



Modern Slavery Statement 2020

TABLE OF CONTENTS

Introduction	2
1. Introduction	2
2. Executive Summary	2
3. Key achievements of the 2020 financial year	2
Structure, Operations and Supply Chains	3
4. The University	3
5. University 2025 Strategy	3
6. University Governance	3
7. University structure	4
8. University procurement framework and supply chains	5
Identifying modern slavery risks	7
9. Risk management framework	7
10. Risks in University supply chains	7
11. Risks in University operations	8
Actions to address modern slavery risks	9
12. Actions to address risks in University operations	9
13. Actions to address risks in University supply chains	11
Effectiveness	15
14. Assessing the effectiveness of the University's actions	15
15. Moving forward	16

INTRODUCTION

1. Introduction

This statement is made in accordance with Part 2 of the *Modern Slavery Act 2018* (Cth) (the **Act**) and constitutes the University's Modern Slavery Statement for the reporting period ending 31 December 2020. This is the University's first statement under the Act and provides an overview of the University's progress in this area in its first reporting period under the Act.

2. Executive Summary

During 2020 the University made significant progress in laying the foundations for identifying and addressing risks of modern slavery in its operations and supply chains. The University established an effective compliance and risk management framework that allocated ownership of the University's compliance responsibilities under the Act and included modern slavery risks within the University's enterprise risk profile. The University promoted awareness of modern slavery risks through the launch of a [Modern Slavery Prevention Policy](#) and training for staff in relation to the Act. The University's Strategic Procurement and Legal and Compliance teams led significant work in relation to the University's supply chains, with modern slavery considerations embedded in the University's procurement processes, supplier engagement around identification of modern slavery risks, modern slavery contractual provisions and the use of a [Procurement Supplier Charter](#) to drive a culture of sustainable and ethical sourcing.

The impact of the COVID-19 pandemic on University operations and the disruption arising from a significant workplace change program impacted the University's ability to address modern slavery risks in operational areas and its engagement with its controlled entities. These will be priorities for the next reporting period, along with further engagement with suppliers and supporting and driving modern slavery prevention initiatives across the University sector.

3. Key achievements of the 2020 financial year

- Launch of the University's [Modern Slavery Prevention Policy](#).
- New clauses addressing modern slavery included in procurement contract templates.
- The University's [Procurement Supplier Charter](#) was released, demonstrating commitment to sustainable procurement practices, together with a Supplier Engagement Package that aims to help suppliers identify areas of modern slavery risk.
- A new Supplier Modern Slavery Questionnaire was introduced for use in sourcing processes.
- Compliance owners under [Legislative Compliance Framework](#) were assigned to incorporate obligations to address modern slavery risks in the University's operations and supply chains.
- Engagement with selected contracted suppliers was undertaken to build collaboration aimed at addressing modern slavery supply chain risks which the University began identifying through collaboration with external expert advisers during 2018 and 2019.
- Launch of a Modern Slavery training program for UNSW staff
- A modern slavery Interdisciplinary Placement Project saw students develop a [Modern Slavery Prevention Toolkit](#) to educate staff, students and other stakeholders.



STRUCTURE, OPERATIONS AND SUPPLY CHAINS

4. The University

Since its foundation in 1949, the University has aimed to improve and transform lives through excellence in research, outstanding education and a commitment to advancing a just society.

The University is one of the world's leading research and teaching-intensive universities, known for innovative, pioneering research and high-quality education with a global impact. The University has a proud tradition of sustained innovation, focussing on areas critical to its future – from climate change and renewable energies to lifesaving medical treatments and breakthrough technologies.

5. University 2025 Strategy

The University's 2015-2025 Strategy provides the framework for UNSW to further advance its contribution in academic excellence, social impact and global engagement, in the best interests of society. The University's strategic priorities are:

- Academic Excellence
- Innovation and Engagement
- Social Impact

Delivering on the above strategic priorities is a focus for the University and is supported by five internal enablers, directed at:

- E1: Developing and supporting our people
- E2: Enhancing our profile, outreach and philanthropy
- E3: Supporting our services, systems and processes
- E4: Enhancing our campuses
- E5: Ensuring our financial Sustainability

A copy of the University's latest 2025 Strategy Update is available [here](#).

