

# Modern Slavery and Human Trafficking Policy

## 1 PURPOSE

This Modern Slavery and Human Trafficking Policy is made pursuant to Section 16 of the *Modern Slavery Act 2018* (Commonwealth) ("the Act") for the Australian Financial Year ending June 30, 2023. It outlines the commitment of Management & Training Corporation Pty. Ltd. (MTC Australia®) across its business and supply chains to combat modern slavery, human trafficking and human exploitation; protecting the rights of the individuals we employ and serve in the community.

Our business centres on managing those within our care in our correctional centres or regional processing centres and providing services to have a positive impact on their lives and the community around them; and in protecting victims and the wider public. Our commitment to delivering robust and professional services accords with the principles of the relevant legislation and we remain focused on continuously improving compliance and service improvement in support of it.

We recognise our responsibility for upholding and protecting the human rights of our employees, service users, victims and wider individuals in the communities we serve. Our strategic and operational plans and processes aim to promote awareness to our employees and partners in a way which promotes a culture of respect for, and promotion of, human rights in everything we do and stand for.

We believe that everyone has the chance to change their lives for themselves, and those around them, for the better and to become a valued citizen in the community. As such, we acknowledge for obligations and commitment to complying with legislation and in preventing modern slavery, in all its forms, and human trafficking within our business, our supply chain and the communities we serve.

## 2 SCOPE

This policy applies to employees of MTC Australia® – whether permanent, fixed, temporary, casual or trainee, and including directors – and any third party or subcontractor engaging in activity for, or on behalf of, MTC Australia®. In this policy, the terms 'employee' or 'workforce' includes all of these groups.

## 3 POLICY STATEMENT

MTC Australia® is a subsidiary of the Management & Training Corporation Ltd. which is based in the United States of America.

MTC Australia® operates the Parklea Correctional Centre, located in New South Wales, Australia, and operates the Nauru Reception Processing Centre, located in the Republic of Nauru on behalf of the Australian Government.

MTC Australia® manages its businesses through its Managing Director, supported by the Business Services Director, Legal & Governance Director and Human Resources & Industrial Relations Director who collectively constitute the MTC Australia® Executive Leadership Team. The Executive Leadership Team report to the parent company's Board.

Much of our frontline services are provided through our employees although we also contract with a small number of significant 'partners' within our supply chain to deliver frontline services in both custodial and community settings. We also use a wider supply chain for collaborative support services and engage (non-

contractually) with a wide array of local community-based service providers – most of whom are Australian-based businesses.

MTC Australia® does operate outside of Australia (specifically in the Republic of Nauru as stated above) and, as such, our supply chain is divided between Australia and the Republic of Nauru. We are aware that having a portion of our supply chain operating outside of Australia exposes us to a higher risk of exposure to modern slavery and human trafficking practices. For this reason, MTC Australia® remains committed to monitoring our business approach and operational delivery with regards to this.

We are fully committed to ensuring there is no modern slavery or human trafficking in any part of our business or within our supply chain and have a zero-tolerance approach to non-compliance.

We utilise a wide array of policies, procedures and standards to promote ethical behaviour and integrity across our business relationships. We continue to develop, implement and refine our systems and controls to address and avoid modern slavery and human trafficking.

Such policies include:

- Code of Conduct Policy
- Code of Conduct – Nauru
- Whistleblower Protection Policy
- Recruitment, Selection and EEO Standard
- Harassment, Bullying, EEO and Discrimination Policy
- Disciplinary Action and Appeals Standard

Our policies are promoted through a mix of onboarding, inductions; and being readily available to employees through our intranet. Our Legal Register is owned by the Legal & Governance department, with our lawyers acting as custodian for legislative amendments – any changes are cascaded through to our policy makers and employees as necessary.

Our key supply chain partners are required to provide assurance of their business approach being in line with our commitment to the relevant legislation through their values, policies and processes. They are expected to demonstrate their competence throughout the contract lifecycle, and we continue to develop our management approach in such regard.

Our key policies and expectations are complemented by mandatory annual training.

