



# GEELONG GRAMMAR SCHOOL

## Modern Slavery Policy

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### 1. Purpose

- 1.1 The purpose of this Policy is to:
  - 1.1.1 Limit, detect and respond with mitigating controls to the risk of modern slavery occurring within the School, its supply chain or in any other commercial relationship;
  - 1.1.2 Demonstrate the School's commitment to engaging only with Third Party's who fully comply with their obligations under the *Modern Slavery Act 2018* (Cth) (**the Act**); and
  - 1.1.3 Enable compliance with the Act (as amended from time to time).
- 1.2 Where the requirements of this Policy differs from the Act or other applicable laws, the School will follow the higher standard, and where there is conflict between the Policy and applicable laws, the School will comply with the law and continue to uphold and respect human rights to the furthest extent possible.

### 2. Scope

- 2.1 This Policy applies to all School Employees, Third Party Contractors, and volunteers.
- 2.2 The principles of this Policy will be complied with or incorporated into the associated Policies and procedures of the School.

### 3. School Commitments

- 3.1 The School commits to respect and uphold the principles of human rights in accordance with the Act in all aspects of its operations and supply chain.
- 3.2 The School commits to progression and the adherence to the highest ethical business standards. The School acknowledges Modern Slavery can have a detrimental impact and consequently, the School commits to recognise and respond to the risk of Modern Slavery in all aspects of its operations and supply chains.
- 3.3 In accordance with the Act the School commits to the eradication of Modern Slavery through the operation and application of this Policy and the School's risk management of supplier so as to ensure the School does not engage in Modern Slavery in its operations or through its Supply Chains.
- 3.4 The School acknowledges that the risk of Modern Slavery must be addressed as part of its broader risk management strategy.

### 4. Commitment by School Employees

This Policy requires a shared commitment by all School Employees in addressing Modern Slavery risks, and the conduct of School Employees must align with the School's overall commitment to addressing Modern Slavery. This includes:

- 4.1 Avoiding any activity that might lead to, or suggest, a breach of this Policy or any other relevant Policy;
- 4.2 Exercising their best professional and ethical judgement when dealing with a suspected Modern Slavery situation;
- 4.3 Treating concerns or issues raised about Modern Slavery with respect, impartiality, courtesy, and sensitivity;
- 4.4 When required, investigating and responding to allegations of Modern Slavery fairly and reasonably, with due regard to procedural fairness and the rules of natural justice; and
- 4.5 Reporting and appropriately escalating any issues of concern around a risk of Modern Slavery to their Line Manager at the earliest possible opportunity.

### 5. School Responsibilities

The School will take proactive steps to reduce the risk of Modern Slavery within its Supply Chains and operations. As part of its commitment to the eradication of Modern Slavery, the School will:

- 5.1 Implement and action policies and procedures, which address Modern Slavery risks and compliance;
- 5.2 Educate, train and inform School Employees in Modern Slavery responsibilities and requirements;
- 5.3 Conduct due diligence checks on local Supply Chains;
- 5.4 Promptly address any potential Modern Slavery risks identified;
- 5.5 Encourage and support all Third Party Contractors to meet and exceed the School's minimum standards, as provided for in Clause 6 of this Policy.
- 5.6 Monitor Third Party Contractors for compliance with the School's minimum standards.
- 5.7 Monitor and review the effectiveness of this Policy and any procedures, considering the effectiveness and suitability in combating Modern Slavery.
- 5.8 Where reasonably possible and practical to do so, the School will require that for Third Party Contractors who provide good and services to the School in a value which meets or exceeds the Determined Threshold for the year, the School will require these Third Party Contractors to:
  - 5.8.1 Comply with the Act (to the extent they are required to do so) and the School's Minimum Standards as identified at clause 6 of this Policy;



- 5.8.2 Complete the School's Supplier Modern Slavery Questionnaire when requested to do so, including providing documents in support of answers furnished where necessary; and
- 5.8.3 Provide the School with a right to terminate if the Third Party Contractor is unable or unwilling to work towards full compliance with the School's Minimum Standards for Third Party Contractors as identified in clause 5 of this Policy.

## **6. Minimum Standards for Third Party Contractors**

To support the School's commitment to reduce the risk of Modern Slavery, the School requires all Third Party Contractors at a minimum to meet the following requirements, and provide the School with confirmation of same in writing (when sought):

- 6.1 Identify the risks of Modern Slavery practices in their operations and Supply Chains;
- 6.2 Take actions to assess and address the risks identified, including due diligence and remediation processes;
- 6.3 Allow employees or contract workers to resign their employment freely and lawfully without restriction or penalty;
- 6.4 Provide employees and contract workers with a pay slip that clearly shows how wages have been calculated and any details of deductions;
- 6.5 Comply with legislation and any applicable industrial awards when paying employees, including overtime compensation and legally mandated benefits;
- 6.6 Ensure all employees and contract workers have the right to work in Australia;
- 6.7 Not restrict the movement of employees or contract workers at any time by withholding original identification and personal documents such as visas, passports etc;
- 6.8 Provide all employees and contract workers with a contract of employment/contractor agreement that outlines pay rates and other entitlements;
- 6.9 Not use any type of forced labour, bonded labour or indentured labour; and
- 6.10 Ensure they comply with the minimum legal working age as required law and verify the age of all employees to ensure compliance.