Respect for human rights and human dignity is fundamental to the achievement of the University's Vision and Values and its 2025 Strategy. This is reflected in the University's commitment to ensuring that its operations and supply chains do not involve or contribute to modern slavery.

6. University Governance

Established by the *University of New South Wales Act 1989* (NSW), the University is governed by a Council of 15 members led by, and including, the Chancellor. Members represent the interests of the University and the community, contributing expertise in a range of areas including finance, commercial activities, law, governance, management and strategic planning.

The Council has the following committees: Finance and Business, Audit, Risk, Remuneration and People, 2025 Strategy and Honorary Degrees. The Council is able to draw on additional, specialised expertise by appointing external members to its committees. Council and Council Committee members serve the University on a voluntary basis.

Under the University's Legislative Compliance Framework, compliance owners assigned to address modern slavery risks in supply chains and operations are required to complete an annual



compliance certification, the results of which are reported through to the Audit and Risk committees of the Council.

7. University structure

Organisational structure

The University consists of:

7 Faculties

- Faculty of Art, Design & Architecture
- Faculty of Engineering
- UNSW Business School
- Faculty of Law & Justice
- Faculty of Medicine & Health
- Faculty of Science
- UNSW Canberra (college) at the Australian Defence Force Academy (ADFA)

45 Schools

125 UNSW and external centres and institutes

11 on-campus residential colleges

Campus number and locations

There are 3 University campuses, being:

UNSW Sydney – set on 38ha at Kensington, 7km from the centre of Sydney’s CBD.

UNSW Art & Design – located at Paddington in Sydney, UNSW Art & Design is an internationally recognised centre for arts-led transdisciplinary research in science and technology, with strengths in art theory and criticism; film, television and digital media; and visual arts and crafts.

UNSW Canberra – located at the Australian Defence Force Academy in Canberra, it provides undergraduate education for officer cadets as well as postgraduate programs (open to all students in arts, business, engineering, IT, management and science).

Staff and student numbers

Staff 2020	<i>Female</i>	<i>Male</i>
Academic staff	1,315	1,928
Professional staff	2,547	1,440
Total staff		7,230 (6,693 full-time equivalent)

Student/alumni

63,232	Total students
22,621	Students commencing 2020
40,124	Local students
23,108	International students
4,288	Higher degree research candidates
334,084	UNSW alumni



Controlled entities

The University has established controlled entities in Australia and overseas to support both its philanthropic and development activities and to further the commercial functions of the University. The University had control over the following entities as at 31 December 2020:

NewSouth Innovations Pty Ltd	Australia
Qucor Pty Ltd	Australia
Scientia Clinical Research Ltd	Australia
The University of New South Wales Foundation Ltd	Australia
University of New South Wales Press Ltd	Australia
UNSW Global Pty Ltd	Australia
UNSW Centre for Transformational Environmental Technologies (Yixing) Co. Ltd	China
UNSW Sino-Australia Innovative Technology & Education (Shanghai) Co. Ltd	China
UNSW Hong Kong Ltd	Hong Kong
UNSW Hong Kong Foundation Ltd	Hong Kong
UNSW Global India Pvt Ltd	India
UK Foundation of UNSW Australia	UK
UNSW & Study Abroad – Friends and US Alumni, Inc	USA

8. University procurement framework and supply chains

The University defines procurement as "the acquisition of goods, services, infrastructure and capital works whether purchased or leased". Under the University's [Procurement Policy](#) all procurement must be underpinned by the following six core principles:

1. Value for Money
2. Probity and equity
3. Risk management
4. Fit for purpose
5. Sustainable
6. Recordkeeping

The University's [Procurement Procedure](#) identifies the processes that govern procurement.

