



# Modern Slavery Statement 2022



**UNSW**  
SYDNEY

# Table of contents

Introduction (criterion 1)	<b>3</b>
The University (criterion 2)	<b>4</b>
Modern slavery risks (criterion 3)	<b>9</b>
Actions to address modern slavery risks (criterion 4)	<b>12</b>
Evaluating effectiveness (criterion 5)	<b>18</b>
Consultation and engagement (criterion 6)	<b>19</b>

# Introduction

(Criterion 1)



This statement is made in accordance with the Modern Slavery Act 2018 (Cth) (the Act) and constitutes the University's Modern Slavery Statement 2022.

This statement reports on the University's progress in assessing and addressing the risks of modern slavery practices that may be occurring in the University's and its controlled entities' supply chains and operations. This statement improves transparency by making information available to our staff, students, alumni, suppliers, business partners and the broader community on our efforts to address modern slavery risks. Each section addresses actions taken in response to the mandatory reporting criteria of the Act during the year ended 31 December 2022.

Modern slavery is a global challenge with its roots based on exploitation. Offenders use coercion, threats or deception to exploit modern slavery victims and undermine or deprive their freedom. Modern slavery is conduct which amounts to a serious criminal offence under Australian law or to a violation of international Conventions to which Australia is a party. Modern slavery is not the same as substandard or dangerous working conditions, such as unfair treatment or underpayment of workers, however the existence of such conditions may be an indicator of modern slavery.

## The University's vision

**Our vision** – to improve lives globally through innovative research, transformative education and commitment to a just society – drives everything we do.

## Declaration

This Modern Slavery Statement 2022 was tabled at and approved by the University Council in its role as principal governing body at its meeting on 19 June 2023.

A handwritten signature in black ink, appearing to read 'Brungs'.

Professor Attila Brungs  
Vice-Chancellor and President





4

# The University

(Criterion 2)

## Scientia corde mente et manu

Our motto – Knowledge by Heart, Mind and Hand – captures the fact that we serve a higher purpose and are committed to serving society through knowledge sharing and new discovery.

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

The University has a proud tradition of sustained innovation, focussing on areas critical to our future – from climate change and renewable energies to lifesaving medical treatments and breakthrough technologies.

A body corporate created by the University of New South Wales Act 1989 (NSW), the University is governed by a Council of 15 members, led by 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 Vice-Chancellor and President is the principal executive officer of the University and has the duty of promoting the interests and furthering the development of the University.

## University vision and values

### Vision

To improve lives globally, through innovative research, transformative education and commitment to a just society.

### Values

In pursuing the University's vision to make a real difference, members of the UNSW community will:

- **Display respect:** Treat others with dignity and empathy. Communicate with integrity and openness.
- **Demonstrate excellence:** Deliver high performance and demonstrate service excellence.
- **Drive innovation:** Think creatively and develop new ways of thinking. Initiate and embrace change.
- **Build collaboration:** Work effectively within and across teams. Build relationships with internal and external stakeholders to deliver on outcomes.
- **Embrace diversity:** Value individual differences and contributions of all people and promote inclusion.

## University structure

The University consists of:

### 6 faculties

- > Faculty of Art, Design & Architecture
- > Faculty of Engineering
- > UNSW Business School
- > Faculty of Law & Justice
- > Faculty of Medicine & Health
- > Faculty of Science

### 1 college

- > UNSW Canberra at the Australian Defence Force Academy (ADFA)

### 6 divisions

- > Academic Quality
- > External Engagement
- > Equity Diversity and Inclusion
- > Operations
- > Planning and Assurance
- > Research and Enterprise

### 44 schools

### 56 UNSW centres and institutes

### Modern slavery responsibilities and reporting

The University's [Modern Slavery Prevention Policy](#) outlines roles and responsibilities for addressing modern slavery risks in our supply chains and operations.

The Legal & Compliance team (part of the Division of Planning and Assurance) has responsibility for preparing the University's annual statement under the Act. The statement is approved by the University Council and is signed by the Vice-Chancellor on behalf of the Council.



