

Safeguarding Students Against Modern Slavery and Exploitation: A Toolkit



THE UNIVERSITY OF
SYDNEY



Australian Government

Office of
the Australian
Anti-Slavery
Commissioner

We recognise and pay respect to the Elders and communities – past, present, and emerging – of the lands that University campuses stand on. For thousands of years, they have shared and exchanged knowledges across innumerable generations for the benefit of all.

We recognise and acknowledge Australia's First Peoples and their survival of policies and practices that today we call modern slavery, including forced labour, removals, segregation, servitude, sexual servitude, child labour and forced marriage. These wrongs remain unresolved and remain, shamefully, part of the Unfinished Business of the Land.



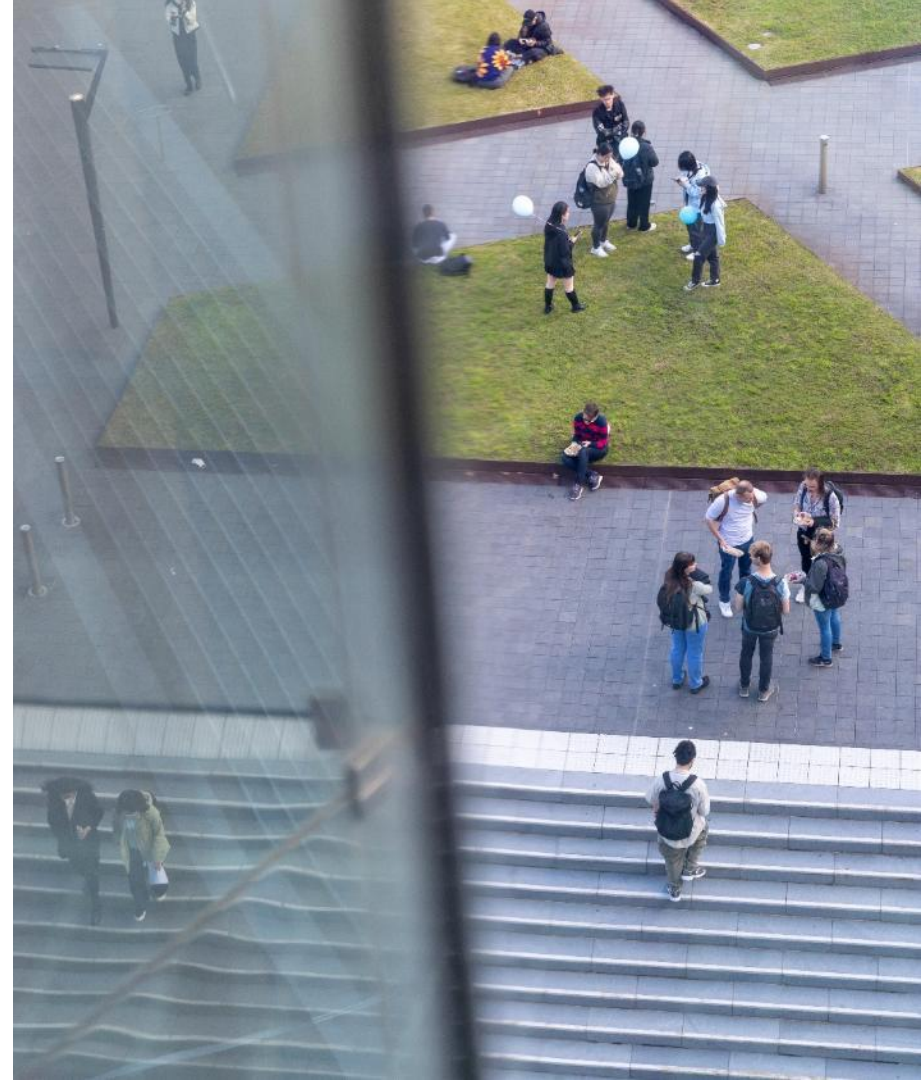
Acknowledgement of Contributions

The University of Sydney (The University) acknowledges the collective contributions that made this Toolkit possible. The University and the Office of the Australian Anti-Slavery Commissioner developed this Toolkit in partnership with 81 representatives from 21 universities across Australia to reflect a shared commitment to safeguarding students against modern slavery and exploitation.

As part of the consultation process, the University of Sydney hosted two roundtable events, which brought together representatives from across the higher education sector and civil society to design and test tools in a simulated environment. These discussions were enriched by the contributions from people with lived experience, whose perspectives were essential to shaping the direction and substance of this Toolkit.

We also recognise the Australasian Universities Procurement Network (AUPN) for their support in co-organising and bringing key stakeholders together.

Our appreciation extends to Anti-Slavery Australia and The Salvation Army for their expertise, advocacy, and unwavering commitment to supporting survivors. We further acknowledge the contributions of other universities and civil society organisations whose feedback and collaboration informed and enhanced this work.



Support Services

This document contains information about modern slavery that some people may find distressing. If you need to talk to someone, or if you or someone you know is unsafe, please know that help is available.

If you are in immediate danger, or feel concerned for someone else's safety, call Emergency Services (000).



24-hour free phone counselling is available from the following community resources:

Lifeline 13 11 14

Beyond Blue 1300 22 4636

13YARN 13 92 76

Mental Health Line NSW 1800 011 511

SuicideLine Victoria 1300 651 251

Queensland 1300 MH CALL (1300 642 255)

**Mental Health Emergency Response Line
WA 1300 555 788**

Mental Health Triage Service SA 13 14 65

**Access Mental Health Tasmania 1800 332
388**

NT Mental Health Line 1800 682 288

Access Mental Health ACT 1800 629 354

1800 RESPECT 1800 737 732

Call Translating and Interpreting Service on 131 450 for free and confidential interpreter services to help speak with service providers in your own language.

Disclaimer

This Toolkit is a resource that has been developed by The University of Sydney in collaboration with the Office of the Australian Anti-Slavery Commissioner. The contents of this Toolkit are made available as an information resource only and should not be used as a substitute for advice or support from a lawyer or other professional. Users of the Toolkit should obtain professional advice, appropriate for their circumstances, as needed.

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By using this Toolkit, you agree to the abovementioned terms and conditions. If you do not agree to the abovementioned terms and conditions, you should not use this Toolkit.

If you would like more information about this Toolkit, please contact The University of Sydney by emailing anti.slavery@sydney.edu.au.

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Foreword: Lived Experience Advisor, Office of the Australia's Anti-Slavery Commissioner

The opportunity to develop skills, earn a degree or a diploma and build a better future attracts international students to Australia. However, these aspirations can also put some students at risk of modern slavery. Ensuring their safety and protection from vulnerability and exploitation is a shared responsibility across government, educational institutions and other community stakeholders.

As a person with lived experience of modern slavery and a former international student, I understand how factors such as financial pressure, language barriers, and limited knowledge of workplace rights can increase the student's vulnerability. These factors can make it challenging to recognise the risks of exploitation they may be experiencing. There are also various barriers which hinder the identification of potential modern slavery taking place in universities and colleges.

Modern slavery might be debt bondage, forced marriage and forced labour. These situations can be made worse through deception or manipulation which leads to threats of domestic violence.

Safeguarding international students from modern slavery is a pivotal way of reaching students who may be at risk, both on and off campus. It helps create a safe and secure space to connect and support students in the best way possible. The Toolkit's roadmap gives universities access to clear and accessible information that empowers students to know their rights and seek support without fear of jeopardising their education, visa status and employment.

Preventing modern slavery requires clear communication, strong collaboration, and coordinated action among stakeholders across universities and colleges. This guide plays an important role in supporting a more trauma-informed, accessible, and lived experience-informed approach to safeguarding international students. By strengthening awareness, policy, and practice, it contributes to creating safer environments where all students can pursue their education free from exploitation.

Preventing modern slavery requires clear communication and coordination between stakeholders across universities. This Toolkit is a meaningful contribution in supporting trauma-informed, accessible and lived-based experiences to safeguarding international students.

This Toolkit is a call to action for us all to work together to strengthen safeguards and create safer pathways for international students at risk of exploitation. I hope all university administrators use the Toolkit to ensure international students on their campuses can understand their rights, access support and seek help safely and without fear.

Belle
Lived Experience Advisor, Office of the Australian
Anti-Slavery Commissioner

Foreword: Australia's Anti-Slavery Commissioner

International students enrich our communities, campuses and economy. Yet we know now more than ever that they may face significant and systemic risks of exploitation. The Migrant Justice Institute's latest report, [Off the Books: Inside Australia's Hidden System of Migrant Worker Exploitation](#), lays bare the scale and severity of the issue. Drawing on the experiences of almost 10,000 migrant workers – including a robust cohort of more than 8,000 international students – the report finds that two-thirds of migrant workers are underpaid, and that international students alone may be short-changed by an estimated \$61 million every week. These risks are often compounded by visa dependency, financial pressure, isolation and limited awareness of rights.

Addressing these risks demands a genuinely multi-sector response. My Office has consistently called on government and business to strengthen prevention, detection and action.

"Universities are equally critical partners. They are not only places of learning, but trusted hubs where awareness can be raised, early warning signs can be recognised, and timely, trauma-informed support can be mobilised."

This Toolkit demonstrates what is possible when that responsibility is embraced. It provides practical guidance to build awareness across the student journey, equip staff to recognise and respond to red flags, and embed safeguarding into institutional systems and processes.

I acknowledge that universities are just one part of the international student ecosystem. Whilst this guide is designed for universities, the principles and processes can be applied to colleges and private institutions.

I commend the University of Sydney for its leadership in developing this resource. I also extend my sincere thanks to the many universities, civil society organisations, and, most importantly, individuals with lived experience who contributed.

Together, these efforts strengthen our collective ability to prevent exploitation, support those at risk, and uphold the rights, dignity and safety of all students.

Chris Evans
Australian Anti-Slavery Commissioner



Message from the University of Sydney

Role of universities in safeguarding students

Universities face unique challenges in identifying and responding to modern slavery risks affecting their students. At the same time, they have an important role to play in supporting students who may be vulnerable to modern slavery. Certain student cohorts may be at heightened risk due to factors such as being newly arrived in Australia, experiencing financial hardship, social isolation, or studying on temporary visas. These circumstances can increase exposure to risks including deceptive recruitment practices, trafficking, debt bondage, forced labour, and other forms of severe exploitation.

While students' employment arrangements and personal or family circumstances often lie beyond the direct control of universities, higher education institutions play a critical role in safeguarding student wellbeing. Universities are uniquely positioned to equip students with the knowledge and resources they need to understand their rights, recognise indicators of exploitation, and access appropriate support when concerns arise.

From strengthening policies and practices relating to student recruitment, accommodation, work-integrated learning and placements, to providing access to support services, legal assistance, and specialist referral pathways, universities can make a significant contribution to the prevention of modern slavery and the protection of students at risk. By embedding safeguarding measures across their operations, services and student engagement activities, universities can foster safer, more inclusive and more informed learning environments where all students are supported to thrive.

This guidance has been developed to assist universities in understanding their role in preventing and responding to modern slavery and exploitation risks affecting students. It aims to strengthen institutional capability, promote good practice, and support a coordinated, student-centered approach to safeguarding some of the most vulnerable members of our university communities. For the 10 universities in NSW captured by the *NSW Modern Slavery Act 2018 Act*, the guidance will also support compliance requirements relating to safeguarding students.

About this Toolkit

This Toolkit aligns with [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#) and is informed by the [Practice Guidelines for Organisations Working with People in or at Risk of Modern Slavery](#).

This Toolkit has been designed to be used as a “go to guide” with ready to download resources and tools, with the aim to:



Equip universities to embed an institutional response to safeguarding students against modern slavery and exploitation.



Provide ready to use tools and resources to strengthen staff confidence to identify and support students at risk of modern slavery or exploitation.

Whether you are a lecturer noticing a student's academic decline, a frontline practitioner hearing disclosures of hardship or a professional staff member coordinating placements or financial bursaries, this resource is for you.