Sustainable Procurement Vision 2018-2025

The University's [Sustainable Procurement Vision 2018-2025](#) aims to deliver strong environmental, social and economic benefits to the University's students, staff and community through understanding and strengthening the University's supply chains. "Sustainable procurement" is the term used to describe any and all practices within the procurement lifecycle, including formed partnerships and/or affiliations. Within this vision are sub-principles that include individual focus plans to be created and delivered against key targets. This includes, but is not limited to:

- Human Rights
- Modern Slavery
- Gender equality
- Health and safety
- Environment
- Equity, diversity and inclusion
- Carbon, Energy, Water, Waste.



For 2020-2022 the University is dedicating its efforts to three Focus Plans, being:

1. Addressing Modern Slavery risks across the University’s Supply Chains;
2. Supplier Diversity and Inclusion
3. Carbon Emissions (Net Zero Strategy).

Each Focus Plan:

- outlines strategy, actions, treatment, management, monitoring and measurement of risk
- includes key activities, associated timeframes, vendor classifications, threats and opportunities
- includes key performance indicators to allow the University to measure performance at various maturity milestones.

Supply chains

The University works with over 10,000 suppliers annually. The supplier base is diverse, as the nature of the industry in which we operate is global and varied. The following Table provides details of the University’s suppliers:

Approved suppliers	11,997
Top 10 countries of spend:	<ol style="list-style-type: none"> 1. Australia 2. United States of America 3. China 4. United Kingdom 5. Germany 6. Hong Kong 7. India 8. Singapore 9. Ireland 10. Canada
Country of operation of top 10 vendors by spend	<ol style="list-style-type: none"> 1. Australia 2. Australia 3. Australia 4. Australia 5. Australia 6. Ireland 7. Australia 8. Germany 9. Australia 10. China

Out of all suppliers used by the University, a total of 2,586 suppliers that are used on a frequent basis are monitored by the Strategic Procurement team on their spend and their activities.



IDENTIFYING MODERN SLAVERY RISKS

9. Risk management framework

Under its [Risk Management Framework](#), the University is committed to building a risk-aware culture that is supported by a tailored, practical and integrated approach to the identification and management of risk arising from the uncertainty inherent in the University's strategy, operations and the global environment. This commitment is articulated in the [Risk Management Policy](#) and championed by University leaders.

In accordance with the [Risk Management Framework](#), identified risks are recorded in risk profiles at the Faculty and Divisional level as well as in the University's enterprise risk profiles. These risk profiles are drawn on in formulating the University's Internal Audit Plan and are overseen by the Risk Committee of the Council. During 2020 modern slavery was identified in the risk profiling activities of the University.

10. Risks in University supply chains

The University has been working to identify and assess modern slavery risks within its supply chains. Risks are often embedded within complex layers of a supply chain. In 2018 the University engaged external experts in sustainable business and supply chain management to undertake and report on a preliminary analysis of the University's supply chains to identify, understand and prioritise key sources of risk, and related measures or opportunities to remediate.

The experts compiled key spend data, delivered workshops to University management on the outcomes of their preliminary analysis and presented a number of key recommendations which formed the basis of the Supply Chain Modern Slavery Focus Plan for 2020.

Sources of risk with the highest risk profile in terms of labour, modern slavery and other human rights infringements were identified by the expert analysis to be:

Services:

1. Catering
2. Cleaning contractors
3. Construction contractors
4. Recruitment and search- overseas operations
5. ICT software/professional services

Consumables:

1. Laboratory consumables
2. Promotional material
3. IT hardware
4. Office supplies
5. Personal Protective Equipment (PPE)

Some of the outcomes arising from this analysis included:

- a review of the University's **ICT hardware arrangements** with its top three suppliers to ensure that, as reporting entities in their own right, they had the appropriate policies, procedures and internal due diligence to mitigate risks within their own supply chains



- establishment of an **Audio Visual Provider Panel**, which at a sector level had been assessed by the University Procurement Hub (UPH) to identify modern slavery risks with contracts executed with the 5 suppliers including modern slavery clauses and agreement that they will comply with the [Procurement Supplier Charter](#)
- **IT Professional services**- establishment of a new panel of 23 suppliers which has been mandated internally for use, with all executed contracts containing modern slavery clauses and agreement by all to comply with the [Procurement Supplier Charter](#).