## University locations

### Sydney campuses

#### Kensington

Set on 38ha, 7km from the centre of Sydney's CBD, this campus is home to six faculties. Through innovative teaching and ground-breaking research, they contribute to the advancement of knowledge across many disciplines as we help to create a just society.

#### Paddington

In the heart of Sydney, this campus is home to UNSW Art & Design, 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.

#### Parramatta Hub

Our new Parramatta Engineering Innovation Hub opened in 2022.

#### Canberra campus

Located at the Australian Defence Force Academy (ADFA) in Canberra, this college is unique in Australia. It provides undergraduate education for officer cadets as well as postgraduate programs (open to all students in arts, business, engineering, IT, management and science). A new Canberra city campus will open in 2023.

#### Regional campuses

UNSW also has hubs in Albury, Coffs Harbour and Griffith, with major health campuses at Port Macquarie and Wagga Wagga.

## University staff and students\*

### Total staff

# 7001

(6421.86 full-time equivalent)

#### Staff

Academic staff	3,251
Professional staff	3,750

### Total students

# 66,540

#### Student/Alumni

Students commencing 2022	25,330
Local students	42,767
International students	23,773
Higher degree research candidates	4,343
UNSW alumni	370,165

\* As at 31 March 2022



## University controlled entities

The University has established controlled entities in Australia and overseas to support its philanthropic and development activities and further the University's commercial functions. The University had control over the following entities as at 31 December 2022:

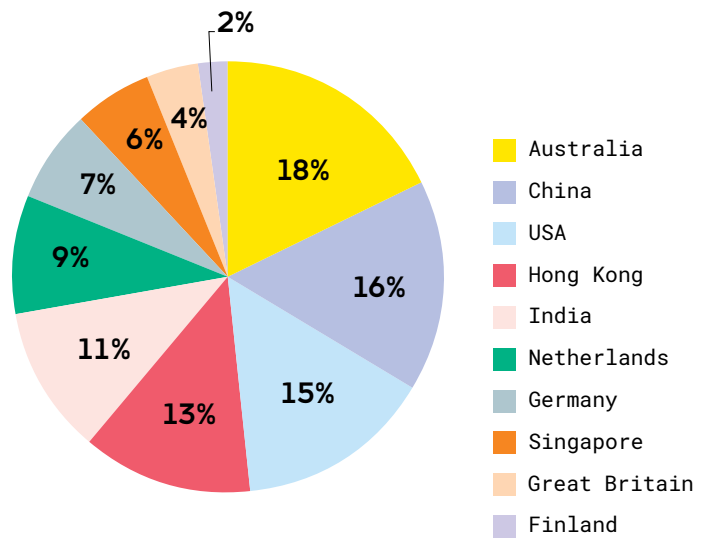
Company Name	Jurisdiction
<b>Horizons Future Learning Pty Ltd (trading as "Mentem")</b> Workforce upskilling and other activities	Australia
<b>NewSouth Innovations Pty Ltd</b> Intellectual property management/commercialisation	Australia
<b>Qucor Pty Ltd</b> Intellectual property management/commercialisation	Australia
<b>Scientia Clinical Research Ltd</b> Clinical trials	Australia
<b>The University of New South Wales Foundation Ltd</b> Philanthropy and donations	Australia
<b>University of New South Wales Press Ltd</b> Press and publications	Australia
<b>UNSW Global Pty Ltd</b> Teaching and other activities	Australia
<b>UNSW Centre for Transformational Environmental Technologies (Yixing) Co. Ltd</b> Intellectual property development/commercialisation	China
<b>UNSW Sino-Australia Innovative Technology &amp; Education (Shanghai) Co. Ltd</b> Intellectual property development/commercialisation	China
<b>UNSW Hong Kong Ltd</b> Promotion and recruitment	Hong Kong
<b>UNSW Hong Kong Foundation Ltd</b> Philanthropy and donations	Hong Kong
<b>UNSW Global India Pvt Ltd</b> Promotion and recruitment	India
<b>UK Foundation of UNSW Australia</b> Philanthropy and donations	UK
<b>UNSW &amp; Study Abroad – Friends and US Alumni, Inc</b> Philanthropy and donations	USA



### University supply chains

The University's supply chain supports our academic programs, research activities, infrastructure and administrative and commercial functions. We work with over 6,000 suppliers annually and our supplier base is diverse as the nature of our industry is global and varied.