What is modern slavery and the ‘continuum of exploitation’

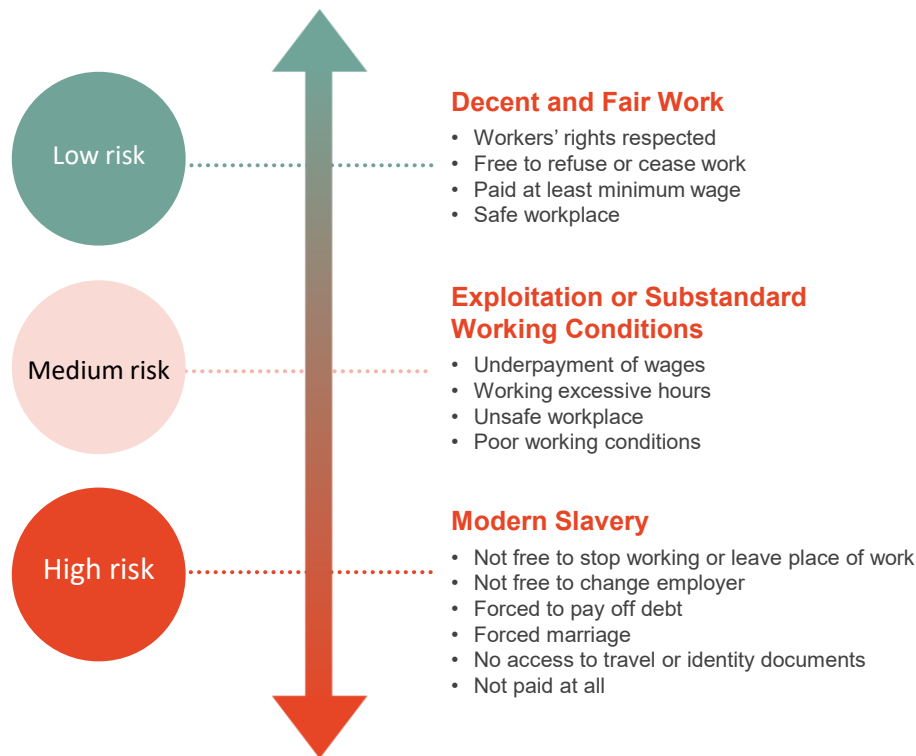
Modern slavery sits at the most severe end of a continuum of exploitation.

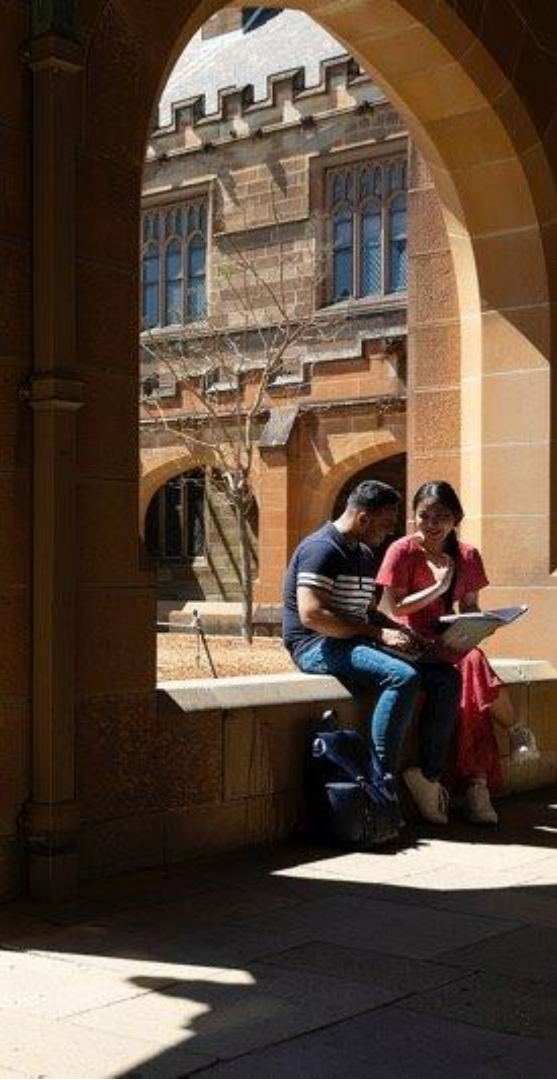
Early warning signs such as underpayment, excessive working hours, unsafe conditions, intimidation, or a reluctance to report concerns may indicate that a person is experiencing exploitation and is at risk of more serious harm such as modern slavery.

While these practices may not, on their own, constitute modern slavery, they can create conditions in which exploitation escalates into forced labour or other forms of modern slavery. Recognising and responding to these indicators early is critical.

Research by the [Migrant Justice Institute](#) (MJJ) highlights that forced labour often occurs along a continuum of labour non-compliance. Organisations seeking to prevent modern slavery should focus on identifying and addressing systemic issues such as underpayment and other workplace rights breaches that can escalate into severe forms of exploitation.

In addition to addressing modern slavery, universities have an important role to play in supporting students to avoid and remedy workplace exploitation. MJJ's research demonstrates the heightened risks faced by international students, and interventions that can reduce the barriers that prevent the vast majority from seeking help when they experience workplace exploitation (see next page).





Research in view:

Migrant Justice Institute

Evidence and recommendations from research on exploitation of international students

In MJI's 2024 survey of almost 8,000 international students, 72% of university students indicated they were paid illegally low wages, but 88% of those who knew they were underpaid took no action.

Many students described the stress and financial distress of underpaid wages and poor working conditions, and the impact on their wellbeing, academics, and the quality of their student experience.

Severe underpayment of international students has been well-documented for a decade. Universities have a critical role in reducing risk and empowering international students to take action.

MJI will soon release a framework with recommendations for more effective interventions by Australian universities. These will include:

- A publicised single on-campus point of contact for problems at work.
- Resources and support to enable international students to identify underpaid and non-compliant work and get help; and
- On-campus legal support for international students to address workplace non-compliance and recover unpaid wages.

Section 1 overview:

Enhancing student awareness



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Section 1 overview: *Enhancing student awareness*

This section provides:



Student academic journey map, highlighting the opportunities to raise awareness among the student population



Good practice case study examples of awareness raising initiatives



Tools and resources for raising awareness about modern slavery risks among the student population



Key reporting mechanisms and contacts to share with students across the academic journey



Section 1 overview: *Enhancing student awareness*

One lever for universities to safeguard students against modern slavery is through information-raising amongst the student population.

Students can experience modern slavery risks across the entire academic journey. Universities can better identify and mitigate risks by equipping students with the knowledge of their rights, risks and red flags and where they can seek support.

Students may face modern slavery in multiple forms, including:

- **Forced marriage** – coercion, threats or deception leading to marriage both within and outside of Australia.
- **Trafficking** – being brought to Australia under false promises and exploited.
- **Exit trafficking** – being tricked, coerced or threatened into departing Australia for exploitation, such as for financial extortion.
- **Deceptive recruitment** – being misled into exploitative or fraudulent jobs.
- **Debt bondage** – forced to work to repay inflated or unlawful debts.
- **Forced labour** – not freely or knowingly consenting to work and facing coercion, threats or penalty.
- **Sexual exploitation** – being forced, coerced or deceived into providing sexual services in a commercial or private setting.
- **Servitude** – unable to leave or stop working or providing services due to coercion or manipulation, and other

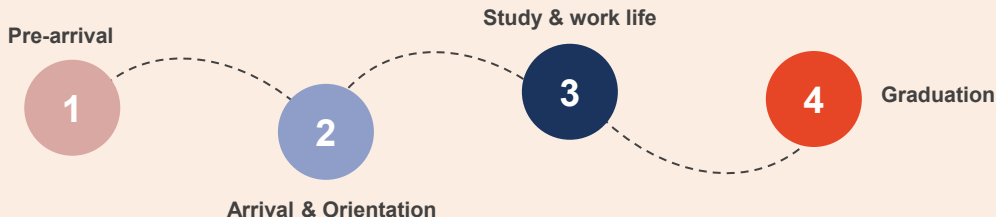
aspects of life are also highly controlled, such as providing unpaid domestic work within a private home.

For detailed legal definitions of these practices, please see [Volume 2, Divisions 270 and 271 of the Criminal Code Act 1995 \(Cth\)](#).

Risks can also arise in workplaces, accommodation settings, or personal relationships. Many students may not recognise exploitation or understand the signs. Vulnerability is often compounded by intersecting factors such as socioeconomic disadvantage, language barriers, cultural norms, and limited awareness of rights. International and local students can experience these risks, however international students in particular face added risks due to visa status, cost-of-living pressures, and isolation.

This section considers the risks that students may face across the academic journey and provides tools and activities that are designed to resonate with students in a clear and accessible way.

Diagram: The four stages of the student academic journey



Creating Awareness Throughout the Student Academic Journey



Pre-arrival

1

Risks

- Limited knowledge of rights and enrolment
- Debt bondage
- Trafficking
- Deceptive recruitment

Touchpoints

- Offshore education agents
- Technology-facilitated recruitment
- Student recruitment
- Global mobility team
- Student enrolment/admin teams
- Student affairs/compliance teams

Tools & Resources

- [FWO \(Fair Work Ombudsman\) International Students Fact Sheet](#)
- [Redfern Legal Centre International Students Welcome Pack \(NSW only\)](#)



Arrival

Risks

- Social and cultural isolation
- Limited knowledge of work/tenancy rights
- Coercive/deceptive tenancy or employment offers

Touchpoints

- Pathway/bridging college
- Student support
- Faith-based and community supports
- Student administration
- Language support
- University accommodation
- Clubs and societies (see next page)
- Faculties and schools
- Teaching staff
- Global mobility team

Tools & Resources

- [Australian Red Cross' Work Right Hub](#)
- [NSW Anti-Slavery Factsheet](#) (in 23 languages)
- [Migrant Justice Institute Off the Books report](#)
- [Checklist: Red Cross Protecting yourself from exploitation](#)
- Anti-Slavery Australia and My Blue-Sky poster on [forced marriage](#) and [pressure to marry](#)
- Experience survey for students recruited through an agent



Study & Work

3

Risks

- Pressure from living/tuition fees
- Acceptance of high risk and underpaid work
- Debt bondage
- Work experience may be exploitative
- Abusive relationships where high levels of coercion and exploitation can occur
- Risk of excessive overtime to meet cost of living
- Deceptive recruitment for forced labour
- Pressure to engage/marry
- Pressure to travel
- Visa sponsor linked to work and/or education

Touchpoints

- Careers and employability support
- Student support and/or legal services
- Faculties and schools
- Teaching staff
- Language/academic support teams
- Student affairs/compliance/special consideration teams
- Safer communities team or similar
- Workplace Integrated Learning/placement teams
- Global mobility team

Tools & Resources

- [Minimum wage poster](#)
- [Student Safety Poster](#)
- [Frontline Worker Guide - forced marriage](#)
- [Additional Referral Pathway Program overview](#)
- [Work Right Hub International Students](#)
- [Anti-Slavery Australia e-learning resources](#)
- [Australian Catholic Anti-Slavery Network - Modern Slavery 101](#)



Graduation

4

Risks

- Visa changes
- Permanent residency (PR) pathway deception
- Self-sourced work-experience/graduate roles
- Deceptive recruitment for forced labour
- Pressure to secure job quickly
- Pressure to marry
- Some students may transfer to private colleges where risks can be heightened
- Re-enrollment when sponsorship fails
- Visa sponsorship pressure

Tools & Resources

- [FWO A guide to starting a new job](#)
- [ScamWatch and Australian Government Jobs and Employment Scams](#)
- [FWO Student Placements factsheet](#)
- [Recognising harmful relationship dynamics](#)

Touchpoints

- Careers and employability support
- Careers centre
- Alumni networks
- Student clubs and societies
- Teaching staff
- Student administration
- Student affairs/compliance
- Student support
- Graduation teams



Good Practice in Action:

Enhancing Student Awareness through peer-to-peer learning



University of Sydney Student Anti-Slavery Ambassador program

The University of Sydney has established a student Anti-Slavery Ambassador (SASA) program by partnering with the Student Life team and the broader Peer Support Advisors network. Individuals are selected to receive specialist training to engage and educate other students on issues related to exploitation, modern slavery, work rights, and available support pathways. ASAs are paid for their work.



“Understanding through peers is essential, especially when English is not your first language”
- Belle, Lived Experience Advisor, Office of the Australian Anti-Slavery Commissioner

Why is this effective?

- As trusted peers, Anti Slavery Ambassadors enable more open and informal engagement, helping students feel more comfortable while also strengthening trust between students and staff.