Based on this analysis and further risk analysis conducted on behalf of the Australian Universities Procurement Network (AUPN), of which the University is a member, the University has been actively working to incorporate human rights (including modern slavery) due diligence within its supply chains. This approach includes:

- identification and assessment: conducting independent reviews, assessment and planning to better understand risks in key areas of focus;
- collaboration: participating in and actively contributing to the AUPN's university sector wide approach to strengthen the integrity of supply chains (across the sector)
- response and remediation: escalating, reporting and determining appropriate actions to respond to and manage modern slavery risks

The **Australian Universities Procurement Network (AUPN)** is a collaborative group with over 30 member institutions. Its mission is to "significantly improve procurement practices in Australian universities through a collaborative approach." The intent of the group is to share expertise, promote benefits and create greater efficiencies across the procurement and university sectors.

Staff from the University have played, and continue to play, a key role in supporting and advising AUPN modern slavery working groups.

11. Risks in University operations

The University recognises that, in addition to its supply chains, the breadth and scope of its operations may expose the University to risks of modern slavery. The University's core activities are education and research, and key operational areas where modern slavery risk may arise include human resources, investments, campus businesses and its controlled entities (that operate both in Australia and overseas).

The University's ability to identify modern slavery risks in its operational areas was limited by the changes in working conditions arising from the COVID-19 pandemic and the significant workplace change that occurred at the University in 2020 (see section 14 below). Identifying, assessing and responding to modern slavery risks in these operational areas will however be a focus of the University's future activities to address modern slavery.

ACTIONS TO ADDRESS MODERN SLAVERY RISKS

12. Actions to address risks in University operations

Modern Slavery Working Group

In 2019 the University convened a Modern Slavery Working Group to develop a plan of action for the University (and its controlled entities) to comply with reporting obligations under the Act. This included milestones/performance measures, staff accountabilities, resourcing requirements, and reporting to key stakeholders. The Working Group was led by the Legal and Compliance team and comprised representatives from key operational areas of the University (including Procurement, Finance, Estate Management, Business and Campus Services, Investments and Human Resources), as well as academics with expertise in human rights and modern slavery from the University's Faculty of Law.

Modern Slavery Prevention Policy

A key action arising from the Working Group was the development, approval and implementation of the University's [Modern Slavery Prevention Policy](#).

The work undertaken by the University to identify modern slavery risks guided the development and focus of this Policy, which outlines the University's commitment to ensuring:

- (a) its operations and supply chains do not cause, involve or contribute to modern slavery; and
- (b) its suppliers, relevant stakeholders and others with whom we do business respect and share the University's commitment to minimise the risk of modern slavery.

Working collaboratively with suppliers and other organisations, the University seeks to identify and implement agreed measures which will contribute to the prevention, detection and remediation of the risks of modern slavery in its supply chains and operations, even if the University itself has not contributed to these risks.

Integration into the University's Legislative Compliance Framework

The University's Legislative Compliance Framework establishes principles of action within the University with respect to achieving demonstrable compliance with its legislative obligations. This includes assigning Compliance Owners, whose responsibilities include developing, implementing, monitoring and reporting on the effectiveness of internal compliance controls for legislative obligations.

Under the Framework, the University assigned Modern Slavery Compliance Owners across the following key operational areas of the University:

- Estate Management
- Business and Campus Services
- Information Technology
- Human Resources
- Education and Student Life
- Research
- Procurement
- Investments
- Knowledge Exchange



The Compliance Owners in these areas are responsible for:

- reviewing existing internal controls and ensuring consistency with the [Modern Slavery Prevention Policy](#)
- developing, implementing and monitoring new internal controls to meet obligations to identify and address modern slavery risks.

