

A large decorative graphic on the right side of the page, consisting of two overlapping semi-circles. The left semi-circle is orange and the right semi-circle is green. They overlap in the center, creating a dark blue shape. The background of the entire page is dark blue.

Council Policy

Modern Slavery Prevention Policy

Document Overview

Document Category	Council Policy
Policy Title	Modern Slavery Prevention Policy
Policy Statement	<i>A Policy to ensure Council is engaging suppliers who practice ethical and legal labour practices and to reduce the risk that Council is engaging any business who is engaging Modern Slavery practices.</i>
Date	24 September 2024
Resolution Date	25 February 2025
Clause Number	ARIC24/63
Accountable Position	Procurement Partner
Responsible Position	Manager Project Management Office
Branch	Organisational Performance
Division	Organisational Performance
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Review Date	24 September 2026
Consultation	PC&S Governance Senior Leadership Team Executive Leadership Team
Document Revision History	Date
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Draft V2	24/9/24

Purpose

The purpose of the policy is to:

- Prevent, detect and respond with mitigating controls to the risk of Modern Slavery that may occur with Dubbo Regional Council, its supply chain or in any other business dealings;
- Ensure Dubbo Regional Council is compliant with its obligations under the Modern Slavery Act; and
- Ensure that Dubbo Regional Council suppliers and others engaged in business dealings are adequately managing modern slavery risks.

Related Information

Modern Slavery refers to situations including (but not limited to) individuals being exploited and unable to refuse or leave a situation because of threats, violence, coercion, deception, or abuse of power. This can include practices such as human trafficking, forced labour, debt bondage, child labour, domestic servitude and forced relationships. Councils like other public entities, are responsible for ensuring that their operations, supply chains, and contractors are free from modern slavery. This means they must assess their procurement processes, identify potential risks of exploitation in their supply chains and take active measures to prevent modern slavery in the goods and services they procure or provide.

Related Legislation

Under the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2018 (NSW), Councils have a duty to address these risks by creating transparent reporting, adopting ethical sourcing practices and ensuring that workers, suppliers, and subcontractors are treated with dignity and respect.

Scope

This policy applies to all Councillors, staff and temporary employees, contractors, consultants and volunteers while engaged by Council.

Policy

Principles

Dubbo Regional Council is committed to the following principles:

- Modern Slavery is a human rights violation and a serious crime. Dubbo Regional Council has a zero-tolerance approach to slavery, exploitation, child labour and human trafficking in all its forms.
- Council is committed to safeguarding human rights in its operations and supply chains as well as taking reasonable steps to identify, mitigate and respond to risks that have the potential to cause, contribute to, or directly link Council to Modern Slavery.
- Council is also committed to ensuring there is transparency in its approach to tackling Modern Slavery throughout its businesses and supply chains, consistent with Council's disclosure obligations under the act.

Governance and Code of conduct

Council has a robust governance structure in place to oversee our commitment to modern slavery, set policies and maintain our approach aligned with our values.

In alignment with our values, all staff and members of Council are required to abide by our Code of Conduct which sets out our values and expected behaviour standards, including complying with legislation, respecting human rights, behaving honestly, with integrity and in a way that upholds the values and reputation of Council. Any breach or wrongdoing can be reported with reporting procedures outlined in public interest disclosures and internal reporting.

Human Resource and Recruitment

Council has clear and diligent human resource policies and procedures in implementing the highest standards for employees to address any form of Modern Slavery risk. Council has robust and transparent recruitment and selection processes and ensures all workers, permanent, temporary and/or agency staff have the required checks per our policies. All employment with Council is voluntary and abides by law and regulations for pay practices and employment. Council expects its suppliers to have a zero tolerance for modern slavery. To support this, we will work with our suppliers to ensure:

- All employment is voluntary and employees are free to leave upon reasonable notice;
- All employees are paid fairly and legally for work completed;
- All working hours and overtime are within legal limits; and
- Discrimination is prohibited.

Procurement and Supply Chain

Council procurement activities are governed by a regulatory framework, particularly Section 55 of the Local Government Act (1993) and Part 7 of the Local Government (General) Regulations 2021. Principles and practices are outlined in documents such as the Department of Local Government's Tendering Guidelines for NSW Local Government (October 2009). All of Council's Procurement activities are conducted in accordance with the adopted Procurement policy and related procedures.