Example initiatives:

- **Supporting Welcome/Orientation week stall:** SASAs are briefed on how to run activities such as '*Identifying signs of a job scam*'. On the day, SASAs bring students in and build engagement and awareness through the activities.
- **Safety/Know Your Rights workshops:** These are student-run sessions led by Peer Support Advisors (trusted peers), where practical guidance on safety, work rights, and common issues faced on campus is delivered in a peer-to-peer format.
- **Communications campaigns** by SASAs to raise awareness of modern slavery risks.

Key Learnings for developing a similar program

- Tap into existing peer support networks at your university, for example peer support advisors, student buddy programs, student unions or other networks where students are engaged to support students.
- Ensure all engagement is paid and appropriately remunerated (this includes pre-reading or training required to perform duties).
- Engage students (as potentially affected stakeholders) to shape and inform your student engagement and awareness raising activities.
- Ensure wellbeing support for students engaged as SASAs, including a clear framework on how to respond to peer disclosure.



Good Practice in Action:

Collaborating with civil society to build student awareness



In 2019, the University of Sydney partnered with Anti-Slavery Australia (ASA) to develop two bespoke awareness modules for staff and students to strengthen prevention and early identification of modern slavery risks.

The student module focuses on modern slavery risks most relevant to students. From forced marriage to forced labour, the online module includes animated videos and case studies based on real life examples of students who have experienced modern slavery.

At the time of its launch in 2019, the USYD Student Anti-Slavery Awareness module was the first module of its kind globally offered to students. To date **more than 19,000 students** from the University of Sydney have voluntarily completed the module.

The collaboration with a leading anti-slavery organisation, ASA, meant that the information provided to students was not just relevant, but trauma-informed and tested in various workshops with learning design experts.

A complimentary staff module was also designed with ASA with an emphasis on building staff knowledge to recognise and respond to exploitation. To date more than 27,000 University of Sydney staff have completed the training.

"The course was very informative and an eye opener, to know that this can happen here in Australia is shocking"

"I was surprised that forced marriage is counted as modern slavery because I was pushed many times on to it"



More than **19,000 students** have voluntarily completed the awareness module



More than **27,000** University of Sydney staff have completed the training



Good Practice in Action:

Educating for change: students as future frontline service professionals

Educating for Change (E4C), a collaboration between anti-trafficking NGO ACRATH, Flinders University and Adelaide University, has developed 7 discipline-specific online modules to train university students to recognise modern slavery when they enter key frontline service professions, such as teaching, social work, healthcare and law.

The modules raise awareness of modern slavery within vulnerable student cohorts whilst simultaneously upskilling them to ensure they can identify modern slavery when they enter the workplace. There are also modules for university staff to empower them to recognise modern slavery within their student populations and university processes.

The modules were rigorously tested by over 100 university students and an expert advisory board and can be easily embedded in existing learning platforms and courses. Students receive a certificate on completion to help with their professional development portfolio.

The modules have been adopted by universities across all Australian states and territories and have also been used by continuing professional development bodies to train current frontline service workers, making them a great resource for university students.

The free, online, on-demand learning



Introduction to modern slavery



Modern slavery in university settings



Modern slavery in healthcare settings



Modern slavery in school settings



Modern slavery in social and community work settings



Modern slavery in legal and criminal justice settings



Modern slavery and ethical sustainability



“
The students were both enlightened and alive to the possibilities of using the knowledge and skills gained from the completion of the module
Dr. Doris Testa, Adjunct A/Prof.
Victoria University
”



Want to know more? Go to:

acrath.org.au/educating-for-change/ or scan the QR code to access the free modules

✉ edforchangeaus@gmail.com

Section 1: Summary of Key Ready to Use Resources and Tools



Free awareness raising material on modern slavery

- [Migrant Justice Institute Off the Books report](#) – provides findings on migrant worker exploitation in Australia from a national survey conducted with over 10,000 migrant workers
- [Work Right Hub resources for the university sector](#) – developed in consultation with international students
- [NSW Anti-Slavery Factsheet](#) (in 23 languages)
- [Anti-Slavery Australia e-learning resources](#)
- [Educating For Change: Introduction to modern slavery module](#)

Information about work rights to share with students

- [FWO International Students Fact Sheet](#)
- [Redfern Legal Centre International Students Welcome Pack \(NSW only\)](#)
- [Australian Red Cross' Work Right Hub](#)
- [Student Safety Poster](#)
- [Red Cross Protecting yourself from exploitation](#)
- [Minimum wage poster](#)
- [FWO A guide to starting a new job](#)
- [ScamWatch and Australian Government Jobs and Employment Scams](#)
- [FWO Student Placements](#)

Awareness-raising activities to share with students

- [6 Signs the job is a scam](#)
- [Chocolate Job Ad](#) (fake job advertisement)

Forced marriage resources to share with students

- [Anti-Slavery Australia and My Blue-Sky poster on forced marriage and pressure to marry](#)
- [Frontline Worker Guide](#) – students can learn how to respond to and support their peers
- [Recognising harmful relationship dynamics](#)

Section 1: Summary of Key Reporting Mechanisms



Key reporting mechanisms and external contacts to share with students throughout the academic journey

National helplines

1800RESPECT

24/7 counselling, information and support for domestic, family and sexual violence, including coercive control, abuse, exploitation and forced marriage concerns.

Full Stop Australia 1800 FULL STOP (1800 385 578)

Violence, abuse and trauma counselling and recovery service.

Lifeline 13 11 14

24/7 crisis support and suicide prevention.

Kids Helpline 1800 55 1800

Free counselling and support for children and young people aged 5–25.

13YARN 13 92 76

24/7 crisis support service for Aboriginal and Torres Strait Islander peoples.

MensLine Australia 1300 789 978

Telephone and online counselling for men experiencing family, relationship or wellbeing concerns.

Beyond Blue 1300 22 4636

Mental health support, anxiety and depression support, and wellbeing resources.

Fair Work Ombudsman 13 13 94

Information on workplace rights, pay, conditions and exploitation.

Australian Federal Police (AFP) 131 AFP (131 237)

Reporting suspected modern slavery, human trafficking, forced labour, forced marriage or exploitation.

Translating and Interpreting Service (TIS National) 131 450

Free interpreting assistance for people needing language support when accessing services.

Emergency Services 000

Police, ambulance or fire services where there is immediate danger or risk.

QLife 1800 184 527

Anonymous and free LGBTIQ+ peer support and referral

National support organisations

Additional Referral Pathway (The Salvation Army) 1800 000 277

Confidential support, safety planning, legal referrals, accommodation support and access to government-funded support pathways for people experiencing modern slavery.

Forced Marriage Specialist Support Program (Life Without Barriers) 1800 403 213

Specialist support for people experiencing or at risk of forced marriage, including case management, safety planning and referrals.

Support for Trafficked People Program (STPP) (Australian Red Cross) 1800 113 015

Referral only via the AFP and ARP for case management and support for people who have experienced human trafficking, forced labour, forced marriage and modern slavery.

Anti-Slavery Australia (ASA) (02) 9514 8115

Free legal advice, migration assistance, rights information and support for people experiencing or at risk of modern slavery, forced labour, trafficking or forced marriage. In the case of forced marriage, ASA also provides a national forced marriage service, [My Blue Sky](#), with legal advice, safety planning, visa support, family law advice and referrals.

Good Shepherd ANZ 1300 050 150

Financial wellbeing support, financial counselling, emergency relief and assistance with financial abuse, debt and hardship.

Migrant Workers Centre (Vic based providing Australia wide triaging as other states establish centres) (03) 7009 6710

Workplace rights education, advocacy and support for migrant workers experiencing exploitation, discrimination or visa-related workplace concerns.

Australian Muslim Women's Centre for Human Rights (AMWCHR) (03) 9481 3000

Support for women affected by family violence, modern slavery, forced marriage, exploitation and wellbeing concerns.

Scarlet Alliance (02) 9517 2577

Information, support and referrals for sex workers experiencing exploitation, trafficking, workplace issues or modern slavery concerns.

Ask Izzy [askizzy.org.au](#)

Online directory connecting people with housing, food, legal, health, financial and community support services.

National Student Ombudsman [www.nso.gov.au](#)

Students can make complaints on a broad range of issues including student safety and wellbeing, gender-based violence and other issues.



Key reporting mechanisms and external contacts to share with students throughout the academic journey

State based helplines

Victoria

Safe Steps 1800 015 188
24/7 specialist family violence response service, safety planning and crisis accommodation support.

New South Wales

NSW Anti-Slavery Commissioner 1800 37 33 36
Confidential advice, support and referrals for people concerned about modern slavery, forced labour, forced marriage, exploitation or trafficking.

Domestic Violence Line 1800 656 463
24/7 crisis counselling and referrals.

Queensland

DVConnect Women's line 1800 811 811
24/7 domestic and family violence crisis support.

South Australia

Domestic Violence Crisis Line 1800 800 098 24/7

Western Australia

Women's Domestic Violence Helpline 1800 007 339

Family and Domestic Violence Helpline 1800 007 339

Tasmania

Safe at Home Family Violence Response and Referral Line 1800 633 937

ACT

Domestic Violence Crisis Service 02 6280 0900
Provides 24/7 support to adults, young people and children affected by domestic and family violence.

Northern Territory

NT Domestic, Family and Sexual Violence Helpline 1800 737 732
Linked with state/territory response pathways.

State based organisations

Victoria

Project Respect (03) 9416 3401 | 0494 027 641 (Call/Text/WhatsApp): Support for people affected by trafficking, sexual exploitation and the sex industry.

InTouch Multicultural Centre Against Family Violence (Victoria) 1800 755 988:
Specialist support for migrant and refugee women experiencing family violence, coercive control, forced marriage and related abuse.

JobWatch (03) 9662 1933 1800 331 617 (Regional): Advice and legal assistance regarding workplace exploitation, wage theft and employment rights.

Young Workers Centre (03) 9659 3516: Free advice for workers aged 30 and under. Assists with wage theft, unfair dismissal, workplace exploitation and harassment.

Westjustice (03) 9749 7720: Employment law and migrant worker assistance, particularly in Melbourne's western suburbs.

New South Wales

Redfern Legal Centre (NSW) (02) 9698 7277: Free legal advice for employment, discrimination, tenancy, migration and international student issues.

Kingsford Legal Centre (NSW) (02) 9385 9566: A community legal centre operated by UNSW that provides free legal advice and assistance on employment law, bullying and harassment, discrimination and other issues.

Immigration Advice and Rights Centre (IARC) (02) 8234 0700: Free immigration legal advice. Operates the Visa Assist program with Unions NSW for migrant workers experiencing exploitation, wage theft, harassment and unsafe work.

Employment Rights Legal Service (ERLS) (02) 8004 3270: Free legal advice specifically for vulnerable and migrant workers experiencing exploitation or abuse.

Legal Aid LawAccess NSW 1300 888 529
Provides free legal information, practical help and referrals for people in NSW.

Queensland

Multicultural Australia (QLD) (07) 3337 5400: Settlement, migration, casework and support services for migrants, refugees and international students.

Legal Aid Queensland 1300 651 188: Legal advice and referrals for people experiencing forced marriage, trafficking, exploitation and family violence-related coercion.

Caxton Legal Centre (Brisbane) (07) 3214 6333: Employment, migrant worker and community legal assistance.

Western Australia

Circle Green Community Legal (WA) (08) 6148 3636: Legal assistance relating to employment rights, migration issues and exploitation.

Employment Law Centre WA (08) 9227 0111 | 1800 655 266 (regional callers): Specialist free employment law advice.

South Australia

Young workers Legal Service (08) 8279 2233: free specialist employment-law service for young people under 30 years old in South Australia experiencing problems at work. It focuses on workplace rights rather than general legal issues.

Women's Safety Services 1800 800 098: Domestic and family violence support, crisis accommodation, advocacy and safety planning.

Working Women's Centre 1800 652 697 | (08) 8410 6499: free assistance for workers.

ACT

Canberra Community Law (ACT) (02) 6218 7900: Free legal advice for vulnerable workers and temporary visa holders. Can assist with employment exploitation and referrals for trafficking/modern slavery concerns.