Training on Modern Slavery Act obligations

The University offered training in relation to the Act and the [Modern Slavery Prevention Policy](#) to its staff during the reporting period. For example, the University's Legal and Compliance team offered the "Modern Slavery 101" training course to all staff and delivered the training to senior executives and other staff of the University. The training course informed staff about modern slavery, how it is relevant to the operations of the University and what the University is doing to respond to its obligations under the Act. It covered key aspects of the University's [Modern Slavery Prevention Policy](#) and how staff can contribute to identifying, managing and reporting modern slavery risks.

The University's Legal and Compliance and Procurement teams, also engaged directly with University business units whose operations may contain modern slavery risks. For example, engagement with the University's department of Business and Campus Services assisted in identifying :

- areas where modern slavery risks may potentially arise including food and other campus retail businesses, contractors and sub-contractors operating on University campuses
- items for inclusion in their modern slavery action plans.

Development of new due diligence processes for third party engagements

The University developed new due diligence processes (including in relation to modern slavery risks) to assess proposed new third party arrangements with organisations both in Australia and overseas, with particular focus on arrangements for the provision of sponsorships, gifts and donations.

Receiving and addressing complaints about modern slavery risks

The University has comprehensive systems to receive and address complaints and reports of wrongdoing, including those that relate to modern slavery. This includes the University's complaints procedures and its [Report Wrongdoing Policy](#) and [Procedure](#). Complaints and reports of wrongdoing can be made through the University's website – www.unsw.edu.au/complaints.

Consultation with University controlled entities

For 2020 none of the University's controlled entities were "reporting entities" under the Act.

The University consulted with its controlled entities (see section 7 above) during 2020 to commence the process of incorporating each entity into the University's Legislative Compliance Framework. This process will give the University systematic annual reporting to validate that the management and staff of its controlled entities are aware of the legislative obligations that apply to them and have systems and processes in place to ensure compliance.

The University consulted closely with its largest controlled entity, UNSW Global Pty Limited, about responding to the reporting obligations under the Act and also implementing its own Modern Slavery Prevention Policy. UNSW Global also made progress through partnering with the University to update template clauses and map its supply chains.



Spotlight on UNSW Global Pty Limited

UNSW Global delivers higher education pathways and English language programs in Australia to international students via its own staff and transnationally via arrangements with third party education providers. UNSW Global has a supplier base of 1,000 + suppliers and its own established policy and compliance framework, including in relation to procurement, risk and legislative compliance. In 2020, due to COVID-19-related border closures, it suffered a significant impact to its business, requiring it to undertake a major workplace change resulting in a circa 30% reduction of its workforce.

As a consequence of these changes, UNSW Global was not able to undertake the entirety of the activities it had planned to undertake to assess, address and remediate the modern slavery risks in its operations and supply chains for the reporting period. It has undertaken the following in 2020 in preparedness for the 2021 reporting period:

1. engagement of a third-party consultant to provide modern slavery training to staff;
2. additional engagement of staff by members of the Legal and Compliance team in relation to operation and supply chain mapping;
3. preparation for the adoption of an appropriately adjusted version of the University's Modern Slavery Prevention Policy;
4. adoption of the University's new template clauses addressing modern slavery now included in UNSW Global clause library and used in relevant agreements;
5. describing and recording the risks of modern slavery practices in UNSW Global's risk register, which also notes current controls, control effectiveness and proposed actions in accordance with UNSW Global's Risk Management Framework Policy
6. attend regular Modern Slavery Working Group meetings with the University.

In 2021, UNSW Global proposes to undertake an operations and supply chain modern slavery risk mapping exercise similar to that undertaken by the University and adopt appropriate remediation strategies and policies, using the University's documentation and frameworks where appropriate, and learning from the University's experiences from 2020.