### Top 10 countries of spend





# Modern slavery risks

## (Criterion 3)

### Risk management framework

Under its [Risk Management Framework](#), the University is committed to building a culture that is supported by a tailored, practical and integrated approach to identify and manage risks in our strategy and operations. This commitment is articulated in the [Risk Management Policy](#) and championed by leaders. Identified risks are recorded in Faculty and Divisional risk profiles as well as in the University's enterprise risk profiles.

Modern slavery is also included in risk profiling activities to gain insights on where modern slavery may occur in our supply chains and operations. We focus on identifying risks where the University may cause, contribute or be directly linked to modern slavery in our supply chains and operations.

In 2022 we engaged Point Advisory, a leading sustainability services consultancy, to identify sources of supply chain spend and operational areas where there is potential for the University to contribute, or be directly linked, to modern slavery risks. Point Advisory conducted stakeholder interviews and data analysis to assess modern slavery risks to people using qualitative and quantitative metrics for UNSW's operations and supply chains. Risk profiling activities included:

- reviewing business activity and procured operational services
- considering high risk geographies and business models
- cross-referencing observed risk exposures with Australian and international businesses.

## Supply chains

Point Advisory's risk assessment of our supply chain highlights the following sources with the highest risk profile for the University in terms of labour, modern slavery and human rights infringements:

Area	Risk rating
Uniforms and personal protective equipment ( <b>PPE</b> )	Very high
Solar installation and maintenance	Very high
IT hardware and electronics	Very high
Janitorial, cleaning and safety supplies	Very high
Marketing materials and promotional items	Very high
Freight and bio shipping	Very high
Laboratory consumables	High
Carpets and floor coverings	High

## Risk Spotlight – Supply Chains



### Uniforms and PPE

Uniforms and PPE constitute the largest supplier count amongst our high risk spend categories. Reports of modern slavery and forced labour are widespread in the textile manufacturing industry. The manufacture of uniforms and PPE may also include our brand and logo, which increases the risk to our reputation if supply chains are not managed.



### IT hardware and electronics

The University procures IT hardware and electronics to support its operations including engineering equipment, laptops, benchtop scientific equipment and IT accessories. The manufacture of electronic goods often occurs in harsh environments with complex supply chains increasing the risks of modern slavery associated with the sector. The University is committed to mitigate risks in this area by developing risk based due diligence criteria to implement in the contract management lifecycle.



### Freight and bio shipping

The University relies on the freight and bio shipping industry to support its leading teaching and research operations. The preceding freight and bio shipping industry is a high-risk sector with low visibility of recruitment and labour practices. Workers often face exploitation due to lack of adequate protections and reporting mechanisms. The University is committed to improving its supplier engagement and escalation process to mitigate the risks in this area.

## Operations

The breadth and scope of our 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 risks may arise include

Area	Risk rating
Cleaning services	Very high
Contracting and labour hire	High
Construction, repair and maintenance	High
Outsourcing to third party overseas providers	Moderate
International research, collaborations and commercial partnership	Moderate
Investments	Moderate
Risk to students	Moderate
Direct workforce	Low
Grievance mechanism	Moderate

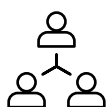
## Risk Spotlight – Operations



### Cleaning Services

The cleaning services industry faces an increased risk of modern slavery due to contracting and subcontracting schemes which may abuse the responsibilities and rights of employers and workers. The supply and manufacture of PPE (such as gloves) also increases the industry's risk of modern slavery.

The University engages cleaners across our campuses through contracting and subcontracting arrangements. Risks are controlled through contractor assurance and sample audits.



### Outsourcing to third party overseas providers

The University engages third party providers for student recruitment, research and partnerships overseas. This includes engagement with international student recruitment agencies, hiring external venues and media and public relations. Modern slavery risks may arise in these providers, especially where the University may not have full visibility of subcontracting and provision of ancillary services. Controls include monitoring of contracts and periodic audits.



### Investments

The University administers its investments via fund managers. Risks of modern slavery are prevalent in the organisations the University invests in as due diligence is outsourced to fund managers.