Council's Expectations of Suppliers

Council seeks to optimize and enhance community outcomes through procuring goods and services with private sector suppliers. Council is committed to acting in a way that is aligned to the core value of Integrity and expects suppliers to make the same commitment and comply with our Statement of Business Ethics. The complete statement of business ethics is a public document and available on our website ([link](#)).

Council's Approach to risk identification and management

Council's commitment to continuous improvement in relation to our system and controls to assess, address and mitigate modern slavery risks in our supply chains is consistent with the reasonable steps included in the NSW Anti-Slavery Commissioner's Guidance on Reasonable Steps (GRS).

Our approach is embedded into our Enterprise Risk Management Framework, focusing on identifying relevant human right risks, assessing actual and potential human rights impact, acting upon the findings, monitoring and reporting on responses.

Recognising that modern slavery is a global, evolving issue affecting all sectors and industries, this process will be reviewed by Council annually and updated in alignment with Council’s commitment to continuous improvement.

Contractual Provisions

Council’s contractual documents include clauses that endeavour to eliminate modern slavery risks in our supply chains. Following a risk-based approach, the clauses include warranties such as compliance and due diligence as well as reporting and audit obligations. The clauses are reviewed regularly to address emerging issues and legislative requirements.

Training and Capacity Building

Dubbo Regional Council will ensure that all employees have the base level knowledge and capacity to comply with the Council’s obligations to reduce the risks of Modern Slavery through a compulsory e-learning module. Key internal stakeholders involved in procurement activities will receive additional training on Council’s Modern Slavery due diligence process, Modern Slavery Contractual Provisions and tools to assist suppliers with due diligence.

Reporting

Dubbo Regional Council ensures compliance with its reporting obligations under the Local Government Act 1993 and Modern Slavery Act 2018 (NSW), in accordance with the Office of the NSW Anti-Slavery Commissioner’s Guidance on Reasonable Steps to Manage Modern Slavery Risks.

Council is committed to an inclusive and equitable work environment. As part of our continuous improvement approach, feedback is welcome through the Inclusion, Diversity and Belonging Committee, our leadership teams or the Consultative Committee and helps to identify what is going well and where improvement can be achieved.

Council’s employees and suppliers can report grievances and concerns about any modern slavery concerns or issues through the Corporate Governance Branch via email governance@dubbo.nsw.gov.au.

Council is committed to ensure that all disclosures are managed through our established policies and protocols to ensure they are properly managed and where possible, the identity of the discloser is kept confidential.

Responsibilities

Position	Responsibility
Users	Complying with this policy and Council’s requirement with respect to Modern Slavery as updated from time to time
Contract Managers	<ul style="list-style-type: none"> Engaging with suppliers to understand how they manage Modern Slavery risks Conducting Modern Slavery risk assessments for contracts they manage.
Project Management Office	<ul style="list-style-type: none"> Integrating procedures to assess Modern Slavery risks into Council’s procurement framework and activities

Corporate Governance

- Preparing and submitting reporting requirement on Modern Slavery

To manage the reporting and outcomes of any issue or complaint raised by any stakeholder with regards to suspected Modern Slavery

Chief Information Officer

Ensuring that Dubbo Regional Council has effective controls in place to manage and minimise the risk of Modern Slavery.

People, Culture & Safety

- Addressing any Modern Slavery risks in the recruitment process particularly when dealing with consultants and agency recruitment
- Ensure the delivery of employee awareness and support specialised in training for relevant employees on Modern Slavery risks and requirements under this policy and Modern Slavery laws
- Managing the Enterprise Risk Management Framework incorporating Modern Slavery Risk management processes.

Related Documents

- [*Procurement policy*](#)
- [*Code of Conduct Policy*](#)
- [*Statement of Business Ethics*](#)
- [*Anti-Discrimination, Harassment & Equal Employment Opportunity Policy*](#)
- [*Public Interest Disclosures and Internal Reporting Policy*](#)
- [*Enterprise Risk Management Framework*](#)

Document Control

Responsible Officer:	Procurement Partner
Division:	Organisational Performance
Prepared by:	Executive Officer – Organisational Performance
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