Modern Slavery Policy

Section 1 - Executive Summary

(1) The University of Newcastle (University) is committed to promoting and protecting human rights, addressing modern slavery risks and managing any identified modern slavery incidents.

(2) The University aims to deliver a strong response to modern slavery by employing a University-wide approach that includes its students, staff partners, suppliers, contractors and others with whom the University does business.

Section 2 - Purpose

(3) The University is a reporting entity as defined in the Modern Slavery Act 2018 (Cth) (Cth) and is required to submit an annual modern slavery statement for inclusion on a public register. Additionally, the University is required to include information about its modern slavery actions in its annual report in accordance with the Government Sector Finance Act 2018 and Modern Slavery Act 2018 (NSW).

(4) This Policy sets out the University's commitment to comply with its modern slavery obligations and the University's strategy to identify, assess, and minimise as far as possible the risks of modern slavery within its operations, investments, and supply chains. It describes the reasonable steps being taken by the University in terms of commitment, planning, sourcing, managing, remedying, reporting, and improving its response to modern slavery.

Section 3 - Scope and audience

(5) This policy applies to all staff and students and all areas of the University, including any entities it may control.

Section 4 - Definitions

(6) In the context of this document:

Defined Term	Meaning
Modern Slavery	The term is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom, usually through one or more of the following eight types of serious exploitation described in Modern Slavery Act 2018 (Cth): - trafficking in persons - slavery - servitude - forced marriage - forced labour - debt bondage - deceptive recruiting for labour or services - the worst forms of child labour. Modern Slavery does not include practices like substandard working conditions or underpayment of workers, which are governed under the Fair Work Act 2009 (Cth), although these practices are harmful and can coexist in some situations of modern slavery.

Section 5 - Principles

(7) Modern slavery is a criminal offence under Division 270 and 271 of the Criminal Code Act 1995 (Cth) and is a violation of human rights. Acts of Modern Slavery breach the most fundamental freedoms of individuals, and the University recognises that modern slavery is never acceptable.

Section 6 - Details

Anti-Slavery Working Group

(8) The University will establish and maintain an Anti-Slavery Working Group (Working Group). The purpose of this Working Group is to facilitate the University's response to modern slavery risks and enable compliance with relevant legislative requirements. To do this, the Working Group will lead the development, monitoring, and ongoing review of a Modern Slavery Action Plan.

(9) The Working Group will be comprised of a range of representatives from across the University and will inform the Chief Operating Officer, Senior Management Group, Executive Leadership Team, and/or Risk Committee as required, on important modern slavery related issues and risks for the University.

Modern Slavery Risk Identification

(10) The University will have a process for conducting an assessment of salient modern slavery risks.

(11) The Working Group will assist to identify which parts of the University's operations and supply chains are most at risk of modern slavery. The Working Group will advise affected Colleges and Divisions regarding any risks identified during its activities so that effective controls can be included within operation risk profiles and where applicable, documented on the University's Modern Slavery Action Plan maintained by the Working Group.

Supply Chain and Procurement

(12) The University is committed to the ongoing development of effective, efficient, and transparent sourcing and supply chain practices, to identify and address Modern Slavery risk. The commitment is supported by due diligence procedures in accordance with the Procurement Policy.

(13) The University will map supply chain risk for high-risk categories to develop sourcing strategies to identify salient risks and take all reasonable steps to ensure procured goods and services are not products of modern slavery. The University will incorporate tender schedules and relevant clauses in the University's standard forms of agreement to ensure that suppliers and contractors support this commitment. The University will take reasonable steps to monitor and evaluate supplier performance relating to Modern Slavery during the contract term.

(14) The University will provide training to staff involved in procurement activities including information about relevant procedures and how to identify, report and respond to any potential modern slavery incident or risk.

(15) The University will provide information about areas of high risk in its supply chain within its annual Modern Slavery Statement to the Commonwealth Government and its Annual Report (in accordance with any guidance or directions provided by Treasury).

Remedying

(16) Where specific instances of Modern Slavery are identified in the University's direct activities, the University will take safe immediate steps to remedy harm.

