

Policy

Anti-Slavery and Human Trafficking

Responsible portfolio	Finance	Document Register ID	250.2023.254.1
Policy owner	Chief executive Officer	Review date	September 2027
Date of Council Meeting	21 September 2023	Resolution Number	231/23
Legislation, Australian Standards, Code of Practice	Modern Slavery Act 2018 (Cth) Modern Slavery Act 2018 (NSW) Local Government Act 1993 Human Rights Act 1998		
Aim	To limit risks of modern slavery in our business and supply chain.		

Version History

Revision No.	Date	Modified By	Details / Comments
02	01/11/2023	Coordinator Governance	Updated to include Council resolution, revision date and individual document ID.
01	21/09/2023	Manager Corporate Projects	New Policy.

1 Introduction

Modern Slavery is the illegal exploitation of people for personal or commercial gain. Victims are controlled by force, coercion and/ or deception. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. This is a violation of fundamental human rights and is not tolerated in our business or supply chains.

2 Purpose

This policy is a statement of Council's commitment to reduce the risk of modern slavery in all its forms, taking place in any part of our business or within any of our supply chains.

Council recognises that it has a responsibility under the Modern Slavery Act to take a strong approach to reject any forms of modern slavery and human trafficking. We are committed to promoting ethical business practices and policies that protect workers from being abused and exploited, both in our business and our supply chains.

Council is committed to limiting the risk of modern slavery occurring in our business, ensuring there is transparency in our business and in our approach to tackling modern slavery throughout our supply chain.

We expect our employees and our suppliers to share our commitment to help ensure modern slavery does not exist in our business or supply chain.

Council procures goods and services needed for the business's day-to-day operations from many contracted and preferred suppliers operating in Australia. Our supply chain arrangements include suppliers from these key areas:

- Corporate and Operational Procurement
- Capital and Property Works.

Our long-term strategic relationships with key suppliers provides a stability in our chain and procurement processes.

3 Scope

This policy applies to everyone who works for Council or on Councils behalf, in any capacity, across Council. This includes, but is not limited to, all employees, directors, officers, agency workers, seconded workers, agents, contractors, external consultants, third-party representatives and business partners.

4 Responsibility

The CEO has overall responsibility for ensuring this policy complies with our legal and ethical obligation, and that all those who the policy applies to comply with it.

Primary and day-to-day responsibility for this policy and modern slavery programme has been delegated to the Chief Financial Officer.

All managers are responsible for ensuring those reporting to them are aware of and understand the policy.

All employees are expected to complete mandatory ethics training, which includes content on modern slavery. Council will provide additional tailored training to specific teams where necessary.

Council's commitment to preventing all forms of modern slavery will be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Council complies with all applicable legislation, including the Modern Slavery Act 2015, the Human Rights Act 1998 and the Local Government Act 1993.

Council respects the human rights of its employees and provides them with safe working environment and fair terms of employment

Council has a commitment to doing all that it reasonably can to prevent all forms of modern slavery within any parts of its business or supply chains by:

- Identifying and assessing the risks of modern slavery in Councils supply chains
- Ensuring whistleblowing and grievance policies and practices cover modern slavery and allow anonymous reporting of human rights violations
- Ensuring contracts include contractual provisions for modern slavery
- Working with suppliers to ensure they understand their obligations to implement processes to eliminate or minimise the risks of goods and services being produced by modern slavery
- Provide training and awareness of modern slavery to staff and suppliers
- Cooperating with the Anti-slavery commissioner in disclosing information and providing assistance and support in respect to modern slavery and its victims.

4.1 Third Parties

Council expects high standards from all its contractors, suppliers and other business partners. They are expected to comply with all applicable laws and regulations and publish an annual anti-slavery and human trafficking statement, where they are legally required to do so.

Consideration of modern slavery risk is built into our procurement processes as part of our due diligence activities.

Council procurement contracts require suppliers to comply with the Modern Slavery Act 2015, in addition to other relevant policies. Council also includes specific requirements that Councils suppliers implement due diligence procedures for their own supply chains and use reasonable endeavours not to purchase raw material, resources or products from organisations using forced labour

Council expects its suppliers to hold their own suppliers to these same high standards

Council may terminate its relationship with individuals and organisations working on Councils behalf if they are found to be in breach of the Modern Slavery Act.

5 Reporting Obligations

The Local Government Act 1993 requires local councils to include statements in their annual reports detailing:

- The action taken in relation to any significant modern slavery issues raised by the Anti-slavery Commissioner during the year concerning councils operations; and
- The steps taken to ensure that goods and services procured by and for the council during the year were not the product of modern slavery

Modern Slavery is a criminal offence and Council will review any reported suspected breaches of the Modern Slavery Act and take appropriate action. This may include reporting the case to the police for investigation.

This procedure should be read in conjunction with the following documents:

Documentation

Office of Local Government Circular 22-09 Councils' obligations under the Modern Slavery Act 2018 A803923

Anti-Slavery Policy Statement

Variation

Council reserves the right to review, vary or revoke this policy and should be reviewed periodically to ensure it is relevant and appropriate.