



# Modern Slavery Statement 2023



**UNSW**  
SYDNEY

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## Acknowledgement of Country

UNSW Sydney is located on the unceded territory of the Bedegal (Kensington campus), Gadigal (Sydney City and Paddington campuses) and Ngunnwal peoples (UNSW Canberra). We recognise and pay our respects to the Elders and communities of these lands.

First Nations peoples in Australia have survived practices that today we call modern slavery including forced labour, segregation, sexual exploitation, and child labour. Our [Indigenous Strategy](#) supports our commitment to truth-telling and delivering positive outcomes for Indigenous education, employment and research.

# Vice-Chancellor's Message

I am pleased to introduce our 2023 Modern Slavery Statement and reflect on our progress in combating modern slavery.

The University has a rich history of applying diverse expertise and perspectives to positively impact society and tackle challenges. In 2023, we launched our Anti-Slavery Strategy to strengthen our approach and continue delivering positive human rights outcomes.

We focused our efforts across three strategic pillars – strong governance, embedded risk management, and remediation and reporting. The Strategy is supported by our collective vision to improve lives globally through innovative research, transformative education and commitment to a just society.



## 2023 Program Developments

- Launched the Anti-Slavery Strategy and the Sustainable Procurement Framework
- Achieved "Corporate Ethical Procurement and Supply Status" from the Chartered Institute of Procurement and Supply for the fourth consecutive year
- Commenced supplier screening in partnership with Givvable
- Commenced development of a due diligence strategy for research activities
- Completed detailed risk assessment of Tier One suppliers

This year, we focused on implementing a coordinated approach to address our Environmental, Social and Governance risks. Our 2023 developments gave us greater visibility of the risks in our supply chain and operations. We completed risk assessments of our Tier One suppliers and reviewed our policy suite and contract clauses to reaffirm our commitment to protecting human rights. We continued to partner with our peers across the Higher Education sector and consulted our controlled entities to support the development of local initiatives tailored to their operations.

As we prepare for the year ahead, we remain focused on integrating human rights due diligence in all that we do. We strive to deliver positive outcomes for society, our supplier network and our community – including our student cohort, who are particularly vulnerable to modern slavery.

Our 2023 Modern Slavery Statement was prepared to address the mandatory reporting criteria under the Modern Slavery Act 2018 (Cth) and was approved by the University Council on **3 June 2024**.

**Professor Attila Brungs**  
Vice-Chancellor and President

# 01 Who We Are

## Our Structure and Operations

We are the University of New South Wales (UNSW Sydney) – a world-renowned research-intensive university known for our global impact. Since our foundation in 1949, we have embraced the spirit of community, innovation and knowledge by heart, mind and hand.

UNSW Sydney is a body corporate established by the University of New South Wales Act 1989 (NSW), and an accredited higher education provider under the Tertiary Education Quality and Standards Agency Act 2011 (Cth).

Our Council is our principal governing body with members representing the University's interests and community interests with expertise in education, risk, finance, law, governance and strategic planning. Our Council includes representatives elected by our staff and students.

### University Council

Audit Committee	Finance and Strategy Committee	Honorary Degrees Committee	Information Technology Committee	Remuneration & People Committee	Safety and Risk Committee
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### Vice-Chancellor and President

University Leadership Team	Vice-Chancellor's Advisory Meetings	Level 1 Health and Safety Committee
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### Academic Board

Academic Board Advisory Committee	Academic Board Programs Committee	Academic Board Program Review Committee	University Academic Quality Committee	University High Degree Research Committee	University Research Committee
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### Faculty Board

Faculty Academic Committee	Faculty Research Committee
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In 2023, we placed equal 19th in the QS World University Rankings, equal 18th in the Times Higher Education Impact Rankings and second globally for the Times Higher Education Sustainable Development Goal 13 – Climate Action.

Our research and education are supported by seven faculties, six divisions, over 50 centres and institutes and 44 schools including:

Faculties	Divisions
Arts, Design & Architecture	Academic Quality
Business	External Engagement
Engineering	Equity, Diversity and Inclusion
Law & Justice	Operations
Medicine & Health	Transformation, Planning & Assurance
Science	Research & Enterprise
UNSW Canberra at the Australian Defence Force Academy	

Our research strengths include biomedical sciences, law and business, fundamental and enabling sciences, defence and security, environment sustainability and next generation materials and technology. This year we received \$106 million in grants from the National Health and Medical Research Council (**NHMRC**). We also received \$67 million in grants from the Australian Research Council (**ARC**) and \$35.7 million from the Medical Research Future Fund. This placed us third in the Group of Eight and nationally for both ARC and NHMRC research outcomes.

