



Australian  
College of  
Nursing

Shaping health, advancing nursing

# Modern Slavery Statement **2022**





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# Foreword



## COMMITMENT

At the Australian College of Nursing (ACN), we are committed to playing our role in eliminating all forms of modern slavery, particularly within our own operations and supply chains. Last year, we made important strides with this goal, strengthening our commitment to:

- a. engaging positively and pro-actively with staff, suppliers, service providers, partners and other stakeholders who respect and uphold the human rights of others;
- b. taking appropriate steps to prevent, mitigate and, where appropriate, remedy modern slavery in ACN's operations and supply chains;
- c. developing and implementing a modern slavery due diligence process to identify, prevent, mitigate and account for how ACN addresses its impacts on modern slavery risks;
- d. investing in the organisational policy and cultural frameworks required to prevent, mitigate and, where appropriate, remedy modern slavery in our operations and supply chains;
- e. developing and implementing processes to enable the remediation of any adverse modern slavery impacts that ACN contributes to or causes; and
- f. ethical and responsible conduct in its operations and to improving the rigour of our supply chain and the positive influence that we can have on the nursing fraternity within Australia and communities within which we operate.

## CEO FOREWARD

As CEO of the Australian College of Nursing (ACN), I am proud to lead a for-purpose organisation dedicated to addressing all forms of injustice and inequality in society. This commitment is at the heart of everything we do, from our mission of Shaping Health, Advancing Nursing to our Strategic Directions and Ways of Being and Ways of Working, which drive our values based leadership.

An example of this in recent years has been our commitment to playing our part in eliminating all forms of modern slavery by volunteering to be a reporting entity. ACN has undertaken a journey to engage, assess, address and monitor modern slavery risks, particularly in our own operations.

Today, I would like to welcome you to our Second Annual Modern Slavery Statement, which covers the reporting period of July 2021 to June 2022. The pages that follow provide a summary of the steps ACN has taken to mitigate and manage the risk of modern slavery within our own supply chains in the last financial year, building on our inaugural statement produced in 2021.

We are still at the beginning stages of our journey, and I look forward to updating you on our continual progression in furthering our work in eliminating modern slavery for many years to come.

Warmest regards,  
Adjunct Professor Kylie Ward FACN  
Australian College of Nursing  
Chief Executive Officer

# Introduction

## BACKGROUND

Modern slavery is a term used to cover practices such as exploitation of individuals or the deprivation of an individual's freedom through the use of coercion, threats or deception, forced labour, debt bondage, forced marriage and human trafficking, slavery practices, and child labour or hazardous work involving children. Modern slavery is a human rights violation and an exploitative crime with devastating consequences for the health and wellbeing of its victims.

We know that modern slavery remains prevalent around the world; however, because of the complexity of global supply chains, this crime is difficult for well-intentioned organisations to both detect and eradicate.

The International Labour Organization estimated that 40 million people were victims of modern slavery worldwide in 2016, approximately 5.4 victims for every 1,000 people. The most prevalent form of modern slavery is forced labour, which disproportionately affects people in more vulnerable circumstances, such as children and young people, undocumented migrants, and those living in poverty.

The Modern Slavery Act 2018 (Cth) provides eight types of exploitation that meet the definition of modern slavery. They are:

- a. trafficking in persons;
- b. slavery;
- c. servitude;
- d. forced marriage;
- e. forced labour;
- f. debt bondage;
- g. deceptive recruiting for labour or services; and
- h. the worst forms of child labour.

## OPERATING CONTEXT

Modern slavery can occur in many forms, encompassing exploitative practices often intersecting with other complex challenges and systems, such as gender and racial discrimination, weak rule of law and poor labour standards.

In June 2021, the Australian College of Nursing (ACN) registered with the Department of Home Affairs to voluntarily opt in to comply with the Modern Slavery Act 2018 (Cth) ("TheAct").

ACN is pleased to present its second Modern Slavery Statement, for the reporting period 1 July 2021 to June 30 2022.



In 2020, ACN published a Position Statement on Modern Slavery, documenting its longstanding adherence to international standards on business and human rights.

As a member of the International Council of Nurses (ICN), ACN endorses ICN's position on The Basics of What Nurses Need to Know on Human Trafficking (ICN 2020); and supports the United Nation's Universal Declaration of Human Rights to treat all people respectfully, humanely and with dignity.

ACN recognises the essential contribution of nursing to preventing modern slavery as evident in the World Health Organization's (WHO) Global Strategy on Human Resources for Health: Workforce 2030 (WHO 2015).

ACN supports the WHO's Sustainable Development Goals (SDG) that directly impact health across all countries irrespective of income status (WHO 2015). ACN supports the SDG target, which aims to address areas of inequality, specifically to "end abuse, exploitation, trafficking and all forms of violence against and torture of children".

This 2022 Modern Slavery Statement articulates the actions taken by ACN to understand and investigate the risk of modern slavery in its operations and supply chain.

ACN's objective in reporting its actions in line with the Modern Slavery Act is to be as transparent as possible, demonstrate leadership to the nursing profession and provide an opportunity for the wider health care sector to learn from its experiences, as other organisations implement their own approaches.

# About ACN

## ACN GOVERNANCE

ACN (ABN 48 154 924 642) is a public company limited by guarantee, registered as a not-for-profit organization. ACN’s mission is to shape health and advance nursing.