13. Actions to address risks in University supply chains

Modern Slavery Supply Chain Output Framework

The University's Procurement team drives action in regard to modern slavery risks in supply chains, taking responsibility for:

- establishing a framework for Sustainable Procurement and a Modern Slavery Focus Plan
- actively participating in the initiatives of AUPN including its Modern Slavery Working Party and Modern Slavery Academic Advisory Board
- assessing modern slavery risks across the University's spend data
- raising supplier awareness, supplier training and supplier engagement
- determining records management, metrics for progress and corrective action plans.

Release of the University's [Procurement Supplier Charter](#)

The University is committed to strengthening supplier relationships, including with non-commercial and research partners. This includes supporting the people, communities and supply chains that work with the University, both locally and overseas. This commitment results in value for money through strong supplier partnering, sustainable sourcing practices and consistent and transparent commercial processes.



The [Procurement Supplier Charter](#) was launched in 2020 with the purpose of working with suppliers to meet sustainable procurement practices. Engagement is encouraged from a diverse range of supplier organisations, from sole traders to global enterprises.

All suppliers that deliver goods or services to the University are expected to commit to the [Procurement Supplier Charter](#), which includes a commitment to respect human rights and reduce modern slavery risks.

Introduction of a new supplier modern slavery questionnaire

A questionnaire was developed by the University to assess modern slavery risks pre-contract. Responses were reviewed against key categories of University procurements of a high value, high impact nature, including:

- supply of personal protective equipment
- integrated platform design and build
- laboratory supplies
- digital assessment platform
- research equipment
- print services.

All new contracted suppliers to the University in these categories are required to complete the questionnaire, with a total of 89 suppliers completing the questionnaire during 2020. Of the responses received:

- 50 had a modern slavery policy, 16 had an equivalent policy, and 25 did not have a policy
- 33 were reporting entities under the Act
- 30 had reviewed and taken steps to identify and mitigate modern slavery risks
- 19 stated that they did not use any overseas labour.

The questionnaire also addresses other key criteria including sub-contracting, training and awareness through the organisation of modern slavery risks, contractual arrangements with sub-contractors and partners, and controls and mitigation techniques.

Supplier Engagement

The University actively engaged with suppliers to build collaboration in addressing supply chain modern slavery risks and to identify any corrective action items that are able to be developed and delivered. This engagement is illustrated through the following case studies from 2020:

CASE STUDY: Cleaning contractors

Labour exploitation in the cleaning industry is a key area of focus for the University when it comes to identifying and responding to modern slavery risks. To minimise these risks the University undertook a 2 staged approach:

1. a Request for Capability was issued to the market followed by
2. a Request for Proposal (RFP).

The University shortlisted nine companies. Factors contributing to not shortlisting companies were lack of experience, negative press and/or findings in relation to labour practices, size of business, inadequate training, and poor financials.

The RFP focused on ensuring companies had rigorous training programs, transparent accounting systems, ISO certifications, adherence to labour laws and compliance with the University's contract and modern slavery requirements. Interviews were undertaken with shortlisted companies which included questions concerning modern slavery.

Cleaning contracts are monitored and audits are undertaken periodically.

CASE STUDY: Laboratory equipment review

The University proactively identified and approached 20 key suppliers in October 2020 across the Research (Direct) portfolio to seek commitment to the University's [Procurement Supplier Charter](#) and compliance with the University's [Modern Slavery Prevention Policy](#). This initiative included a self-assessment by suppliers of their business maturity in anti-slavery policies and the collection of evidence from suppliers of their implemented framework.

Analysis of the data allowed the University to identify the key suppliers that it followed up through a series of workshops addressing modern slavery due diligence processes. The presentations contained the University's expectations and training material which was shared and discussed between procurement, the business areas and the supplier(s). The workshop helped to identify high risk products across geographical areas that had been earmarked for review. In collaboration with the suppliers, progress across the category will continue and will be tracked against the agreed performance matrix.