## Our Community

Total students  
**70,234**

Total staff  
**7588**

	Female	Male	Other
Commencing 2023	13,276	15,575	28
Local students	19,153	23,317	69
International students	12,648	15,038	9
Higher degree research	1931	2304	10

	Female	Male	Other
Academic	1430	2001	21
Professional	2680	1449	7
Full time	3181	2990	13
Part time	929	460	15
Permanent	2073	1716	<5
Fixed term	2037	1734	24
Casual	8199 casual staff*		

\*Headcount from 2022 submission for Transforming the Collection of Student Information (TCSI) data. The 2023 casual data headcount will be available in 2024.



**387,263**  
global alumni network



**11**  
residential colleges



**3900+**  
beds on campus

Figure 1: UNSW Sydney's Student and Staff Data as at March 2023

## Controlled Entities

UNSW Sydney has established controlled entities to support its philanthropic activities and commercial functions.

Controlled Entity	Incorporated in
<b>Horizons Future Learning Pty Ltd (trading as "Mentem")</b> <i>Workforce upskilling</i>	Australia
<b>New South Innovations Pty Ltd (NSI)</b> <i>Intellectual property management and commercialisation</i>	Australia
<b>Qucor Pty Ltd</b> <i>Intellectual property management and commercialisation</i>	Australia
<b>Scientia Clinical Research</b> <i>Clinical trials</i>	Australia
<b>The University of New South Wales Foundation Ltd</b> <i>Philanthropy and donations</i>	Australia
<b>Trustee for:</b> The University of New South Wales Foundation The NSW Minerals Industry/University of New South Wales Education Trust	
<b>University of New South Wales Press Ltd</b> <i>Press and publications</i>	Australia
<b>UNSW Global Pty Ltd (trading as "UNSW College")</b> <i>Teaching including in China, Thailand, Indonesia, Japan and South Korea</i>	Australia
<b>UNSW Centre for Transformational Environmental Technologies Co Ltd</b> <i>Intellectual property development and commercialisation</i>	China
<b>UNSW Sino-Australia Innovative Technology &amp; Education Co Ltd</b> <i>Intellectual property development and commercialisation</i>	China
<b>UNSW Hong Kong Ltd</b> <i>Promotion and recruitment</i>	Hong Kong
<b>UNSW Hong Kong Foundation Ltd</b> <i>Philanthropy and donations</i>	Hong Kong
<b>UNSW Global India Pvt Ltd</b> <i>Promotion and recruitment</i>	India
<b>UK Foundation of UNSW Australia</b> <i>Philanthropy and donations</i>	UK
<b>UNSW &amp; Study Abroad – Friends and US Alumni Inc</b> <i>Philanthropy and donations</i>	USA

## UNSW Locations

From Sydney to regional New South Wales (NSW), we are expanding access to our research and teaching facilities.

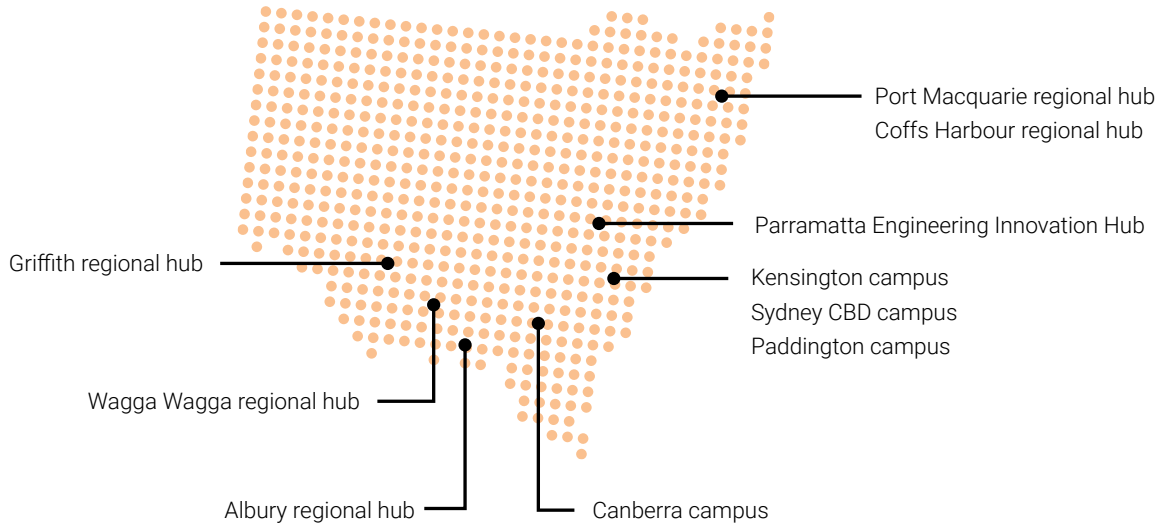


Figure 2: Map of UNSW Sydney Locations



## Our Supply Chain

UNSW Sydney's supply chain is diverse and complex. We directly work with over 6700 domestic and international suppliers to deliver our academic and research programs and support our infrastructure and commercial functions.



