

# Modern Slavery Policy

## Purpose

The purpose of this policy is to:

- outline the City of Sydney’s commitment to:
  - identifying, managing and minimising the risk of modern slavery in its operations and supply chains; and
  - taking steps to ensure that City of Sydney Suppliers and others it does business with are adequately managing modern slavery risks;
- ensure the City of Sydney is compliant with its obligations under the Modern Slavery Act; and
- ensure that City of Sydney of Sydney Employees are aware of the City of Sydney’s requirements in relation to Modern Slavery.

## Scope

This Policy applies to all persons and entities working for and with the City of Sydney or on its behalf in any capacity.

## Definitions

Term	Meaning
Employees	All City of Sydney employees including permanent (whether full-time or part-time), temporary, agency contractors (labour hire), casual employees and apprentices.
Modern Slavery	As defined by the <i>Modern Slavery Act</i> , including the following types of exploitation: <ul style="list-style-type: none"> <li>• Trafficking in people – the recruitment, harbouring and movement of persons for the purposes of exploitation through modern slavery. This includes sexual exploitation, forced labour or services and slavery and practices similar to slavery.</li> <li>• Slavery – when a person exercises power of ownership over another.</li> <li>• Servitude – a situation where an individual’s freedom is significantly restricted, for example they are not free to stop working or to leave their place of work.</li> <li>• Forced labour –where violence or other methods (for example accumulation or debt, retention of identity papers) are used to coerce victims to work.</li> <li>• Forced marriage – where an individual is forced or deceived into marrying.</li> </ul>

Term	Meaning
	<ul style="list-style-type: none"> <li>• Debt bondage – where a victim’s services are pledged as security for a debt and the debt is excessive, the length and nature of services are not defined or the value of the services is not applied against the debt.</li> <li>• Deceptive recruiting for labour or services – where a victim is deceived about the conditions in which they will be working.</li> <li>• The worst forms of child labour - situations where children are subjected to slavery or similar practices, or engaged in hazardous work which could harm their health and safety.</li> </ul>
Modern Slavery Act	The <i>Modern Slavery Act 2018</i> (NSW).
Modern Slavery Laws	All applicable modern slavery laws, statutes, regulations and codes from time to time in force which prohibit exploitation of workers, human trafficking, slavery, servitude, forced labour, debt bondage or deceptive recruiting for labour or services, or similar (Modern Slavery Laws), including but not limited to the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2018 (NSW), which came into effect in 2022.
Suppliers	Any entity supplying goods and/or services to the City of Sydney.

**Policy Statement**

Modern Slavery is a human rights violation and a serious crime. The City of Sydney is committed to respecting and protecting human rights and identifying, managing and minimising Modern Slavery risks within its supply chains.

The City of Sydney will strive for collaborative action and continuous improvement in its approach to Modern Slavery and will continue to work with key stakeholders and Suppliers to review and improve its practices and procedures in this area on a regular basis.

**Supply Chain**

The City of Sydney will engage with its Suppliers to identify, manage and minimise risks and instances of modern slavery in their supply chains and business operations.

Specifically, the City of Sydney will:

1. identify modern slavery risks in its supply chain, including the extent of those risks and take action to manage or minimise them;
2. engage with Suppliers to understand their commitment to minimising the risk of modern slavery in their own supply chains and operations;
3. include modern slavery considerations in its procurement processes as guided by legislation and best practice;
4. ensure the City of Sydney’s standard contracts contain clauses requiring Suppliers to take reasonable steps to identify, assess and address Modern Slavery risks within their operations and supply chains and comply with Modern Slavery Laws;

5. where Modern Slavery risks are identified that are outside of the City of Sydney's direct control, engage with key stakeholders to leverage its influence and encourage positive and permanent change; and
6. implement an internal reporting process to enable City of Sydney Employees to raise concerns about any potential or suspected instances of Modern Slavery in the City of Sydney's supply chain.
7. ensure Modern Slavery reporting obligations are met.

### **Training and capacity building**

The City of Sydney will ensure that relevant Employees have the knowledge, tools and capacity to comply with the City of Sydney's obligations to reduce risks of Modern Slavery.

### **Reporting**

The City of Sydney will comply with its reporting obligations under the *Local Government Act 1993* (NSW) as updated from time to time.

### **Responsibilities**

#### **Chief Executive Officer**

- Ensuring that the City of Sydney has effective controls in place to manage and minimise the risk of Modern Slavery.

#### **Procurement Unit**

- Integrating procedures to assess Modern Slavery risks into the City of Sydney's procurement framework and activities, including conducting assessments when engaging suppliers in high-risk industries.
- Preparing and submitting annual reporting on Modern Slavery.

#### **Risk and Governance Unit**

- To implement and manage an internal reporting process for City of Sydney Employees to report suspected Modern Slavery.

#### **Internal Audit**

- Reviewing and evaluating the effectiveness of controls in place to manage Modern Slavery risks.

#### **Legal Services**

- Ensuring that the City of Sydney's standard contracts contain requirements to manage and address Modern Slavery risk.
- Negotiating amendments to non-standard contracts to manage Modern Slavery risk where relevant.

**Learning and Development**

- Deliver Employee awareness and specialised training for relevant Employees on modern slavery risks and requirements under this policy and Modern Slavery Laws.

**Contract Managers**

- Engaging with Suppliers to understand how they manage modern slavery risk.
- Conducting modern slavery risk assessments for contracts they manage.

**All Staff**

- Complying with this policy and the City of Sydney’s requirements with respect to Modern Slavery as updated from time to time.

**Consultation**

This Policy has been reviewed in consultation with M3 Managers, Risk & Governance, Legal Services and Procurement.

**References**

Laws and Standards
• <i>Local Government Act 1993 (NSW)</i>
• <i>Modern Slavery Act 2018 (NSW)</i>
• <i>Modern Slavery Act 2018 (Cth)</i>
Policies and Procedures
• Procurement and Contract Management Policy
• Supplier Code of Conduct
• City of Sydney Employee Code of Conduct
• Public Interest Disclosure Policy

**Review period**

This policy will be reviewed every four years.

**Approval Status**

The Chief Executive Officer approved this policy on 20 November 2023.



**Monica Barone, Chief Executive Officer**

### Approval History

Stage	Date	Comment	TRIM Reference
Original Policy	20 November 2023	Approved by CEO	2023/667346
Commence Review Date	20 February 2027		
Approval Due Date	20 November 2027		

### Ownership and approval

Responsibility	Role
Author	Chief Procurement Officer
Owner	Chief Procurement Officer
Endorser	City of Sydney of Sydney Executive
Approver	Chief Executive Officer