CASE STUDY: Digital Experience Platform

The University managed a high value procurement aimed at engaging a partner for a three-year term with the scope comprising predominately of IT resources delivering desktop outcomes. A thorough review of the preferred tenderer was undertaken to look at the labour intended, including the development and integration work aimed to be delivered by resources in Australia and overseas, and noted resource allocation proposed from high- risk geographical location(s).

A preliminary questionnaire for all tenderers was reviewed with key risks identified and a detailed report prepared. This was further expanded upon with the preferred tenderer through a virtual workshop meeting, to request further clarification surrounding:

- offshore labour resources intended to be used to perform services and employment practices,
- awareness and training within the organisation to identify and mitigate modern slavery risks, and
- further inspection and evidence of sub-contracting arrangements particularly overseas and within their subsidiary organisations.

Upon reviewing the corporate structure and arrangements that the supplier intended to use to resource the work, the University deemed their answers and information supplied to be satisfactory, however did note a recommendation that within the executed contract, the personnel that had been reviewed should be transparently noted, including the geographical location that they are delivering the services from, and their employment relationship with that of the contracting party. It also recommended that any change to the approved personnel was to be reviewed and approved by the contract manager in consultation with the Procurement team. These recommendations were noted and reflected in the executed contract.

CASE STUDY: Office Supplies

In early 2020, the University worked closely with the enterprise supplier to review the product list and streamline the basket of goods, with the objective to include key ethical sourcing targets. As the supplier is also a reporting entity under the Act, the option to use 'own brand' was encouraged where possible, and the University worked with the supplier to identify items which better mitigated and managed modern slavery risks within the supply chain. This was achieved through the use of 'own brand' items, meaning no third party or sub-tier supply for those specific items. The outcome resulted in a reduction of over 4,000 items to 900 items which included 32% (300 items) private label product implemented enterprise wide. This has been maintained from July 2020 and it is intended that it be reviewed on an annual basis.

Identify and prioritise high risk sectors for immediate action

The University identified the following key high risk, high value categories that are managed by the Procurement team and where focused engagement with suppliers is a key priority.

- Research and Major Equipment (Consumables, Equipment)
- Estates Management (Construction, Facilities Management)
- Information Technology (Software, Hardware, Services)



Modern slavery clause added to all procurement contract templates

A new modern slavery clause was added to procurement contract templates for

- Consultancies/Contractors
- Goods
- Panel Agreements
- IT
- Construction

The clause commits suppliers to ensuring that they do not contravene any modern slavery laws, do all things necessary to mitigate or reduce modern slavery risks in their operations and supply chains, and that they notify the University if they become aware of any suspected or actual breach of a modern slavery law.

Collaboration with CAUDIT to onboard Electronics Watch

The **Council of Australasian University Directors of Information Technology (CAUDIT)** is a not-for-profit association formed by Australasian universities and a number of major Australian research organisations to support members through the provision of a broad range of IT related services, fostering collaboration, leadership and good practice. Services include negotiation of collective procurement agreements, benchmarking, and professional development.

The University also sought to identify potential partners who were actively delivering remediation for high-risk categories. Electronics Watch is an independent monitoring and remediation organisation focused on public procurement. It has a strong presence in the United Kingdom and is gradually growing in prominence in Australia.

The University's Procurement team collaborated with CAUDIT representatives to showcase to members the benefits of establishing a sector wide partnership with Electronics Watch. CAUDIT and the University presented a joint webinar including key materials that attracted university representatives nationwide. Electronics Watch were able to provide context to the work that they perform for their affiliates and offer consortium membership value.

Due to the limited expenditure allowed during the peak of COVID-19, membership at the consortium level was not able to be achieved, however it is a priority for the University to secure independent membership with Electronics Watch given the importance of practical remediation of modern slavery risks.

Other actions

The standard University Request for Quote (RFQ) package for suppliers incorporates the new **supplier modern slavery questionnaire** as part of its Sustainable Procurement Criteria which suppliers are expected to address.

The Request for Proposal (RFP) templates now also have modern slavery criteria integrated into the Conditions of Participation.