**784 million**

total strategic procurement spend



**85%** of spend directed to Australian suppliers



\$1.5 million directed to

**49 Indigenous suppliers**



We recognise our strategic sourcing presents an opportunity to leverage our supply chain and deliver positive societal impact where we can. We developed our Sustainable Procurement Framework to deliver outstanding environmental, social and economic benefits for our community and underpin our strategic sourcing processes.

Implementation of our Sustainable Procurement Framework is aligned across:

- environmental sustainability,
- modern slavery and
- social procurement (working with Indigenous suppliers, social enterprises and women-owned businesses).

Our strategic procurement is coordinated centrally and divided into categories to track our spend in a transparent manner. Our 2023 spend data is highlighted below alongside the top three products or services we purchased under each category.

The percentage values listed in Figure 3 refer to the University's dollar spend value in each category.

#### ■ Corporate - 29%

##### 1500 suppliers

1. International student recruitment
2. Business and management consulting services
3. HR & workforce services

#### ■ Technology - 27%

##### 406 suppliers

1. IT consultancy services
2. Cloud services
3. Teaching & research software

#### ■ Estate Management - 25%

##### 713 suppliers

1. New build works
2. Refurbishment works
3. Commercial cleaning

#### ■ Research, Medical, Equipment and Consumables - 14%

##### 801 suppliers

1. Research services
2. Scientific equipment
3. Laboratory equipment

#### ■ Not yet categorised - 5%

##### 2503 suppliers

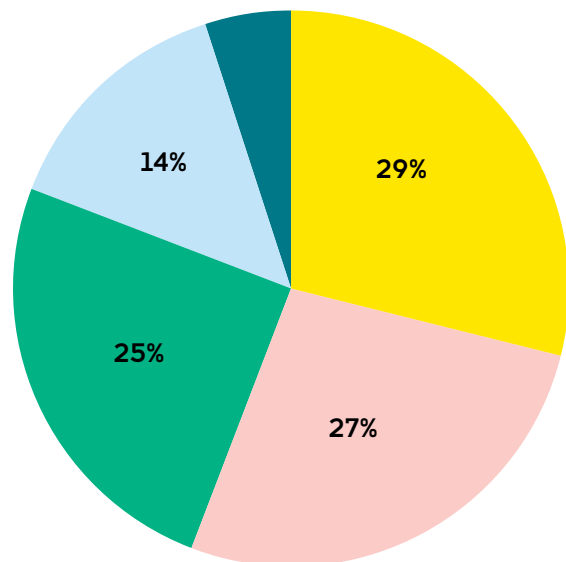


Figure 3: UNSW Sydney's Spend Data by Category and Distribution



This year we conducted our first materiality risk assessment of our Tier One suppliers to identify Environmental, Sustainability and Governance (ESG) risks in our supply chain. From the assessment, we verified **71 sourcing countries** within our supply chain.

