



**POLICY TITLE: MODERN SLAVERY POLICY**

**DEVELOPED / REVIEWED BY**

Policy Committee  
Principal  
Director of Business Services  
Head of Human Resources  
Risk and Compliance Manager

**REVIEW SUMMARY**

The Siena College Modern Slavery Policy was first ratified by the Siena College Board in October 2024. It has been reviewed for alignment with Dominican Education Australia (DEA)'s 2025 Modern Slavery Policy.

**DOCUMENT DEVELOPMENT PROCESS**

This Policy was first developed in October 2024 based on the Melbourne Archdiocese Catholic Schools Modern Slavery Policy and the Modern Slavery Statement 2023 issued by DEA. It has been reviewed in February 2025 following the release of DEA's 2025 Modern Slavery Policy.

**RATIONALE**

Siena College recognises that people who are trapped in modern slavery are often manipulated in schemes that do not allow them to escape, ask for help or gain an understanding that they are victims of exploitative activity.

This policy aims to mitigate the risk of modern slavery within College operations and supply chains. It provides a framework to ensure compliance with the reporting requirements of the *Modern Slavery Act 2018 (Cth)* and adheres to the mandate from DEA to entities within the DEA group to implement appropriate procedures to prevent and address modern slavery risks and implement a program of work to demonstrate compliance with the *Modern Slavery Act 2018 (Cth)* and any other applicable modern slavery laws and regulations.

**DEFINITIONS**

<b>DEA group</b>	Dominican Education Australia, a public juridic person (PJP) incorporated under the Corporations Act 2001 and each of its separately incorporated Ministries. Siena College is one such separately incorporated Ministry within DEA group.
<b>Modern slavery</b>	Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Practices that constitute modern slavery include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and child labour.

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## GUIDING PRINCIPLES

Catholic social teaching calls for the dignity of work, the rights of workers and advancing the common good. These core principles underpin this Policy.

- Slavery has been identified as a major issue for Australian businesses within Australia and in extended supply chains.
- Siena College will not knowingly use or contribute to modern slavery practices in any form.
- Siena College will actively work to identify and eliminate modern slavery practices from our operations, business partnerships and supply chain.
- Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or financial) of workers in Siena College or supply chains is unacceptable.
- Siena College shall comply with relevant laws and regulations regarding recruitment, remuneration, working conditions and freedom of association of its staff.
- Siena College's final purchasing decisions shall not be based on price alone. Ethical business processes are an essential part of our value for money and 'fit for purpose' considerations.
- Siena College will support its suppliers and business partners to assess and address modern slavery risks and take action to improve transparency, traceability and accountability for modern slavery practices and impacts in our collective supply chains

## PROCEDURES

### Prevention and management of modern slavery risk

Siena College's modern slavery risk management program is underpinned by ethical business practices and in consideration of our stakeholders, including people who are at risk of modern slavery practices and people who experience modern slavery practices.

Key elements of our modern slavery risk program include:

- A policy which outlines a commitment to prevent and manage modern slavery within the College's operations, business partnerships and supply chains
- Communication of this policy and related program initiatives to staff, business partners and supply chain
- Consultation with people with lived experience of exploitation and modern slavery, wherever possible, conducted according to ethical engagement principles
- Assessment of modern slavery risks within the College's operations and supply chain and the development of effective, efficient and transparent controls to manage and mitigate risks
- Integration of anti-slavery requirements into relevant tenders and contract terms and conditions
- Due diligence measures for review of suppliers and business partners coupled with a requirement that they implement systems and processes to effectively manage their own modern slavery risk
- Raising awareness, engaging and educating staff and other key stakeholders so they take practical steps to prevent and manage risk
- Implementation of an escalation protocol and remedy pathway to ensure human rights impacts caused by Siena College's activities, contributed to by the College or that are linked to Siena College

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are effectively addressed

- Monitoring and reporting measures so the College can identify ways to continuously improve
- Collaboration with other organisations, wherever possible, to increase the College's impact in the prevention of modern slavery

### Management of staff, contractors, suppliers and business partners

Risk management actions include:

- Communicating with staff to ensure they are aware of this policy, are provided with regular training in its application and have sufficient resources for its implementation.

