Macquarie University

Modern Slavery Statement

January – December 2020

Mandatory Reporting Criterion

To meet the seven mandatory reporting criteria, Macquarie University's statement is structured across nine sections.

Australian Modern Slavery Act mandatory reporting criterion	Reference in the statement
1. Identify the reporting entity	1: Introduction p.3 2: Macquarie University Group at a glance p.4
2. Describe the reporting entity structure, operations and supply chain	3: Our governance structure as it relates to modern slavery obligations p.6
3. Describe the risks of modern slavery practices in the operations and supply chains	4. Assessing modern slavery risks and practices in our operations and supply chain p.7
4. Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address risks, including due diligence and remediation processes	5. Actions taken to address identified risks p.10
5. Describe how the reporting entity assesses the effectiveness of such actions	6. Assessing the effectiveness of actions p.17
6. Describe the process of consultation with any entities the reporting entity owns or controls; and, for a reporting entity covered by a joint statement, the entity giving the statement	7. Consultation process p.18
7. Include any other information that the reporting entity, or the entity giving the statement, considers relevant	8.Other relevant information p.19 9. Next steps p.21

Macquarie University is committed to respecting and protecting human rights of our staff and students and the public. This statement is made pursuant to Part 2, Section 16 of the Modern Slavery Act 2018. It sets out the steps that the University has taken across our research, teaching and operational activities to identify and prevent modern slavery in our operations and supply chains.

1. Introduction

Macquarie University (the University) and its controlled entities recognise that modern slavery is a real risk globally, including in countries like Australia. The University supports the commitments introduced under the Commonwealth *Modern Slavery Act 2018* (the Act). The University opposes all forms of modern slavery and is committed to maintaining responsible and transparent operations and supply chains. The University also acknowledges the complexity of the issue. Modern slavery can be hard to detect and is often hidden within seemingly legitimate industries. Our approach and commitment to guard against modern slavery in this area is consistent with the University's Purpose, Vision and Values.

The University recruits students through international agents and has relationships with overseas entities.

The University's risk of modern slavery is most present in the University's procurement activities, specifically, in the areas of subcontracting and complex supply chain network.

The University has taken the first steps in assessing and mitigating the risks of modern slavery in our supply chain by being an active participant in the Australian Universities Procurement Network (AUPN) initiative to create a modern slavery risk dashboard, which provides universities with an indication of the scale of modern slavery risks within their supply chains and the broader sector.

In this Modern Slavery Statement, we have considered the areas where the University may potentially cause or contribute to modern slavery through our supply chain and operations. To date we have not identified any instances of the practice in our operations or supply chain. We will continue to work diligently with our partners and suppliers and will continue to refine our analytics and assessments to ensure that we have the ability to prevent, identify and manage instances of modern slavery within our control.

The University also recognises the importance of fostering collaboration with our partners and suppliers as we develop policies and improve practices to ensure that there is no inadvertent adverse impact or harm to those who the University and the Act are aimed at protecting.

The University is committed to:

- ensuring that our employees, students, partners and suppliers have a full understanding of the modern slavery risks and have the tools and pathways to address them in accordance with the internationally agreed principles and the Act
- identifying and eliminating any potential for modern slavery practices in our operations and supply chain
- developing a plan to measure the effectiveness of the approach.

Date - 28 June 2021

S Bruce Dowton MD
Vice-Chancellor and President
Macquarie University

This Modern Slavery Statement was approved by the Macquarie University Council on 24 June 2021.

2. Macquarie University Group at a glance

Macquarie University was established by the New South Wales Parliament in 1964. It is situated on a 126-hectare university-owned campus in the Macquarie Park Innovation District. The University operates **four faculties** – *Arts; Science and Engineering; Medicine, Health and Human Sciences;* and *Macquarie Business School* – that offer an extensive range of undergraduate, postgraduate and research programs. It is the only university in Australia to establish and operate a private, not-for-profit **teaching hospital** on a university campus, which is part of MQ Health Pty Limited (MQ Health). The University also operates the following controlled entities that are covered by this statement (referred to together as the 'Group'):

Access Macquarie Limited (AccessMQ) is a not-for-profit public company limited by guarantee and wholly owned by the University. Its principal business is to further the University's mission by promoting and pursuing the practical application of the University's research, scholarly and outreach activity to industry or the wider community, principally through commercialisation of research and teaching.