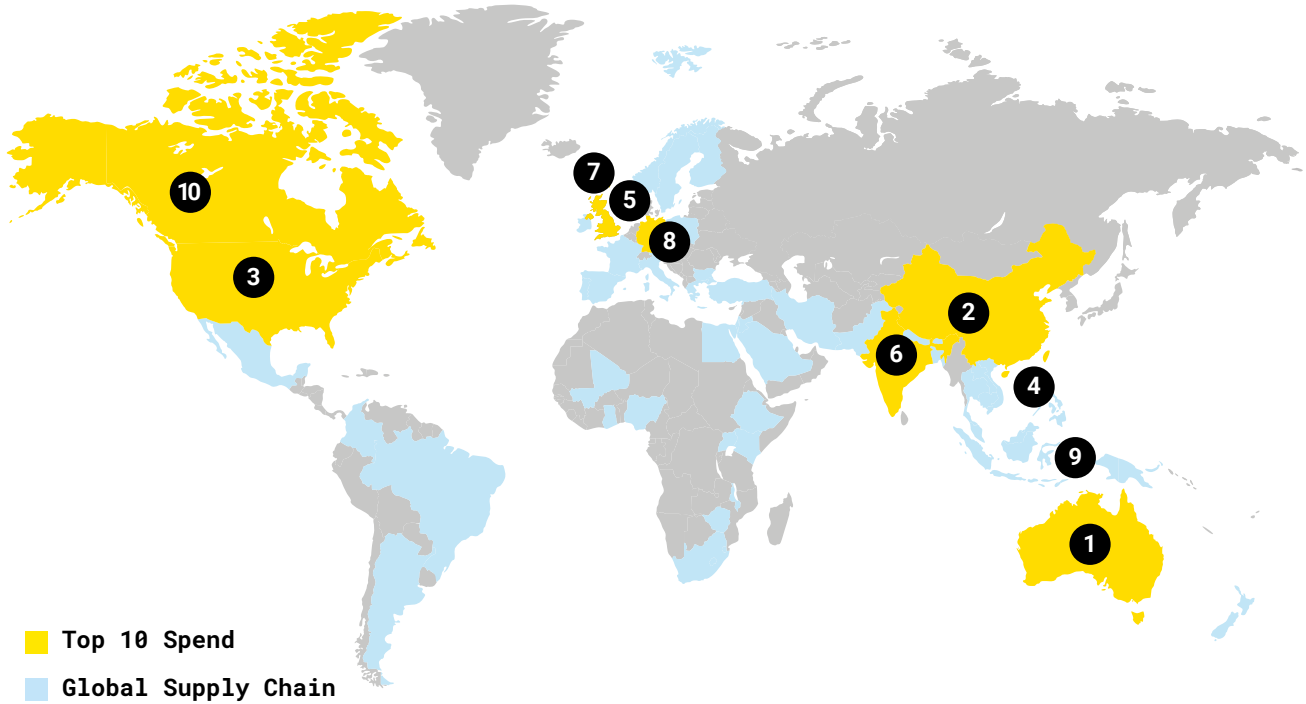


Figure 4: UNSW Sydney's Geographic Spend Data

## Top 10 Countries

	Country	Spend
1	Australia	\$671.4 million
2	China	\$27.1 million
3	United States of America	\$17.05 million
4	Hong Kong SAR	\$13.3 million
5	Netherlands	\$11.01 million
6	India	\$7.5 million
7	United Kingdom	\$5.5 million
8	Germany	\$4.8 million
9	Singapore	\$3.7 million
10	Canada	\$2.4 million

The risk assessment results also identified modern slavery risks linked to 784 suppliers that account for \$199 million of our spend. The results verified inherent industry and geography risks for our Tier One suppliers, which we discuss further in Section 2.

# 02 Our Modern Slavery Risks

## ESG Materiality Risk Assessment

In 2023, we engaged a third-party specialist to perform an independent materiality risk assessment of our supply chain against ESG pillars. Our Tier One suppliers were assessed for inherent ESG risks including:

- social risks and impacts on workers and communities
- modern slavery risks and violations of human rights.

Our spend data from September 2022 – September 2023 was analysed and related spend categories (Australian Universities Procurement Network taxonomy) were mapped to the Global Industry Classification Standard (GICS). Suppliers were allocated an inherent score based on industry risk (30%), industry controversy risk (30%) and country risk (40%).

## Supplier Inherent Risk Score

- Low
- Low-Medium
- Medium
- Medium-High
- High

## Risks in Our Supply Chain

We have set out the specific modern slavery and social risks and related supplier insights from the risk assessment below. Suppliers may have different risk scores across separate modern slavery and social risk categories

Risk	Supplier Insight
<b>Modern slavery</b>	
Forced labour	Medium-High risk: 153 suppliers   High risk: 3 suppliers
Human trafficking	Medium-High risk: 784 suppliers   High risk: 1 supplier
Child labour	Medium-High risk: 149 suppliers   High risk: 1 supplier
<b>Social</b>	
Labour rights	Medium-High risk: 717 suppliers   High risk: 9 suppliers
Safe and hygienic working conditions	Medium-High risk: 193 suppliers
Indigenous and Tribal People's rights	Medium-High risk: 112 suppliers
Discrimination	Medium-High risk: 30 suppliers
Harsh or inhumane treatment	Medium-High risk: 30 suppliers
Community rights	Medium-High risk: 3 suppliers

**Table 1: Specific Risks within UNSW Sydney's Supply Chain**



Three suppliers in Cambodia and Thailand received a High inherent risk score for forced labour. This spend (\$74K) was separate to strategic procurement and related to travel, hotels and conferences. Another non-strategic procurement supplier in India was High risk for child labour and human trafficking and related to provision of construction materials (\$3600)



784 suppliers, which accounts for \$200M of our overall spend, received a Medium-High inherent risk score and covers several industries including construction, industrials and information technology

Our procurement spend was categorised into GICS codes and the risk assessment identified our social and modern slavery risks across each category.

