

## Modern Slavery Policy

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#### 1.0 Purpose

This Policy reflects Griffith University's commitment to respecting human rights and addressing modern slavery. It outlines the University's approach to fair labour practises and protecting workers in its operations and supply chains from exploitation and modern slavery.

It is consistent with our core principles of excellence, ethical behaviour and engagement, which are based on a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations and continuous improvement. It is aligned with the University's values stated in Griffith's Creating a future for all – Strategic Plan 2020-2025 and Supplier Code of Conduct.

This Policy supports the intent of the United Nations Sustainable Development Goals, as well as relevant laws, principles, and standards, such as the United Nations (UN) Declaration on Human Rights, International Labour Organization Conventions and the *Modern Slavery Act 2018* (Cth), to eradicate modern slavery.

As part of our commitment, Griffith University is a signatory of the United Nations Global Compact and supports the United Nations Guiding Principles on Business and Human Rights 'Protect, Respect, Remedy' framework.

#### 2.0 Scope

This policy applies to:

- All staff
- Appointees of the University
- Students
- Griffith's controlled entities
- Griffith's affiliates
- Griffith's suppliers.

#### 3.0 Policy statement

##### 3.1 Principles

The University is committed to the following principles:

- Modern Slavery is a serious crime and Griffith University has a zero-tolerance approach to slavery, exploitation, human trafficking in all its forms, and child labour.
- The University is committed to safeguarding human rights in its operations and supply chains, as well as taking concrete steps to identify, mitigate, and respond to risks that have the potential to cause, contribute to, or directly link the University to modern slavery.
- If the University identifies risks outside its direct control, it will engage with key stakeholders to leverage its influence and encourage positive, long-lasting change.
- The University compels suppliers to identify, mitigate and address salient risks and instances of modern slavery in their supply chains and business operations.

- The University adopts a risk-based due-diligence and implements and regularly reviews systems and controls for identifying, addressing and remediating any known instance of modern slavery in its supply chains of our suppliers.
- The University collaborates with peers and civil society to enhance its approach to modern slavery over time.
- The University is committed to developing and implementing capability-building programs for its employees and suppliers to develop the mindset, behaviours, and skills to power a positive systemic transformation.
- The University is committed to establishing and providing access to grievance mechanisms and remedy modern slavery risks in its operations and supply chains.

### 3.2 Modern Slavery Approach

Griffith University will take proactive steps to mitigate and address the risk of modern slavery in our supply chains and operations, and we expect all entities we engage with to do the same.

#### 3.2.2. University Operations

- **Governance**

Griffith University has a robust governance structure in place to oversee our commitment to modern slavery, set policies and maintain our approach aligned with our values, as outlined in Griffith's *Creating a future for all – Strategic Plan 2020-2025*.

The Vice Chancellor has approved our policy commitment, which has been incorporated into our procurement and risk management frameworks and referenced, where appropriate, in our policy suites. The approach and implementation of the modern slavery policy and related processes are overseen by a cross-functional executive Modern Slavery Task Force.

This Policy commitment is reviewed and updated yearly.

- **Griffith Code of Conduct**

In alignment with our values, all staff and members of the University Council and its Committees, who are not staff of the University, are required to follow the University's Code of Conduct which sets out our values and expected behaviour standards, including complying with all applicable laws, respecting human rights and behaving honestly, with integrity and in a way that upholds the values and reputation of the University.

Failure to act in accordance with these obligations can be a cause for investigation under the relevant misconduct provisions of the University Staff Enterprise Agreements.

- **Communication and capability building**

Staff and students at Griffith University will be provided with communication and training opportunities to improve their understanding of the causes and impact of modern slavery, the Modern Slavery Policy, and our approach to mitigating and addressing the risk of modern slavery within our supply chains and operations.

Key internal stakeholders involved in procurement activities will receive additional training on the Griffith Supplier Code of Conduct, the Griffith Modern Slavery Due Diligence Process, Griffith modern slavery contractual provisions, and tools to assist suppliers with due diligence.

- **Collaboration and continuous improvement**

We are committed to evolving our approach and taking all necessary steps to mitigate and address the risk of modern slavery and labour-related harm within our operations and supply chains.

