underpayment of workers. However, if these practices are also illegal and harmful and may be present in some situations of modern slavery.
    ii. These practices may escalate into modern slavery if not addressed.

(6) Modern Slavery breaches the most fundamental freedoms and human rights of individuals, and the University rejects all forms of Modern Slavery and recognises that Modern Slavery is never acceptable.

(7) The University expects staff, students, Partners, Suppliers, Contractors, and all those who have, or seek to have, a relationship with the University, to familiarise themselves with this Policy and to act in a way that is consistent with its values. The University will seek to only do business with people and organisations who fully comply with this Policy, and those who are taking verifiable steps towards compliance.

(8) As a higher education institution, the University recognises the important role the University, and the tertiary education sector, can play in making a significant contribution to the global effort to eliminate Modern Slavery.

(9) The University is committed to acting ethically and with integrity in all its functions and activities. This includes by taking appropriate action to identify and address issues within its direct control which have the potential to cause, contribute to, or directly link the University to Modern Slavery.

(10) Where Modern Slavery risks arise outside the University's direct control, the University will use its influence and leverage to engage with Partners, Suppliers, Contractors and others with whom the University does business, to effect change in their relevant practices. If an identified risk is unable to be eliminated or mitigated, the University may choose to cease the relationship with that Partner, Supplier, Contractor, or other party with whom the University is doing business with.

(11) The University is committed to taking meaningful action by implementing and enforcing effective systems and controls to remedy Modern Slavery risks in its operations, supply chains and investments.

(12) The University will establish a Modern Slavery risk register and review it annually in line with this Policy and the annual Modern Slavery Statement, to determine which parts of its operations and supply chains are most at risk of

Modern Slavery.

(13) Where the University identifies an incident or event that may cause, contribute to, or be directly linked to, a form of Modern Slavery, its response will be informed by this Policy and the Modern Slavery Procedure.

(14) This Policy and the Modern Slavery Procedure will be used to underpin and inform the University's Modern Slavery Statements pursuant to the Modern Slavery Act 2018.

Section 4 - Responsibilities

Who	Responsibilities
Council	The Council is responsible for approving the University's Modern Slavery Statements in accordance with the Modern Slavery Act 2018.
Vice-Chancellor	The Vice-Chancellor is responsible for the approval of this Policy and has overall responsibility for it, and in ensuring the University complies with all legal and ethical obligations.
Staff	Must report suspected and known cases of Modern Slavery in accordance with the Modern Slavery Procedure.

Section 5 - Procedures

(15) Refer Modern Slavery Procedure.

Section 6 - Definitions

Terms	Definitions
Affiliate	Includes: • clinical title holders; • adjunct, conjoint and honorary appointees; • consultants and contractors to the University; • holders of offices in University entities, members of boards of University foundations, members of University committees; and any other persons appointed or engaged by the University to perform duties or functions on its behalf.
Contractor	Means the individual or organisation that the University has entered into a contract with to provide specified goods or services, and includes their officers, directors, subcontractors, agents, related entities and consultants.
Controlled Entity	Has the meaning given in the Controlled And Related Entities Policy. At the date of this Policy, this is: a separate legal body which the University has the capacity to determine the outcome of decisions about the entity's business and financial arrangements.
Modern Slavery	As defined in clause 5 of this Policy. Modern Slavery is also defined in the Modern Slavery Act 2018 (Cth) at section 4.
Modern Slavery Act	Means the Modern Slavery Act 2018 (Cth), as amended from time to time.
Modern Slavery Statement	Means the annual statement the University is required to prepare and submit in accordance with the Modern Slavery Act 2018, regarding the risks of Modern Slavery in the University's operations and supply chains.
Partner	Includes organisations and people who collaborate with the University or participate in a joint venture or research initiative with, or on behalf of, the University.
Supplier	Means an organisation or person who supplies the University with goods or services, and includes their officers, directors, subcontractors, agents, related entities and consultants.

Status and Details

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Custodian	Geoff Drummond Chief Financial Officer
Responsible Manager	Nick Markesinis Policy Manager
Author	Jerrin Mathew Policy and Compliance Coordinator
Enquiries Contact	Nick Markesinis Policy Manager Policy