ACN reported an annual consolidated revenue of \$24.9M for the 2022 financial year. Its membership includes Enrolled Nurses (EN), Registered Nurses (RN) and Midwives. ACN also offers Associate membership to anyone with an interest in the nursing profession.

ACN is governed by a dedicated Board of Directors. The Board comprises Directors elected from, and by, the membership of ACN and two Independent Directors appointed by the Board.

The Board is responsible for ensuring that ACN has an appropriate corporate governance structure. ACN will achieve its mission of Shaping Health, Advancing Nursing through six pillars, one of which is Social Impact. ACN is committed to highlighting the beneficial impact nurses have upon society. The organisation will lead by example through its voluntary reporting and transparent review of ACN’s supply chain to ensure all members of the community know it is committed to eradicating modern slavery. [Read more.](#)

## ACN MANDATE

ACN was established by its members to cultivate and maintain the highest principles of nursing and health care by:

- a. Facilitating the education and continuing professional development of nurses and other health care professionals;
- b. Providing opportunity for and administering grants, trusts and awards to further nursing and health professional scholarships;
- c. Contributing to a professional framework that enhances the practice, leadership and progression of nursing and health care nationally and internationally;
- d. Initiating, encouraging and supporting research to seek solutions to issues and problems relevant to nursing and health care practice and the health of the community in general and taking action on such problems and issues;
- e. Fostering and maintaining links with other nursing and allied organisations or relevant groups through co-operation or affiliation;

- f. Acting in an advisory role and providing a consultative service on the process and outcomes of nursing and health policy development and research at national and state levels in order to improve the health care of the community.

## ACN MISSION

### Shaping Health, Advancing Nursing

ACN will work to achieve its mission through its six pillars. They will be ACN’s foundation over years to come and enable innovation and stability. In 2021, the Board approved ACN’s Strategic Directions for 2021–2026.

### ACN’s Strategic Six Pillars

BEHAVIOUR	EXAMPLES
<b>ADVOCACY</b>	We will advocate for the issues that matter to our profession and the health of all Australians to make real and lasting change for today and generations to come.
<b>COMMUNITY</b>	We will support an engaged and contributing community of nurses – at all stages and levels of their career – inclusive of a strong band of supporters, volunteers, health professionals, media and government.
<b>EDUCATION</b>	We will train, educate, inspire and mentor nurses, with constant access to world-class information, research and evidence, and foster the intellectual rigour required of professionals making health care decisions.
<b>LEADERSHIP</b>	We will prepare nurses to lead. We will facilitate opportunities for nurses to make a difference and grow, to expand career options and horizons to reach their utmost potential.
<b>POLICY</b>	We will demonstrate how health and professional care can be enhanced through the expertise and experience of nurses via developing, debating, responding, publishing, promoting and commissioning good policy.
<b>SOCIAL IMPACT</b>	We are inclusive and here for all nurses and their place in society. We will actively strive to develop respect and appreciation for nurses and improve the beneficial impact nurses have on our society and to protect the environment we all share.

ACN operates in Australia and has an online presence worldwide. The registered office is in Canberra with an additional office in Sydney.

ACN is led by the Chief Executive Officer, who implements the strategy approved by the Board.



## POLICY FRAMEWORK

During the reporting period, we undertook a detailed gap analysis to identify and/or confirm the need for a standalone ACN Modern Slavery Policy. This preliminary needs-assessment highlighted the following considerations:

- a. Broader modern slavery considerations that may be expected to be addressed by a Modern Slavery Policy fit naturally within ACN's existing comprehensive ACN policy framework, supported by ACN's Quality and Safety management system and risk management framework.
- b. Modern slavery issues may be better managed via education, raising awareness, and engagement with stakeholders as opposed to driving compliance through a policy document.
- c. It may be most effective to improve, strengthen and enhance existing processes, initiatives and policy documents to drive compliance in this space.

## Governance and Policies

ACN has a suite of policies and procedures that seek to mitigate the risk of modern slavery and human rights violations across our operations and supply chains, including:

- a. Modern Slavery Policy,
- b. Code of Conduct,
- c. Risk Management Policy,
- d. Whistleblowing Policy,
- e. Equity and Diversity Policy,
- f. Privacy Policy,
- g. Grievance Policy and Procedures,
- h. Complaints Policy and Procedures,
- i. Recruitment Policy, Process and Procedures, and
- j. Supplier Evaluation and Selection Policy, Process and Procedures.

ACN's Code of Conduct and Modern Slavery Policy outline the minimum standards of behavior expected of ACN employees and representatives in general and specifically regarding the risk of modern slavery. These policies set out our commitment to acting ethically and responsibly, going beyond mere compliance with legal and regulatory obligations. Rather, it involves acting with honesty, integrity and in a manner that is consistent with the expectations of ACN stakeholders and the broader community.

The Modern Slavery Policy confirms ACN's commitment to the identification and prevention of all forms of modern slavery in our business and supply chains. Under these policies, employees, contractors and representatives are encouraged to raise any concerns they might have in relation to the treatment and working conditions of any person in our business or supply chains.

ACN takes compliance with and enforcement of its legal, ethical and social responsibilities seriously. This includes mitigating the risk of modern slavery occurring in our operations and supply chains. Any material breach of our policies is reported to the CEO and may be considered misconduct and result in disciplinary action (including cessation of employment or engagement).