	<b>GICS Category</b>	<b>Spend</b>	<b>Spend Country</b>	<b>Category Risk</b>
1	Information technology	\$202M	AU, CA, CN, US	Medium-High
2	Industrials	\$137M	AU, CN, IN, US	Medium-High
3	Education and training	\$128M	AU, CN, HK, SG	Medium-High
4	Manufacturing	\$26M	AU, CN, DE, US	Medium-High
5	Consumer discretionary	\$23M	AU, ID, UK, SG	High
6	Financials	\$18M	AU, US, KR	Medium
7	Administrative and support services	\$16M	AU, IN, UK, CN	Medium-High
8	Health care	\$11M	AU, CA, DE, US	Medium-High
9	Construction	\$6M	AU, DE	Medium
10	Materials	\$2M	AU, CN, US	High

**Table 2: UNSW Sydney's Highest Modern Slavery Risk by GICS Industry**

By analysing our risk assessment results, we determined likely industries where UNSW Sydney may contribute to modern slavery. We have expanded on these industries and the type of modern slavery risks we face below.



### Consumer Discretionary

#### High Risk

In 2023, 14 suppliers were engaged to provide UNSW Sydney with branded merchandise and apparel. This industry was rated as High risk due to the prevalence of **child labour, forced labour, human trafficking, discrimination and unsafe and unhygienic working conditions**.



### Administrative and Support Services

#### Medium-High Risk

The University engaged with 69 suppliers for building and industrial cleaning, employment placement and recruitment services and other labour supply services. Our risk for cleaning services was ranked as Medium-High, with **forced labour** and **human trafficking as prevalent risks**.



### Information Technology

#### Medium-High Risk

The University engaged with over 830 suppliers to purchase application and systems software, communications equipment, electronic components, IT consulting services and technology hardware and storage. Our modern slavery risks in this industry are **forced labour** and **human trafficking**.



### Construction

#### Medium Risk

The University engaged 23 suppliers to complete construction works including carpentry services, electrical services, building installation services, painting and plumbing. Our modern slavery and social risks in this industry include **forced labour, human trafficking, discrimination and harsh or inhumane treatment**.

## Risks in Our Operations

### Research Activities

As a member of the [Group of Eight](#), UNSW Sydney is recognised as a leading research-intensive university in Australia. In 2023, our annual spend included \$41.5 million within the research and consulting services GICS sub-industry with 414 entities.

We recognise the risk of purchasing consumables and equipment required for research increases our operational risk of contributing to modern slavery and other human rights abuses.

Our top modern slavery and social risks include forced labour, harsh or inhuman treatment, discrimination and poor labour rights.



### Professional and Scientific Equipment

#### Medium-High Risk

In 2023, the University spent \$16.5 million on professional and scientific equipment and related manufacturing with over **105 entities**. Our risk assessment linked 104 entities to a Medium-High risk score for **poor labour rights** and 98 entities to a Medium risk score for **human trafficking**.



### Medical Equipment Manufacturing

#### Medium Risk

In 2023, the University spent \$5.5 million on medical equipment and related manufacturing with over **60 entities**. Our top modern slavery and social risks include **child labour, poor labour rights, unsafe or unhygienic working conditions and harsh or inhuman treatment**.



## Controlled Entities

UNSW Sydney has a network of 16 controlled entities, seven of which are based overseas. While our controlled entities undertake valuable functions on our behalf, we recognise the risk of contributing to modern slavery through their supply chains and operations. Our controlled entities were established to facilitate:



Teaching, education and lifelong learning



Clinical Trials



Intellectual property and commercialisation



Philanthropy, marketing and promotion

Seven offshore controlled entities operate in China, Hong Kong, India, the United Kingdom and the United States of America. We are in the process of assessing our controlled entities' specific modern slavery risks in their supply chains and operations. We are prioritising larger entities with significant operations or those located offshore.

Our assessments will include consultations with our controlled entities and providing training and awareness sessions to procurement stakeholders and executive leaders.

## International Students

Education and student experience are at the heart of what we do – our vision is underpinned by 75 years of experience and driven by our [Education and Student Experience Strategy](#).

We recognise our students are vulnerable to modern slavery and human rights abuses. Our Anti-Slavery Strategy includes an action to raise awareness of modern slavery within our student cohort, with specific focus for our international students.