Women's Legal Service (02) 6257 4377 or 1800 634 669: free information, legal advice and representation for women, trans people and non-binary people.

Young Workers Advice Centre (02) 6225 8104: free, confidential advice for all young workers under the age of 25 in the ACT.

NT

Darwin Community Legal Service (08) 8982 1111: Free legal advice and referrals regarding workplace exploitation and migrant worker rights.

Katherine Women's Information and Legal Service (08) 8972 1358 | 1800 620 108: Support for women and young people experiencing coercion, abuse, family violence or related risks.

Tasmania

Migrant Resource Centre Tasmania (03) 6221 0999: Support, advocacy & referrals for migrant and international student communities.

Section 2 overview:

Enabling staff to support students



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Commissioner



Section 2 overview: *Enabling staff to support students*

This section provides guidance, tools and resources for:



A. Staff training and capacity building on modern slavery



B. Enabling staff to support students who may be experiencing modern slavery or exploitation

University staff play a critical role in creating a safe and supportive learning environment. For students to thrive in their academic journey, staff must be able to identify when a student may be experiencing harm, particularly for students who may not know they are being exploited.

This section provides an overview of resources and tools available to build and support staff to identify, respond and safely refer students experiencing modern slavery or exploitation.



A. Staff training

Training and capacity building are effective ways to strengthen staff awareness and understanding of modern slavery risks within the university environment, and to equip staff with the knowledge and confidence to identify, prevent and respond to these risks.

As shown in the *Academic Journey Diagram* on page 15, modern slavery and associated risks can occur at any stage of a student's academic journey.

This highlights the important role that staff across the university can play in recognising early indicators of exploitation, responding appropriately, and supporting students in a safe, trauma-informed manner. This section includes the following training options for staff:

1. [Free online training](#)
2. [Bespoke training and workshop options](#)
3. [Creating your own training program](#)





Free online training available for universities



Anti-Slavery Australia (ASA)

Modern Slavery online course (2hrs)



Explanation of the types of modern slavery through case studies and examples – human trafficking, slavery, servitude, forced labour, debt bondage, deceptive recruitment, the worst forms of child labour, and forced marriage.

To access this course, click [here](#)

Modern Slavery in the Home (2hrs)



What modern slavery is and how to recognise and respond to it in domestic settings.

To access this course, click [here](#)

Who is this training for?

- 1** Staff in student-facing and/or student-support roles.
- 2** Teaching and academic staff, staff interested in learning about modern slavery.
- 3** Students who want to build awareness and support themselves and their peers.



Educating for Change (ACRATH, Adelaide University and Flinders University)

Introduction to modern slavery (1 hr)



Modern slavery overview, types of modern slavery, continuum of exploitation, drivers of modern slavery, identifying modern slavery, responding to modern slavery.

To access this course, click [here](#)

Modern slavery in university settings (1 hr)



The role of universities, university procurement, university students, identifying modern slavery amongst students, responding to a situation of modern slavery.

To access this course, click [here](#)

Who is this training for?

- 1** Student-support staff and/or student-facing staff.
- 2** Teaching staff, staff interested in learning more about modern slavery.
- 3** Students who want to develop foundational knowledge of modern slavery.

Who is this training for?

- 1** Students who want to deepen their understanding of modern slavery in the university context.
- 2** Student-support staff and/or student-facing staff.
- 3** Staff working in procurement.



Bespoke training and workshop options

In addition to free online modules, several organisations offer paid bespoke training programs and workshops tailored to your university's needs and priorities.



Anti-Slavery Australia (ASA)

ASA can partner with universities to deliver customised training options including:

- webinars
- face-to-face training
- workshops and customised online courses

Training can be designed for staff in student support roles such as student wellbeing, counsellors, case managers etc.

The training can focus on identifying modern slavery risks in students, trauma informed care and referral.



Salvation Army

The Salvation Army can also deliver bespoke training sessions that focus on modern slavery risks to students, and the additional referral pathway that they offer to potential victims of modern slavery.



Australian Red Cross

Australian Red Cross

Designed to build capability within organisations to recognise and respond to modern slavery.

Australian Red Cross can deliver and tailor training specifically for universities, designed to enhance awareness and capability in identifying and responding to modern slavery.

Training is centered on the 4Rs Framework:

- Recognising modern slavery
- Reducing Risk
- Responding safely
- Referring individuals to support and assistance

Through practical and engaging learning, participants build the knowledge and confidence to identify indicators of modern slavery and understand their role in prevention, response and referral pathways.

LIFE WITHOUT BARRIERS

Forced Marriage Specialist Support Program

Providing confidential, specialist support to people experiencing one of the most prevalent, and often least recognised, forms of modern slavery in Australia.

Core focus is on making it easy for schools, services and individuals to recognise risk indicators and connect to the right support quickly and safely.

Options for training include short, practical briefings for students and or staff covering:

- what forced marriage can look like in a personal and community context
- key signs of forced marriage
- simple referral pathways and supports

“My most important message is to include training on data privacy so privacy is assured. Only then will students speak”

- Belle, Lived Experience Advisor, Office of the Australian Anti-Slavery Commissioner



Creating your own training program

Effective training requires careful design and consideration of the needs of both staff and students. If your university or organisation is developing its own modern slavery training, refer to [Tool: Checklist: Delivering effective training](#) for helpful tips before you design your program.

Encouraging participation in training programs

The success of any training program is based on how widely used the training is by its key audience. To encourage high participation in bespoke training use other university communication channels to educate staff and promote available training for example:

- Staff e-news
- Staff events and offsites
- Existing staff training schedules (e.g. student admin staff training, career centre training, student services training etc.)
- New starter onboarding packs
- Mandatory training modules in Learning Management System

An example of a training presentation delivered by the Responsible Business and Human Rights team is included below for you to download and tailor to your university setting.

You can download this presentation: [Tool: Modern Slavery Training slides – Student facing staff](#)

Tip:

Use indicator-type language, instead of legal modern slavery terminology.





B. Enabling staff to support students

University staff members can take three key steps to support a student who may be experiencing modern slavery:

1

Identify:
modern slavery
and exploitation
indicators

2

Respond:
engage in a
trauma-informed
way

3

Refer: Make a
referral to a
specialist support
organisation

See [Process Map Overview](#) for a one-page summary of these steps.

These overarching steps are often applied by university student-support teams for mental health, personal, or academic issues. They are based off and, therefore consistent, with good practice guidelines including the [Red Cross Guide for frontline workers and responders](#), and the [Practice Guidelines for organisations working with people in or at risk of modern slavery](#).

Throughout these steps, staff are also encouraged to seek support if they are experiencing emotional overwhelm or potential vicarious trauma. See [Practice Guidelines resources on vicarious trauma](#).

These steps can be adapted to respond to potential situations of modern slavery, and related risks that students may be experiencing. The aim is to seamlessly embed these steps into existing student support processes within your university.





Step 1. Identify

This step involves the identification of indicators and determination of the level of risk.

The identification of students who may be experiencing or at risk of modern slavery may occur during interaction with the student through any of the touchpoints mapped out in the academic journey.

“This is the most challenging step – it is hard to identify when the students are not opening up because they are scared or worried about their visa.”

- Belle, Lived Experience Advisor, Office of the Australian Anti-Slavery Commissioner

How can staff identify a student at risk of modern slavery?

Here are some examples of potential pathways where a staff member may identify a student at risk:

1. **Incidental identification**, where university staff may incidentally identify someone who is experiencing modern slavery or exploitation in the general context of their work at the university. For example:
 - a. A lecturer noticing a drop off in class attendance or speaking to a student requesting an assignment extension.
 - b. A library staff member observing a student in emotional distress.
 - c. Professional staff member witnessing a student sleeping rough on campus.
2. **Typical pathways** where the student is seeking support from a University student support team, for example:
 - a. seeking support for related concerns (e.g. family, domestic or sexual violence).
 - b. Seeking financial hardship assistance.
 - c. Seeking advice on legal and/or migration matters.
 - d. Healthcare services and wellbeing related queries.
 - e. Concerns about academic progress and adjustments.

Note: In the first instance, the staff member can refer the student to their University's student support team.

For more information on identification, see page 55 of the [Practice guidelines for organisations working with people in or at risk of modern slavery](#).

Tools and resources to implement in Step 1:

1. [Tool: Modern Slavery Indicators](#)
 2. [Tool: Modern Slavery Risk Matrix – University support staff](#)
-

Note:

There may be indicators present in a student's situation that fall on the exploitation continuum (see [Tool: Modern Slavery Indicators](#)) but do not constitute modern slavery.

It is important that staff are aware that these may be proxy indicators for something more serious, or the situation could quickly worsen. Therefore, if *any* indicators are present in the student's circumstances, staff should be equipped to respond appropriately (see [Step 2 – Respond](#)).

Examples: What can potential modern slavery and exploitation look like in a university setting?



Johnny

- Johnny dropped by the Welcome Hub to do some reading before his next class.
- You start talking to him and you learn that he has just applied for a job he found on Instagram.
- He paid a starter fee but hasn't heard back and he is not sure what he should do.

Indicators of scam or potential deceptive recruitment:

- Job advertisements on social media.
- Paying a starter fee.
- No communication with the recruiter after the fee was paid.

Sophia

- Sophia is an undergraduate student at the University who is struggling with money due to cost-of-living pressures.
- She works at a café in the city. She has been doing long additional hours, but she hasn't been paid for it yet.
- When she asks the café for her money, the owner says they will report her to Border Force for working over the student hours cap.
- She asks who can help her get her overtime money back.

Indicators of exploitation/or potential modern slavery:

- Experiencing financial pressure, increasing her vulnerability risk.
- She is working excessive overtime.
- Unpaid hours.
- Threat of deportation.

Laura

- Laura is a first-year student.
- She says she is worried about failing because she has skipped 3 of her tutorials and asks if you can help her obtain special consideration.
- She says it's hard for her to get to and from University because she can only attend classes if her brother is free to pick her up and drop her off.
- Laura says her mum and brother safekeep her laptop, Opal card and bank card.
- Laura is worried she won't be able to finish her degree, like her sister who got married in the middle of her degree when she didn't want to and couldn't complete it.

Indicators of potential modern slavery:

- Her movements are controlled, including public transport.
- Finances controlled.
- Laura's sister potentially experienced forced marriage, which indicates Laura is at risk too.
- Control of communication devices.

Sajan

Indicators of potential debt bondage:

- Sajan being an international student has implicit visa vulnerability.
- Strong dependence on the education agent increases risk of exploitation.
- Owning money and feeling pressure to work to repay the debt.

- Sajan is an international student who has recently arrived and is excited to start his Bachelor's degree in Semester 2.
- He explained that his education agent in his home country helped him with his enrolment, visa and travel costs, and he needs to pay them back.
- He is wondering if the university has employment support to help him find work while studying to pay off his travel costs.

Note: In all cases further assessment would be required to determine if the situation constitutes modern slavery.



Step 2. Respond

When a student is experiencing potential modern slavery indicators, it is important that staff members respond in an appropriate, trauma-informed manner. This step is all about building trust and seeking informed consent. This will enable the staff member to have a conversation with the student and gently try to learn more about their situation.

When responding to a student, the staff member should:

- Prioritise immediate safety and autonomy
- Engage in a trauma-informed way (refer to Tools)
- Clarify your role
- Obtain informed consent (voluntary and ongoing)

“If you are in Modern slavery trusting anyone outside that situation is really hard.”

- Belle, Lived Experience Advisor, Office of the Australian Anti-Slavery Commissioner

The ***Practice guidelines for organisations working with people in or at risk of modern slavery*** on page 64, provide the **exceptions** where action may be required without informed consent:



- in the instance of a crisis situation, where the immediate safety of an individual is at risk and you are required to call Triple Zero (000).
- the person is a child, and additional considerations may apply.
- there are laws or policies that may place reporting obligations on entities.

Tools and resources to implement in Step 2:

1. [Tool: Suitability to support potential survivors](#)
 2. [Tool: Trust and Rapport checklist](#)
 3. [Tool: Checklist: consideration when seeking informed consent](#)
 4. [Tool: Open-ended questions for engagement](#)
-



Step 2. Respond

Things to keep in mind from the *Practice guidelines for organisations working with people in or at risk of modern slavery* (pages 49-50):

- Students are more likely to consider seeking support if they know there is someone who can respond in a safe, trauma-informed and effective manner.
- Student-facing and student support teams can develop and regularly update standard operating procedures to ensure that staff know how to respond to someone who may be experiencing some form of serious exploitation in a trauma-informed way. The steps outlined in this Toolkit can be incorporated into these policies and procedures.
- Be aware that there is always some level of risk when interacting with a potential victim of modern slavery, including risks of re-traumatisation.
- Remember that support looks different for everyone.

