Anti-Modern Slavery and Human Trafficking Guidelines

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Purpose

Addressing the crimes of modern slavery and human trafficking is a vitally important, global human rights issue. Federation University Australia (“the University”) is committed to protecting all human rights.

This Anti-Modern Slavery and Human Trafficking Guideline (“Guidelines”) governs our approach to ethical sourcing and the prevention of worker exploitation. Our approach includes the identification and management of the risks of the modern slavery and human trafficking within our operations and supply chains.

The document should be read in conjunction with University legislation, policies, procedures and workplace agreements.

Scope

These Guidelines applies to all employees of the University and to persons holding an honorary, visiting or adjunct appointment with the University.

Suppliers and partners (as defined in this document) and volunteers are expected to comply with these Guidelines as a condition of their engagement with the University.

Legislative Context

- *Modern Slavery Act 2018* (Cth)
- Commonwealth Criminal Code Act 1995
- *Federation University Australia Act 2010* (Vic)

Definitions

TERM	DEFINITION
Modern Slavery	Modern slavery encompasses all types of slavery and servitude, including forced or compulsory labour, debt bondage, indentured servitude, forced marriage and the worst forms of child labour.
Human Trafficking	Human trafficking refers to the recruitment, transportation, transfer, harbouring, or receipt of persons for the purposes of exploitation, including modern slavery, by means of the threat or use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability, or the giving of payments or other benefits.
Supplier	means an organisation which or a person who supplies the University with goods or services, and includes their officers, directors, contractors and their subcontractors. 'Suppliers' includes third party providers, their agents, related entities and consultants.
Partner	for the purposes of these Guidelines, means any organisation or person which/who is participating in a joint venture or joint research initiative with, or on behalf of, the University.

Guideline Statement

The University recognises that modern slavery and human trafficking are criminal offences which violate fundamental human rights. Our Living Values of **Inclusion, Innovation, Excellence, Empowerment and Collaboration** underpin our commitment to this document and guide us in striving to minimise the risks of modern slavery in our operations and supply chains.

These Guidelines outlines our approach and expectations of all staff members, suppliers and partners to prevent, identify and report risks of or suspected incidents of modern slavery and human trafficking.

Organisational Context and Approach

The University has responsibilities as a global citizen, which our internal stakeholders (Council members, staff and students) and our external stakeholders (including Governments, our communities and alumni) expect us to meet.

The University engages with Australian and international communities by providing enriching educational and cultural experiences, by raising public awareness of educational, scientific and artistic developments, and by promoting academic freedom, freedom of speech and critical and free enquiry. As we engage with Australian and

international communities, we are committed to ensuring that our operations and business relationships do not lead to human rights violations.

Our commitment to human rights extends to striving to continuously improve our responses to the risks of modern slavery and human trafficking in our operations and in our supply chains.

Managing and Reporting Risks

If modern slavery or human trafficking occurs within the University's business or supply chains, the University might be subject to legal liabilities and incur significant reputational damage. Persons who are directly involved in misconduct which comprises or involves modern slavery or human trafficking, or who choose to ignore the known or suspected misconduct of others in that regard, might also incur legal liability.

The University has compulsory reporting obligations under Australia's modern slavery law, to identify, and to mitigate and manage, modern slavery risks within our operations and supply chains.

Accordingly, we are committed to meeting our reporting obligations, and to implementing, enforcing and continuously improving systems and controls to address modern slavery and human trafficking risks.

Staff Members', Suppliers' and Partners' Responsibilities

All employees have a responsibility to prevent, identify and report risks or suspected incidents of modern slavery and human trafficking in any part of our operations or our supply chains.

Federation University has a complex supply chain structure. Certain sectors, products and services and countries might carry higher risks of modern slavery than others. Managing this risk in certain cases is likely to be complex and difficult.

In those circumstances, it is critical to understand the risks and to develop a documented plan to mitigate and manage such risks over time.

Currently some of the highest-risk sectors are the following:

- IT services and software;
- Apparel, uniforms and merchandise;
- Trade Services and maintenance;
- Engineering and construction; and
- Security services.

Notification and Reporting of Incidents

If a staff member becomes aware of potential or actual incident related to modern slavery and human trafficking, they must promptly notify the Legal Office at legaloffice@federation.edu.au.

Investigating and Managing Incidents

The University will promptly investigate reports relating to actual or potential breaches of these Guidelines and will address breaches whenever and wherever they occur.

The University encourages all employees, suppliers and partners to raise genuinely-held concerns which fall within the scope of the Policy. Similarly, and where relevant, all such persons are required to participate honestly and fully in any investigation of an actual or potential breach of this Policy.

The University is committed to ensuring that nobody suffers retaliation as a result of reporting in good faith a suspicion that modern slavery or human trafficking may be taking place in any part of our operations or global supply chains. Carrying out retaliation in any form (e.g. threats, harassment or intimidation) is unacceptable and will not be tolerated.

Staff members who believe that they have been subjected to retaliation for reporting in good faith their suspicions about modern slavery or human trafficking, should speak to the Associate Director, Governance, Legal and Risk. Acts of retaliation will be disciplined up to and including employment termination in accordance with the Staff Code of Conduct.

Supporting Documents

- Operations Governance Policy

Responsibility

- The Chief Operating Officer (the Approval Authority) is responsible for monitoring the implementation and outcomes of these Guidelines.
- The Director, Governance, Legal and Risk (as the Policy Sponsor) or delegate is responsible for maintaining the content of these Guidelines and scheduling its review.

Promulgation

This Policy will be communicated throughout the University via:

1. A Fed News announcement; and
2. An announcement on the ‘Recently Approved Documents’ page on the University’s Policy Central website.

Implementation

The requirements of these Guidelines will be incorporated into the University’s Procurement Framework and associated procedures in particular;

- contract management and
- supplier riskassessment and risk management.

These Guidelines will be implemented throughout the University via

1. A FedNews announcement and on the ‘Recently Approved Documents’ page on the University’s Policy Central website.
2. Staff induction sessions.
3. Staff training sessions.