MQ Health is a not-for-profit company limited by shares and wholly owned by the University. Its objectives are to provide clinical services that are patient-centred, high-quality, evidence-based and efficient. MQ Health provides clinical placements for medical and allied health students, as well as junior doctors undergoing their postgraduate clinical training. It supports medical research with Macquarie University and other high-quality affiliated medical and research institutions.

U@MQ Ltd (U@MQ) is a not-for-profit public company limited by guarantee and wholly owned by Macquarie University. Its objective is to provide facilities for the members of the University community, including staff and students, which complement and support the University's academic activities. Services include sporting and recreational facilities; food, beverage and retail services; and the provision of childcare.

MGSM Limited (MGSM) is a not-for-profit public company limited by guarantee and wholly owned by the University. Its principal activity is to operate the hospitality facilities that support the mission of Macquarie University.

Macquarie University Hong Kong Foundation Limited is a not-for-profit public company limited by guarantee and wholly owned by the University. Its principal activities are to advance, promote and develop higher education. It focuses on the advancement of education and exchange of knowledge between Macquarie University, Hong Kong and China, providing mobility scholarships and support for students, researchers and academics.

1700+ academic staff

2000+ professional staff

33,864 domestic students

10,968 international students from more than 117 countries

More than 207,000 alumni around the world feeding back into our MQ network

$1152 million income from continuing operations, including controlled entities

3. Our governance structure as it relates to modern slavery obligations

The University was established under the *Macquarie University Act 1964* (NSW) and currently operates under the *Macquarie University Act 1989* (NSW). Under the Act, the object of the University is the promotion, within the limits of the University's resources, of scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence.

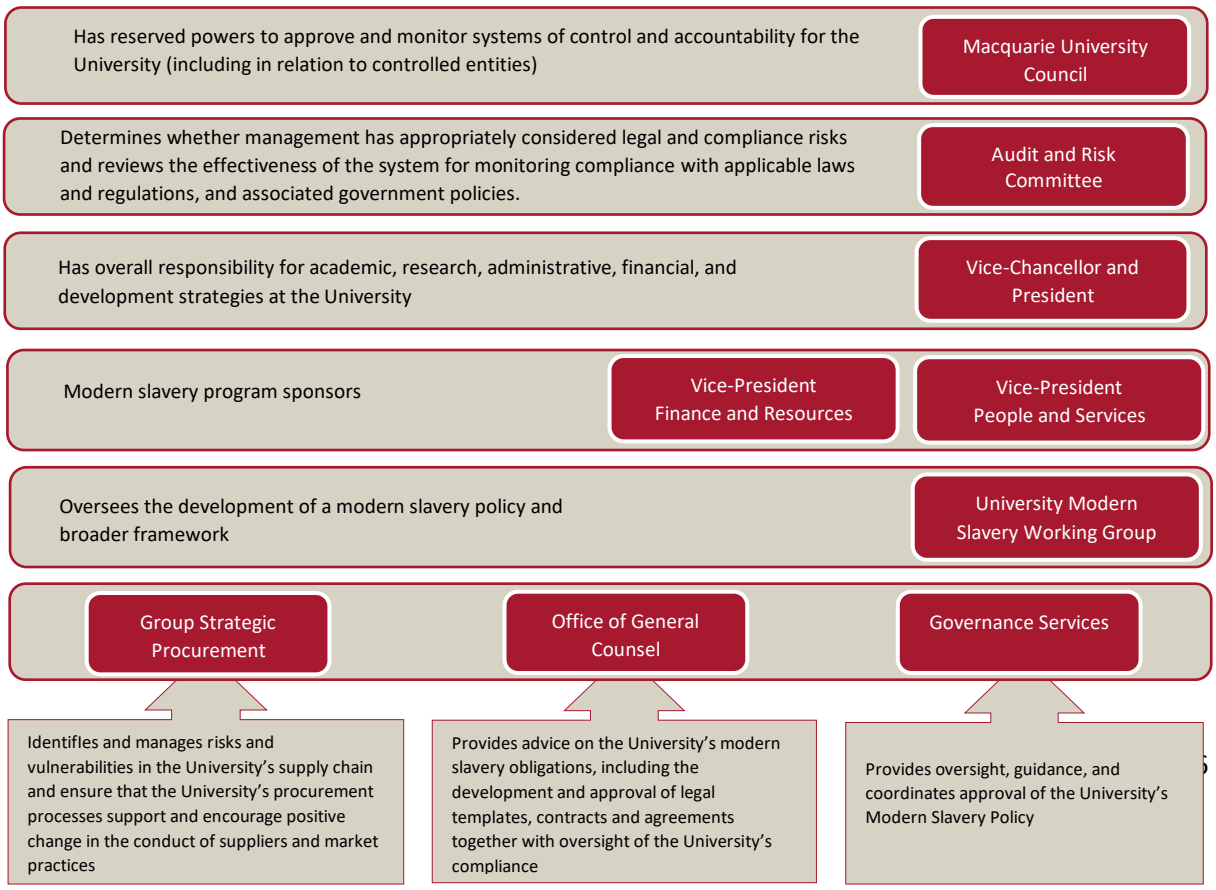
The University Council is the governing body of the University. Under Part 4 of the Act, the Council acts for and on behalf of the University in such manner as appears to the Council to be the best calculated to promote the objects and interests of the University. It is empowered to make by-laws and rules relating to how the University is managed. The *Macquarie University Act* also establishes the Academic Senate as the principal academic body of the University, and the Vice-Chancellor and President as the principal executive officer of the University.

