



**Modern Slavery Supplier Risk  
Assessment Handbook**



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# Introduction

According to the [2021 Global Estimates](#), there are 50 million individuals in modern slavery on any given day, either forced to labour against their choice or in a forced marriage. This equates to approximately one out of every 150 persons on the planet. Unfortunately, the situation is not improving as millions more men, women and children have been forced to work or marry since the previous estimates were released in 2017.

Griffith University (Griffith) has a zero-tolerance approach to slavery, exploitation and human trafficking in all its forms. We pursue our vision and mission through our core principles of excellence, ethical behaviour and engagement, and are committed to living our values in the way we operate our university. Our values are also aligned with our commitment to the United Nations Sustainable Development Goals (SDGs) to achieve a sustainable future for all.

Griffith has welcomed and supported the [Modern Slavery Act \(Cth\) 2018](#), which requires Australia's largest organisations, including Griffith, to publish annual statements describing their efforts to assess and address the risks of modern slavery in their operations and supply chains. We are also a member of the [Mekong Club](#), a non-profit organisation that supports businesses to address modern slavery in their operations and supply chains.

Our approach is grounded in the [United Nations Guiding Principles on Business and Human Rights](#). It supports the intent of the [United Nations Sustainable Development Goals](#), as well as relevant laws, principles and standards, such as the [United Nations Declaration of Human Rights](#), [International Labour Organization Conventions](#), the [Modern Slavery Act \(Cth\) 2018](#) to eradicate modern slavery, and the [Queensland Government's commitment to eliminating modern slavery in government supply chains](#).

We realise that the task at hand is not straightforward, as the highest risk of modern slavery is often hidden in complex, opaque supply chains. We are therefore asking our suppliers around the world to join forces with us to eradicate any forms of modern slavery from our supply chains. We hope that you will find this handbook helpful and that together, we can make a difference and create a better future for all.

## Purpose

This handbook serves as a guide and provides an overview of our approach to modern slavery risks in our supply chains. Both this handbook and our [Supplier Code of Conduct](#), communicates to all our existing and prospective suppliers including subsidiaries, joint ventures, divisions, or affiliates, how we expect to work together to identify, address and account for adverse human rights impacts within our supply chains.



Sources:

[themekongclub.org/modern-slavery](http://themekongclub.org/modern-slavery)

[ilo.org/global](http://ilo.org/global)



## Engaging with us

We are committed to eradicating modern slavery from our operations and supply chains through collaboration, capability building and continuous improvement. We have developed a framework of policies, procedures and standards that guide us in the way we identify and address modern slavery risks—including due diligence and remediation processes—in our operations and supply chains.

Before engaging with us, we encourage you to become familiar with our [vision, mission and values](#) as well as our expectations when [supplying to Griffith](#).

When contracting with us, you will be required to take the following actions:

1. Accept the modern slavery provisions included in the contract or agreement.
2. Take all reasonable steps to comply with our [Supplier Code of Conduct](#).
3. Meet the minimum legal requirements outlined in the Queensland Government's [Ethical Supplier Threshold](#).
4. Complete our Modern Slavery Supplier Risk Assessment.
5. Where required, work collaboratively with us on a continuous Improvement Plan.



# Risk assessment process

Suppliers who have an active contract with us in a category considered high risk for modern slavery or are invited by us to participate in a sourcing event, will be assessed for the risk of modern slavery. Sourcing events include:

- Expression of Interest (EOI)
- Invitation to Offer (ITO)
- Request for Proposal (RFP)
- Request for Quotation (RFQ).

Our Modern Slavery Supplier Risk Assessment process consists of three steps as illustrated in Figure 1 below:

