

Nepean Community College Modern Slavery Policy

RTO ID: 1223

1. Purpose

Nepean Community College (NCC) is committed to the protection of human rights and the elimination of modern slavery in all its forms. This policy outlines NCC's approach to identifying, preventing, mitigating, and responding to modern slavery risks across our operations, workforce, student programs, partnerships, and supply chains.

This policy supports NCC's obligations under:

- Modern Slavery Act 2018 (Cth)
- Modern Slavery Act 2018 (NSW)
- Fair Work Act 2009 (Cth)
- Work Health and Safety Act 2011 (NSW)
- NCC's Code of Conduct, Procurement Policy, and Complaints & Serious Wrongdoing frameworks.

2. Scope

This policy applies to all individuals engaged with NCC, including:

- employees (permanent, temporary, casual)
- trainers and assessors
- volunteers
- contractors, consultants, and service providers
- students (including minors, international students, and vulnerable cohorts)
- work-placement hosts, community partners, and third-party providers
- members of the College Council and governance bodies

3. Definitions

Modern Slavery includes conduct defined in the Modern Slavery Act 2018 (Cth), such as:

- slavery and slavery-like practices
- servitude
- forced labour
- forced marriage
- trafficking in persons
- debt bondage
- deceptive recruiting for labour or services
- the worst forms of child labour

Modern Slavery Risk refers to the potential for NCC's operations, programs, or supply chains to cause, contribute to, or be directly linked to modern slavery.

Supplier includes any external organisation providing goods or services to NCC.

4. Policy Statement

NCC:

- rejects all forms of modern slavery
- upholds the dignity, safety, and rights of all people
- recognises the vulnerability of some cohorts, including refugees, migrants, women, young people, and individuals with limited English literacy
- commits to transparent, ethical, and socially responsible operations
- integrates modern slavery risk management into procurement, partnerships, and student programs
- ensures staff and students know how to identify and report concerns

5. Principles

NCC's approach is guided by the following principles:

5.1 Human Rights Protection

All individuals have the right to live and work free from exploitation, coercion, and abuse.

5.2 Transparency

NCC maintains clear, ethical processes for procurement, contracting, and partnership engagement.

5.3 Prevention and Early Identification

NCC actively monitors risks in:

- supply chains
- student work placements
- homestay or host arrangements
- community partnerships
- recruitment and onboarding
- international student contexts

5.4 Support and Remediation

Where modern slavery is suspected or identified, NCC will:

- act immediately to protect the individual
- report to relevant authorities
- provide support, referral, and safety planning
- review and strengthen internal controls

6. Responsibilities

6.1 All Staff and Volunteers

- complete required training
- report concerns or suspected modern slavery

- follow NCC procurement and due-diligence processes
- uphold NCC's Code of Conduct

6.2 Students

- report concerns relating to themselves or others
- participate in awareness activities where relevant
- comply with NCC behavioural expectations

6.3 Executive Management

- ensure compliance with legislation
- allocate resources for risk management and training
- oversee procurement and supplier due diligence
- ensure reporting pathways are safe and accessible

6.4 Procurement and Contracting Staff

- assess suppliers for modern slavery risks
- maintain documentation and risk assessments
- ensure contracts include ethical-conduct clauses
- escalate concerns to Executive Management

6.5 Third-Party Providers and Partners

- must comply with NCC's Modern Slavery Policy
- must not engage in practices that cause or contribute to modern slavery
- must cooperate with NCC's due-diligence processes

7. Risk Management and Due Diligence

NCC will assess modern slavery risks by considering:

- country of origin of goods and services
- industry sector (e.g., cleaning, textiles, technology, construction)
- labour practices and subcontracting
- vulnerability of workers
- complexity of supply chains

Due-diligence activities may include:

- supplier questionnaires
- contract clauses requiring ethical labour practices
- review of public reporting (e.g., Modern Slavery Statements)
- termination of contracts where risks cannot be mitigated

8. Reporting Concerns

Anyone may report suspected modern slavery involving NCC operations, students, staff, or suppliers.

8.1 Internal Reporting Channels

- NCC CEO
- RTO Compliance & Quality Assurance Manager
- NCC Admin Team
- NCC Complaints & Serious Wrongdoing process

8.2 External Reporting Channels

- NSW Police
- Australian Federal Police (AFP)
- National Human Trafficking and Slavery Helpline (1800 737 732)
- Fair Work Ombudsman

8.3 Protections for Reporters

NCC will ensure:

- confidentiality
- protection from victimisation
- trauma-informed handling of disclosures
- referral to support services where appropriate

9. Response and Remediation

Where modern slavery is suspected or confirmed, NCC will:

- prioritise the safety and wellbeing of affected individuals
- notify relevant authorities
- provide access to support services
- suspend or terminate relationships with implicated suppliers or partners
- review internal processes to prevent recurrence

10. Training and Awareness

NCC will provide:

- induction training for staff, trainers, and volunteers
- refresher training every two years
- targeted training for procurement and contracting staff
- awareness information for students, especially vulnerable cohorts

11. Related Documents

- NCC Code of Conduct
- NCC Procurement Policy
- NCC Complaints & Serious Wrongdoing Procedure
- NCC Child Safe Policy

- NCC Work Health and Safety Policy
- NCC Student Handbook
- Modern Slavery Act 2018 (Cth)
- Modern Slavery Act 2018 (NSW)

12. Review

This policy will be reviewed every **two years** at the beginning of Term 1, or earlier if:

- legislative changes occur
- significant risks are identified
- NCC undergoes major operational changes

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