# Risks in ACN operations and supply chains

## TRANSPARENCY IN OUR OPERATIONS AND SUPPLY CHAINS

Transparency is fundamental to maintaining a safe and responsible supply chain. Our Modern Slavery Working Group has assessed areas of our operations and supply chains where modern slavery risks are likely to be most prevalent, utilising research and data sources from the UN Guiding Principles, 2018 Global Slavery Index and the Australian Institute of Criminology.

Using a combination of geographic and product categorisation as risk identifiers to assess supplier risk, we have mapped our supply chains and performed a risk assessment including conducting enhanced checks where necessary. Enhanced checks involved:

- a. screening suppliers for adverse media relating to human exploitation;
- b. sending out questionnaires to suppliers; and
- c. ongoing monitoring of those 'higher risk' supplier operations.

ACN has assessed the likelihood and consequences of modern slavery in core business operations and services and found it to be generally VERY LOW, although some of ACN's functional activities have been risk assessed as Low and others bordering on MEDIUM risk.

Given the nature of ACN's workforce, partnerships, and procurement needs, modern slavery risks are possible but are not expected to routinely arise, as they are being monitored and controlled by ACN's

Certified ISO 9001 Quality Management System policies, processes and procedures.

The basis for this assessment and the management measures that mitigate modern slavery risk is described in detail in the following sections.

## RISK IN MANAGEMENT OF HUMAN RESOURCES

ACN's operations and staffing profile do not exhibit any of the characteristics that might indicate a higher risk of modern slavery.

The nature of ACN's workforce is highly skilled and all on-going, contract and casual staff are recruited using transparent and merit based processes.

Continuing, fixed term, and casual employees of ACN work under the Australian College of Nursing Enterprise Agreement 2020–2024, which exceeds the requirements of National Employment Standards and has been approved by the Fair Work Commission.

## RISK IN TEACHING OPERATIONS

ACN education and teaching operations are also service based, with the majority of educational services delivered by continuing or casual employees who are protected by ACN's Certified ISO 9001 Quality Management System policies, processes and procedures. Contractors are occasionally used (under contract with ACN), which includes Modern Slavery acknowledgement and compliance requirements.



ACN recognises the vulnerability of international students and provides a range of support services and information as required under the Education Services for Overseas Students Act. ACN is committed to ensuring that the whole international student experience while in Australia is as positive as possible and will continue to raise the awareness of international students of their rights and where to get help if they experience exploitative working conditions and/or modern slavery-like practices.

### **RISKS IN THE PURCHASE OF GOODS AND SERVICES**

Key modern slavery risks relevant to ACN are found in goods and services procurement, including building security and maintenance services, cleaning, travel, corporate functions and events management (particularly where services intersect with base skill labour workers include, international students and backpackers from low-English speaking countries). Such risks may manifest themselves in operational and reputational risk with disruptions and harm to relationships.

Given the number of direct suppliers and service providers we engage, the number of indirect (or secondary) suppliers and service providers involved in our businesses is substantial. As the supply chain becomes more remote, influencing the behaviour and conduct of those indirect suppliers and service providers creates a greater challenge.

Since 2021, ACN's contracts relating to the purchase of goods and/or services have included standard contract clauses making clear its position on modern slavery and its expectations of suppliers. This due diligence strategy requires any organisations providing goods and/or services to:

- a. comply with the intent and the requirements of the Modern Slavery Act;
- b. include similar modern slavery clauses in contracts with their own suppliers and subcontractors;
- c. notify ACN as soon as the supplier becomes aware of any actual or suspected slavery in a supply chain connected to the contracted goods and/or services; and
- d. remedy any identified instances of modern slavery within a reasonable timeframe.

During the 2022 reporting year, new and renewing contracts have included Modern Slavery clauses.

# Modern slavery risk assessment process

Australian College of Nursing has a Modern Slavery Working Group which has been active in assessing the risk of modern slavery within the Australian College of Nursing (ACN). The remit of ACN's cross-functional Modern Slavery Working Group is to develop, review and refine ACN's response to modern slavery as a continuing journey.

During the current reporting period (June 2021 to July 2022), the Working Group, with assistance and input from key stakeholders, conducted a second year ACN wide Modern Slavery Risk Assessment of our operations, with the intention of reviewing our activities against modern slavery indicators to help us:

- understand potential gaps and opportunities for improvement;
- to identify new potential modern slavery risks that have emerged in our business operations;
- evaluate the effectiveness of ACN's supply chain management and the effectiveness of internal Modern Slavery risk controls in the supplier and service provider selection process; and
- provide a pathway to improve our ability to mitigate that risk in an ongoing manner.

The findings of this risk assessment illustrate how modern slavery risks may materialise during ACN's operations. We intend to use the findings from the modern slavery risk assessment to conduct further due diligence on areas of our operations with potential modern slavery risks and to target our awareness initiatives in those particular areas.

## RISK IDENTIFICATION AND ASSESSMENT

The risk assessment process involved a review of the 'Spend Categories' data (see Figure 1) – to identify with suppliers and service providers in higher risk categories of spend, which was then analysed in conjunction with identified and potential Modern Slavery risks (for each 'Supply Chain Element' – see Figure 2) to derive a Modern Slavery Risk Significance, HIGH, MEDIUM, or LOW (in line with the ACN Certified ISO 9001 Quality Management System Risk Management Framework).