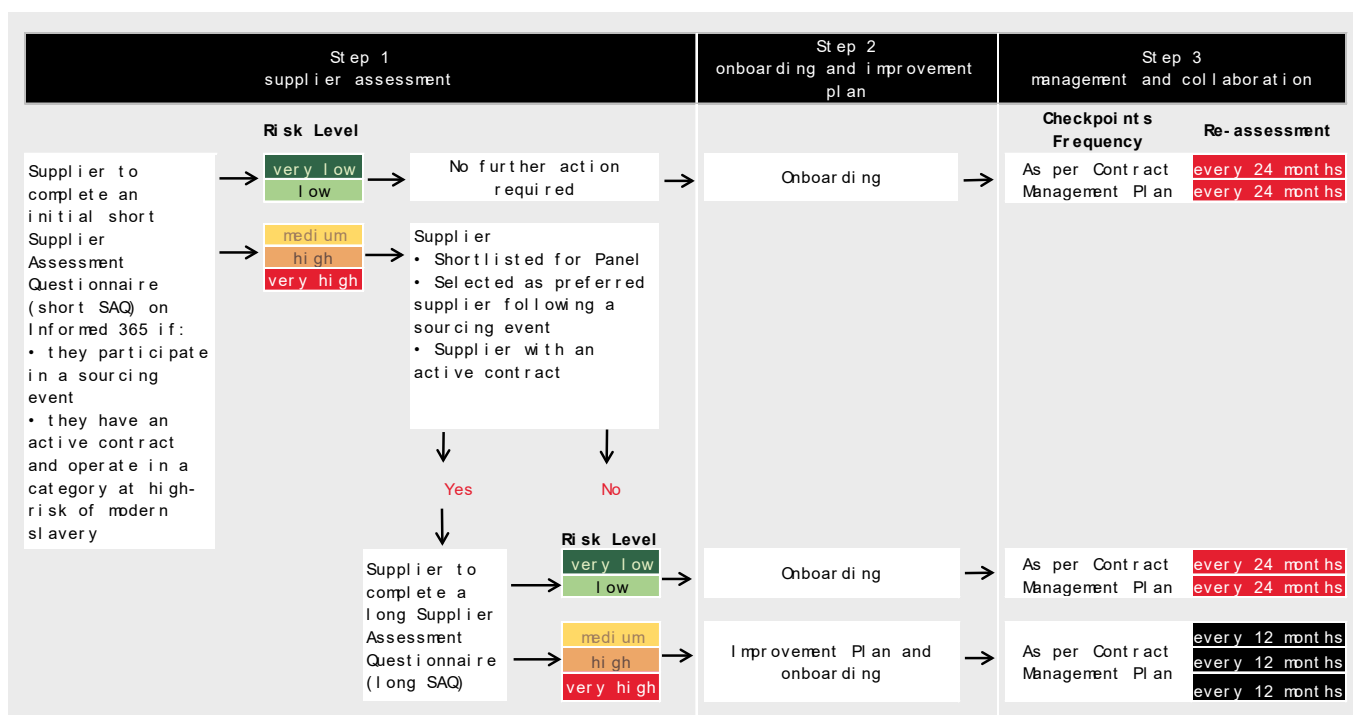


Figure 1—Griffith’s Modern Slavery Supplier Risk Assessment Process

## Step 1: Supplier assessment

The first step to gaining transparency in our supply chains and identifying areas of actual and potential risk of modern slavery is through the assessment of our suppliers via online third-party platform [Informed 365](#). This will be in the form of an initial Modern Slavery Supplier Risk Assessment Questionnaire (short SAQ).

- If you are an existing supplier with an active contract, you will be invited to register and complete the short SAQ via the platform.
- If you have been invited to participate in a sourcing event, the sourcing documentation will provide details of how to register and complete the short SAQ.
- If you are already registered on the Informed 365 platform and have been assessed within the last 12 months (see Step 2), you will not be required to complete the short SAQ.

The short SAQ does not ask for sales and product data but does provide you with an opportunity to showcase your ethical compliance. The information you provide will only be made accessible to us via secure login.

Upon completion of the short SAQ, a modern slavery risk rating, ranging from very high, high, medium, low, to very low, will be assigned to you.

## Short SAQ: suppliers with a very low or low risk rating

If after completing the short SAQ, your risk rating is very low or low, you will not be required to complete a more extensive questionnaire (long SAQ).

If you are awarded a contract upon completion of a sourcing event or are an existing supplier with an active contract, you will be required to:

- discuss, with the relevant Griffith Contract Manager, any emerging modern slavery risks during the agreed scheduled checkpoints
- complete a new short SAQ in 24 months, noting that reassessments may be required earlier if we become aware of any changes that increase the risk of modern slavery in the industry or supply chain within which you operate, or there is a change to the nature of your operations and supply chain management.