### International research, collaborations and commercial partnerships

The University conducts research and knowledge exchange activities in many countries around the world. Modern slavery can occur where activities are conducted in countries that may have poor governance, weak rule of law, corruption and other socio-economic factors. Controls including our research code of conduct and ethics approvals for research involving human participants.



### Risk to Students

The University acknowledges that young persons, including students, may experience dangerous or substandard working conditions. Students are a vulnerable group prone to exploitation due to lack of awareness, visa status, legal right to work and fear of reporting.





# Actions to address modern slavery risks

## (Criterion 4)

### Policy commitment

The University's [Modern Slavery Prevention Policy](#) outlines our commitment to ensuring:

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

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.

## Ongoing actions

The University continues to work collaboratively with suppliers and other organisations to take action on modern slavery risks in our supply chains and operations by:

- requiring all suppliers that deliver goods or services to the University to commit to the Procurement Supplier Charter, which includes a commitment to respect human rights and reduce modern slavery risks
- including a modern slavery clause in procurement contract templates, committing the 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 to notify the University if they become aware of any suspected or actual breach of a modern slavery law
- including a modern slavery clause in all new and renewed campus retail leases and licences, committing the retailer to not engage in or authorise modern slavery in their business operations, and to take reasonable steps to ensure that there are no modern slavery practices in any part of their business or supply chains
- collaborating with Electronics Watch to leverage a range of reports and tools to strengthen social responsibility within our IT hardware and electronics supply chains (the reports include regional risk assessments based on consultations and work testimonies and factory risk assessments to identify violations of the code of labour standards)
- undertaking risk identification with FRDM, the higher education sector wide algorithmic tool that maps and identifies modern slavery risks in supply chains (FRDM improves transparency of modern slavery across domestic and international supply chains and provides useful data dashboard tools to facilitate meaningful reporting).
- being an active member of the Australian Universities Procurement Network (AUPN), a collaborative network with over 30 members sharing expertise to improve procurement practices within the higher education sector
- incorporating the obligations of the Act into the annual certification program of the University's legislative compliance framework
- having grievance systems to receive and address complaints and reports of wrongdoing, including those that relate to modern slavery – see [www.unsw.edu.au/complaints](http://www.unsw.edu.au/complaints) (during the reporting period no complaints or public interest disclosures were received by the University concerning modern slavery practices in the University's supply chains and operations).

### The University's Modern Slavery Questionnaire for Suppliers

The University assesses modern slavery risks pre-contract by requiring new suppliers to complete a modern slavery questionnaire. In 2022:

**129**

suppliers completed the questionnaire as part of the Request for Proposal (RFP) process, of which:

**104**

suppliers had a modern slavery policy

**49**

suppliers were reporting entities under the Act

**49**

suppliers stated that they did not use any overseas labour.

The questionnaire addresses key criteria including sub-contracting, training and awareness and controls and mitigation techniques. Results from the questionnaires can be used to guide engagement and collaboration with suppliers to address supply chain modern slavery risks and identify any corrective action items that are able to be developed and delivered.

## Gap analysis and strategy development

The University is committed to having a strong approach to managing modern slavery, aligned with its values and academic thought leadership on modern slavery and human rights.

In 2022 the University identified a need to review and gain a better understanding of the strengths and gaps of its current approach for addressing risks of modern slavery in its supply chains and operations.

This included:

- a review and sense check of its initial modern slavery action plan for alignment to regulatory requirements and leading practice, with the aim of identifying key priorities, and
- the development of a detailed and meaningful multi-year strategy with clear measurable actions.

