

Modern Slavery Grievance and Remediation

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1.0 Purpose

This procedure outlines the steps to take to identify and remediate business involvement in modern slavery identified in Griffith University's (the University) supply chain or operations. The grievance mechanism allows all people that could be impacted by a business activity, to raise grievances concerning human rights harm and to seek remedy. Grievances may be identified through the University's grievance channels, internally by a staff member conducting due diligence, or from a third party.

This procedure is grounded in the [United Nations \(UN's\) Guiding Principles for Business and Human Rights](#), the Walk Free's [Modern Slavery Response & Remedy Framework](#), and the [Mekong Club's Remediation Toolkit](#).

It is based on the following concepts:

- Being **proactive** in identifying human rights abuses - victims of modern slavery may not come forward if they have a complaint.
- **Listening** to workers and not making assumptions.
- **Addressing** both the case of the grievance and the factors which led to the grievance.
- As a last resort, **disengaging** from a business relationship - workers could potentially be exposed to even greater vulnerability.

2.0 Scope

This procedure applies to all modern slavery related complaints involving supplier workers, including sub-contractors, who provide goods and/or services on or off the University's campuses.

3.0 Procedure

All modern slavery related grievances will be managed in accordance with this procedure. The process will be carried out with complete confidentiality, to prevent any retaliation or victimisation against the aggrieved. If someone is at risk of immediate harm call Triple Zero (000).

3.1 Assessment

3.1.1 Grievance submission channels

Modern slavery related grievances may be received through one or more of the following channels:

- The University's internal or external reporting mechanisms, including Griffith University's Whistleblower Hotline, 'Your Call'.
- Internally by a staff member conducting due diligence.
- Through a third party such as auditors, contractors, civil society organisation's, trade union representatives, media outlets, researchers, or a member of the community.

University staff who become aware of modern slavery related grievances are required to report them to the Manager (Integrity) or to Strategic Procurement and Supply.

3.1.2 Grievance Assessment

All modern slavery related grievances must be assessed by a designated team of stakeholders who are delegates of the Chief Operating Officer (COO). This team will seek to determine the University's connection to the grievance and the appropriate action to be taken in response. The team may include representatives from Procurement, Integrity, Legal, and other relevant areas.

In making the assessment, the team should:

- **Acknowledge** receipt of the grievance.
- **Gather** relevant information related to the identity of the aggrieved (if possible), the legitimacy of the grievance, the number of persons aggrieved, the impact of harm and whether the issue is systemic.
- **Notify** any relevant internal personnel that are not already aware of the matter. This may include sustainability, health & safety teams, risk & compliance teams, legal, human resources, external affairs or media teams as well as the contract manager or relevant business unit representatives. Notify the respective university supplier where appropriate.
- **Determine** whether the grievance should also be referred to the Australian Federal Police, a Regulator (e.g., the Fair Work Ombudsman), or a civil society organisation (e.g., Salvation Army Australia, Red Cross Support for Trafficked People Program, Anti-Slavery Australia or the Australian Catholic Anti-Slavery Network). It should also be determined whether supplier site investigations are required, or if the matter should be referred to an external investigator.
- **Ascertain** whether the University has caused, contributed to, or is directly linked to the harm.
- **Seek advice** to determine if any human rights have been violated or are at risk of being violated, or whether a criminal offence is alleged to have been committed. If the complaint concerns a supplier, request a legal review of contractual terms and requirements to identify each parties' modern slavery obligations, potential breaches and any mechanisms that could be used to support the response and remediation.
- **Identify** the remediation actions (see below and 3.2) including their cost and feasibility.