What if the student does not provide informed consent?

- Their decision must be respected.
- This is an opportunity to build trust and make them feel safe.
- Your response and respect of the student's decision can be an opportunity to make the student feel safe enough to return if they change their mind.
- Consider using student identifier numbers rather than names to minimise unnecessary disclosure of personal information.





Step 3. Refer

The final step in this process is for the staff member to refer the student to an appropriate specialist support service, or appropriate university teams with skilled and qualified professionals.

The staff member may find that after completing the first two steps, the student is experiencing exploitation indicators, however this may not constitute modern slavery. This is where internal student support teams and organisations, such as the Fair Work Ombudsman, can provide support and guidance, depending on the nature of the student's experience.

The staff member can refer to the [Tool: Process Map Overview](#), and if unsure, they can still refer the student to a specialist support service (see [Tool: External referral pathways for modern slavery](#)).



Referring to a specialist support organisation

- Specialist support organisations can offer expert support to people who have experienced modern slavery.
- They have access to a broad range of tools and resources to ensure that people who have been identified as experiencing modern slavery are able to be referred to the support they need.
- If the threshold for modern slavery is not met, but there are exploitation indicators, a referral to an external specialist support service may not be necessary.

“If you can ensure the privacy of students, I think there could be a lot of reports”

- Belle, Lived Experience Advisor, Office of the Australian Anti-Slavery Commissioner

Tools and resources to implement in Step 3:

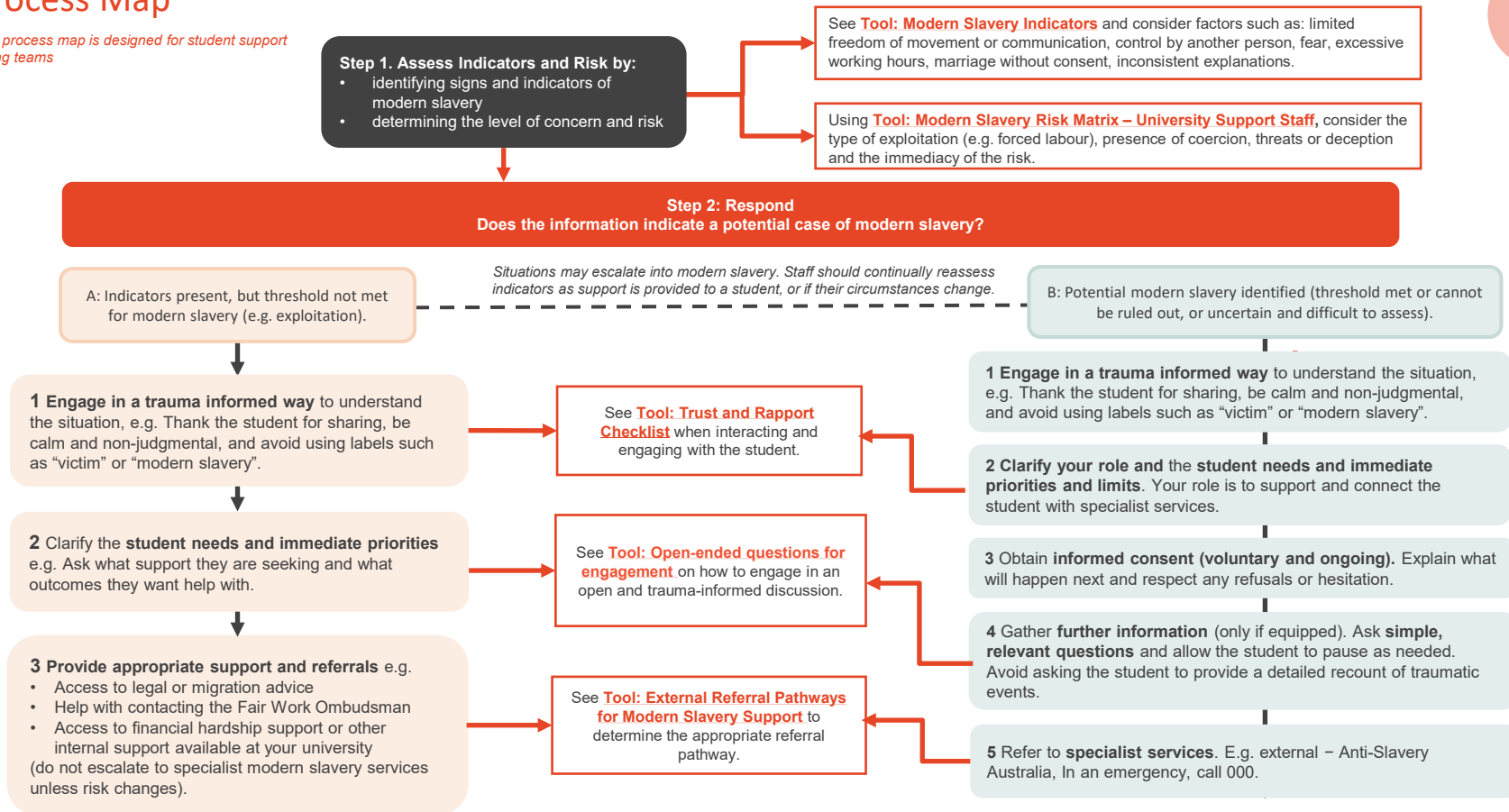
1. [Tool: Process Map Overview](#)
 2. [Tool: External Referral Pathways for Modern Slavery Support](#)
-

Tip:

Tip from the [Practice guidelines for organisations working with people in or at risk of modern slavery](#) (page 83): Before referring to the appropriate service, the staff member should prepare all the information in a trauma-informed way and include the wishes and informed consent of the person who has experienced modern slavery.

Process Map

This process map is designed for student support facing teams



Case Study 1: Applying the process



Text summary:

Eleanor, an international student, approaches student services for help managing her study workload. She reports difficulty keeping up with her studies. Her family overseas have arranged for her to marry a man she has never met, insisting he is suitable and encouraging her to proceed in the coming months.

Eleanor does not want the marriage but fears shaming her family if she declines. She informs staff that her parents have already begun organising the wedding, including dates, invitations, and her flight home, prompting her request to reduce her study load.

Step 1

Identify: to determine whether there is a potential situation of modern slavery.



Step 2

Respond: to create a safe, confidential and culturally respectful environment to make the student feel heard and supported and learn more about their situation.



Step 3

Refer: to refer the student to an appropriate support team and/or external specialist support service.

- Use the [Modern Slavery Indicators](#) tool to map the key facts to modern slavery indicators.
- Determine the modern slavery risk level by applying [Modern Slavery Risk Matrix – University Support Staff](#).

The outcome of Step 1 will be either:

- **Low or medium risk:** Indicators present, but threshold not met for modern slavery (e.g. exploitation).
- **High risk:** Potential modern slavery identified (threshold met or cannot be ruled out).



Red flags

- Multiple indicators present
- Evidence of coercion, deception, or inability to refuse
- Imbalance of power

Reminder: When high risk indicators are present, classify the risk at the highest level, regardless of whether some indicators also align with medium risk.

- Prioritise immediate safety.
- Before seeking informed consent, clarify your role and explain the purpose of your engagement.
- Determine [Suitability to support potential survivors](#).
- Seek informed consent by using Tool: [Checklist: Consideration when seeking informed consent](#).
- Refer to the Tool: [Trust and Rapport Checklist](#) to engage in a trauma-informed way.
- If consent is provided, learn more about the student's situation by asking relevant [Open-ended questions for engagement](#).

Reminder: If the student does not provide informed consent:

- Their decision must be respected.
- This is an opportunity to build trust and make them feel safe.
- Your response and respect of the student's decision can be an opportunity to make the student feel safe enough to return if they change their mind.

- If there is a potential case of modern slavery, use the [External Referral Pathways for Modern Slavery Support](#) to determine the appropriate referral pathway.
- If the threshold for modern slavery is not met, but there are exploitation indicators, staff can:
 - Encourage self-referral or make referral to internal student support teams.
 - Provide information on external resources (e.g. FWO, Work Right Hub).
 - If unsure, still make a referral to specialist support service with informed consent.

Tip: Before referring to the appropriate service, the staff member should prepare all the information in a trauma-informed way and include the wishes and informed consent of the person who has experienced modern slavery.

Tip: The staff member should regularly check in with the student after making a referral to maintain trust and support and gain feedback from the student on their experience and outcome.

Case Study 1: Answer Sheet (detailed) – Eleanor’s experience



Text summary:

Eleanor, an international student, approaches student services for help managing her study workload. She reports difficulty keeping up with her studies. Her family overseas have arranged for her to marry a man she has never met, insisting he is suitable and encouraging her to proceed in the coming months.

Eleanor does not want the marriage but fears shaming her family if she declines. She informs staff that her parents have already begun organising the wedding, including dates, invitations, and her flight home, prompting her request to reduce her study load.

Step 1

Identify



Step 2

Respond



Step 3

Refer

Modern Slavery Indicators:

- **Eleanor expressly does not want to marry** – Unable to decline marriage due to shame, pressure and fear.
- **Marriage arranged to a man she has never met** – Family making significant life decisions for the student.
- **Fear of bringing shame to family if she refuses** – Feels extreme pressure or guilt by family.
- **Parents have already organised date and invitations** – Sudden announcement/progression toward marriage without consent.
- **Parents booked Eleanor’s flight home** – Movements restricted/controlled.
- **Eleanor feels compelled to return home** – Limited discretion over life choices.
- **Impact on studies, need to reduce load** – Declining academic performance/attendance.
- **Emotional distress and feeling trapped (implied)** – Mental or physical health issues (feeling trapped, anxiety).

Tool: Modern Slavery Risk Matrix:

There are several factors that indicate this is a risk of forced marriage and exit trafficking. **Therefore, the modern slavery risk level is high.**

- Assess whether there is an **immediate risk**, particularly the timeframe related to overseas travel. *Note: certain staff members have mandatory reporting requirements if a minor is involved.*
- Determine Suitability to support potential survivors. If there is no suitable team within the university, skip to Step 3.
- If suitable, apply the Trust and Rapport checklist and:
- Thank Eleanor for sharing this information.
 - Use respectful, non-stigmatising language, avoiding labels such as ‘forced marriage’ or ‘victim’, unless Eleanor uses them herself
 - Explain the limitations of confidentiality (e.g. when the university would need to escalate concerns for her safety).
 - Ask Eleanor if she is comfortable with speaking with a support service, within or outside the university.

- **Clarify the scope of your role**
Refer to Tool: Checklist: consideration when seeking informed consent, explain to Eleanor what will happen next and respect any refusals or hesitation.
- Gently explore her experience by using Tool: Open-ended questions for engagement. Focus on choice, pressure, safety and travel plans.

Examples of appropriate questions:

- “Do you feel like you have a genuine choice about whether or not to marry this person?”
- “Have you shared your concerns with your family?”
- “Can you tell me more about the travel plans, do you know the dates and details?”
- “Do you feel pressured or coerced into doing something you don’t want to do?”
- “Do you have access to your passport and important documents right now?”