In October 2023, the NSW Anti-slavery Commissioner formally notified us of the vulnerability of international students to modern slavery as a significant issue under the Modern Slavery Act 2018 (NSW). The Commissioner identified factors that lead to this vulnerability including:



Language and cultural barriers



Limited working hours which may lead to riskier work and tolerance of abuse, discrimination, underpayment or coercion



Concerns about potential loss of visa, deportation or retaliation against themselves or their families



Limited knowledge of Australian workplace rights and immigration regulations



Limited knowledge of or access to support from civil society, unions and governments



## Educational Support Services

### Medium-High Risk

In 2023, the University spent \$74 million to facilitate international student recruitment. Our suppliers are based in Australia, China, Germany, India and Malaysia. The risk score for this industry considers the prevalence of **human trafficking, forced labour, poor labour rights and unsafe and unhygienic working conditions**.



## Education Services

### Medium Risk

In 2023, the University spent \$3.9 million for education services including to support student work placements. The risk score for this industry reflects the prevalence of **poor labour rights, harsh or inhuman treatment and forced labour**.

Our work to address the risks of modern slavery in our supply chain and operations is further discussed in Section 3.

# 03 Addressing our Risks

## Actions for our Supply Chain



### Visibility of our Supply Chain

This year we focused on gaining a better understanding of our supply chain – starting with our Tier One suppliers.

#### 2023 Actions

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- Independent third party assessment of our Tier One suppliers for inherent ESG risks
- Categorised 100% of our strategic procurement spend into risk segments
- Identified Medium-High and High-risk industries to inform risk mitigation plans
- Commenced development of risk management plans for categories including IT, Construction and Cleaning Services

**2024 focus:** formalise risk assessment and management process for procurement categories



### Sustainable Procurement Framework

As part of our Anti-Slavery Strategy, we committed to aligning our actions in combatting modern slavery to broader ESG processes in our supply chain. We developed a Sustainable Procurement Framework to facilitate a coordinated approach across modern slavery, environmental sustainability, and social procurement.

#### 2023 Actions

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- Updated the Request for Procurement (RFP) template to facilitate clear evaluation of Sustainable Procurement measures and documentation supplied by potential vendors
- Developed an evaluation workbook to:
  - score and weight modern slavery questions and
  - inform supplier selection and contracts for successful vendors
- Provided bespoke training to Finance team (over 100 staff) on our Anti-Slavery Strategy and our Sustainable Procurement Framework
- Commenced training for Strategic Procurement team to ensure successful implementation of the new RFP template and evaluation workbook
- Conducted a full ESG risk assessment over UNSW's supply chain to establish baseline risk factors and priority areas.

**2024 focus:** strengthen tender process for modern slavery considerations



## Supplier Deep Dives

This year we initiated supplier deep dives to better understand the challenges our suppliers are facing with regards to their ESG risks.

### 2023 Actions

- Partnered with Givvable to:
  - initiate supplier screening for up to 4000 suppliers against ESG credentials
  - track suppliers' improvement in relation to their ESG credentials
  - inform supplier partnership and development initiatives

*Givvable is an alumni company of the UNSW Founders program. Givvable is used by companies and organisations to search, screen and track their suppliers' verified sustainability initiatives.*

- As part of our ESG materiality risk assessment, we identified 20 High-risk suppliers across different industries including IT, healthcare, education support services, security and cleaning. We are currently reaching out to each of the 20 identified suppliers with bespoke questionnaires to better understand the supplier's plans to mitigate ESG (including modern slavery) risks in their supply chains

**2024 focus:** enhance supplier capability to identify and mitigate modern slavery risks

## Case Study

### Supply of Lab Gowns

This year we switched suppliers for the provision and laundry maintenance of lab gowns issued to our staff and students. The new supplier confirmed materials for the lab gowns and the manufacturing process is completed in China by a Tier Two supplier based in Australia.

The textiles industry in China is rated High-risk for forced labour exploitation. We requested a statement outlining the risks of slavery in the supplier's operations and supply chains and proposed actions to mitigate risks.

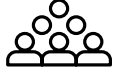
The supplier provided the statement, which was approved by its Managing Director, and provided assurance of implementing the following actions:

- request statutory declarations from subcontractors to ensure workers are paid correctly and only work hours in accordance with employment awards
- request statement from subcontractors of compliance with anti-slavery regulatory frameworks
- issue copies of the Human Resources and Grievance Policy to new staff.

The contract was awarded with acceptance of the supplier's statement. We plan to conduct a 12-month review of the supplier's actions to monitor progress.



# Actions for our Operations



## Governance

Strong governance is a pillar of our Anti-Slavery Strategy – in 2023 we focused on embedding effective governance and metrics within our delivery of anti-slavery initiatives.

