

POLICY



CENTRAL TABLELANDS WATER

MODERN SLAVERY RISK ASSESSMENT MANAGEMENT PLAN

DOCUMENT CONTROL

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PURPOSE

The purpose of this Management Plan is to implement organisation-wide anti-slavery risk management, systems, and processes that ensure the consistent, efficient, and effective assessment of anti-slavery risk in all Council's planning, decision-making, and operational processes.

DEFINITIONS

ASC	Anti-Slavery Commission
Grievance Mechanism	A process for managing a complaint or grievance about modern slavery that is consistent with the criteria set out in Principle 31 of the United Nations Guiding Principles.
IRIT	NSW Anti-slavery Commissioner's Inherent Risk Identification Tool. Forms part of the Anti-Slavery Commission Guidance on Reasonable Steps.
Modern Slavery	Any conduct constituting a modern slavery offence, or any conduct involving the use of any form of slavery, servitude or forced labour to exploit children or other persons taking place in the supply chain of organisations. See Modern Slavery Act 2018 (NSW) section 5.
Salient Risk	The significance of a modern slavery risk or impact as determined by its scale (how grave it is), scope (how widespread the impact is or would be) and irremediable character (how hard it is to counteract or make good the resulting harm).
SME	Small or medium enterprise or business.
Tier One Suppliers	a company that directly provides goods or services to another company, forming the first level of the supply chain.

IDENTIFICATION AND ASSESSMENT

- Initial risk assessment against current suppliers with an annual spend over \$150K should be completed. The risk assessment initially addresses Modern Slavery risks of tier one suppliers.
- The initial risk assessment should also include an audit of high-risk products regardless of spend value.
- Subsequent risk assessments on new suppliers with an annual spend over \$150K should be conducted annually. The risk assessment initially addresses Modern Slavery risks of tier one suppliers.
- CTW will create a centralised database and collate data regarding all new and existing suppliers.
- CTW will send questionnaires to all new suppliers annually and a review will be conducted against all suppliers with a spend over \$150K biennially. CTW will assign a risk rating to each of these suppliers based on a ASC methodology.
- Before proceeding with any purchase over \$150K this rating should be reviewed before going through the Tender process.

TENDERS AND QUOTATIONS

- a) All tenders and quotations require a further Preliminary Questionnaire to be completed by the supplier with their documentation prior to consideration of the Tender/Quotation. If the supplier does not complete the Questionnaire the submission will become invalid, subject to clause (d) below.

- b) If the risk of the Supplier remains high after consideration of the Tender/Quotation, then Council should approach the Supplier to see if they can lower their risk.
- c) Evaluation of the risk to Council will need to be considered prior to the awarding of a Tender/Quotation. A weighting of between 5% and 10% should be set.
- d) Caution should be taken not to overburden SMEs and/or Aboriginal businesses. Consideration of the size and resources of these businesses should be considered when evaluating the Tender/Quotation.

OPERATIONAL TARGETS

The following data should be collected and reported annually to the ASC.

- a) Percentage of employees completed the three levels of modern slavery training:
 - i. General
 - ii. Tender/Quotation
 - iii. Executive
- b) Percentage of questionnaires sent to high-risk suppliers.
- c) Percentage of Grievance Mechanisms submitted.
- d) Percentage of agreed and activated Remediation plans.

GRIEVANCE MECHANISM

A grievance and remediation form should be available to all employees and suppliers.

All grievances should be addressed within 28 days of receiving a completed and signed Grievance Mechanism Form.

ASSIGNED RESPONSIBILITY

The Accounts Payable Officer should collate data for all new Suppliers, Suppliers with a spend greater than \$150K, and all other Suppliers that provide high-risk products regardless of spend. Collated data should be forwarded to annually to CNSWJO for addition to the Centralised Data Base.

Any staff raising a Quotation/Tender are responsible for the review and assessment of the Supplier's submission using data collected from the Preliminary Questionnaire submitted with the Tender/Quotation documents.

Acceptance of the risk to council will be the responsibility of Councillors, General Manager and Executive Managers.

The processing of Grievances and remediation of same will be the responsibility of Executive Manager Corporate Services.

Annual reporting to the Auditor General and Anti-Slavery Commission with regards to Modern Slavery will be the responsibility of the Executive Management Accountant.

Annual review of the effectiveness of the risk management measures described in this plan should be the responsibility of the Executive Management Accountant, along with any updates to legislation and guidelines.