

# Modern Slavery Prevention Procedure

## Section 1 - Summary

(1) The [Modern Slavery Act 2018 \(Cth\)](#) (MS Act), requires businesses and organisations to identify and address their modern slavery risks, and to maintain responsible and transparent supply chains. Along with other Australian organisations Victoria University (VU) is required to prepare an annual Modern Slavery Statement which is made publicly available.

(2) Modern slavery breaches the most fundamental freedoms and human rights of individuals. VU is committed to respecting human rights, acting ethically in our dealings with partners and suppliers, and taking real action to address any modern slavery risks within VU's direct control.

(3) The purpose of this Procedure is to set out the steps VU commits to which will contribute to minimising the risks of modern slavery within our supply chains and operations.

## Section 2 - TEQSA/ASQA/ESOS Alignment

(4) Nil.

## Section 3 - Scope

(5) This Procedure applies across VU, including:

- a. all VU Staff; and,
- b. all contractors, suppliers and other affiliates of VU.

## Section 4 - Definitions

(6) High Risk Suppliers: Definition used by Walk Free and ILO to categorise suppliers who are included in high-risk product and service categories with complex supply chains, work practices, and geographies with a vulnerable population.

(7) Modern Slavery: Modern slavery has the same meaning as the [Modern Slavery Act 2018 \(Cth\)](#).

## Section 5 - Policy/Regulation

(8) [Modern Slavery Prevention Policy](#)

# Section 6 - Procedures

## Part A - Summary of Roles and Responsibilities

Roles	Responsibilities
Managers and Supervisors	Ensuring that all staff within their operational area comply with the Modern Slavery Prevention Policy and Procedure.
All staff	Ensuring that they comply with the <a href="#">Modern Slavery Prevention Policy</a> and Procedure.
Executive Director Procurement and Finance Operations	The effective implementation of this Procedure, Chairing the Modern Slavery Working Group and reporting to the Vice Chancellors Executive the Modern Slavery Risk and Action Plan.
Procurement	Developing and monitoring action plans to manage modern slavery risks in the supply chain. Providing annual awareness training for staff, students and suppliers.
People and Culture	Addressing modern slavery risks in the recruitment process particularly when dealing with consultants and agencies in the recruitment of staff, contract workers, consultants, casual workers and others.
Office of the General Counsel	Maintaining a central registry for potential Modern Slavery Risks within VU's operations.
Modern Slavery Working Group	Leading Modern Slavery Prevention at VU and contributing to the development of strategies to eliminate Modern Slavery Risk within VU's operations and supply chain.

## Part B - Procedures

### Awareness

(9) VU will promote awareness of the risk of modern slavery through training and the provision of training materials to relevant VU staff, students and suppliers to identify and address modern slavery risks.

### Internal Practices

(10) In order to identify and manage modern slavery risks in its supply chain, Procurement will:

- a. undertake an annual review of all suppliers in the VU supplier data base, by mapping, identifying and monitoring supply chain risk, and identifying 'high risk' suppliers;
- b. contact any suppliers identified as "high risk", who then must demonstrate how they are ensuring the risk is mitigated in their supply chain;
- c. subject to the analysis of risk factors (industry, country and value of VU spend) initially work with suppliers to improve their modern slavery risk status;
- d. terminate the supply arrangements of any high risk suppliers who cannot demonstrate they have practices in place to mitigate their modern slavery risk; and,
- e. include modern slavery compliance and risk reduction as part of the VU Procurement tender process.

### External Engagement

(11) All individuals engaging on behalf of VU with external contractors, suppliers, collaborators, and others are required to:

- a. undertake risk-based assessments and due diligence, to minimise the risk of modern slavery in VU's supply chain; and,

- b. where appropriate and as informed by their risk assessment, engage with their contractors, suppliers, collaborators, and others to gain a proper understanding of the measures they have in place to identify and address modern slavery risks, including if applicable by complying with VU's [Purchasing Policy](#) and [Purchasing Procedure](#).

## **Modern Slavery Statement**

(12) VU is required to prepare and publish an annual statement setting out the steps taken to identify and address the risks of modern slavery in its operations, supply chains and investments, as required by the MS Act. The relevant reporting period is the calendar year and the statement is due no later than 30 June of the following year.

(13) In order to ascertain VU's ongoing compliance with the statement, the Executive Director Procurement and Finance Operations will chair a Modern Slavery Working Group that will meet at least twice per calendar year. The working group will contain staff from the Office of the General Counsel, Procurement, and Compliance, as well as other business areas which may include but are not limited to, VU Online, VU Global, TAFE at VU, Campus Services, and People and Culture.

(14) VU business areas identified as relevant will provide written reports to Procurement by 28 February the year following the reporting period in question detailing:

- a. modern slavery risks or issues identified in their area of responsibility;
- b. steps taken to address them;
- c. performance against set targets and key performance indicators;
- d. actions taken to evaluate the effectiveness of steps taken; and,
- e. plans for continuous improvement.

(15) The Executive Director Procurement and Finance Operations in conjunction with the Office of the General Counsel, the Office of the Vice-Chancellor and the Chief Financial Officer will prepare the annual Modern Slavery Statement for consideration by VU Council and the Audit and Risk Committee, in accordance with the requirements of the MS Act.

## **VU Modern Slavery Working Group**

(16) The VU Modern Slavery Working Group will be responsible for the development and management of VU's Modern Slavery Risk Register and Action Plan. The Working Group will:

- a. Provide a forum to discuss and debate modern slavery risks across VU's operations and supply chain;
- b. Contribute to the development of VU's Annual Modern Slavery Statement;
- c. Identify and report on actual or potential modern slavery risks within their respective operations or within VU; and,
- d. review and provide input into the development of the Modern Slavery Risk Register and if required, implement the Action Plan.

## **Reporting incidents or concerns of Modern Slavery**

(17) VU encourages staff, students and others (including organisations or companies who have dealings with VU) to raise concerns about potential modern slavery in the first instance, via email to [legaladvice.requests@vu.edu.au](mailto:legaladvice.requests@vu.edu.au) for recording on a central register. Concerns will then be forwarded onto the Executive Director Procurement and Finance Operations who will investigate the matter as it relates to VU's operations and/or supply chains, following the processes outlined in the [Complaints Policy](#), as relevant.

(18) If an individual is unsure about whether a particular act or arrangement constitutes a form of Modern Slavery, they may contact Procurement or the Office of the General Counsel to raise concerns with the assurance of confidentiality.

## Status and Details

<b>Status</b>	Current
<b>Effective Date</b>	30th August 2024
<b>Review Date</b>	30th August 2027
<b>Approval Authority</b>	Deputy Vice-Chancellor Finance
<b>Approval Date</b>	30th August 2024
<b>Expiry Date</b>	Not Applicable
<b>Accountable Officer</b>	Trish Roberts Deputy Chief Financial Officer trish.roberts@vu.edu.au
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