ACN has performed an analysis of its accounts payable data and categorisation of the spend for the reporting period and identified the following 'Spend Categories':

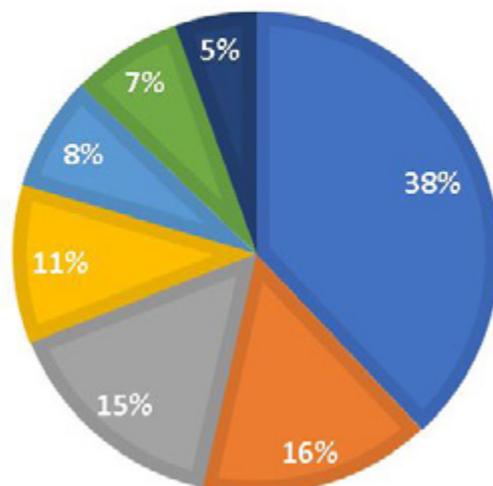
## SUPPLY CHAIN SPEND CATEGORIES

ACN has performed an analysis of its accounts payable data for the reporting period and identified the following spend categories:

Figure 1

### ACN SPEND CATEGORIES

■ ICT                      ■ Service Providers   ■ Media/Marketing   ■ Facilities/Utilities  
■ Events/Travel       ■ Education               ■ HR/Recruitment



## MODERN SLAVERY ACT RISK ASSESSMENT

ACN has performed an analysis of each 'Supply Chain Element' and has, taking into consideration the 'Spend Category' significance, assessed the Modern Slavery risks as detailed below: Risks that have been assessed as Very Low (eg, Volunteers) have not been included.

Figure 2

SUPPLY CHAIN ELEMENTS	MODERN SLAVERY ACT RISKS	RISK SIGNIFICANCE
Marketing	<ul style="list-style-type: none"> <li>• Corporate Merchandise – Gifts of ACN Branded Goods Not for Sale (eg, pens, mugs etc) – Goods Suppliers</li> <li>• Corporate Clothing (ACN Branded scarves, hats, tee-shirts etc) – Goods Suppliers</li> </ul>	Low
Events Management	<ul style="list-style-type: none"> <li>• Using a third-party events manager and events venues and entertainment</li> <li>• Deceptive Recruiting of Catering and Waitering Labour Force</li> <li>• Fair Remuneration of Workers including contracted Entertainers</li> <li>• Documented Agreements with Designers and Artists (Copyright) to protect all parties in respect of future use</li> <li>• Wages and Superannuation Theft</li> <li>• Corporate Merchandise – Gifts of ACN Branded Goods Not for Sale (eg, pens, mugs etc) – Goods Suppliers</li> <li>• Corporate Clothing (ACN Branded scarves, hats, tee-shirts etc) – Goods Suppliers</li> <li>• Direct Sources Seasonal Fruit and Vegetables</li> </ul>	Medium
Cleaning Services	<ul style="list-style-type: none"> <li>• Increased risk by reduced visibility over recruitment practices and labour hire for cleaning, security and maintenance services, which have been known to result in fraudulent wages and conditions promises to workers associated with cleaning (eg, underpayment of wages and non-payment of superannuation – referred to as “wage and superannuation theft,” Law council of Australia 6 March 2020 Unlawful Underpayment of Employees Remuneration)</li> <li>• Deceptive Recruiting of Labour Force</li> <li>• Fair Remuneration</li> <li>• Wages and Superannuation Theft</li> <li>• Underpayment and excessive working hours</li> <li>• Providers of Contractors' uniforms possibly engaging in child labour, underpayment and excessive working hours and poor conditions</li> </ul>	Medium
Security and Maintenance Services		

Figure 2 (continued)

SUPPLY CHAIN ELEMENTS	MODERN SLAVERY ACT RISKS	RISK SIGNIFICANCE
Recruitment/Human Resources	<ul style="list-style-type: none"> <li>• Deceptive Recruiting of:               <ul style="list-style-type: none"> <li>- Staff</li> <li>- Content Writers</li> <li>- Content Reviewers</li> <li>- Tutors</li> <li>- Clinical Facilitators</li> <li>- Session Planners</li> </ul> </li> <li>• Recruitment and Selection Process               <ul style="list-style-type: none"> <li>- Using a third-party recruitment company increases risk by reducing visibility over recruitment practices</li> <li>- Workers engaged via an employment contract or service agreement contract with ACN – underpayments of wages or superannuation or other factors, may be an indicator of modern slavery</li> </ul> </li> </ul>	Low
Student Placements and Education Partners	<ul style="list-style-type: none"> <li>• Student placements with Education Partners:               <ul style="list-style-type: none"> <li>- Students are particularly vulnerable to being exploited in the workplace (servitude)</li> <li>- Potential for the student placement supervisor who is in the more powerful position and who is conducting the student evaluation, to be overbearing, exercise a lack of liberty or have a poor customer service attitude or who may exhibit poor ethical standards may qualify as Modern Slavery.</li> </ul> </li> </ul>	Low
Information Technology, Telecommunications and Office Related Supplies and Services	<ul style="list-style-type: none"> <li>• Suppliers of ICT goods – underpayment, poor working conditions and excessive working hours:               <ul style="list-style-type: none"> <li>- raw material extraction, smelting minerals</li> <li>- manufacture of hardware and software, printers</li> <li>- stationery and other office supplies</li> <li>- disposal</li> </ul> </li> </ul>	Medium
Travel	<ul style="list-style-type: none"> <li>• Labour Force Exploitation within the Transport and Accommodation Industries including Airlines and Ground Transport (drivers)</li> <li>• Accommodation and Hospitality (specifically cleaners, kitchen and maintenance staff)</li> <li>• Underpayment and excessive working hours</li> <li>• Providers of uniforms possibly engaging in child labour, underpayment and excessive working hours and poor conditions</li> </ul>	Low