## Operations

Our frontline services focus on individuals within our care and public protection through:

- managing the sentences handed down by the Courts related to those within our care
- managing reception and administration requirements
- undertaking risk and needs assessment on those within our care
- providing services in line with our Government contracts.

We recognise that those within our care may be both perpetrators and/or victims of modern slavery and human trafficking, most notably in terms of:

- sexual exploitation

- domestic servitude
- child-related crimes including sexual exploitation, illegal drug cultivation and distribution, and organisational theft
- forced marriage and illegal adoption.

We equally recognise that our business also comes into contact with, and has duty to protect, victims of those within our care. In light of this, we work closely with the relevant State or Federal departments who advise the Court and support victims of crime.

## Employee Vetting

All employees, whether temporary, permanent or casual, are required to be vetted. The entry vetting for all employees is the Australian Federal Police (AFP) Background Check as well as the relevant qualification and license vetting, employees also having, if required, Negative Vetting Level 1 and a Working with Children Check (WWCC).

All employees, when recruited, are required to provide documented evidence including Personal ID and Proof of Address.

## Training

Our training portal enables employees to develop the skills, knowledge, qualifications and understanding they need to deliver high quality services.

Learning and development plans form part of our employee's annual personal development plans, consisting of a mix of mandatory annual and ad hoc voluntary training.

Training is provided through our online training portal.

## Strategy

We are always looking to enhance and evolve our policies to deliver against our commitment to the legislation and, we will have a further focus on:

- Promoting employees and, ideally, supplier awareness through training on our learning platform as well as ongoing reinforcement via our communications strategy;
- Reviewing our procurement and contract management policies to ensure they remain fit for purpose and further promote understanding and compliance with the Act.

## 4 ROLES, RESPONSIBILITIES AND DELEGATIONS

Role	Responsibility
Managing Director	Responsible for ensuring, are a business we do not enter into business with any company that does not meet the requirements of The Act
Business Services Director	Responsible for vetting all subcontractors and providers to ensure they are not in breach of The Act
Legal & Governance Director	Responsible for the Legal Register regarding legislative amendments
Human Resources & Industrial Relations Director	Responsible for ensuring our recruitment on onboarding compliance checks are completed for every employee and the relevant training is conducted
Code of Conduct Policy	Outlines the conduct expected of employees
Code of Conduct - Nauru	Outlines the conduct expected of employees connected with the Nauru Contract
Whistleblower Protection Policy	Outlines our Whistleblower policy and protections
Recruitment, Selection and EEO Standard	Outlines our recruitment, selection, equal employment opportunity standards
Harassment, Bullying, EEO and Discrimination Policy	Outlines our position on Harassment, Bullying, EEO and Discrimination
Disciplinary Action and Appeals Standard	Outlines the process for disciplinary action and appeals



Australia

## 5 LEGISLATION

National	Modern Slavery Act 2018 (Cth) "The Act"
Australian Capital Territory	Discrimination Act 1991
Northern Territory	Anti-Discrimination Act 1992
South Australia	Equal Opportunity Act 1984
Tasmania	Anti-Discrimination Act 1998
Western Australia	Equal Opportunity Act 1984
New South Wales	Anti-Discrimination Act 1977
Queensland	Anti-Discrimination Act 1991
Victoria	Equal Opportunity Act 2010
Australian Capital Territory	Work Health & Safety Act 2011
Northern Territory	Work Health and Safety (National Uniform Legislation) Act 2011
South Australia	Work Health and Safety Act 2012
Tasmania	Work Health and Safety Act 2012
Western Australia	Work Health and Safety Act 2020
New South Wales	Work Health and Safety Act 2011
Queensland	Work Health & Safety Act 2011
Victoria	Occupational Health and Safety Act 2004
Australian Capital Territory	Working with Vulnerable People registration
Northern Territory	Working with children clearance, also called an Ochre Card
South Australia	Working with Children Check
Tasmania	Work with Vulnerable Children Check
Western Australia	Working with Children Check
New South Wales	Working with Children Check
Queensland	Working with Children Check, Blue Card
Victoria	Working with Children Check
National	Children's Guardian Act 2019



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