### 2023 Actions

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- Recruited a Senior Legal Compliance Officer in the Legal & Compliance team to coordinate our Modern Slavery Strategy and Action Plan and a Sustainable Procurement Manager in the Strategic Procurement team
- Reconvened our Modern Slavery Working Group with:
  - representation across Legal & Compliance, Strategic Procurement, Treasury, IT, Research Services, Risk, Facilities Management and Conduct & Integrity
  - fit-for-purpose terms of reference to maintain progress and membership.
- Reviewed our Code of Conduct to ensure it reflects UNSW Sydney's commitment to protecting human rights
- Commenced review of policies and data capture to prepare for upcoming integrated reporting requirements under the Government Sector Finance Act 2018 (NSW)
- Commenced update of our Modern Slavery Prevention Policy to:
  - align policy provisions to the United Nations Guiding Principles on Business and Human Rights and our revised Complaints Management and Investigations Policy
  - strengthen our internal human rights due diligence processes.
- Completed letter of commitment, signed by the Vice-Chancellor, to progress our application to become a member of the United Nations Global Compact Network

**2024 focus:** update and roll-out training program for staff to raise awareness of modern slavery



## Due Diligence and Grievance Mechanisms

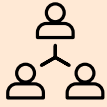
In reviewing the recommendations from the review of the Modern Slavery Act 2018 (NSW), we focused on strengthening our due diligence processes and grievance mechanisms.

### 2023 Actions

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- Commenced development of a human rights due diligence framework to:
  - assess and address risks to human rights in our operations and
  - integrate action plans to mitigate those risks and track progress.
- Updated our Complaints Management and Investigations Policy which now reinforces our commitment to human rights in our investigation and resolution of complaints
- Broadened our [complaints management system](#) to accept reports about modern slavery from staff, students and the public including workers in our supply chain

**2024 focus:** trial the human rights due diligence framework with a team before implementation



## Risk to Students

Addressing the risks of modern slavery to our student cohort is an identified action in our Anti-Slavery Strategy, the importance of which was reinforced by the decision of the NSW Anti-slavery Commissioner in October 2023 to declare this risk a "significant issue" for NSW universities.

### 2023 Actions

- Commenced stakeholder consultation with the Education and Student Experience team to plan activities and raise awareness, especially for international students
- Investigating opportunities to engage with students, student community groups and external stakeholders to raise awareness of support mechanisms and groups
- Planning review into strategic procurement of international student recruitment

**2024 focus:** raise awareness of modern slavery risks within student cohort

## Case Study

### Risks in Research Commercialisation

UNSW Sydney proposed to enter a research contract to deliver industrialised procedures for a company based in China to operationalise lithium slag recycling. A due diligence report revealed the company's subsidiary was allegedly involved in forced labour violations within the Xinjiang Uyghur Autonomous Region (XUAR).

Allegations of forced labour in the XUAR are found to be credible by the [United Nations High Commissioner for Human Rights](#) and the United Nations Special Rapporteur on Contemporary Forms of Slavery. Such allegations are also supported by research published by the [Center for Strategic and International Studies](#) and the [Sheffield Hallam University](#).

To resolve this issue, the University:

- Considered our commitment to protect human rights,
- Determine the likelihood of our research being used to enable modern slavery in the XUAR and related risks to operations and our reputation and
- Made an informed decision to not proceed with the agreement.

Legal & Compliance are developing a human rights due diligence framework to address similar challenges and situations for research commercialisation.

# 04 Effectiveness of Actions

Strong effectiveness and robust governance are pillars of our Anti-Slavery Strategy and Action Plan. We remain committed to improving our implementation of anti-slavery initiatives by reviewing the impact of our actions. We continue to engage other universities and external partners to share our experience and learn about best practices.

## Supply Chain

Long Term Goal	Impact
<b>Strengthen tender process to include modern slavery considerations for supplier selection</b>	<ul style="list-style-type: none"> <li>• Training rolled out to Strategic Procurement to ensure implementation of revised RFP template</li> <li>• Sustainable Procurement Manager facilitates sustainability scoring for High-risk tenders</li> <li>• Three High-risk tenders successfully evaluated for specific modern slavery risks using the RFP template</li> </ul>
<b>Formalise end-to-end risk assessment and management process</b>	<ul style="list-style-type: none"> <li>• Independent risk assessment of our Tier One supply chain with results circulated to the Finance team and the Modern Slavery Working Group</li> <li>• Ongoing roll out of risk assessment results to wider organisation including faculty executive directors, schools and divisional directors to inform risk assessments at a local level</li> <li>• Development of risk-based category frameworks to facilitate supplier due diligence across UNSW's portfolio categories</li> </ul>
<b>Align and expand long term goals to broader ESG processes</b>	<ul style="list-style-type: none"> <li>• Review of suppliers for ESG credentials through Givvable with a 12% (net) increase over 6 months in total ESG credentials held</li> <li>• Only Australian university to receive "Corporate Ethical Procurement and Supply" accreditation from Chartered Institute of Procurement and Supply for the fourth consecutive year – the accreditation covers human rights, anti-bribery initiatives and environmental factors</li> </ul>



