

POLICY REGISTER

MODERN DAY SLAVERY POLICY

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Issue	Prepared/Revised By and Date	Action/Amendment Description	Approved By and Date
1.0	Joe Joseph	First Edition	Council Minute No. 235.7. 25 (24th July 2025)

1. Purpose

This Policy affirms Warren Shire Council's commitment to preventing, identifying and addressing modern slavery in all areas of our operations and supply chains. Modern slavery undermines human dignity and breaches fundamental human rights and Council recognises its responsibility to act ethically and transparently in all procurement, partnerships and employment practices.

2. Scope

This Policy applies to all Council employees, Councillors, contractors, consultants, labour hire staff, volunteers, and suppliers involved in delivering services or providing goods to or on behalf of Warren Shire Council.

3. Policy Statement

Warren Shire Council does not tolerate any form of modern slavery, including but not limited to forced labour, human trafficking, servitude, debt bondage, and child labour. We are committed to:

- Embedding modern slavery risk considerations into Council's procurement and contract management frameworks.
- Taking reasonable steps, proportionate to Council's risk level and resources, to identify and address potential modern slavery practices in our operations and supply chains.
- Building internal and external capability through education, collaboration, and continuous improvement.

4. Definitions

Modern slavery is defined as per the Modern Slavery Act 2018 (NSW) and includes serious exploitation such as trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

5. Principles

Council's approach to modern slavery is underpinned by the following principles:

- **Prevention:** Incorporating ethical sourcing and human rights due diligence into all procurement activities.
- **Accountability:** Establishing clear responsibilities and reporting mechanisms.
- **Transparency:** Disclosing risks, actions taken and challenges encountered through annual reporting and community engagement.
- **Continuous Improvement:** Enhancing our systems, policies and practices over time based on emerging best practice and lessons learned.

6. Responsibilities

- Senior Management Team: Provides oversight and ensures adequate resourcing and strategic direction.
- Procurement Team: Leads implementation of due diligence processes in accordance with the Modern Slavery Risk Management Plan.
- Contract Managers: Monitor supplier compliance and manage modern slavery risk controls through the contract lifecycle.
- All Staff: Are responsible for understanding and applying this Policy in their day-to-day roles.
- Suppliers and Contractors: Must comply with all relevant laws and Council's Statement of Business Ethics and may be required to complete questionnaires, supply supporting documentation, and implement corrective actions if risks are identified.

7. Implementation

This Policy will be implemented through the Modern Slavery Risk Management Plan (2025), which includes:

- Annual risk assessments and reporting using the Inherent Risk Identification Tool (IRIT).
- Categorised due diligence obligations (Heightened, Light, Minimal).
- Corrective action plans for suppliers as required.
- Supplier engagement and modern slavery awareness activities.

8. Reporting and Remediation

Suspected or confirmed cases of modern slavery must be reported immediately to Council's Governance or Procurement teams. Council will:

- Prioritise the safety and wellbeing of affected individuals.
- Escalate matters to appropriate authorities where required.
- Support suppliers in developing and implementing corrective actions.
- Suspend or terminate contracts where suppliers fail to remediate unacceptable risks or practices.

9. Review

This Policy will be reviewed every two years or earlier if there are changes to legislation, Council operations, or identified risks.