Modern Slavery Policy Template

1 February 2024

Version 1.1

|  |  |
| --- | --- |
| Author | Finance Risk & Governance |
| Approval | Executive Director of Finance, Risk & Governance |
| Version | 1.1 |
| Implementation | April 2023 |
| Review | April 2025 |

Contents

[1. Introduction 3](#_Toc158375321)

[2. Associated procedures 3](#_Toc158375322)

[3. Disclaimer 3](#_Toc158375323)

[4. Sample policy 4](#_Toc158375324)

1. Introduction
   1. This tool has been designed to assist health services to develop a Modern Slavery Policy (the Policy) demonstrating their commitment to complying with the Act.
   2. The Policy should be developed in alignment with health services’ guiding principles and operational requirements. It is envisaged the Policy will become part of the health services’ suite of policies used to guide decisions and behaviours to achieve organisational goals and objectives.
   3. Whilst this tool refers to ‘the Policy’, it should be described in accordance with your document management system and governance processes including naming protocols. This may mean that the Policy is incorporated within another document or policy (for example, as part of the Procurement Policy) and not retained as a separate document.
   4. The health service may consider publishing this Policy, and any associated procedures, on its website, depending on its processes.
2. Associated procedures
   1. Following development of the Policy, health services should undertake a review of all other policy and procedure/s documents to identify the Policy’s impact (if any) on already documented practices. It is important to ensure consistency and transparency across all policy and procedures to support operational efficiency and effectiveness.
   2. Procedures that may be impacted by the introduction of the Policy include:
   * procurement policy and associated procedures
   * complaints procedures
   * protected disclosures/ whistle-blower procedures
   * recruitment procedures
   * environment, social and governance procedures
3. Disclaimer
   1. The information presented in this document is general in nature and based on HealthShare Victoria’s interpretation of the Health Services Act 1988 (Vic) and Modern Slavery Act 2018 (Cth) and any ancillary legislation and regulations in effect at the time, and should not be relied upon as legal advice. Please consider seeking professional and independent advice from your legal representative as to the applicability and suitability of this information and the legislation to your own business needs or circumstances.
4. Sample policy
   1. As noted above, the Policy should be drafted in alignment with existing document guidelines. However, a sample Policy is provided below for guidance and to highlight key Policy considerations.
   2. This Policy is provided as a guide only. Health services should seek legal advice on the scope of this Policy within their own operations.

|  |
| --- |
| Purpose [Health service name] upholds the Australian Government’s position on modern slavery. There is no place for modern slavery in the Australian community or in the global supply chains of Australian goods and services.  This Policy establishes [health service name]’s approach to the management of modern slavery risks within [health service name]'s operations and supply chain in accordance with the Modern Slavery Act 2018 (Cth) (the Act). Scope This Policy applies to [health service name], [health service owned / controlled entity 1, if applicable], [health service owned / controlled entity 2, if applicable] [add as many entities as required].  This policy applies to all [health service name] employees including Board members, contractors, students, visiting medical officers and consultants.  This policy should be read in conjunction with the [health service name] Code of Conduct, Procurement Policy and Human Resource Policy. Definitions **Modern Slavery:** has the same meaning as it has in the Modern Slavery Act 2018 (Cth) and includes trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.  **Modern Slavery Risks:** risks the [health service name] may potentially create, contribute to, or could be linked with modern slavery practices.  **Modern Slavery Statement:** has the same meaning as it has in the Modern Slavery Act 2018  (Cth).  **Operations:** activities undertaken by the entity to pursue its business objectives and strategy in Australia or overseas.  **Supply Chains:** the products and services (including labour) that contribute to the entity’s own products and services. This includes products and services sourced in Australia or overseas and extends beyond direct suppliers.  **The Act:** *Modern Slavery Act 2018* (Cth) |

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Policy [Health service name] will adopt a risk-based approach to combatting modern slavery in its operations and supply chains.  [Health service name] is committed to:   * + Complying with applicable legislation that supports the elimination of modern slavery globally, including the Act.   + Assessing its operations and supply chains for modern slavery risks.   + Implementing and enforcing effective systems and controls to reduce the risk of modern slavery.   + Ensuring there is transparency in its operations and approach to addressing modern slavery. These standards being reinforced during the procurement process.   + Fostering open and transparent supplier relationships which encourage modern slavery reporting and meaningful change through remediation. It is noted this component is reinforced with appropriate contractual obligations.   + Ensuring the health, safety and wellbeing of its workforce. This is supported by a suite of policies that are compliant the *Occupational Health and Safety Act 2004 (Vic)* and corresponding regulations and with Australian workplace and occupational health and safety laws.   + Applying a continuous improvement approach to how it reduces the risk of modern slavery practices within its operations and supply chains.  Roles and Responsibilities  |  |  | | --- | --- | | Role | Responsibilities | | Board | * Review and authorise the annual Modern Slavery Statement in compliance with the Act. * Delegate responsibility for the implementation of this Policy. | | **Chief Executive Officer** | * Review and sign the annual Modern Slavery Statement. | | **[Team or person to whom the health service has assigned responsibility for the Modern Slavery Framework.**  **E.g. Chief Procurement Officer, Procurement Director]** | * Has overall responsibility for the implementation and management of procedures to enforce this Policy. * On behalf of the Board, review and update this Policy. * Prepare the annual Modern Slavery Statement in consultation with relevant health service stakeholders. * Submit the annual Modern Slavery Statement to the Modern Slavery Register. | | **All employees** | * Support organisational initiatives related to this Policy. * Ensure compliance with any associated procedures. * Provide information, as may be requested from time to time, to assist with the preparation of the Modern Slavery Statement. * Attend training, briefing and awareness sessions in relation to modern slavery, as may be required from time to time. | |