- The staff member has followed Step 1 and 2 to build a good understanding of what type of support Eleanor may require, while respecting her choices.
- The staff member can now use Tool: External Referral Pathways for Modern Slavery Support to determine the appropriate referral pathway for Eleanor.
- Based on Eleanor’s scenario, there is a potential risk of forced marriage and exit trafficking. Therefore, the most appropriate support services to refer her to are:

Life Without Barriers for specialist support for people in or at risk of forced marriage:
Phone: 1800 403 213
Online:
<https://www.lwb.org.au/services/forced-marriage-support/>

Anti-Slavery Australia and My Blue Sky for free legal support and advice:
Phone: +61295148115
Chat box on <https://mybluesky.org.au/>
Email: help@mybluesky.org.au

Case Study 2: Answer sheet (lite) – Maya's experience

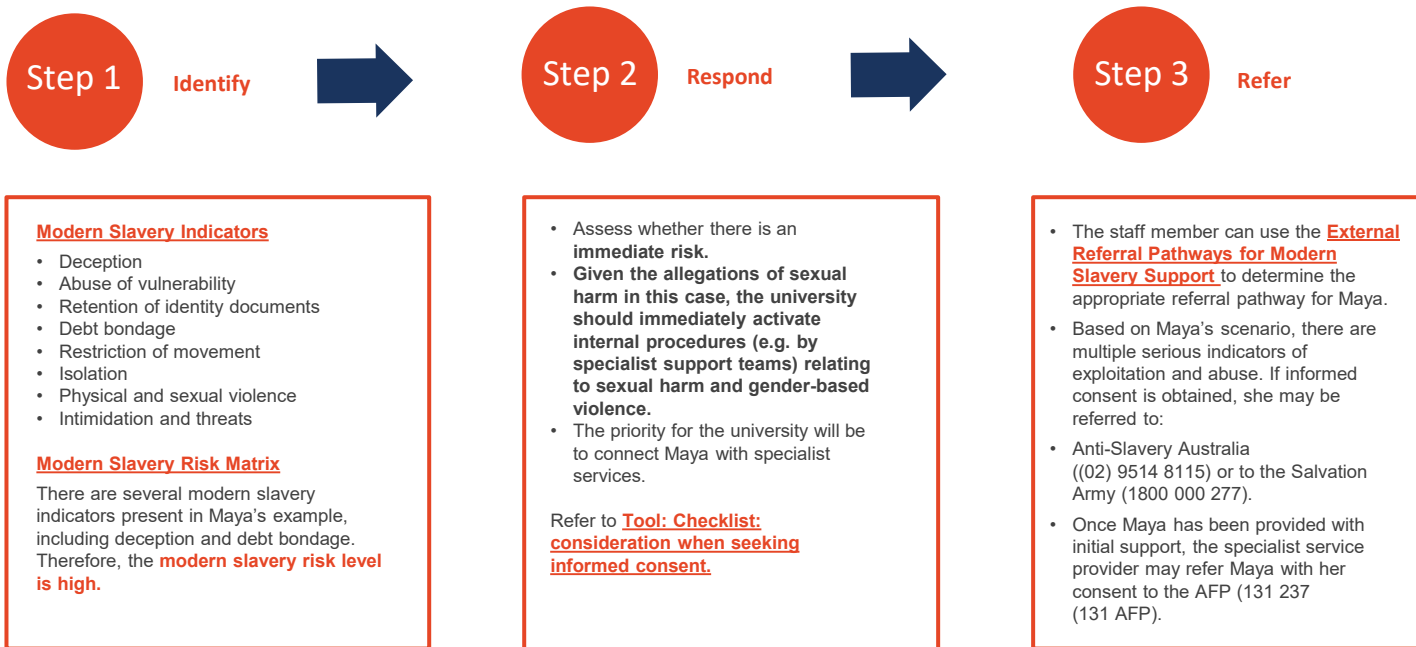


Text summary:

Maya, a 20-year-old international student, pays an online contract-cheating company to complete her university assignments, only for the company to threaten to expose her to immigration authorities unless she pays escalating "fees." When she cannot pay, the handler confiscates her ID documents and forces her to work for them under constant surveillance, writing assignments and performing unpaid labour. Over time, he uses threats, shame, and her visa insecurity to coerce her into sexual servitude, insisting it is part of her "debt." Maya is approached by her university's student compliance team, who discovered that she had engaged a cheating company.

Reminder: When a student presents with these indicators, this requires an immediate safeguarding response.

The priority is the student's safety and wellbeing. Academic integrity processes must only occur after the student is safe, supported and there is evidence that the indicators of risk are no longer present.



Case Study 3: Answer sheet (lite) – Amir's experience



Text summary:

A student, Amir approaches the student wellbeing team at his university after months of working excessive hours in a restaurant where the owner withholds his wages.

The employer did not provide an employment contract and, therefore, Amir does not know what he is entitled to.

Amir reports feeling exhausted, and increasingly isolated.

Step 1

Identify



Step 2

Respond



Step 3

Refer

Modern Slavery Indicators

- Wages withheld
- Excessive overtime
- Isolation
- Abuse of vulnerability
- Mental or physical health issues

Modern Slavery Risk Matrix

There are several indicators in Amir's scenario that may constitute forced labour. However, there is no indication that Amir cannot leave the situation.

After applying the Risk Matrix, there is a **medium risk of modern slavery**.

- Assess whether there is an immediate risk.
- Determine Suitability to support potential survivors. If there is no suitable team within the university, skip to step 3.
- Apply the Trust and Rapport checklist.
- **Clarify the scope of your role** and how you may be able to provide support (e.g. referral to support service, Fair Work Ombudsman).
- Refer to Tool: Checklist: consideration when seeking informed consent. Gently explore Amir's experience by using Open-ended questions for engagement

- After obtaining more information through engaging with the student, the staff member can determine how to provide appropriate support.
- In Amir's situation, the most appropriate options include:
 - Providing Amir with information about access to legal and employment rights advice.
 - Providing Amir access to financial hardship support or other internal support available at your university.
- If the student provides consent, support Amir to lodge a claim with the Fair Work Ombudsman.
- If unsure how best to support Amir, contact **Anti Slavery Australia** or the **Additional Referral Pathway at the Salvation Army**.



Example of staff roles that are well equipped to make referrals to specialist support service

Complex Case Management at Flinders University

As a student-facing, crisis-responsive role, a **Complex Case Manager (CCM)**, which is a current student support role at Flinders University, may engage with a student seeking support for potential modern slavery.

At Flinders University, the CCM is the first point of contact for students experiencing distress, crisis, or complex needs, providing intake, assessment, and short-term crisis support as part of a multidisciplinary team.

The role involves **assessing student needs**, coordinating referrals, and working with internal and external stakeholders to ensure appropriate support.

Complex Case Managers are engaged when students are identified by staff or crisis services and may support students **in person or by phone**, often in high-risk service locations.

A core focus of the role is **managing students' immediate emotional distress** while assessing whether further support (e.g. counselling, mental health triage, security) is required. Therefore, in potential instances of modern slavery, the CCM can make a referral to Anti-Slavery Australia or the Salvation Army or other appropriate specialist service.

If you are interested in developing a similar process or would like to speak with Flinders University about how this works in practice, please contact:

**José Paulino, Senior Manager,
International Student Services**

Student Experience and Management

+61 8 8201 5668

jose.paulino@flinders.edu.au

Section 2 Summary of Key Tools



Free tools for Section 2A (Staff training)

- [Modern Slavery online course](#)
- [Modern Slavery in the Home](#)
- [Introduction to modern slavery](#)
- [Modern slavery in university settings](#)
- [Tool: Checklist: Delivering effective training](#)
- [Tool: Modern Slavery Training Slides – Student-facing staff](#)



Downloadable tools for Section 2B – (Supporting students)

- [Process Map Overview](#)
- [Modern Slavery Indicators](#)
- [Modern Slavery Risk Matrix](#)
- [Suitability to support potential survivors](#)
- [Trust and Rapport checklist](#)
- [Checklist: consideration when seeking informed consent](#)
- [Open-ended questions for engagement](#)
- [External Referral Pathways for Modern Slavery Support](#)
- [Practice Guidelines for Organisations: working with people in or at risk of modern slavery](#)
- [Frontline Worker Guide](#)

Section 3 overview:

University wide frameworks and tools to embed student safeguarding into management systems and controls



THE UNIVERSITY OF
SYDNEY



Office of
the Australian
Anti-Slavery
Commissioner



Section 3 overview: *University wide frameworks and tools to embed student safeguarding into management systems and controls*

This section provides University leaders and decision-makers with practical frameworks, tools and resources to support an institution-wide approach to identifying, preventing and addressing the risks of modern slavery and exploitation.



3A

University governance
foundations



3B

Role and leverage of
universities to
address risks



3C

Staff capacity building and
embedding risk
management



3D

Response, remedy and
learning

3A: University Governance Foundations Roadmap

Consistent with the UNGPs, this section sets out the governance foundations for a university wide response to addressing modern slavery risks. For more detailed steps, see **TOOL: Modern Slavery Governance and Accountability Checklist**.

1 Policy Commitment

Articulate through a standalone policy a clear and public commitment to respect human rights and address modern slavery. The policy should set out roles and responsibilities and clearly outline how risks will be identified and addressed.

TOOL: Modern Slavery Policy Checklist

For an example of a modern slavery policy, see the University of Sydney's **Modern Slavery Policy**

2 Governance and Accountability

Strong governance at the enterprise level ensures safeguarding is consistent and effective. For staff, governance clarity ensures there is no ambiguity about where to seek advice, how to escalate concerns and who is responsible for decision making. Establish who within the organisation has the appropriate institution wide oversight to be responsible for modern slavery risk management.

3 Embed commitment into existing policies and management controls

Embed consideration of modern slavery and student exploitation risks into existing policy settings and management controls, including risk management frameworks, procurement rules, safeguarding policies and governance processes.

TOOL: Good practice risk appetite checklist

4 Annual Risk Saliency Assessment

A risk saliency-based approach, consistent with international human rights frameworks, helps universities prioritise the most severe and likely risks to students, rather than adopting a purely reputational or compliance-driven lens.

Saliency assessments should inform where staff training, resources and safeguards are prioritised, particularly for staff in high risk, student facing roles.

TOOL: Saliency assessment methodology

5 Map existing student support and wellbeing services that can be supported to identify students at risk

Modern slavery exists on a continuum of exploitation, where harm can escalate over time. Students may present to student support services with indicators of modern slavery at different points along this continuum. Equipping student-facing teams (see section 2) to recognise these indicators can support early intervention and help prevent further harm.

TOOL: Modern Slavery Indicators

6 Establish a confidential grievance mechanism that aligns with the UNGPs

Grievance mechanisms should be designed in a manner that is trauma-informed and aligned with best practice principles such as the UNGPs. These mechanisms allow people who may be experiencing harm to raise concerns and seek remedies.

Monash University has designed a rights-based framework for universities to design appropriate grievance mechanisms. **See page 57**



Good practice: *Taking an intersectional approach to institutional governance*

Students may experience **intersectional risks** arising from the interaction of personal characteristics, lived experiences and social position. When these factors overlap, they can increase a student's exposure to discrimination, marginalisation and exploitation, including modern slavery.

It's important to recognise, how a student's background, personal circumstances and experience may:

- influence how they experience modern slavery or other forms of exploitation
- affect whether, when and how they seek help or disclose concerns
- shape the type of support they need and any barriers to accessing it
- impact their interactions with the university, particularly where staff or service providers hold positions of authority or decision-making responsibility



See page 131 of the [Practice Guidelines for Organisations: Working with People in or at Risk of Modern Slavery](#) for an overview of relevant characteristics and broader social and structural factors that can compound vulnerability.

Taking an intersectional approach supports more responsive, culturally safe and trauma-informed prevention and response, and helps ensure that modern slavery risk management and student support mechanisms do not unintentionally exclude or disadvantage those most at risk.

Tip:

Engaging with affected stakeholders and people with lived experience is a core element of effective human rights due diligence under the UNGPs – see the [NSW Anti-Slavery Commissioner's practical guidance](#).

A trauma-informed approach recognises the power imbalances, fear and practical barriers that may prevent students from speaking up.

