

## Policy Title

Modern Slavery Policy

## Purpose

Modern Slavery is a crime and violation of human rights and is defined under the Australian Modern Slavery Act 2018 (the Act) as including eight types of serious exploitation:

- trafficking in persons;
- slavery;
- servitude;
- forced marriage;
- forced labour;
- debt bondage;
- deceptive recruiting for labour or services; and
- the worst forms of child labour which means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

The purpose of this Policy is to:

- prevent, detect and respond with mitigating controls to the risk of Modern Slavery occurring within Monash College (the College), its supply chain or in any other business relationships;
- demonstrate MC's commitment to only doing business with those who fully comply with the Act; and
- ensure compliance with the Act (as may be amended from time to time).

## Scope

This policy applies to all persons working for and with the College or on its behalf in any capacity, including employees, directors, officers, volunteers, interns, external consultants, third-party representatives and business partners.

## Policy Statement

The College has a zero-tolerance approach to Modern Slavery.

The College is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in its own business operations or supply chains.

The College is also committed to ensuring there is transparency in its approach to tackling Modern Slavery throughout its business and supply chains, consistent with the College's disclosure obligations under the Act.

The prevention, detection and reporting of Modern Slavery in any part of the College's business and supply chains is the responsibility of all those working for it or under its control.

Employees who also include contractors, are encouraged to raise concerns with their manager or Director Governance, about any likely Modern Slavery breaches in any parts of the College's supply chains or business, at the earliest possible stage.

The College expects the same high standards from all of its contractors, suppliers and other business partners. The College's contracting processes will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and expect suppliers to hold their own suppliers to the same high standards.

## Policy Program

The College's Modern Slavery program contains the following elements:

### 1. Policies

The College currently operate the following policies that support awareness of acceptable practice and behaviour; and the reporting mechanisms to raise concerns of inappropriate behaviour:

- Fraud, Bribery, Foreign Bribery and Corruption Policy
- Whistleblowing Policy
- Staff Personal and Professional Employee Code of Conduct.

### 2. Procedures

The College will meet the requirements under the Modern Slavery Act in three ways:

#### 1) Procurement of goods and services (Procurement Policy and Procedure)

The procurement framework is the key mechanism whereby suppliers are engaged by the College. The procurement framework provides for due diligence on these suppliers and their compliance with the Act. Procuring goods and services will, as far as reasonable, be conducted in a way as to ensure that the College sources goods and services from entities that comply with their obligations under the Act. The extent of the due diligence conducted in the procurement process will depend on the types of goods or services being sourced.

Some examples of the due diligence that may be conducted include requesting:

- self-assessment/attestation that the supplier complies with various provisions in the Act;
- a copy of the supplier's most recent Modern Slavery statement (if applicable);
- details of structure and operations of their supply chain; and/or
- details of the actions taken by the supplier to manage and address modern slavery risks in their supply chain. If a proposed contract is included as part of the procurement, consideration must be given to a provision ensuring compliance with the Act.

## 2) Contract management and monitoring key suppliers/offshore partners

The adoption of anti-slavery wording in contracts to cover compliance with the Act. The obligations in the clause to include:

- Obligation to comply with the Act;
- A requirement to take reasonable steps to ensure that there is no modern slavery in the contractors supply chains or any subcontractor's supply chains; and
- A requirement to notify the College if the supplier becomes aware of any actual or suspected breach of the Act.

The College will work collaboratively with key suppliers/business partners to identify and manage modern slavery risks and develop commercial and actionable solutions.

## 3) Statement Preparation, Endorsement and Approval

The Act requires that an annual statement be prepared and approved for each financial year where the Company has a revenue of at least \$100 million. Where required, the annual statement will be approved by the Board and signed by a member of the Board. The preparation and submission of the annual compliance statement will be done in association with Monash University.

## Definitions

### Employees

Individuals employed by Monash College Pty Ltd, including continuing or ongoing, fixed term, casual and sessional employees, and contractors.

## Responsibilities

### Procurement Team

The Procurement Business Partner is responsible for overseeing sourcing activity, ensuring that an assessment of suppliers is conducted (where appropriate) on their compliance with the Modern Slavery Act.

The Governance team is responsible for preparing the annual Modern Slavery Statement, supported by the Procurement Team.

### Governance Team

The Governance team is responsible for overseeing offshore partnerships and ensuring that an assessment of offshore partners is conducted on their compliance with the Modern Slavery Act.

### People and Culture

People and Culture is responsible for addressing modern slavery risks in the recruitment process particularly when dealing with consultants and agencies in the recruitment of personnel, teachers, contract workers, consultants, casual workers, interns and others.

## Records Management

The Modern Slavery Policy is a Level 1 Governance Policy. The latest approved version of the Modern Slavery Policy will be stored on the Policy Bank on the MC intranet.

The policy owner will maintain a record of issues relevant to the Modern Slavery Policy for consideration at the time of review

## Legislation and Standards

[Modern Slavery Act \(COM\) 2018](#)

[Australian Charities and Not for profit Commission \(ACNC\) – External Conduct Standards](#)

## Implementation plan

<b>Step #1</b>	This policy will continue to be made available on the Monash College website.
<b>Step #2</b>	Training for staff responsible for Procurement/Offshore Partnerships
<b>Step #3</b>	Communication to all staff on new Policy from CEO or Director Governance.

<b>Reference Policies and Supporting Documentation</b>	<p>Procurement Policy  Fraud, Bribery, Foreign Bribery and Corruption  Staff Personal and Professional Code of Conduct  Whistleblower Policy  Whistleblower Procedure  Disciplinary Policy  Employees Disciplinary Procedures</p>
<b>Responsibility for Implementation</b>	<p>Chief Executive Officer  Monash College Senior Leadership Team  Director Governance</p>
<b>Status</b>	Revised
<b>Key Stakeholders</b>	<p>Monash College Board of Directors  Audit &amp; Risk Committee  MCPL Senior Leadership Team</p>
<b>Approval Body</b>	<p>Monash College Pty Ltd Board of Directors</p> <p>Meeting number: 5/2020  Meeting date: 22 October</p>
<b>Date Effective</b>	1/11/2020
<b>Next Review Date</b>	31/10/2025
<b>Policy Owner Job Title Division</b>	<p>Company Secretary  Finance</p>
<b>Contact</b>	Compliance Specialist
<b>Policy Level</b>	Level 1

## Change history

<b>Version number</b>	<b>Approval date</b>	<b>Approved by</b>	<b>Brief outline of changes</b>
1.0	22 October	MCPL Board	New
1.1	20 October	MCPL Board	Reviewed – review date extended for three years.