## Short SAQ: suppliers with a very high, high or medium risk rating

If after completing the short SAQ, your risk rating is very high, high or medium, you will be required to complete a more extensive questionnaire (long SAQ), if you:

- are shortlisted for inclusion as a Panel member
- are selected as a preferred supplier following a sourcing event (e.g., ITO, RFQ, RFP)
- have an active contract with us.

If you are required to complete a long SAQ, you will be notified by email. Upon receipt of a notification from us, you will be required to log into Informed 365, using your existing credentials, to complete the long SAQ.

After completing the long SAQ, a modern slavery risk rating, ranging from very high, high, medium, low, to very low, will be assigned to you, offering valuable insights into the maturity of your modern slavery efforts. This rating system is designed to assist you in better understanding and enhancing your modern slavery initiatives.

## Step 2: Improvement Plan and onboarding

### Long SAQ: Suppliers with a very high, high or medium risk rating

If after completing the long SAQ, your risk rating is very high, high, and medium risk rating, you will be required to agree to an Improvement Plan aimed at minimising the risks identified in the assessment process.

The Improvement Plan will be shared through the Informed 365 Platform and can include short-term, medium-term and longer-term recommendations to close any gaps identified in your approach to modern slavery. Some examples of actions that may be required in an Improvement Plan include:

- developing modern slavery training for staff and suppliers
- developing a modern slavery supplier due diligence process
- developing and implementing a modern slavery grievance and remediation process accessible by all workers.

Some Improvement Plans may include several actionable recommendations. However, we recognise that combating modern slavery is a significant endeavour and therefore we do not expect you to act on all recommendations. We request that you select and commit to executing one recommendation and indicate a specific timeframe for completing the selected action. On the other hand, certain actions may be non-negotiable due to the high likelihood of causing harm to individuals if they are not implemented.

## Step 3: Management and collaboration

We recognise that modern slavery risk management is a process of continuous improvement and not a moment-in-time proposition. Once an Improvement Plan has been agreed on, we will discuss progress with you at a frequency that aligns with the Contract Management Plan.

You will be required to reassess your approach to modern slavery on a regular basis by completing either new short SAQ or long SAQ. Details of the frequency of engagement and reassessment required are also included in Table 1.

Supplier Risk Rating	Frequency of checkpoints and associated actions	Frequency of re-assessment
Very high	As per Contract Management Plan	Suppliers re-complete a Long SAQ every 12 months or as needed
High		
Medium		
Low	As per Contract Management Plan	Suppliers re-complete a Short SAQ every 24 months or as needed
Very low		

Table 1—Frequency of reassessment

As-needed, reassessments outside of this regular cycle may also be triggered:

- if we become aware of any changes that increase the risk of modern slavery in the industry or supply chain within which you operate or there is a change to the nature of your operations and supply chain management
- you indicate you cannot fulfil a commitment in your Improvement Plan
- we identify new or additional modern slavery risk hotspots in its supply chain
- by contract negotiations or if variations that are underway
- when an incident of modern slavery is identified, or a credible allegation of modern slavery practices or behaviours is detected during ongoing monitoring or brought to our attention by you or another source.

## Definitions

**Grievance:** broadly refers to an allegation, issue, or problem that a person (or group) has raised in relation to their treatment or experience, whether perceived or actual.

**Grievance mechanism:** is a procedure through which a grievance can be raised, assessed, investigated and responded to.

**Modern Slavery Act:** The Commonwealth legislation (the Act) enacted by the Parliament of Australia on 29 November 2018.

**Modern slavery:** when an individual is exploited by others for personal or commercial gain. Whether tricked, coerced or forced, they lose their freedom. This includes but is not limited to human trafficking, forced labour and debt bondage.

Practices that constitute modern slavery can include the following:

- **Trafficking in persons:** the recruitment, harbouring and movement of a person for the purposes of exploitation through modern slavery. Exploitation also includes the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.
- **Slavery:** when a person exercises powers of ownership over another.
- **Servitude:** situations where the victim’s personal freedom is significantly restricted and they are not free to stop working or leave their place of work.
- **Forced marriage:** situations where coercion, threats or deception are used to make a victim marry, or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
- **Forced labour:** situations in which persons are coerced to work through the use of violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers or threats of denunciation to immigration authorities.
- **Debt bondage:** situations where the victim’s services are pledged as security for a debt and the debt is manifestly excessive or the victim’s services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.
- **Deceptive recruiting for labour or services:** situations where the victim is deceived about whether they will be exploited through a type of modern slavery.