The University engaged Point Advisory, a leading sustainability services consultancy, to review its existing approach, supply chain, operations and risk mitigation progress. The project consisted of two phases:

### Phase 1: Gap Analysis and Review

- Consolidated and comprehensive review of existing approach against the Act and leading practice

- Detailed risk management review of key supply chain and operational risk data to inform strategy

- Stakeholder engagement to identify, validate and prioritise risks

### Phase 2: Strategy Development

- Facilitated goal setting with stakeholders

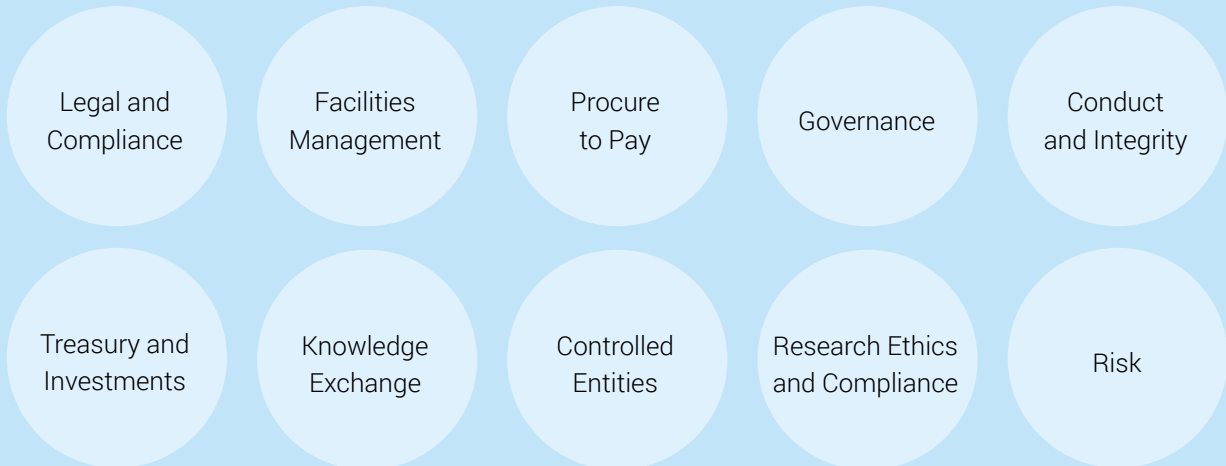
- Development of strategic objectives and plan

- Detailed action plan with clearly defined timelines, responsibilities and accountabilities





Both phases of the project allowed us to focus on foundational elements, such as policies, as well as key systems and processes to assess and manage our modern slavery risks. Workshops were conducted to engage and build buy-in with stakeholders including:



The approach to the project:

- supported the development of a robust and pragmatic Modern Slavery Strategy
- reflected evolving best practice, whilst recognising current levels of progress and resourcing
- engaged key internal stakeholders to inform the strategy and ensure buy in
- supported identification of immediate priorities and achievable actions as well as the development of a sound approach in key areas such as due diligence and risk management
- established key measures of success to track and report on progress.

## Gap Analysis

The gap analysis was conducted to assess current processes and systems to address modern slavery risks in the University's supply chains and operations. The analysis drew on the guidance of the Modern Slavery Act 2018 Guidance for Reporting Entities and best practice international standards and focused on six key assessment criteria:

- 1 Governance and policy
- 2 Responsibility and accountability
- 3 Risk assessment and due diligence
- 4 Risk management (supply chain, operations and investments)
- 5 Grievance and remedy
- 6 Public disclosure and stakeholder engagement

The gap analysis included the following findings:

- A systematic and comprehensive approach to risk assessment, supplier due diligence, training and awareness is required to be undertaken.
- While relevant accountabilities are documented, a clear allocation of responsibility across business units or a clear ladder of accountability up to and including the University Council is required.
- Risk assessment and management processes require improvement, especially in post-contract management of third-party risk.
- Grievance mechanisms need to be more accessible and accountable, aligning with UN guiding principles.

Focus areas to enable continuous improvement and mitigation of modern slavery risks in our operations include:

- Adopting a uniform approach to anti-slavery, environmental sustainability and social procurement during new supplier onboarding
- Developing risk-based due diligence criteria for high-risk categories including uniforms, PPE, solar installations and IT hardware and electronics
- Further optimising existing platforms, including Electronics Watch and FRDM, to support risk analysis and remediation
- Conducting training for contract lifecycle management
- Addressing risk to international students through referrals and grievance mechanisms
- Embedding responsible purchasing practices in our procurement practices to place limits on subcontracting and ensure workers are paid a living wage
- Strengthening risk management for overseas third party contractors and recruiters to initiate due diligence and improve access to grievance mechanisms.