[TOOL: Engaging with People with Lived Experience](#)





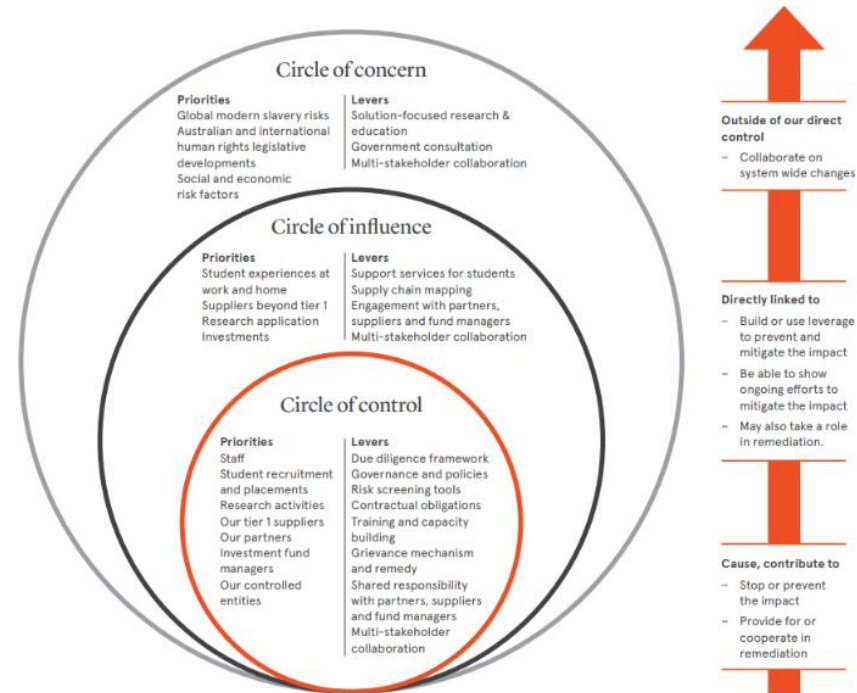
3B: Role and leverage of universities to address risks

While many of the risks of modern slavery faced by students, take place in the student's home or workplace setting, and sit outside of the direct control of a university, there are certain risks which fall directly in the circle of control of universities.

This section focuses on how universities can integrate safeguards for students into management systems and controls, using a human rights due diligence approach that is risk-based, proportionate and student-centred.

To support practical decision making, this section applies the concept of a university's circle of control and sphere of influence. This framework helps identify where institutions have:

- Direct control, and therefore the highest responsibility to prevent and address harm (for example, on-campus employment);
- Authorising or facilitating roles, where leverage is strong but shared with external partners (such as student placements and internships); and
- University-endorsed relationships, where the institution may not control all actions but has significant influence and responsibility to undertake due diligence and monitoring (such as student recruitment through agents).





Modern slavery risks in the university's circle of control



1. Student Placements

Universities provide students with the ability to undertake internships and workplace-integrated learning.

This presents modern slavery risks, including students being threatened with failing a unit if they do not work excessive hours, students having to perform tasks unrelated to their role and having their phones or passports taken away from them.



2. Student Recruitment

Universities have an opportunity to embed risk management practices when engaging student recruitment companies/agents to help international students organise study and visa arrangements.

Education agents may exploit students' trust and expose students to modern slavery through deceptive marketing, excessive fees and coercion into ancillary services.



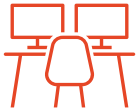
3. On-campus student employment

Universities employ large numbers of students to work on campus. This presents a modern slavery risk, as students may be pressured into working excessive hours or experience underpayment.

As universities control the employment contracts for on-campus work, modern slavery clauses can be added to minimise the risk.



1. Student placements – risks and due diligence steps



Universities deliver student placements, internships, workplace-integrated learning (WIL), and other work-based learning during a student's course. These also introduce new environments and partners to the university setting, where there may be less visibility of the student's working conditions.

Key modern slavery risks

- Undertaking activities outside appropriate experiences and unrelated to their learning goals (e.g. menial tasks not aligned to professional expectations).
- Performing activities outside university-approved hours, which may be excessive (e.g., attending placement for 12 hours a day).
- Placement has transitioned into an employment arrangement.
- Student may be threatened with placement failure/academic repercussions.
- Student may be threatened with having their visa revoked.
- A student's passport, identity documentation or mobile phone is confiscated.
- A student may feel trapped in a situation of exploitation due to threats, force, or violence.

Who at the university should conduct due diligence?

Relevant teams involved in organising, approving and monitoring student placements and internships are responsible for implementing minimum due diligence requirements.

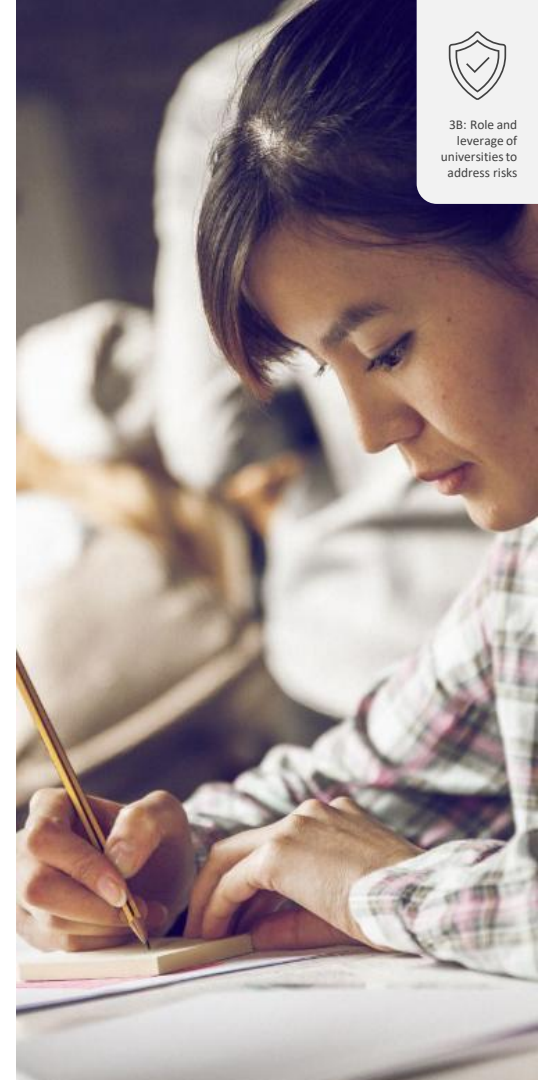
These include:

- Workplace integrated learning/placement teams
- Faculties and academic supervisors
- Careers and employability services
- Governance, risk and compliance functions

How?

To effectively safeguard students from exploitation and/or modern slavery, ensure that the minimum due diligence requirements are met **before** a student commences their placement.

Relevant teams in universities can follow the [TOOL: Checklist for minimum due diligence requirements in student placements](#)





Case Study: Student placement – workplace exploitation



Sophie is a final-year veterinary science student on a supervised clinical placement at a large veterinary hospital. Her roster repeatedly exceeds 60 hours per week (nights/weekends), well beyond the agreed placement requirements.

She is frequently left working alone on night emergency shifts without adequate supervision, becomes exhausted and starts making errors, potentially risking animal welfare and her own safety.

When she raises fatigue and wellbeing concerns, a supervisor warns that negative feedback could affect her final grade and refusal to work could jeopardise her assessment. Sophie feels unable to speak up due to fear of academic repercussions and uncertainty about her workplace rights.

Workplace exploitation indicators:

1

Excessive hours
beyond agreed
placement scope

2

Unsafe work
conditions: left
working alone
without supervision

3

Wages withheld/
unpaid labour while
performing equivalent
duties to staff



Good practice in action

Universities should embed modern slavery due diligence steps when evaluating student placement providers.

Example: The University of Sydney's Workplace Integrated Learning team has embedded modern slavery requirements within the due diligence process map for each Faculty that provides student placements.

STANDARD	MAPPING QUESTION	FACULTY RESPONSE
The provider has been provided a copy and agreed to adhere to the University's Modern Slavery Policy 2020.		All Student Placement Agreements used at the University of Sydney provide the following clause: <i>The parties will not use any form of modern slavery practices (such as slavery, child labour, bonded labour or forced labour) in the performance of this agreement and will abide by all applicable laws, statutes and regulations in respect of modern slavery.</i>
The student has been requested to complete the Anti-Slavery online awareness module and has been informed where to seek support if needed.	Please describe the mechanism to request students to complete the Anti-Slavery online awareness module and how students are informed of where to seek support if needed.	This information and links to the module will be included in future editions of the student placement handbook; Students are also provided with links to Fair Work Australia; Student Wellbeing and Counselling Services.



3B: Role and leverage of universities to address risks





2. Student recruitment



One of the most effective ways that universities can take practical steps to embed risk management into its operations is through **student recruitment**. Universities typically engage student recruitment companies or education agents to help international students organise study and visa arrangements.

Complicated admission and visa processes can lead to students' dependence on education agents. Agents may exploit this trust and power imbalance.

Key modern slavery risks

Modern slavery can occur in student recruitment through:

- deceptive or misleading marketing and career outcomes
- excessive recruitment fees
- exploitation through ancillary services (e.g. migration and financial)
- explicit or subtle forms of coercion by recruiters

The case study on the next page demonstrates how exploitation can occur in practice, and highlights areas where universities can mature their due diligence processes.





Case Study: International student recruitment tender



Scenario:

A university entered a contract with an international student recruitment company (Company), which appeared reputable during the tender process.

It was later revealed the recruitment company offered students loans to cover application fees and promised work opportunities in Australia to help pay off the loan.

After arriving in Australia, several students began discreetly disclosing their situation, some to academic advisers concerned about repeated absences, others to a student counsellor during wellbeing appointments, and one to a campus housing officer who noticed signs of exhaustion and distress. Students reported that they had paid large, undisclosed “placement fees” in their home country, taking on high-interest loans and had given their passports to Company representatives.

Through these interactions, University staff learned that the Company had threatened students with deportation, visa cancellation, harm to their families, and severe financial penalties if they failed to keep up debt repayments or questioned the Company’s authority.

Relevant student support teams were able to ensure immediate safety and refer the students to specialist support organisations.

Key modern slavery indicators:

Deception False promises about legitimate placement and migration arrangements.

Abuse of vulnerability Students targeted as international students reliant on the Company and unfamiliar with local systems. Exploitation of poverty and family pressure due to high-interest loans.

Debt bondage Students paid large, undisclosed placement fees and were trapped by high-interest debts.

Intimidation and threats of deportation, visa cancellation, harm to families, and severe financial penalties.

Retention of identity documents
Students’ passports were confiscated by Company representatives.

Restriction of movement Passport confiscation and threats restricted their movement and ability to seek help.

Isolation Students disclosed only discreetly, indicating social isolation, fear of speaking openly, and controlled interactions.

Mental or physical health concerns
Staff observed distress, exhaustion, repeated absences, and wellbeing concerns.

How?

How can universities strengthen due diligence in student recruitment to prevent, identify and respond to these risks?

See next page on the AUPN Working Group.



The AUPN – Anti-Slavery Working Group: Addressing Student Recruitment Risks

Objective

The AUPN has established a Student Risk Working Group (working group) to address risks in a coordinated, whole-of-sector approach.

- Short term, task-focused group within the AUPN's Anti-Slavery pillar.
- Purpose is to strengthen how universities identify, prevent and manage modern slavery risks associated with international student recruitment.

Approach

The working group will develop resources that will be added as tools once finalised.

The group will focus on:

- Sharing existing tools, practices and lessons learned across universities.
- Identifying gaps, priority risk areas and unmet needs.
- Agreeing on common standards, expectations and controls.
- Developing fit-for-purpose procurement materials that can be applied across institutions.

Risk profile



High risk offshore recruitment & limited supply chain

- Often operating in high risk jurisdictions with weaker labour protections.
- Heavy reliance on sub-contractors or informal networks (minimal transparency beyond Tier 1).
- Most agencies fall outside of mandatory reporting – reduced accountability and disclosures limits the impact of contract clauses.



Student vulnerability

- Limited understanding of workplace laws, visa conditions & protections.
- Language barriers & cultural power imbalances.
- Fear of visa cancellation or exclusion from study.
- Risk of misinformation from agent about work hours, wage expectations & conditions of employment.



Illegal fees, commissions & debt-requirement

- Risk that agents charge students with prohibited recruitment, placement or visa related fees.
- Limited mechanisms to validate compliance with prohibited fees.
- Students may incur debt to secure enrolment and visas.
- Debt creates pressure to accept exploitative work or accommodation conditions.



Exploitation risks during study & work placements

- Students repaying recruitment fee or debt at risk of underpayment, excessive hours, work in unsafe or high risk sectors.
- Risk of unvetted internships, placements or informal employment arrangements.
- Limited oversight of employment and placement providers during study and poststudy transition.