- **Worst forms of child labour:** situations where children are subjected to slavery or similar practices, including for sexual exploitation, or engaged in hazardous work that may harm their health, safety or morals, or used to produce or traffic drugs.

**Remediation:** counteracts or makes good any human rights harms that have occurred as a result of a business's activities. This may include apologies, restitution, rehabilitation, financial or non-financial compensation and punitive sanctions, as well as the prevention of harm through, for example, injunctions or guarantees of non-repetition.

**Short Supplier Assessment Questionnaire (short SAQ):** designed to be quick and easy to complete, consisting of a limited number of questions to quickly assess the actions taken by the supplier to address modern slavery risks.

**Long Supplier Assessment Questionnaire (long SAQ):** is an extensive and comprehensive, with a wide range of questions that delve deeply into various aspects of a supplier's operations and practice. Its purpose is to facilitate an understanding of the residual risks, seeking detailed information regarding a supplier's policies, procedures, due diligence efforts, and actions taken to prevent and address modern slavery.

**Supplier:** an enterprise known to be capable of supplying required goods and/or services. It includes manufacturers, stockists, resellers, merchants, distributors, consultants and contractors.

**Supply chains:** the products and services (including labour) that contribute to Griffith's own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.





# Resources

## Relevant laws, principles and standards:

**Modern Slavery Act (Cth) 2018**

[legislation.gov.au](https://legislation.gov.au)

**United Nations Guiding Principles on Business and Human Rights**

[ohchr.org/documents](https://ohchr.org/documents)

**United Nations Sustainable Development Goals**

[sdgs.un.org/goals](https://sdgs.un.org/goals)

**United Nations Declaration of Human Rights**

[un.org/en/about-us/universal-declaration-of-human-rights](https://un.org/en/about-us/universal-declaration-of-human-rights)

**International Labour Organization Conventions**

[www.ilo.org/declaration](https://www.ilo.org/declaration)

**Queensland Government Ethical Supplier Threshold**

[www.business.qld.gov.au](https://www.business.qld.gov.au)

**Griffith University Supplier Code of Conduct**

[griffith.edu.au](https://griffith.edu.au)



## Other resources

**2021 Global Estimates**—Explore the Global Slavery Index and learn more about international human rights group Walk Free.

[walkfree.org/global-slavery-index](https://walkfree.org/global-slavery-index)

**Anti-Slavery Australia**—Anti-Slavery Australia are a specialist legal practice, research and policy centre committed to the abolition of modern slavery in Australia.

[antislavery.org.au](https://antislavery.org.au)

**Mekong Club**—Mekong Club is a not-for-profit organisation that supports businesses to address modern slavery in their operations and supply chains. If you need advice on how your organisation can start tackling modern slavery in its operations and supply chain, you can contact [supplychain@themekongclub.org](mailto:supplychain@themekongclub.org) for a free, no-commitment, confidential discussion with a modern slavery expert.

[themekongclub.org](https://themekongclub.org)

# Contact us

If you have any questions, concerns or suggestions about this handbook or our approach to modern slavery please contact Strategic Procurement and Supply [procurement@griffith.edu.au](mailto:procurement@griffith.edu.au).



# What to do if you suspect modern slavery

<p><b>1</b></p> <p>You should be careful that any actions you take do not harm a victim or survivor of modern slavery. Never publicly disclose personal information without informed consent.</p> 	<p><b>2</b></p> <p>In emergencies, where there is immediate danger, or where the situation involves a child, call 000.</p> 	<p><b>3</b></p> <p>Anti-Slavery Australia can provide access to free confidential legal and migration advice to anyone in slavery. Call 02 9514 8115 or visit <a href="http://www.antislavery.org.au">www.antislavery.org.au</a></p> 	<p><b>4</b></p> <p>To report modern slavery in Australia call the Australian Federal Police on 131 237 or report through their website <a href="http://www.afp.gov.au">www.afp.gov.au</a></p> 
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