Staff are expected to:

- Acknowledge that business operations or relationships that knowingly support, facilitate or encourage worker exploitation or modern slavery are strictly forbidden
- Ensure that the identification, prevention, management and mitigation of modern slavery risk is known and accepted to be a core responsibility of all workers
- Acknowledge that any actual or suspected activity that could breach this policy will be reported immediately
- Inclusion of anti-slavery clauses in procurement tenders and contracts of significant purchases in selected procurement categories regarding modern slavery which include the right to audit, review documentation and interview workers
- Undertake supplier reviews (including self-assessment questionnaires) to assess levels of modern slavery risk, commitment, capability and capacity to manage identified risks. This includes any new companies that would like to do business with the College
- Actively engage with relevant external stakeholders (for example, suppliers, contractors or other business partners) to promote this policy and assist in developing their capabilities to identify and manage modern slavery risks with the expectation that suppliers share College values and its goal to ending modern slavery, and support the College's efforts to assess the levels of risk within their operations and supply chain and gauge their commitment and capability to manage modern slavery risks
- Request major suppliers to demonstrate how they identify, prevent, manage and mitigate modern slavery risk in their operations and supply chains

Principles for procurement are set out in the Procurement Policy. Child safe procurement applies regardless of the value of the product or service.

### Monitoring and Reporting

The College will collect relevant information to enable implementation of this Policy and annual reporting as required.

Internal reporting of actual or suspected modern slavery risks by staff is expected. Staff should immediately report any suspected violations of the policy other illegal or unethical conduct to the Director of Business Services. Information provided by staff will be treated confidentially and there will be no reprisal, retribution, retaliation or unfavourable treatment for reports made in good faith.

Suppliers are also required to report immediately, any

- suspected or actual modern slavery impacts to people

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- indicators or “red flags” indicating potential modern slavery activity, without fear of retribution, retaliation or loss of business

If a supplier or any other person outside the Sienna College provides information to any staff member about suspected or actual modern slavery impacts to people, indicators or red flags within our organisation or supply chain, the information must be immediately passed by the staff member to their line manager for escalation.

#### **Compliance**

Staff who knowingly and wilfully breach this policy may face disciplinary action. This could, in the most severe circumstances include dismissal for misconduct or gross misconduct.

Sienna College will exercise its right to terminate relationships with individuals, suppliers, contractors and business partners working in, on behalf of or engaged by Sienna College if they knowingly and wilfully breach this Policy.

## RESPONSIBILITY

The Trustees of the PJP have overall responsibility for ensuring the DEA Modern Slavery Policy and its implementation complies with the relevant Guiding Principles outlined in the DEA Modern Slavery Policy, and legal and ethical obligations.

The Sienna College Board and Executive team has responsibility for managing modern slavery risk within Sienna College, and ensuring this Policy and its implementation complies with Catholic social teaching, legislated requirements and ethical obligations.

The College Leadership team will ensure that staff are aware of this Policy and will be provided with training progressively to build awareness. Internal reporting of actual or potential modern slavery risks by staff is required and expected.

## RELATED LEGISLATION

- Modern Slavery Act 2018 (Cth)

## RELATED SIENA COLLEGE POLICIES

- Procurement Policy
- Child Safety and Wellbeing Policy
- Safeguarding Children and Young People Code of Conduct
- Whistleblower Policy

## RELATED DOCUMENTS

- Dominican Education Australia (DEA) [Modern Slavery Statement 2023](#) and Modern Slavery Policy 2025

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## RISK

In the Committee's deliberations it is important to consider the College's main strategic processes and the identification of associated risks. Some sample questions are included for referral. Answers are to be documented as part of the policy.

1. **Faith and Catholic Identity.** Identify any risks to Catholic Identity or Dominican charism of the school. How will this policy harm or enhance either?
2. **Reputation.** Identify if there are any reputational risks to the College. How will this policy impact Siena and wider communities?
3. **Financial.** Identify any financial risks to the College. How will this policy impact the financial stability of the College?
4. **Contemporary Learning and Teaching.** Identify any risks to learning and teaching. How will this policy impact the academic performance of the College?
5. **Wellbeing.** Identify any risks to safety and wellbeing. How will this policy impact the mental and physical wellbeing of the College community?
6. **Community Engagement.** Identify any risks to building community engagement. How will this policy impact community relationships?
7. **Governance and Leadership.** Identify any risks to governance and leadership in the College. How will this policy affect the strategic direction of the College?

Do any risks identified above warrant changes to the proposed policy? If so the policy should be referred back to the developer/s.

## NEXT REVIEW

March 2028

## POLICY LOCATION

<https://sienacentral.siena.vic.edu.au/homepage/3452>

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