Modern Slavery Prevention Policy

1.   Purpose

This Policy sets out the principles UNSW College commits to implement with regard to managing its operations and supply chains to minimise the risks of modern slavery. As a controlled entity of the University, UNSW College adopts the University's Modern Slavery Prevention Policy through the publication of this document.

2.   Scope

This Policy applies to all staff and affiliates of UNSW College. To the extent of any inconsistency, the University's Modern Slavery Prevention Policy prevails.

3.   Policy Statement

UNSW College is committed to ensuring:

(a)   its operations and supply chains do not cause, involve or contribute to modern slavery; and

(b)   its suppliers, relevant stakeholders and others with whom we do business respect and share our commitment to minimising the risk of modern slavery.

3.1   Working collaboratively with suppliers and other organisations, UNSW College seeks to identify and implement measures which will contribute to the prevention, mitigation and remediation of the risks of modern slavery in its supply chains and operations, even where UNSW College has not contributed to these risks.

In giving effect to its obligations under the Modern Slavery Act 2018 (Cth), and to its principles and values, UNSW College is committed to ensuring that its practices, and those of its partners and suppliers, uphold the highest standards of human rights and dignity through:

(a)   ensuring that its overall policies and procedures effectively address the risk of modern slavery (particularly in areas such as procurement, student wellbeing and the handling of complaints),

(b)   undertaking risk assessments and due diligence, in accordance with paragraph 3.6 below, to identify suppliers and others with whom we do business who are committed to minimising the risk of modern slavery in their own supply chains and operations,

(c)   working with suppliers and relevant stakeholders to agree on measures (such as reporting, audits and grievance processes) which will mitigate modern slavery risks,

(d)   implementing measures designed to remediate identified modern slavery risks (including working with suppliers and relevant stakeholders to agree on corrective action plans); and

(e)   evaluating the effectiveness of these measures to drive continual process improvement.

UNSW College may undertake due diligence on its suppliers or any third parties that the College engages with to assess any level of risk of modern slavery with regards to:

(a)   the sector in which the third party operates (noting that certain sectors are recognised as having a higher risk of modern slavery);

(b)   the country or countries in which goods are manufactured and from which services are provided (noting that certain countries are recognised as having a higher risk of modern slavery);

(c)   the measures taken by the third party in relation to modern slavery risks in its own operations and supply chains; and

(d)   the complexity and transparency of supply chain(s), including the extent of sub-contracting relationships.

3.2   UNSW College will promote awareness of modern slavery through training and the availability of materials to build understanding and provide practical tools to enable staff and affiliates to identify modern slavery risks so that we can respond appropriately to those risks.

3.3   UNSW College encourages its staff, affiliates and others to raise concerns about modern slavery through its established complaint processes, including the, Fraud and Corruption Prevention Policy (Staff) Student Grievances and Complaints Procedure (Students), Student wellbeing and Support Framework (Student) and, Procurement Policy and Procedure (Staff).

4.   Review

This policy is due for review 3 years from its date of implementation or in case of legislative or regulatory changes.

5.   Roles and responsibilities

Role	Responsibility
Approver	The Chief Executive Officer is responsible for the approval of this policy.
Executive Team	UNSW College's Executive Team is responsible for overseeing the steps taken by USNW College, consistent

	with this Policy, to identify and address the risks of modern slavery with its operations and supply chains.
Responsible Officer	The Chief Operating Officer is responsible for the implementation, dissemination and review of this policy including: (i) supporting University Compliance Owners to develop protocols, processes and procedures to support compliance with this Policy; and (ii) supporting the preparation of the University's Modern Slavery Statement annually with the assistance of University Compliance Owners.
Contact Officer	The Risk Officer is responsible for the day-to-day implementation of this Policy and is the first point of contact for all enquiries that relate to this Policy.
Managers and supervisors	UNSW College managers and supervisors are responsible for ensuring that all staff within their operational area comply with this Policy and any applicable protocols, processes and procedures prescribed by the relevant University Compliance Owner/s under this Policy.
Individual staff	Individual staff responsible for ensuring that they comply with this Policy and with any applicable protocols, processes and procedures prescribed pursuant to this Policy.

6. Definitions

Definitions and Acronyms	
Academic progression	The process by which a student advances in their program of study, through progressively meeting the academic and administrative requirements for the program.
Academic Standing	The status of a student's progress towards meeting the requirements for their program.

Related Policy Documents and Supporting Documents	
Legislation	Modern Slavery Act 2018 (Cth) Guidance for Reporting Entities - Commonwealth Modern Slavery Act 2018
Policy	UNSW Modern Slavery Prevention Policy Student Appeals Policy Student Grievances and Complaints Policy Equity, Diversity and Inclusion Policy Guidance for Reporting Entities - Commonwealth Modern Slavery Act 2018 Fraud and Corruption Prevention Policy Procurement Policy Staff Code of Conduct Policy
Procedures	UNSW Complaints Management and Investigations Policy and Procedure Procurement Procedure
Others	UN Guiding Principles on Business and Human Rights

7. Policy Governance

Modern Slavery Prevention Policy	
Category/Business Group	Legal & Compliance
Published Externally (Yes/No)	Yes
Approver	Chief Executive Officer
Responsible Officer	Head of Legal, Risk and Compliance
Contact Officer	Risk Officer
Effective Date	12 November 2025
Next Review Date	12 November 2025
Version	1.0

Revision History

Version	Approved by	Approval date	Effective date	Sections modified
1.0	Chief Executive Officer (CEO) Sarah Lighfoot	12 November 2025	12 November 2025	This is a new policy.

Please visit our website to ensure that you have the latest version of this policy. Policies are available at: https://unswcollege.sharepoint.com/SitePages/Policy-&-Procedure-Register.aspx