## Operations

Long Term Goal	Impact
<p><b>Ensure external individuals and communities can access our grievance systems</b></p>	<ul style="list-style-type: none"> <li>• New complaints management system rolled out with modern slavery identified as a specific area of focus, after which UNSW Sydney received an official complaint from an anonymous worker in our supply chain relating to unsafe working conditions</li> </ul>
<p><b>Strengthen enterprise risk framework to include human rights considerations</b></p>	<ul style="list-style-type: none"> <li>• We are currently developing an ESG Risk Profile to consider salient risks and relevant controls across several areas including student experience, third party contractors, research, commercial partnerships, investments, fundraising and general awareness</li> </ul>
<p><b>Leverage collaboration with existing networks, platforms and key expertise</b></p>	<ul style="list-style-type: none"> <li>• Hosted Electronics Watch on campus to provide training to Strategic Procurement, IT and Legal &amp; Compliance</li> <li>• Attendance at industry events including information sessions with the Office of the NSW Anti-slavery Commissioner and the Cleaning Accountability Framework (CAF)</li> <li>• Application to become a member of CAF underway and scheduled to take place in early 2024. We hope to engage CAF's expertise for our upcoming cleaning tender in 2024</li> </ul>

## Case Study

### Promotional Merchandise

Prior to establishing our Sustainable Procurement Framework, modern slavery was not consistently evaluated in our tender process. Suppliers were also not given an opportunity to elaborate on specific actions they were implementing to combat modern slavery in their supply chain to give the University a comprehensive view of its suppliers' risks. This often led to inconsistent scoring methodology and would not allow suppliers' anti-slavery initiatives to be reflected in the outcome of the tender evaluation.

We recruited a Sustainable Procurement Manager in 2023 to develop and implement the Sustainable Procurement Framework and build our capacity to apply a consistent approach when scoring suppliers as part of the tender process.

This year we engaged a supplier to provide promotional merchandise for the University. We categorised this industry as High-risk due to the lack of transparency in sourcing models.

Our Strategic Procurement team increased the sustainability weighting for this tender to ensure modern slavery risks were appropriately evaluated. We also asked additional questions to short-listed suppliers and requested:

- A comprehensive mapping of their supply chain and
- Documents from Tier Two suppliers on modern slavery prevention policies and initiatives.

The Sustainable Procurement Manager also facilitated in-person meetings on our campus to interview short-listed suppliers and evaluate salient risks in their supply chains.

Through this process, we selected a supplier that has internal controls in place and provided excellent transparency over their manufacturing process and country of origin risks. The selected supplier also committed to notifying us when they onboard new Tier Two suppliers in the event of a disruption within its supply chain.

This tender provided an opportunity to perform a deep dive assessment into a high-risk category. We also collaborated with a supplier whose commitment to protecting human rights goes beyond a policy statement. As part of our Sustainable Procurement Framework, UNSW Sydney will reach out to the supplier in 2024 to follow up on their initiatives and perform a deep dive of Tier Two suppliers including a screening of their ESG credentials through Givvable.



# 05 Engagement

## Consultation

In preparing our 2023 Modern Slavery Statement, we facilitated a thorough consultation process with input from our:

- Modern Slavery Working Group,
- Relevant business units including Strategic Procurement and Risk,
- University Leadership Team and
- University Council.

For the 2023 reporting period, none of our controlled entities were reporting entities as defined in the Modern Slavery Act 2018 (Cth). However, we recognise our controlled entities pose risks of contributing to modern slavery through their supply chains and operations. We have commenced consultation with our controlled entities to assess and address their risks by prioritising larger entities with significant operations.

## Acknowledgements

UNSW Sydney would like to thank Professor Justine Nolan and Mr Samuel Pryde from the Australian Human Rights Institute for their expertise which has helped shape our Anti-Slavery Strategy.

UNSW Sydney would also like to thank the following partners for their invaluable expertise and contribution in fighting human rights abuses in Australia and on a global scale:

- the researchers from Monash University for their seminal research on [Measuring Disclosure Quality of Modern Slavery Statements](#),
- the NSW Anti-slavery Commissioner,
- the Commonwealth Attorney-General Department for the [Report of the Statutory Review of the Modern Slavery Act 2018 \(Cth\)](#),
- the Cleaning Accountability Framework,
- the Australian Universities Procurement Network and
- Electronics Watch.

We look forward to continuing our engagement of experts within and external to the Higher Education sector to drive a coordinated approach to anti-slavery initiatives.