(17) The University may take steps to build leverage through other universities, or through collaborative efforts to exert influence on entities contributing to or causing harm. This may be relevant where any identified harm cannot be easily remedied by the University because this is outside the University's sphere of control; or where the University's existing leverage is insufficient to prevent or mitigate Modern Slavery risks.

(18) The University may withdraw from a relationship with a supplier or business partner as a last resort, where the supplier or partner is unable or unwilling to effectively address Modern Slavery risks or concerns. In the case of heightened risk procurements, the University may rule a supplier out where they are unable to meet essential requirements.

Protecting Vulnerable Persons

(19) The Working Group will consider vulnerable groups in its community and throughout its operations and supply chains when preparing its Anti-Slavery Action Plan.

(20) In particular, the University will ensure that information is provided to vulnerable student groups, particularly international students, to ensure these students are aware of associated rights in Australia and sources of assistance and support.

Protecting Workers

(21) Action will be taken to protect staff and contractors from all forms of Modern Slavery through adherence with University procedures for recruitment and employee management.

Investments

(22) The University's Investment Policy incorporates Environmental, Social and Corporate Governance (ESG) factors in the management of its' investment portfolio, and excludes some products or services from the investment portfolios if they are inconsistent with the Ethical Framework.

Reporting Incidents of Modern Slavery and Supporting Those Impacted

(23) If a member of the University community is personally affected by a form of Modern Slavery, assistance is available. Refer to Support for Students Policy, and information for workers who require counselling, advice and support (either internally or externally) can be found at the University's Wellbeing webpage.

(24) A large number of external support services and sources of help are available and information about these can be obtained from the website of the NSW Anti-slavery Commissioner.

(25) Reports will be treated with appropriate confidentiality and other safeguards to protect the interests of victim-survivors.

(26) If an employee is unsure whether a particular act or arrangement with any employee or supplier constitutes a form of Modern Slavery, the employee can raise this concern with a University Disclosure Coordinator as defined in the Public Interest Disclosures Policy.

(27) Reports can also be made in accordance with the Complaint Management Policy and Procedure, Resolving Workplace Concerns and Grievances Procedure and/or Fraud and Corruption Framework if applicable.

(28) Instances of suspected Modern Slavery can also be reported to the NSW Anti-Slavery Commissioner or Police.

Continuous Improvement

(29) The University will cooperate with the NSW Anti-slavery Commissioner and the Federal Anti-slavery

Commissioner, including by sharing information and providing reasonable assistance and support.

(30) The University will disclose progress towards high-level targets in its annual reporting information and Modern Slavery Statement.

(31) The University will regularly review its performance on Modern Slavery risk management and integrate lessons from stakeholder engagement, grievance mechanisms and peers.

(32) The University will ensure that members of the Anti-Slavery Working Group and other personnel are provided with appropriate ongoing training related Modern Slavery.

Status and Details

Status	Current
Effective Date	10th December 2024
Review Date	10th December 2027
Approval Authority	University Council
Approval Date	1st November 2024
Expiry Date	Not Applicable
Responsible Executive	Alex Zelinsky Vice-Chancellor alex.zelinsky@newcastle.edu.au
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Glossary Terms and Definitions

"University" - The University of Newcastle, a body corporate established under sections 4 and 5 of the University of Newcastle Act 1989.

"Risk" - Effect of uncertainty on objectives. Note: An effect is a deviation from the expected, whether it is positive and/or negative.

"Risk management" - The co-ordinated activities of assessing, controlling, monitoring, and reviewing risk in the pursuit of the University's objectives.

"Student" - A person formally enrolled in a course or active in a program offered by the University or affiliated entity.

"Staff" - Means a person who was at the relevant time employed by the University and includes professional and academic staff of the University, by contract or ongoing, as well as conjoint staff but does not include visitors to the University.

"International student" - A student (as defined by the University) who is not an Australian citizen, Australian Permanent Resident or New Zealand citizen (or dual citizenship holders of either Australia or New Zealand). This includes students who will be studying offshore and those who will be studying onshore and have a student visa, provisional residency, temporary residency, bridging visa, or any other category of non-permanent visa for Australia.

"College" - An organisational unit established within the University by the Council.