## IDENTIFIED RISKS AND CONTROL MEASURES

ACTIVITY AND RISK OVERVIEW	RISK ASSESSMENT AND CONTROL MEASURES PUT IN PLACE
<p><b>Marketing</b></p> <ul style="list-style-type: none"> <li>▶ Corporate Merchandise – Gifts of ACN Branded Goods Not for Sale (eg, pens, mugs etc) – Goods Suppliers</li> <li>▶ Corporate Clothing (ACN Branded scarves, hats, tee-shirts etc) – Goods Suppliers</li> </ul>	<p>Modern slavery risk assessed as <b>LOW</b> due to:</p> <ul style="list-style-type: none"> <li>▶ ACN set up formal structures and procedures to underpin its corporate social responsibility platform. We proudly support and advocate responsible travel, responsible entertainment employment, responsible employment, positive diversity practices, empowered giving, and conservation of natural resources and sustainability.</li> <li>▶ Procurement and contracts with ‘higher risk’ category providers to include Modern Slavery provisions and awareness.</li> </ul>
<p><b>Events Management</b></p> <ul style="list-style-type: none"> <li>▶ Using a third-party events manager and events venues and entertainment</li> <li>▶ Deceptive Recruiting of Catering and Waitering Labour Force</li> <li>▶ Fair Remuneration of Workers including contracted Entertainers</li> <li>▶ Documented Agreements with Designers and Artists (Copyright) to protect all parties in respect of future use</li> <li>▶ Wages and Superannuation Theft</li> <li>▶ Corporate Merchandise – Gifts of ACN Branded Goods Not for Sale (eg, pens, mugs etc) – Goods Suppliers</li> <li>▶ Corporate Clothing (ACN Branded scarves, hats, tee-shirts etc) – Goods Suppliers</li> <li>▶ Direct Sources Seasonal Fruit and Vegetables</li> </ul>	<p>Modern slavery risk assessed as <b>MEDIUM</b> due to:</p> <ul style="list-style-type: none"> <li>▶ The nature of labour-force for events increases risk as there’s reduced visibility over recruitment practices over labour hire for events, which have been known to result in fraudulent wages and poor conditions for workers associated with events, catering and support activities (eg, underpayment of wages and non-payment of superannuation – referred to as “wage and superannuation theft,” Law council of Australia 6 March 2020 Unlawful Underpayment of Employees Remuneration).</li> <li>▶ ACN set up formal structures and procedures to underpin its corporate social responsibility platform. We proudly support and advocate responsible travel, responsible entertainment employment, responsible employment, positive diversity practices, empowered giving, and conservation of natural resources and sustainability.</li> </ul>



ACTIVITY AND RISK OVERVIEW	RISK ASSESSMENT AND CONTROL MEASURES PUT IN PLACE
<p><b>Cleaning Services</b> <b>Security and Maintenance Services</b></p> <ul style="list-style-type: none"> <li>▶ Increased risk by reduced visibility over recruitment practices and labour hire for cleaning, security and maintenance services, which have been known to result in fraudulent wages for workers associated with cleaning (eg, underpayment of wages and non-payment of superannuation – referred to as “wage and superannuation theft,” Law council of Australia 6 March 2020 Unlawful Underpayment of Employees Remuneration)</li> <li>▶ Deceptive Recruiting of Labour Force</li> <li>▶ Fair Remuneration</li> <li>▶ Wages and Superannuation Theft</li> <li>▶ Underpayment and excessive working hours</li> <li>▶ Providers of Contractors’ uniforms possibly engaging in child labour, underpayment and excessive working hours and poor conditions</li> </ul>	<p>Modern Slavery Risk assessed as <b>MEDIUM</b> due to:</p> <ul style="list-style-type: none"> <li>▶ Increased risk by reduced visibility over recruitment practices and labour hire for cleaning, security and maintenance services, which have been known to result in fraudulent wages for workers associated with cleaning (eg, underpayment of wages and non-payment of superannuation – referred to as “wage and superannuation theft,” Law council of Australia 6 March 2020 Unlawful Underpayment of Employees Remuneration)</li> <li>▶ Procurement and contracts with ‘higher risk’ category providers to include Modern Slavery provisions and awareness.</li> </ul>

