

How to Prepare a Modern Slavery Policy

May 2024

What is a Modern Slavery Policy?

A Modern Slavery Policy expresses a covered entity's commitment to address modern slavery, through a public statement of policy approved by its senior governing body.

The Policy should commit a covered entity to comply with its obligations under the *Modern Slavery Act 2018* (NSW) and related legislation to take reasonable steps to ensure that goods and services procured by and for the entity are not the product of modern slavery. Your Policy should align with the Anti-slavery Commissioner's [Guidance on Reasonable Steps](#) and should address the following 7 Reasonable Steps:



When should I have a Modern Slavery Policy in place?

Covered Entities should aim to have a Modern Slavery Policy approved and in place by **30 June 2024**.

What form/format should my Modern Slavery Policy be in?

Your Policy may be a standalone document, or it may be incorporated into other relevant organisational policies.

You may wish to draft it in alignment with the structure suggested below.

You may also wish to consider publishing your Modern Slavery Policy in a format that is accessible for both users (i.e., your entity's personnel) and affected stakeholders. For example, consider:

- does your Policy meet accessibility guidelines?
- is your Policy in plain English? Where appropriate, can it be made available in other languages to affected stakeholders?
- can your Policy be made available online?

Who is responsible for drafting and approving my Modern Slavery Policy?

Your Senior Governing Body should aim to develop and adopt a formal Modern Slavery Policy by 30 June 2024.

For larger entities with more complex modern slavery risks, effective management may require setting up a cross-functional modern slavery working group or committee to develop the policy and submit it to the Senior Governing Body for consideration.

What should you think about when drafting your Modern Slavery Policy?

Context	<p>Your Policy should be informed by your entity's purpose, values, and regulatory environment.</p> <p>Your Policy should be aligned and integrated with existing policies, processes, and resources (e.g. procurement, risk management, workplace health and safety, and human resources).</p>
Impacts	<p>Your Policy should consider the operational impacts of modern slavery for your entity (e.g. legal, financial, workplace health and safety, human resources, and strategic implications).</p>
Risks	<p>Your Policy should reflect on identified risks through your Salient Modern Slavery Risk Assessment, and drivers of these risks. Note that:</p> <p>Your Salient Modern Slavery Risk Assessment should be informed by effective engagement with stakeholders, including people with lived experience (PWLE), or at people at risk of modern slavery in your operations or supply-chains.</p> <p>Your Policy should not be a generic statement of exposure to modern slavery risk.</p> <p>Consider your entity's own business model, strategy and practices, and any proposed changes to these practices.</p> <p>Could these practices <i>cause, contribute to, or be directly linked to</i> modern slavery risks?</p> <ul style="list-style-type: none"> • are you paying enough attention to indicators of modern slavery amongst your consumers or beneficiaries? • do any aspects of your business rely on poorly regulated or supervised labour hire companies and recruiters? • are there short turnaround times on orders, or long payment times to suppliers? • do you evaluate whether tenderers are offering a living wage to employees as part of your tender process? • do you know whether your supply-chain workforce has the right to freedom of association? <p>Identify how your entity's policies and practices target the specific sources of modern slavery risk in your business model, strategy, and practices.</p>
Progress and Challenges	<p>Your Policy should explain how progress made and challenges identified so far in addressing modern slavery risks and impacts will be identified, documented, and reported.</p>
Expertise and Stakeholder Engagement	<p>Your Policy should include expertise on the best measures or approaches to identify and address modern slavery risk, e.g.:</p> <ul style="list-style-type: none"> • leading practice: the Anti-slavery Commissioner's GRS, the UN Guiding Principles on Business and Human Rights, relevant OECD guidance, etc. • consultation with experts, civil society, PWLE, rights holders and other relevant stakeholders.
Targets	<p>Your Policy should identify high-level targets for addressing salient modern slavery risks, including metrics for evaluating progress towards these targets.</p>
Accountability and Governance	<p>Accountability and effective governance of risks: who is responsible for ensuring that modern slavery risks are assessed, prevented, mitigated, remedied, and reported? What incentives do they have for good performance?</p>
Review	<p>Your Policy should be subject to periodic discussion and regular review, it should not be set and forget.</p>