EFFECTIVENESS

14. Assessing the effectiveness of the University's actions

The establishment of a solid compliance framework in the reporting period has laid the foundations for the University to identify and progressively address modern slavery risks into the future. The [Modern Slavery Prevention Policy](#), the assignment of modern slavery Compliance Owners across the University, and the embedding of tools and processes to address modern slavery risks in the procurement function have positioned the University to strengthen its ability to respond to and tackle issues of modern slavery in its operations and supply chains.

Importantly, this framework provides the means for the University to assess the effectiveness of its actions to address modern slavery by:

- tracking progress of actions identified in the University's Modern Slavery Action Plan 2020 (for example, the University's Procurement team completed all actions set for 2020 for identifying, assessing and remediating risks in the University's supply chains)
- requiring modern slavery Compliance Owners in key operational areas to certify they have systems in place to identify and assess modern slavery risks and the effectiveness of related controls, with such certifications being reviewed and reported to the University's Risk and Audit committees of the University Council
- modern slavery compliance certifications informing the preparation of the University's internal audit plans including control testing, and related risk profiles informing the Risk Management Framework
- working closely with, and supporting the work of, sector groups (eg. AUPN) to implement and assess modern slavery prevention initiatives in university supply chains and operations.

Impact of COVID-19 on assessing modern slavery risks

The impact of the COVID-19 pandemic on the University's operations throughout 2020 reduced the ability of the University to take action in regard to modern slavery risks (especially in operational areas and in relation to its controlled entities).

To minimise the risk of virus transmission, University staff were required to work from home and, where possible, all University activities (including teaching and research) were conducted online instead of face-to-face.

Impact of workplace change on assessing modern slavery risks

The financial impact on the University arising from the COVID-19 pandemic necessitated a significant workplace change program across the University in 2020. The resulting loss of staff across the University had an impact on progressing projects and initiatives aimed at addressing modern slavery risks.



15. Moving forward

Under the University's Modern Slavery Action Plan, the focus in the current year and beyond is:

- enhancing governance processes responding to modern slavery risks
- increasing staff and supplier awareness, education and training on modern slavery risks that impact operations and supply chains
- mitigating, managing and remediating identified modern slavery risks and the continued identification and assessment of risks identified in future.

Moving forward – supply chains

To continue to address modern slavery risks in its supply chains the University will:

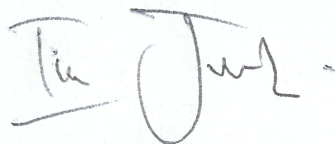
- on an annual basis (with quarterly reviews) develop category management plans for high value, high risk procurement activities
- continue to assess supplier responses to the Modern Slavery Supplier Questionnaire and determine risk rating prior to contractual engagement
- use the Supplier Engagement Package to help identify new areas of modern slavery risk that need to be addressed
- engage with existing suppliers across high risk categories and where necessary develop remediation plans with clear targets and measurable outcomes
- support the implementation of a technology solution for measuring and managing risks as part of the AUPN sector wide approach
- as a member of CAUDIT support potential further engagement with Electronics Watch.

Moving forward – operations

The University will focus on identifying, assessing and managing modern slavery risks by:

- working with modern slavery Compliance Owners across University operations to address issues and risks relating to modern slavery identified within their areas of compliance responsibility
- undertaking further consultation and engagement with University controlled entities to ensure that each entity has systems in place to identify and address modern slavery risks arising from their operations and supply chains, and to report on their actions to address such risks through the annual certification program of the University's Legislative Compliance Framework;
- engaging with food retail outlets and other campus retail businesses, contractors and sub-contractors operating on University campuses to collaboratively identify modern slavery risks and to establish plans of action to respond to such risks.

DECLARATION: I confirm that this **Modern Slavery Statement 2020** was tabled at and approved by the University Council at its meeting on 7 June 2021.



Professor Ian Jacobs
Vice-Chancellor and President