## **7. Compliance**

- 7.1 The detection, prevention and reporting of Modern Slavery is the responsibility for all working with the School. Any activity that may lead to, or suggest a breach of this Policy, should be avoided.
- 7.2 If an actual or suspected breach of this Policy has occurred, School Employees should notify their Line Manager (or suitable point of contact) as soon as possible.
- 7.3 The School will engage directly with its Third Party Contractors regarding this Policy (where appropriate). Third Party Contractors are encouraged to proactively engage with the School regarding any actual or suspected breach of this Policy within their business. The School encourages open and transparent communication between all parties and will support any person who raises genuine concerns regarding a breach of this Policy, even if they are found to be erroneous or inaccurate.

## **8. Modern Slavery Statement – Monitoring and Reporting**

- 8.1 The School expects continuous and constant monitoring of the School's effectiveness in mitigating Modern Slavery from all School Employees. This monitoring includes reporting (where necessary) and monitoring to enable both School Employees and Third Party Suppliers to meet the School's Modern Slavery Standard.
- 8.2 To enable the School's operations and supply chains to be free of Modern Slavery, the School will produce an annual Modern Slavery Statement describing the actions the School has taken to address Modern Slavery risks, and what further actions the School commits to complete within the next annual reporting period. The Modern Slavery Statement will be reviewed and approved by the School Council and signed by the Chair of School Council and Principal of the School.
- 8.3 The School's Annual Modern Slavery Statement will be uploaded to the Modern Slavery Statements Register at <https://modernslaveryregister.gov.au/>

## **9. Related School Policies and Procedures**

- 9.1 Code of Conduct Policy (School Employees);
- 9.2 Whistleblower Protection Policy;
- 9.3 Procurement Policy;
- 9.4 Supplier Pre-Registration; and
- 9.5 GGS Statement of Commitment and Intent.

## **10. Policy Variations**

- 10.1 The School reserves the right to amend, replace or terminate this Policy from time to time.

## **11. Definitions**

<b>Act</b>	means the Modern Slavery Act 2018 (Cth) and all associated regulations (as amended from time to time)
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<b>Boarding Premises</b>	means the School's registered boarding Houses at the Corio Campus and Units at the Timbertop Campus
<b>Determined Threshold</b>	means the sum determined and advised by the School from time to time being the cumulative value of goods and services provided to the School by a Third Party Contractor across a calendar year
<b>Modern Slavery</b>	<p>Modern Slavery, in its simplest terms, refers to the exploitation of a person for the gain of another person/group and occurs at the most extreme end of the working spectrum, involving the gravest abuses of human rights and serious crimes, having severe and often lifelong consequences for its victims. It rarely exists in isolation as it is often a precursor to or goes hand-in-hand with other criminal activity. The Act defines Modern Slavery as including eight types of serious exploitation:</p> <ul style="list-style-type: none"> <li>• Trafficking in persons;</li> <li>• Slavery;</li> <li>• Servitude;</li> <li>• Forced marriage;</li> <li>• Forced labour;</li> <li>• Debt bondage;</li> <li>• Deceptive recruiting for labour or services; and</li> <li>• The worst forms of child labour which means situations where children are subjected to slavery or similar practices or engaged in hazardous work.</li> </ul>
<b>the School</b>	means Geelong Grammar School, including its registered Boarding Premises
<b>School Employee</b>	means, for the purposes of this Policy means an employee of the School (and includes all permanent, fixed term, casual and sessional employees and contractors)
<b>Supply Chains</b>	means the products and services (including labour) that contribute to the School's products and services. This includes products and services sourced in Australia or where applicable overseas and extends beyond direct third party contractors
<b>Third Party Contractors</b>	means any organisation or individual who provides the School with goods or services, including their subcontractors, agents, related entities and consultants.

## 12. Review and circulation

<b>Responsible Department:</b>	<input checked="" type="checkbox"/> Finance
<b>Version:</b>	1
<b>Approved by:</b>	<input type="checkbox"/> Executive Team
<b>Effective Date:</b>	1 May 2025
<b>Review Date:</b>	11 May 2027
<b>Applicable Location:</b>	<input checked="" type="checkbox"/> School wide
<b>Applicable Audience:</b>	<input checked="" type="checkbox"/> School Community
<b>Publication:</b>	<input checked="" type="checkbox"/> GGS Intranet <input checked="" type="checkbox"/> Hive