## Strategy development – 2023 and beyond

Through the gap analysis, peer review and stakeholder engagement, the University developed a Modern Slavery Action Plan with a goal to demonstrate an effective, leading approach to addressing modern slavery by managing social risks and protecting human rights. This Action Plan includes three overarching strategic priorities, clear objectives and measures and progress indicators to demonstrate achievement of outcomes.

**VISION**  
The future we want | A just society where human rights are respected, and social impacts are enhanced in Australia and around the world.

**GOAL**  
What we aim to do | Demonstrate an effective, leading approach to addressing modern slavery by managing social risks and protecting human rights

### STRATEGIC PRIORITIES

- 1 Strong Governance and Effectiveness**
  - 1.1 Set clear objectives, responsibilities and accountabilities via a robust governance framework
  - 1.2 Monitor and evaluate progress and review the effectiveness of our actions
  - 1.3 Build skills, capacity and awareness required to effectively manage modern slavery
- 2 Embedded Risk Management**
  - 2.1 Build strong ESG-aligned systems to prioritise and address modern slavery risks through our procurement and supplier engagement processes
  - 2.2 Develop measures to address operational risks including controlled entities, investment, on-campus operations, research and students
- 3 Remediation and Reporting**
  - 3.1 Strengthen grievance mechanisms and establish a leading approach to remediation of human rights issues
  - 3.2 Consistently report serious issues, risks or lack of compliance to Management Board and the Council's Safety & Risk Committee
  - 3.3 Engage effectively with partners, stakeholders and the public including effective and transparent disclosure



# Evaluating effectiveness

## (Criterion 5)

### Modern Slavery Action Plan – Measures and progress indicators

To track the effectiveness of the University's implementation of the Modern Slavery Action Plan, the following will be documented and endorsed for each action:

- Tracked Start and End Dates
- Responsibility for implementing the action
- A target (e.g. 100% of high risk category purchases are reviewed for modern slavery risk)
- Risks and dependencies that could impact the action
- Guidance to be followed, including available tools and resources.

Progress on the Modern Slavery Action Plan will be measured against key indicators, as set out below. The impact of our overall progress against each action will be reported to the University's Management Board and Council on a regular basis.

### Certification through the University's Legislative Compliance Framework

All current and new controls implemented to support the Modern Slavery Action Plan are captured within the University's Legislative Compliance Framework. Control owners are required to complete an annual compliance certification to assess coverage and effectiveness of such internal controls. Controls assessed as "Improvement Required" are reviewed to determine actions required to update controls to a level where they are "Well Based" or "Effective". The controls are then reassessed during the next annual compliance certification.

18

#### Strategic Objectives

#### Key Indicators include

##### Strong Effectiveness and Governance

- Modern Slavery Working Group operating effectively to ensure delivery of the Action Plan and facilitate meaningful progress reporting
- Applicable policies (including the Modern Slavery Prevention Policy) include anti-slavery commitments and aligns to the United Nations Guiding Principles
- Maintaining senior management sponsorship through the facilitation of effective training and reporting

##### Embedded Risk Management

- Formalised end-to-end risk assessment and management process
- Engagement with strategic suppliers via e-modules and supplier guidance that raises their awareness of University expectations

##### Remediation and Reporting

- External individuals (including workers in the supply chain) have access to either the University's own grievance mechanism or one led by suppliers
- Enterprise risk framework strengthened to include human rights

# Consultation and engagement

(Criterion 6)



## Engaging with our controlled entities

The University consulted representatives from our controlled entities to inform our strategy development and Modern Slavery Action Plan. Stakeholders were included in workshops and engagement sessions to ensure strategy development reflected our controlled entities' operations. The Modern Slavery Action Plan embeds consultation with our controlled entities into our governance and monitoring of modern slavery actions.

For the 2022 reporting period, none of the University's controlled entities, as listed earlier in this Statement, were "reporting entities" under the Act. Controlled entities that were assessed as not having sufficient operations or supply chains to give rise to risks of modern slavery were not consulted.

## Engaging with senior management

During 2022 there was active engagement with the University's Management Board and Council on the University's existing approach to addressing modern slavery risk and working collectively to move towards leading practice in the higher education sector.