We will work with staff, suppliers, partners, and other parties to review and advance our approach on a regular basis, taking into account emerging human rights issues.

Every year, by 30 June, we will publish a Modern Slavery Statement that describes the actions we took during the financial year to identify, mitigate and remediate the risk or instances of modern slavery in our operations and supply chains.

### 3.2.3 Supply Chain

- **Griffith Supplier Code of Conduct**

We are committed to acting in a way that is in line with our principles of Excellence, Ethical Behaviour, and Engagement, and we expect our suppliers to make the same commitments, making sure that these principles are followed throughout their supply chains.

As part of this commitment, we expect our suppliers to take reasonable steps to make sure that their employees, related entities, suppliers, and subcontractors know about, understand, and follow the Code. They should also take reasonable steps to deal with any violations of the Code, including violations by their employees, related entities, suppliers, and subcontractors, and assist us in conducting third-party audits, due diligence checks or investigations with respect to compliance with the Code.

- **Griffith approach to risk identification and management**

Our commitment to continuous improvement in relation to our systems and controls to assess, address and mitigate modern slavery risks in our supply chains is consistent with the United Nations Guiding Principles on Business and Human Rights. Our five-step approach is embedded in our procurement activities and focuses on identifying salient human rights risk, assessing actual and potential human rights impacts, acting upon the findings, monitoring and reporting on responses:

1. Assign a modern slavery risk rating through inherent risk and residual risk assessments.
2. Develop an improvement plan by collaborating with suppliers as needed to reduce the risk of harm to people within their operations and supply chain.
3. Conduct ongoing supplier engagement, risk monitoring and reporting.
4. Re-assess the supplier on a regular and as-needs basis.
5. Participate in grievance investigation and remediation as needed.

Recognising that modern slavery is a global, evolving issue affecting all sectors and industries, this process will be reviewed by Griffith's Modern Slavery Task Force annually and updated in alignment with Griffith's commitment to continuous improvement.

- **Contractual provisions**

Griffith supply agreements include clauses that try to strike a balance between our objective of eliminating modern slavery risks in our supply chains and the practical challenges faced by suppliers.

Following a risk-based approach, the clauses include basic warranties as to compliance and due diligence, as well as reporting and audit obligations. These are included where appropriate, following an assessment of the risk of slavery in the supply chain connected with a particular transaction.

The clauses are reviewed regularly to address emerging issues and legislative requirements.

### 3.2.4 Reporting, investigating and remediating unethical conduct

The University is committed to an inclusive and equitable work environment. Feedback is welcomed and helps us identify what we are doing well and where we need to improve our services and systems.

Our suppliers' workers can report grievances and concerns about modern-slavery related issues through **Your Call**, an independent hotline engaged by the University to impartially and confidentially manage disclosures, and to facilitate disclosers to provide information or concerns without fear of reprisal.

- The Your Call organisational identification for the University is GRIFFITH.
- Telephone Your Call on: 1300 790 228 on business days between 9.00 am and 12 am
- Make a secure report online at [www.yourcall.com.au/report](http://www.yourcall.com.au/report) at any time using the ORG ID

Your Call is a legitimate, accessible, predictable, equitable, transparent and right-compatible channel, which is also used by the University as a source for improving the mechanism and preventing future grievances and harms.

To make Your Call accessible, the University will openly communicate its existence through its website, posters, trainings, inductions, and verbal notifications.

The University is committed to ensuring that all workers' disclosures are properly managed and that those who report wrongdoing in the workplace are protected from reprisals.

The University will, to the greatest extent possible, keep the disclosure and the identity of the discloser confidential.

