



Policy PL83 - Modern Slavery Policy

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Review Date:	2023	Policy Owner:	Head, Research Governance, Risk and Compliance
Status:	Approved	Approval Authority:	Director
Key Words:		Department:	Governance, Risk & Compliance

Key Points

NA

1. Purpose

WEHI is committed to eliminating Modern Slavery from its supply chains and operations. This policy outlines the framework that WEHI will apply to the management of Modern Slavery in WEHI's supply chains and operations.

2. Scope

This policy applies to all board members, executives, staff, students, contractors, consultants, volunteers, visitors, and tenants of WEHI (collectively, Personnel).

This policy applies to instances of actual or suspected Modern Slavery involving WEHI or any external organisation with which WEHI engages, such as collaborators and suppliers.

3. Definitions

Term	Definition
Modern Slavery	See section 4.2
Modern Slavery Act	Modern Slavery Act 2018 (Cth)
Supply chains	The networks between an organisation and its suppliers to produce and distribute a specific product or service.
Operations	The activities that an organisation engages in on a daily basis to run the organisation and increase its value.

4. Policy

4.1 Overview

This policy provides the framework for managing the risk of Modern Slavery at WEHI. It documents the processes that WEHI will use to promptly identify, assess, and respond to actual or suspected instances of modern slavery and defines the roles and responsibilities.

4.2 What is Modern Slavery?

The term "Modern Slavery" describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern Slavery is only used to describe serious exploitation. It does not include practices like

substandard working conditions or underpayment of workers (although these practices are also illegal and harmful).

The Modern Slavery Act defines Modern Slavery as eight types of serious exploitation:

1. trafficking in persons
2. slavery
3. servitude
4. forced marriage
5. forced labour
6. debt bondage
7. deceptive recruiting for labour or services
8. the worst forms of child labour such as situations where children are subjected to slavery or similar practices or engaged in hazardous work.

Relationship with human rights

Freedom from slavery is a fundamental human right. Under the UN <Guiding Principles on Business and Human Rights>, entities have a responsibility to respect human rights in their operations and supply chains. This responsibility includes taking action to prevent, mitigate and, where appropriate, remedy Modern Slavery in an entity’s operations and supply chains.

4.3 Roles and responsibilities

All Personnel	All Personnel must report any actual or suspected instances of Modern Slavery that they become aware of in their role at WEHI (see section 4.4).
Head Governance, Risk and Compliance	Responsible for: <ul style="list-style-type: none"> • oversight of processes • investigating actual or potential cases of Modern Slavery in our supply changes and operations • reporting
Procurement Manager	Responsible for putting in place systems to identify and manage the risk of Modern Slavery with WEHI suppliers
Corporate Council	Responsible for preparing the annual Modern Slavery Statement in conjunction with the Procurement Manager.

4.4 Reporting Modern Slavery

Personnel that have concerns about actual or potential cases of Modern Slavery in WEHI’s supply changes or operations must report it; this can be done in two ways:

- directly
- whistleblower protected and anonymous reporting

Directly

Directly to the Head Governance, Risk and Compliance or through your direct supervisor who must report the matter to the Head of Governance, Risk and Compliance.

Whistleblower protected and anonymous reporting

WEHI’s [Whistleblower Policy](#) outlines the process for making whistleblower protected and anonymous reporting.

4.5 Investigating Modern Slavery

WEHI’s Head of Research Governance, Risk and Compliance will (with support from the Procurement Manager where appropriate) investigate all reported instances of Modern Slavery to determine whether WEHI’s supply chains or operations could cause, contribute to, or be directly linked to Modern Slavery. This may include:

- interviewing WEHI Personnel and any organisation linked to the reported instance;
- requesting documentation from WEHI Personnel and any organisation linked to the reported instance; and
- seeking external legal advice to assist with the investigation.

Personnel asked to provide information or documents connected with a Modern Slavery investigation, must do so truthfully and promptly.

Reporting

The Director, Executive, Risk Management Committee and Audit and Risk Committee must be kept informed of any modern slavery reports and the outcome of investigations.

Remediation

Where it is more likely than not that an instance of Modern Slavery has occurred, WEHI must take steps to ensure that Modern Slavery risks are appropriately remediated to prevent or mitigate their harm and recurrence.

These should include appropriate remediation steps for the victims, such as:

- ensuring the harm cannot recur;
- formal apologies;
- compensation; and
- stopping certain activities.

Remediation steps must be considered by the Board, with support from the Head of Research Governance, Risk and Compliance and the Audit and Risk Committee. Any remediation steps to be taken in particular circumstances must be approved by the Board. Less significant remediation steps (such as educative and clarification remediation steps) may be actioned by Procurement promptly in consultation with Head, Governance Risk and Compliance for noting only by the Audit and Risk Committee and Board.

Any substantiated instances of Modern Slavery and the associated remediation steps should be included in WEHI's annual Modern Slavery Statement.

4.6 Compliance

The Modern Slavery Act established a national Modern Slavery reporting requirement for organisations with an annual consolidated revenue of at least AUD\$100 million. Organisations must prepare annual Modern Slavery Statements which set out the entity's actions to assess and address modern slavery risks in their global operations and supply chains. These are published by the Australian Government on an <online register>.

The Corporate Counsel is responsible for preparing WEHI's Modern Slavery Statements in conjunction with the Procurement Manager. Each Modern Slavery Statement must be approved by the Board, signed by the Board Chairperson and uploaded to the online register by 30 June each year.

5. Review and Consultation

Action	Name and role
Drafted by	Alicia Campos, Corporate Council
Principle review	Joh Kirby, Head Governance, Risk and Compliance
Consultation	Director Chief Operating Officer Chief Financial Officer Financial Controller Procurement Manager Professional Services Leadership Team

6. Supporting Information

6.1. References

Modern Slavery Act 2018 (Cth)

Commonwealth Modern Slavery Act – [Guidance for reporting entities](#)

6.2. Related Policies

Legal Advice Policy

[Procurement Policy](#)

[Whistleblower Policy](#)

Review Cycle

Initial Review	1 Years
Ongoing Review	1 Years
Next Review	2023

Version History

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