The University's accountability in addressing the grievance will correspond to its level of involvement, according to the following three statuses:

- **Caused:** The University causes harm when its activities (or omissions) in and of themselves result in harm. *E.g., if the University itself uses forced labour.*
- **Contributed:** The University contributes to harm when its activities (or omissions) significantly facilitate, enable or incentivised a third party to cause harm. *E.g., if the University engages a low-cost cleaning contractor to service staff accommodation that does not pay their workers adequately.*
- **Directly linked:** The University is directly linked to harm caused by a third party if the harm is directly linked to its products, services or operations through its business relationships. *E.g., if the University purchases cables manufactured using components from a supplier that exploits their workers.*

When the grievance assessment is completed, the University will draft an appropriate response.

3.2.1 Notifications to Stakeholders

If the assessment determines that:

- the University did not cause or contribute to the grievance, then the University will:
 - Notify the aggrieved of the outcome in writing.
 - Notify the supplier of the outcome in writing (if applicable).
 - Notify all internal stakeholders verbally or in writing.
- the University either caused, contributed, or is directly linked to such grievance, then the University will:
 - Notify the aggrieved of the outcome in writing. The notification will include the potential remediation actions (see 3.2.2) and the timeframe for implementation.
 - Notify the supplier of the outcome in writing. The notification may require the development of a Corrective Action Plan (CAP).
 - The CAP should:
 - (1) define clear expected results,
 - (2) specify timeframes and
 - (3) include quantitative or qualitative performance indicators which can be measured over time to gauge the effectiveness of remediation efforts and identify areas for further refinement.
 - notify all internal stakeholders verbally or in writing.

3.2.2 Remediation Actions

Where the University finds that it caused, contributed, or is directly linked to the grievance, it may undertake one or more of the actions to remediate the harm:

- Respond to the needs of harmed workers, ideally in partnership with an organisation that specialises in working in human rights remediation. This may include facilitating access to medical support, counselling or temporary accommodation, facilitating the repayment of owed wages or fees paid by workers in the recruitment process, and/or providing financial assistance including transportation or repatriation costs.
- Provide access to aftercare services for the harmed workers such as counselling and trauma services and assist them to get access to legal support. The civil society organisations mentioned in step 1 (see 3.2.1) could provide referrals to a reliable health or legal service providers in other countries.
- Provide an apology to workers that were harmed. This may be issued together with the supplier or a third party.
- Report the incident to authorities if a crime has been committed or is suspected. However, in some situations, such as with state-backed forced labour, reporting the crime is not appropriate. If possible, workers that were harmed should be asked what they prefer and what, if any, concerns they have about notifying law enforcement.
- Confirm that workers are satisfied with the remedy provided.

3.2.3 Corrective Action Plan (CAP) Implementation

Strategic Procurement and Supply are accountable for implementing the CAP with the contract owner and supplier by leveraging the supplier relationship to influence the prevention and mitigation of future harm.

The corrective action will be determined by a range of factors including available leverage with the University's supplier, how strategic the relationship is, the severity of the harm, and consequences of termination.

If the supplier is uncooperative and makes little or no effort to remediate the harm or there are grounds to suspect they are unwilling to collaborate, Strategic Procurement and Supply should escalate the matter to the COO for further action including:

- Arrange a meeting with the supplier's senior executives and/or legal team to discuss the matter, establish if there are any barriers or concerns, and seek an arrangement where corrective action can be met.
- Issue a written warning or breach notification, re-iterating contract terms, university policies, supplier code of conduct and the University's Core Principles.
- If there is no further cooperation, the University may commence working on an exit strategy that considers human rights breaches and seeks to terminate the supplier agreement.

3.3 Mitigate and prevent future harm

On completion of the remediation actions, the University may also undertake one or more of the following actions to address the cause of the harm to mitigate future occurrences:

- Develop an internal corrective action plan with clear timelines and priority actions for development. The plan may include supporting staff to improve their modern slavery due diligence practices, and training suppliers to clarify expectations.
- Review whether existing grievance mechanisms are effective and will enable the identification of future harm.
- Assess the University's practices, policies, systems and lessons learnt to determine if changes should be made. For example, unnecessarily short timelines could place pressure on a supplier to subcontract or employ a labour hire agency to fill short-term staffing needs.
- Share learnings to help build capacity. This may include sharing non-sensitive and non-commercial findings with relevant internal stakeholders and external stakeholders (e.g., Australasian University Procurement Network (AUPN) members), disclosing incidents and their remediation in the University's Annual Modern Slavery statement, ensuring personal and supplier information is de-identified.
- Update contracts, codes of conducts, supplier terms and training tools to address any potential gaps. This may include amending policies or procedures and reassessing business models and procurement practices.