The AUPN – Anti-Slavery Working Group: Addressing Student Recruitment Risks

Planned outputs

1

Capability, Awareness & Internal Alignment

- Close knowledge and awareness gaps between frontline staff, procurement and contract managers.
- Strengthen links to student safety, wellness and mental health teams, clear escalation and remediation pathways.
- Buyer's guide outlining minimum ethical, contractual and modern slavery expectations.
- Feedback loops between student services & procurement to inform supplier risk decisions.

2

Sector Standard & Shared Expectations

- National / Sector Code of Conduct for student recruitment agents.
- Ethical supplier declaration outlining what agents can / cannot do (e.g. recruitment fees, visa practices, use of sub-agents).
- Develop sector-aligned contract principles.

3

Contracting & Commercial Controls

- Strengthen contracts, template recruitment contract / MSA structure.
- Standard list of tender questions, evaluation weightings and guidance.
- Define contract compliance requirements, including audit rights and reporting obligations.
- Guidance on pre-market risk assessment for high risk recruitment activities (checklist).

4

Supplier Due Diligence & Assurance Requirement

- Pre-qualification supplier list.
- Targeted SAQ for the recruitment sector.
- Contract compliance audits, including agent and sub-agent practices.
- Share information on high risk or non-compliant recruitment suppliers.

5

Student Voice & Early Risk Detection

- Student voice mechanisms, including safe and confidential reporting.
- International student onboarding form / process capturing direct feedback.



3B: Role and leverage of universities to address risks

3. On-campus student employment



Universities directly employ large numbers of students across campus in roles such as retail, hospitality, facilities, libraries, events, research assistance and administrative support. These roles sit within a university's circle of control and present a clear opportunity to model good practice in preventing modern slavery and labour exploitation.

Potential risks

On-campus student employment arrangements can pose modern slavery and exploitation risks where students:

- are unclear about their employment status or rights
- work hours that exceed visa or wellbeing limits
- experience underpayment or unpaid trial shifts
- feel pressured to accept unsafe or inappropriate work to maintain income
- are discouraged from raising concerns due to power imbalances

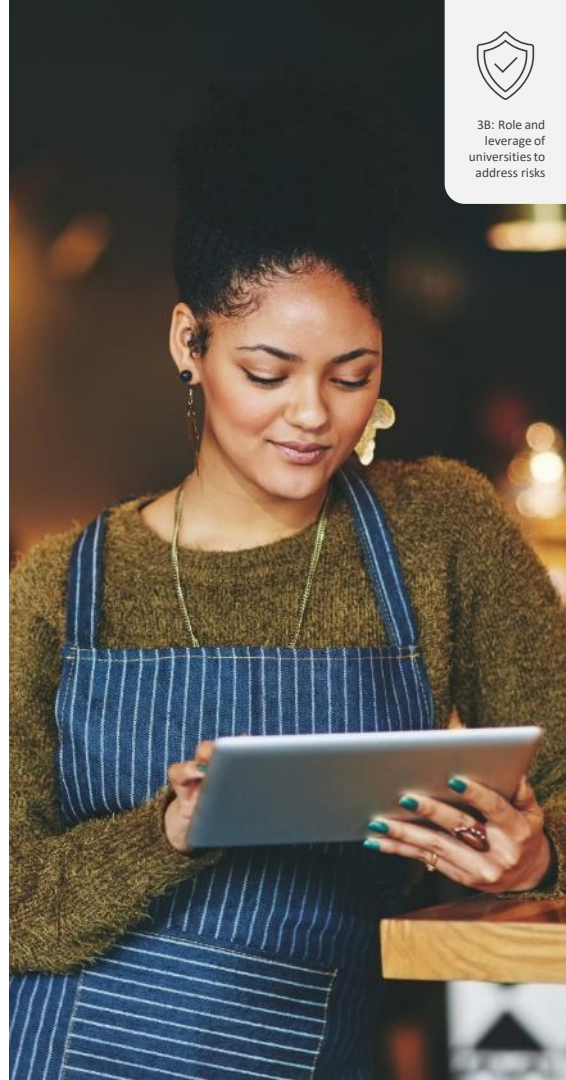
What can universities do?

Because universities set the policies, contracts and oversight frameworks for on-campus work, safeguarding measures can be embedded directly into employment and contracting systems.

For example, modern slavery contract clauses can be added into on-campus retail licence agreements, and should include the following elements:

- ✓ Compliance with relevant employment laws and university policies
- ✓ Clarity of employment status and working conditions
- ✓ Student visa and wellbeing safeguards
- ✓ Respecting freedom of movement
- ✓ Communication of internal complaint mechanisms and university reporting channels
- ✓ Training and awareness for supervisors/management
- ✓ Monitoring and audit rights
- ✓ Breach and remediation

Implementing the forthcoming Migrant Justice Institute framework would provide personalised support at the university level to students who experience labour exploitation both on-campus and off-campus.





3C: Staff capacity building and embedding risk management

Embedding risk management into existing student support frameworks

Universities should undertake a structured risk assessment across the [academic journey](#) to identify where and how students may be exposed to exploitation risks, coupled with a mapping exercise of existing student touch points and support services.

To be effective, modern slavery risk management should be embedded within existing student-facing risk, safeguarding and governance frameworks.

Training student-facing teams to recognise indicators of exploitation can support early identification, consistent responses and harm prevention. See Section 2 on staff training available.

Student-facing teams that may benefit from training include:

- Student services and wellbeing teams
- Counsellors and mental health practitioners
- International student support teams
- Safer Communities / student safety teams
- Equity, diversity and inclusion staff
- Student accommodation and residential life staff
- Academic advisors and teaching staff
- Student conduct and complaints teams
- Careers and employability services
- Financial assistance and scholarships teams
- Campus security staff
- Disability and accessibility support services
- Work Integrated Learning (WIL), placement and internship coordinators
- Student unions and peer support programs

Tip:

Prioritise teams most likely to interact with students experiencing financial hardship, housing insecurity, workplace exploitation, visa-related vulnerabilities or wellbeing concerns.

3D: Response, remedy and learning

When modern slavery or related forms of exploitation are identified, universities need to understand their responsibilities and the leverage available to them to support effective remedy and prevent further harm.

The UNGPs provide a practical framework to guide this assessment by distinguishing between situations where an organisation has:

- Caused harm
- Contributed to harm
- Is directly linked to harm through its relationships

TOOL: Cause, Contribute, Directly Linked Framework

Using Leverage

Leverage refers to a university's ability to influence the actions of others. Types of leverage can include:

- contractual or partnership agreements
- approval or accreditation of placements and agents
- reputational influence
- access to information, training and resources
- collective action with other universities or sector bodies

The greater the risk and severity of harm, the stronger the expectation that a university will use and, where possible, increase its leverage.





Good practice in action

Monash University has developed a practical, rights-based framework that supports universities to design and strengthen grievance mechanisms in line with good practice, ensuring they are accessible, safe, trauma-informed and aligned with the UNGPs.

The **8R framework** comprises three overarching criteria – **Representation**, **Respect** and **Relationships** – which form the foundational pillars underpinning a grievance mechanism's effectiveness.

See [TOOL: Monash University's Framework for Grievance Mechanism Design](#)

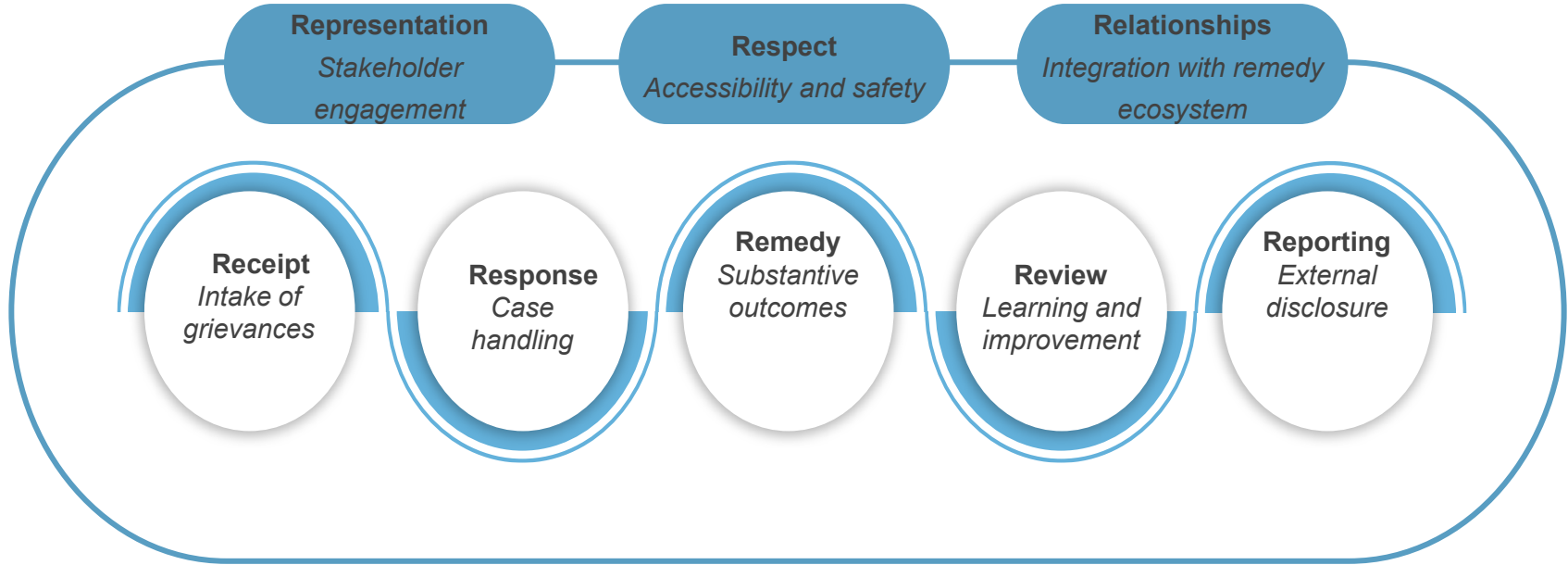
- **Representation** – *Stakeholder engagement in design* emphasises active engagement and dialogue with stakeholders, ensuring grievance mechanisms are designed and operated collaboratively with those who may be impacted.
- **Respect** – *Accessibility and safety* underscore the necessity for equitable, confidential, and accessible processes, enabling stakeholders to participate safely and meaningfully.
- **Relationships** – *Integration with the remedy ecosystem* is about how the grievance mechanisms interact with external mechanisms.

Building upon these criteria, the framework outlines five sequential process steps – the process pillars:

- **Receipt** – *Intake of grievances* is about how accessible channels are established for stakeholders to voice concerns.
- **Response** – *Case handling* ensures transparent, timely, and accountable handling of grievances.
- **Remedy** – *Substantive outcomes* provides appropriate and satisfactory solutions to address harm.
- **Review** – *Learning and improvement* is about continuously improving the grievance mechanism through regular analysis and stakeholder feedback.
- **Reporting** – *External disclosure* involves transparent communication about grievance outcomes and processes.

Read the report: Pham, Coghlan and Bartram. [Grievance Mechanisms and Remediation: Disclosure by ASX100 Financials and Materials Companies as Reported in the Modern Slavery Statements under the 8R Framework](#). Monash Centre for Financial Studies. Melbourne, Australia.

8R framework



Section 3 Summary of Key Tools



Free tools for Section 3

- [Modern Slavery Policy Checklist](#)
- [Example Modern Slavery Policy](#)
- [Modern Slavery Governance and Accountability Checklist](#)
- [Good practice risk appetite checklist](#)
- [Saliency assessment methodology](#)
- [Modern Slavery Indicators](#)
- [Engaging with People with Lived Experience](#)
- [Checklist for minimum due diligence requirements in student placements](#)
- [Cause, Contribute, Directly Linked Framework](#)
- [Monash University's Framework for Grievance Mechanism Design](#)

Glossary

Abbreviation	Meaning
AFP	Australian Federal Police
ASA	Anti-Slavery Australia
AUPN	Australasian Universities Procurement Network
CCM	Complex Case Manager (Flinders University)
E4C	Educating for Change (ACRATH, Flinders University and Adelaide University)
FWO	Fair Work Ombudsman
MJI	Migrant Justice Institute
OAASC	Office of the Australian Anti-Slavery Commissioner
SASA	The University of Sydney's student Anti-Slavery Ambassador Program
UNGPs	The United Nations Guiding Principles on Business and Human Rights
WIL	Work Integrated Learning