ACTIVITY AND RISK OVERVIEW	RISK ASSESSMENT AND CONTROL MEASURES PUT IN PLACE
<p><b>Recruitment/Human Resources</b></p> <ul style="list-style-type: none"> <li>▶ Deceptive Recruiting of: <ul style="list-style-type: none"> <li>- Staff</li> <li>- Content Writers</li> <li>- Content Reviewers</li> <li>- Tutors</li> <li>- Clinical Facilitators</li> <li>- Session Planners</li> </ul> </li> <li>▶ Recruitment and Selection Process <ul style="list-style-type: none"> <li>- Using a third-party recruitment company increases risk by reducing visibility over recruitment practices</li> <li>- Workers engaged via an employment contract or service agreement contract with ACN – underpayments of wages or superannuation or other factors, may be an indicator of modern slavery</li> </ul> </li> </ul>	<p>Modern Slavery Risk assessed as <b>LOW</b> due to:</p> <ul style="list-style-type: none"> <li>▶ ACN’s operations and staffing profile do not exhibit any of the characteristics that might indicate a higher risk of modern slavery. The nature of ACN’s workforce is highly skilled and all on-going, contract and casual staff are recruited using transparent, recognised processes. In performing their duties, staff are generally highly connected to the workplace and operational processes designed to achieve consistency in performance.</li> <li>▶ Employee engagements are governed by an enterprise bargaining agreement and regulated by ACN’s comprehensive suite of policies and procedures coupled with formal, transparent grievance mechanisms.</li> <li>▶ No ACN staff are subject to recruitment fees. ACN employees are typically employed directly by ACN; where external recruitment companies are used, these are Australian-based.</li> <li>▶ Agreements with third-party recruitment companies articulate ACN’s Modern Slavery Policy and expectations in this regard, and ACN has direct control over its arrangements.</li> <li>▶ Standard and rigorous recruitment processes are followed.</li> <li>▶ Processes are established to ensure that ACN’s payment systems and procedures properly reflect the responsibilities and workloads of staff.</li> <li>▶ Induction Training to include Modern Slavery Act.</li> <li>▶ Continuing, fixed term, and casual employees of ACN work under an Enterprise Agreement, covers all aspects of employment, including working conditions, remuneration, leave and other benefits.</li> <li>▶ ACN is diligent in checking that all new employees have the right to work in Australia.</li> </ul>

ACTIVITY AND RISK OVERVIEW	RISK ASSESSMENT AND CONTROL MEASURES PUT IN PLACE
<p><b>Student Placement and Education Partners</b></p> <ul style="list-style-type: none"> <li>▶ Student placements with Education Partners: <ul style="list-style-type: none"> <li>- Students are particularly vulnerable to being exploited in the workplace (servitude)</li> <li>- Potential for the student placement supervisor who is in the more powerful position and who is conducting the student evaluation, to be overbearing, exercise a lack of liberty or have a poor customer service attitude or who may exhibit poor ethical standards may qualify as Modern Slavery.</li> </ul> </li> </ul>	<p>Modern slavery risk assessed as <b>LOW</b> due to:</p> <ul style="list-style-type: none"> <li>▶ Strong regulatory frameworks</li> <li>▶ ACN's robust student placement framework, which includes: <ul style="list-style-type: none"> <li>- policies and procedures</li> <li>- partner screening and due diligence of host organisations</li> <li>- contractual framework</li> <li>- recording and reporting requirements</li> <li>- training and guidance for student placement supervisors</li> </ul> </li> <li>▶ Acknowledging that a culture of servitude may breed an attitude of servitude, 'exceptional customer experience' aligns with ACN's values and is an integral element of ACN's ways of working. ACN entrusts employees to demonstrate and operate with this mindset. Leadership in Nursing is also an influencing and controlling measure.</li> <li>▶ Facilities that are offering ACN student placements are paid for each student placement, as per a contract between ACN and the placement organisation. Moving forward, ACN will establish what the partner's policy is in respect to Modern Slavery to ensure that it aligns with ACN's Modern Slavery Act policy and ensure that this is reflected in the contract.</li> <li>▶ Additional controls being considered: <ul style="list-style-type: none"> <li>- review extent and nature of due diligence performed across ACN to ensure consistent approach;</li> <li>- inclusion of modern slavery clauses in contract templates;</li> <li>- building awareness in students about modern slavery risks and available escalation pathways.</li> </ul> </li> </ul>

ACTIVITY AND RISK OVERVIEW	RISK ASSESSMENT AND CONTROL MEASURES PUT IN PLACE
<p><b>Information Technology, Telecommunications and Office Related Supplies and Services</b></p> <ul style="list-style-type: none"> <li>▶ Suppliers of ICT goods – underpayment, poor working conditions and excessive working hours: <ul style="list-style-type: none"> <li>- raw material extraction, smelting minerals</li> <li>- manufacture of hardware and software, printers</li> <li>- stationery and other office supplies</li> <li>- disposal</li> </ul> </li> </ul>	<p>Modern slavery risk assessed as <b>MEDIUM</b> due to:</p> <ul style="list-style-type: none"> <li>▶ ACN set up formal structures and procedures to underpin its corporate social responsibility platform. We proudly support and advocate responsible travel, responsible entertainment employment, responsible employment, positive diversity practices, empowered giving, and conservation of natural resources and sustainability.</li> <li>▶ Procurement and contracts with ‘higher risk’ category providers to include Modern Slavery provisions and awareness.</li> </ul>
<p><b>Travel</b></p> <ul style="list-style-type: none"> <li>▶ Labour Force Exploitation within the Transport and Accommodation Industries including Airlines and Ground Transport (drivers)</li> <li>▶ Accommodation and Hospitality (specifically cleaners, kitchen and maintenance staff)</li> <li>▶ Underpayment and excessive working hours</li> <li>▶ Providers of uniforms possibly engaging in child labour, underpayment and excessive working hours and poor conditions</li> </ul>	<p>Modern slavery risk assessed as <b>LOW</b> due to:</p> <ul style="list-style-type: none"> <li>▶ ACN set up formal structures and procedures to underpin its corporate social responsibility platform. We proudly support and advocate responsible travel, responsible entertainment employment, responsible employment, positive diversity practices, empowered giving, and conservation of natural resources and sustainability.</li> <li>▶ Procurement and contracts with ‘higher risk’ category providers to include Modern Slavery provisions and awareness.</li> </ul>
<p><b>Volunteers</b></p> <ul style="list-style-type: none"> <li>▶ Excessive working hours</li> <li>▶ Feeling obliged to volunteer through organisational pressure</li> </ul>	<p>Modern slavery risk assessed as <b>very LOW</b> due to:</p> <ul style="list-style-type: none"> <li>▶ Volunteers participate in a number of ACN activities including representation on expert advisory groups, leadership teams for regional Faculties, education course committees, Policy Fellows (Policy and Advocacy), Scholarships and the Board.</li> <li>▶ Volunteers, by definition are not paid and can terminate their services at any time and accordingly, the Modern Slavery Risk is very low.</li> </ul>