3.4 Monitoring and reporting

The University will maintain records of reported modern slavery grievances in accordance with the University's Information Management Policy. As a minimum this should include:

- Grievance details.
- Grievance assessment, outcome and agreed actions to remediate.
- Monitoring and reporting documentation.
- Communications with all relevant parties and stakeholders.

Regular monitoring of the grievance mechanisms will be conducted to ensure effectiveness and compliance with legal obligations and best practice standards.

3.5 Confidentiality and non-retaliation

All grievances will be handled in accordance with the University's Privacy Policy. Retaliation against

individuals who raise grievances will be managed in accordance with Griffith's Supplier Code of Conduct.

3.6 Review

The remediation actions implemented should be reviewed to monitor their effectiveness. The review may include:

- **Monitoring** the workers that were harmed, if it is appropriate to do so.
- **Capturing** lessons learned and opportunities for continuous improvement of process and systems.
- **Engaging** a third party to conduct an external review/audit.

4.0 Definitions

Grievance: a cause of distress (such as an unsatisfactory working condition) felt to afford reason for complaint or resistance.

Grievance mechanism: any routinised, State-based or non-State-based, judicial or non-judicial process through which grievances concerning business-related human rights abuse can be raised and remedy can be sought.

Modern Slavery: when an individual is exploited by others, for personal or commercial gain. Whether tricked, coerced, or forced, they lose their freedom. This includes but is not limited to human trafficking, forced labour and debt bondage. Practices that constitute modern slavery can include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage
- the worst forms of child labour.

Remedy / Remediation: remedy for human rights harm refers to both the processes of providing remedy for an adverse human rights impact and the substantive outcomes that can counteract, or make good, the impact. Remediation involves responding to individuals that have been harmed and preventing and mitigating potential harms.

Retaliation: in an employment context, retaliation is punishment of an employee by an employer for engaging in legally protected activity, such as making a complaint of harassment to a governmental body or participating in workplace investigations. Retaliation can include any negative job action, such as demotion, discipline, firing, salary reduction, or job or shift reassignment.

Right holder: from a human rights perspective, individuals are rights-holders that can make legitimate claims, and States and other actors are duty-bearers that are responsible and can be held accountable for their acts or omissions. Therefore, a focus on rights and obligations helps to identify who is entitled to make claims and who has a duty to take action, empowering those who have legitimate claims to rights.

Supplier: means an entity known to be capable of supplying the required goods and/or services (including outsourced activities and services provided by third party providers). It includes manufacturers, stockists, resellers, merchants, distributors, consultants and contractors.

Victimisation: occurs when a person treats a worker unfairly due to the worker having made a workplace complaint, e.g., of sexual harassment, bullying, discrimination, etc.

Title	Modern Slavery Grievance and Remediation Procedure
Document number	2025/0001061
Purpose	This procedure outlines the steps to be taken to investigate and remediate cases of modern slavery that Griffith University might have caused or contributed to in its supply chain. Such cases may be identified through various channels including directly from victims through a grievance mechanism, internally by a staff member conducting due diligence, or from a third party.
Audience	Staff
Category	Governance
Subcategory	Governance Risk and Integrity
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Policy advisor	Head of Financial Management
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6.0 Related Policy Documents and Supporting Documents

Legislation	Modern Slavery Act 2018 (<i>Cth</i>)
Policy	Modern Slavery Policy
Procedures	Modern Slavery Supplier Assessment and Risk Management Procedure
Local Protocol	N/A
Forms	Services@Griffith - Procurement Advice Request