#### 4.0 Roles, responsibilities, and delegations

ROLE	RESPONSIBILITY
Vice Chancellor	<ul style="list-style-type: none"> <li>• Approve this policy.</li> <li>• Approve and sign the annual University's Modern Slavery Statement.</li> </ul>
University Executive	<ul style="list-style-type: none"> <li>• Oversee the University's compliance with the Modern Slavery Act and this policy, including actions taken to identify and address risks of modern slavery in the University's operations and supply chains.</li> <li>• Lead and direct the activities of Modern Slavery Task Force to ensure consistency of our approach to modern slavery with the University's values and principles.</li> <li>• Lead the respond to modern slavery allegations against Griffith and/or any of its suppliers.</li> <li>• Escalate issues, where appropriate, to the Vice Chancellor.</li> <li>• Regularly update the Vice Chancellor on the implementation of this policy and related procedures (the Modern Slavery Framework).</li> </ul>
Chief Operating Officer	<ul style="list-style-type: none"> <li>• Chair the Modern Slavery Task Force.</li> <li>• Administer and implement this policy.</li> <li>• Manage the implementation of the University's Modern Slavery Framework and regularly evaluate its effectiveness to respond to modern slavery risks.</li> <li>• Within the Modern Slavery Task Force, prepare an annual Modern Slavery Statement as required by the Modern Slavery Act and submitting it to the relevant authority.</li> </ul>
The Head of Strategic Procurement and Supply	<ul style="list-style-type: none"> <li>• Oversee the implementation of the modern slavery due diligence of the University's operations and supply chains.</li> <li>• Implement procurement activities consistent with this policy.</li> </ul>

- Engage with suppliers to help build awareness of the risks of modern slavery and develop an appropriate response.
- Develop and implement procurement policies and processes that comply with this policy.
- Review the policies and processes yearly to include emerging issues and the University's response.

Other Principal Officer	<ul style="list-style-type: none"> <li>• Implement this policy as it relates to their areas of responsibility</li> </ul>
The Office of General Counsel	<ul style="list-style-type: none"> <li>• Draft and advise on the inclusion of modern slavery provisions in contractual documentation with suppliers and partners.</li> <li>• In case of modern slavery allegations against Griffith or its suppliers, take due action, following the Modern Slavery Grievance and Remedy procedure.</li> </ul>

## 5.0 Definitions

For the purposes of this policy and related policy documents, the following definitions apply:

**Affiliates:** anybody the University appoints or engage to undertake duties or functions on its behalf.

**Controlled entity:** a person, group of persons or body over which the University has control.

**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:** The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. The Act defines modern slavery as including eight types of serious exploitation:

1. **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
2. **Slavery:** when a person exercises powers of ownership over another.
3. **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
4. **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.
5. **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.
6. **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.
7. **Deceptive recruiting for labour or services:** situations where the victim is deceived about whether they will be exploited through a type of modern slavery.

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

**Operations:** activities undertaken by Griffith University

**Partner:** any entity or individual collaborating with the University or participating in a joint venture or research project with or on behalf of the University.

**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.

**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 University's own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.

**University staff:** any employee of an agency whether permanent, temporary, full-time, part-time or casual, and any volunteer, student, contractor, consultant or anyone who works in any other capacity for an agency.

INFORMATION		Printable version (PDF) Downloadable version (Word)
Title	Modern Slavery Policy	
Document number	2022/0001273	
Purpose	This Policy reflects Griffith University's commitment to respecting human rights and addressing modern slavery. It outlines the University's approach to fair labour practises and protecting workers in its operations and supply chains from exploitation and modern slavery.	
Audience	This policy applies to all staff, appointees of the University, students, its controlled entities, affiliates, controlled entities, suppliers and partners.	
Category	Governance	
Subcategory	Risk and Integrity	
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Policy advisor	Head of Strategic Procurement and Supply	
Approving authority	Vice Chancellor	

## RELATED POLICY DOCUMENTS AND SUPPORTING DOCUMENTS

### Legislation

[Modern Slavery Act 2018](#)

### Policy

Queensland Government:

- [Queensland Procurement Policy](#)
- [Queensland Government Supplier Code of Conduct](#)
- [Ethical Supplier Threshold](#) and [Mandate](#)

International Standards and Frameworks

- [UN Guiding Principles on Business and Human Rights](#)
- [the United Nations \(UN\) Declaration of Human Rights](#)
- [International Labour Organisation Conventions](#)
- [UN Global Compact's ten principles](#)
- [UN Sustainable Development Goals](#)

Griffith University:

- [Procurement and Supply Policy](#)
- [Code of Conduct Policy](#)
- Supplier Code of Conduct
- [Sustainability Policy](#)
- Risk on a page

### Procedures

Procurement procedures, including processes, guidelines and frameworks available at [Purchasing \(griffith.edu.au\)](#)

### Forms

Templates, tools and systems available at [Purchasing \(griffith.edu.au\)](#)