# Risk assessment outcomes and mitigation initiatives taken



Modern Slavery risks in ACN's business operations have not been assessed as significant, but as there remains potential for such risk, ACN has taken a proactive role in seeking to identify and mitigate such risks. Also, ACN sees an opportunity to contribute to the Modern Slavery cause by using its education platform to provide key stakeholders with the information and awareness to recognise and report suspected Modern Slavery instances, and evidence of coercive control and intimidation and prohibition on the solicitation of others.

With about 98% of ACN's first-tier supplier based in Australia and 86% providing services, it is likely that the potential to be linked with, or contribute to, modern slavery exploitation in ACN's supply chain sits beyond the first tier of its supply chain and most probably outside of Australia's national borders. Modern slavery risks may arise due to issues present in the countries and regions from which we source the type of products we procure. The country where a product is manufactured, processed or assembled, or where service delivery occurs can present modern slavery risks. High-risk sources for procurement of goods (even if procured through an Australian based agent) include conflict-affected countries where there is a weak rule of law where governments may not fulfil their responsibilities to protect human rights.

Australian based suppliers and service providers cannot be assumed to be low risk, as businesses operating in Australia have been exposed as exploiting vulnerable workers including foreign students and migrants, either through their own operations or their supply chain.

With that in mind, ACN's focus of actions has been to strengthen the understanding of its suppliers' and service providers' supply chain and raise their awareness of the issue, as well as strengthening ACN's supplier selection and on-boarding process. This entails two specific areas of risk mitigation due diligence, namely:

- a. a collaborative engagement with suppliers and external service providers in the higher 'Spend Categories' and higher risk significance category (ie, in ACN's assessment MEDIUM) – to ensure Modern Slavery Act compliance; and
- b. improvement of the Modern Slavery due diligence and supplier and service provider management processes to achieve a more robust and transparent focus on Modern Slavery risks.

## RISKS MITIGATION ACTIONS TAKEN

Our policies and procedures play an important role in embedding respect for human rights in general and setting a standard of behaviour and conduct expectations throughout our operations and within related stakeholders. These policies and procedures also help with building a respectful and safe environment and establish a framework to monitor compliance with our expectations. ACN leverages its mature and integrated Quality and Safety Policy and Procedure Framework to provide a first line of defence and a range of cohesive levers for risk management.

Our robust supply chain procurement framework and associated probity controls call for a consistent approach to procurement activities and responsible purchasing practices, while at the same time managing risks and ensuring clear lines of accountability across our stakeholders. Modern slavery risk mitigation within ACN is an ongoing process, which, during the reporting period, involved:

- a. the supplier and service risk assessment process – to identify the “Higher Risk” categories and elements within our supply chain, which involves where possible, establishing the country of origin for the product being procured;
- b. raising awareness and engagement among our direct suppliers and service providers, to communicate expected standards of behaviour in their engagement with us, by asking the supplier to complete a Modern Slavery Act questionnaire (and if not completed and returned, to the satisfaction of ACN then ACN’s policy is to seek out an alternative source of supply, where the supplier agrees to adopt ACN’s Modern Slavery Act policy);
- c. modern slavery awareness training for all ACN staff in senior leadership roles;
- d. raising awareness and engagement among all ACN staff (through awareness training sessions and during new staff induction training) – to build the capacity of staff to detect modern slavery through training programs; and
- e. raising awareness of ACN’s authorised expenditure delegates of the supplier identification, risk assessment, risk mitigation and management process.

Throughout the reporting period, we began developing ACN’s new Supplier selection standards, which will set out our principles as a socially responsible organisation with the expectation that our supplier and service provider will align with those standards in their own operations. The concerted effort being put into eliminating and preventing modern slavery in our operations and supply chain is another demonstration of ACN’s commitment to the elimination and mitigation of modern slavery.

ACN’s new Supplier selection standards along with a new Supplier contract management framework will be finalised in 2022 – to be applied consistently across ACN departments.

## SUPPLIER CODE OF CONDUCT

In 2021, ACN created and implemented a Supplier Code of Conduct (“the Code”). This Code conveys the public commitment that ACN has made to undertake procurement activities in an environmentally, socially, ethically, and economically responsible manner, and sets out ACN’s expectations for its suppliers.

