



Modern Slavery Policy

Effective Date: 2024.09.27

Last Reviewed: 2026.02.19

Version: v1.1 2026.02.19

1. Purpose

This policy outlines Alphacrucis University College's (AC) dedication to:

- Proactively identifying, assessing, and mitigating the risks of modern slavery within its operations and supply chains.
- Making reasonable efforts to ensure all operations and supply chains are conducted responsibly and transparently.
- Upholding and safeguarding the human rights of all members of its community by fostering an ethical and dignified working environment.

2. Scope

This Policy applies to all Alphacrucis University College: Staff, students and affiliates.

3. Definitions

- Modern Slavery:** A range of serious forms of exploitation, including forced labour, child labour, debt bondage, human trafficking, slavery and servitude.
- Supply Chains:** The network of organisations, businesses, or individuals involved in the provision of goods, services or labour to AC, either directly or indirectly.
- Due Diligence:** A systematic approach to identifying, preventing, and mitigating modern slavery risks within operations and supply chains.
- Risk-Based Assessment:** A structured process to assess the likelihood and severity of modern slavery risks, considering factors such as sector, location, and workforce vulnerability.

4. Policy Statement

- AC stands firmly against all forms of modern slavery and is deeply committed to upholding and safeguarding the human rights of all members of its community. AC is committed to fostering an environment that promotes ethical practices and human dignity, both within the institution and in all external partnerships.
- To the best of AC's ability to ascertain, AC's operations will abide by the following principles:
 - Supply chains do not cause, involve, or contribute to modern slavery.
 - Contractors, suppliers, collaborators, and all other business partners respect and share AC's commitment to minimising modern slavery risks.
 - The effectiveness of measures to verify risks of modern slavery are evaluated on an annual basis through the Executive Committee to ensure ongoing improvement.

4.3. Modern Slavery Identification Training Guide

- To identify and mitigate modern slavery risks, AC adopts a Modern Slavery Identification Training Guide that all new and current staff are trained in on induction. Current staff are trained on an annual basis. Training is as follows:
- Provide information on key indicators of Modern Slavery:
 - Work Conditions: Long/unpaid hours, unsafe environments, no safety gear.
 - Employment Terms: No contracts, underpayment, forced accommodation.
 - Control & Coercion: Restricted movement, threats, no access to documents.
 - Recruitment Practices: High recruitment fees, misleading ads, visa misuse.
 - Psychological/Physical Signs: Fearful behaviour, poor health, isolation.



4.3.3. Provide information on high-risk areas:

- a. Sectors: Hospitality, agriculture, construction, fashion, domestic work.
- b. Supply Chains: Unverified suppliers, sudden cost drops, countries with elevated supply chain risks.

4.3.4. Provide information on guidance if Modern Slavery is suspected:

- a. Immediate Action:
 - i. Don't confront perpetrators.
 - ii. Document observations.
 - iii. Reported to Executive Committee.

4.4. External Engagement and Due Diligence

4.4.1. All individuals engaging on behalf of AC with external contractors, suppliers, collaborators, and others are required to:

- a. Use the above training to identify and minimise the risk of modern slavery in the supply chain.
- b. Where risks are identified, work with suppliers to mitigate risks or, where necessary, consider alternative procurement options.
- c. Report concerns to Executive Committee.

4.5. Awareness, Training & Reporting

4.5.1. AC will promote awareness of modern slavery by equipping all staff to help identify and address modern slavery risks as per the Modern Slavery Identification Training Guide provided on induction and annually.

4.5.2. Training and Education

- a. Mandatory Induction Training: Include modern slavery awareness as part of HR onboarding for new employees.
- b. Annual HR Training: Conduct annual training as part of annual HR training on the Modern Slavery Identification Training Guide.

4.5.3. Reporting and Feedback Mechanisms

- a. Reporting Channels: Reporting is available in accordance with the AC Whistleblower Policy.
- b. Executive Team Briefings: Ensure leadership is well-informed on modern slavery risks and compliance measures.

5. Procedures

5.1. Reporting & Whistleblowing Mechanism

5.1.1. Alphacrucis University College encourages staff, students, and affiliates to report any concerns regarding modern slavery risks. Reports can be made to the Executive Committee.

5.2. Monitoring & Compliance

5.2.1. AC will conduct annual reviews of its modern slavery risk procedure.

5.2.2. Compliance reports will be submitted to the Executive Team for evaluation and further action if required.

5.2.3. Staff and supplier training on modern slavery risk identification and mitigation will be implemented.

6. Responsible for Implementation

6.1. Chief Financial Officer

7. Related AC Policies or Documents, Standards and Legislation



7.1. AC Policies or Documents

This policy is to be read in conjunction with the following AC policies available at ac.edu.au/ppm/:

- 7.1.1. Code of Conduct Policy;
- 7.1.2. Staff Grievance Resolution Policy;
- 7.1.3. Risk Management Policy;
- 7.1.4. Fit and Proper Person Policy;
- 7.1.5. Diversity and Equity Policy;
- 7.1.6. Critical Incident Management Policy;
- 7.1.7. Whistleblower Policy.

7.2. Relevant Standards and Legislation

- 7.2.1. The Modern Slavery Act 2018.

8. Review and Revision

This policy will be reviewed by the Chief Financial Officer on a regular basis in accordance with the Policy Development and Review Policy. Any proposed changes will be tabled at the Executive Team for endorsement and Council for approval. Revisions will be communicated to all relevant stakeholders upon approval.

9. History of Approval and Amendments

Policy owner	Chief Financial Officer
Policy category	Management: HR
Policy status	Approved
Approval Body	Council
Endorsement Body	Executive Team
Approval Date	2024.09.25
Last Review Date	2024.09.25
History of Policy Amendments	
V1.1 2026.02.19	Change from VPO to CFO
V1.2 2026.08.07	New Template

Add a new row for each version of the policy. Do not remove previous changes.

Appendices

N/A