During the 2022 reporting year, ACN’s standard contracts for purchase of goods and/or services were updated to include a clause requiring the supplier to comply with the Code.

In instances where an alternate contract was used (for example, supplier’s own contracts), suppliers were requested to sign the Code and confirm they agree to it and understand their expectations as a supplier to ACN.

## MARKET APPROACH

When undertaking formal approaches to market in 2022, ACN asked suppliers to respond to questions relating to their reporting status under the Modern Slavery Act; their policies, education, and training practices relating to modern slavery; and the steps they have taken to ensure the risks of modern slavery have been identified and addressed in their supply chains and operations.

## TRAINING AND ENGAGEMENT

Improving staff and management awareness of modern slavery risks is vital to our sustainable and ethical approach to reduce the risk of slavery or human trafficking not being identified and addressed within our business or across our supply chains.

During the reporting period, ACN developed modern slavery training for all employees targeted at increasing the awareness of modern slavery risks both in our operations and supply chains and providing our people with a clear path for raising any concerns which they may have or become aware of. Also, during the reporting period, all staff authorised to procure goods and services received training in modern slavery, ensuring these key staff are aware of ACN’s pro-active approach to addressing modern slavery risks and the meeting its obligations under the Modern Slavery Act.

# Action road map for 2023

## ACTION PLAN FOR THE NEXT REPORTING PERIOD

During the next 2023 reporting period, our actions will:

- a. embed the cycle of ACN's modern slavery statement production into annual calendar of work;
- b. review and refresh membership of ACN's Working Group as necessary to ensure relevancy and provide opportunity to stakeholders across ACN to contribute to the ongoing processes associated with the risk assessment of a range of risk factors including the risk of modern slavery;
- c. continue to focus on strengthening our understanding and capabilities to identify potential modern slavery risks in our operations and supply chains, and improving our procurement policies and processes;
- d. continue to monitor progress against our 2022 commitments and identified priorities for future years as specific reporting against the broad indicators of our Modern Slavery Action Plan;
- e. develop and implement targeted education and engagement activities to enhance knowledge and awareness of modern slavery risks for the "Higher Risk" areas and activities;
- f. include conducting an awareness survey to gauge staff awareness of modern slavery risks, with the results of this survey used to inform ongoing design of training initiatives and provide useful insights on ways to improve capability in this space;
- g. include providing regular updates to ACN governance bodies;
- h. establish reporting on measures which inform the effectiveness of our risk mitigation actions;
- i. review and strengthen our new supplier evaluation and selection process to enable us to better assess the response of new supplier and service provider in addressing modern slavery risks in their operations and supply chains;
- j. review opportunities for embedding modern slavery due diligence into contractor and supplier onboarding and management processes;
- k. ensure that our procurement contracting templates to include clauses in relation to modern slavery and sets out setting out ACN's expectations of its supplier and service providers in terms of acting ethically, with integrity, and according to good commercial and social practice;
- l. investigate how modern slavery risk management can be integrated into ACN's enterprise wide risk management framework; and
- m. investigate opportunities for effective and robust supplier and service provider compliance monitoring;
- n. continue to review, develop and promote our policies and practices to identify and mitigate risk areas for modern slavery and human rights abuse in our business and supply chains as part of our ongoing commitment to continual improvement.
- o. review and development of our risk management framework;
- p. development of our supply chain map and risk management activities;
- q. expand the scope of high-risk countries reviews (for monitoring and screening purposes);
- r. internal audit of our Modern Slavery Program; and
- s. developing a set of key performance indicators to enable quantitative assessment of the effectiveness of ACN's actions, and measurement of progress over time.

## ASSESSING THE EFFECTIVENESS OF OUR ACTIONS IN 2023

The table below describes how we plan, in the next reporting period (July 2022 to June 2023), to assess the effectiveness of our actions against the Key Performance Indicators (KPI's) used to address the risks of modern slavery practices in our operations and supply chains:



ACTION (KPI)	HOW EFFECTIVENESS WILL BE ASSESSED	FY2022/2023 OUTCOMES
<b>Board oversight of actions taken</b>	Regular reporting and review at ACN Board and/or the Governance and Scholarships Committee meetings	Material matters reported at Governance and Scholarships committee meetings during the year
<b>Modern Slavery Awareness Staff Training</b>	Monitoring the training percentage output from ACN's learning management system	95% of employees have completed the Modern Slavery Awareness Training
<b>Contracts which include modern slavery requirements</b>	The number of 'higher risk' category supplier contracts with modern slavery conditions	All Standard contracts for 'higher risk' category suppliers and service providers reviewed by authorized and accountable expenditure delegates
<b>Supplier Selection and Monitoring</b> (Modern Slavery Questionnaires)	Number of new 'higher risk' category suppliers ACN's Modern Slavery Supplier Questionnaires Number of Suppliers responding positively to ACN's Modern Slavery Supplier Questionnaire	Target: All new 'higher risk' category suppliers are sent an ACN's Modern Slavery Supplier Questionnaire
<b>Grievances, Complaints and Whistleblowing</b> (Modern Slavery concerns)	Number of grievances, complaints or whistleblowing raised with modern slavery concerns	Target: Zero

ACN's Modern Slavery Statement for 2022 has been approved by the Australian College of Nursing Board of Directors on 9 December 2022.

Signed

**Professor Christine Duffield, RN PhD FACN**  
ACN President