The Office of General Counsel (OGC) has oversight of the Compliance Framework for the Group and is responsible for the provision of legal services to the University. The OGC maintains a library of standard agreements and templates for use in a range of common transactions. It reviews and provides advice on deviations from the standard agreements. The OGC also provides advice to staff within the University on non-standard contracts, instruments, and dealings.

The University's Governance Services manages Policy Central, the sole authoritative source for all Macquarie University rules, policies, procedures, guidelines, and related documents. Compliance is a shared responsibility across the Group to ensure that operational activities are undertaken in a manner consistent with relevant laws and regulations. Targeted consultation is undertaken to determine policy relevance across the Group and various portfolios. To govern our approach on Modern Slavery, a Working Group has been established with the objective of overseeing the modern slavery risks across the Group to gain insights for the Framework's development.

Unless otherwise stated, the data in this report covers University operations only. A detailed analysis of our controlled entities supply chain and operations as they relate to modern slavery will be undertaken during the next reporting period. Figure 1 shows the governance arrangement established to develop the approach to our modern slavery obligations across the Group.

Figure 1



4. Assessing modern slavery risks and practices in our operations and supply chain

Under the Act, the term 'modern slavery' broadly includes exploitative practices including human trafficking, slavery, forced labour, child labour and other slavery-like practices. According to the Global Slavery Index 2018, there are about 40.3 million people enslaved globally, of which about 25 million people are in the Asia-Pacific region, and 15,000 in Australia.

Due to the existing legislative framework concerning education and employment in Australia, the risk that the University itself is engaged in modern slavery activities is relatively low. Most of the University's staff, academic and professional, are employed directly and on permanent and/or fixed-term contracts. This significantly lowers our risk in the area of employment. Our operational risk assessment focuses on student recruitment, third-party labour suppliers and international research partnerships.

The risk is more pronounced in the area of procurement; specifically, in the areas of subcontracting and supply chain. The University is an active participant in the AUPN Modern Slavery Working Group, a university sector–wide collaboration and approach on supply-chain monitoring. The AUPN Modern Slavery Working Group was established in early 2019, initially with nine universities, including Macquarie, actively contributing time and effort on a voluntary basis.

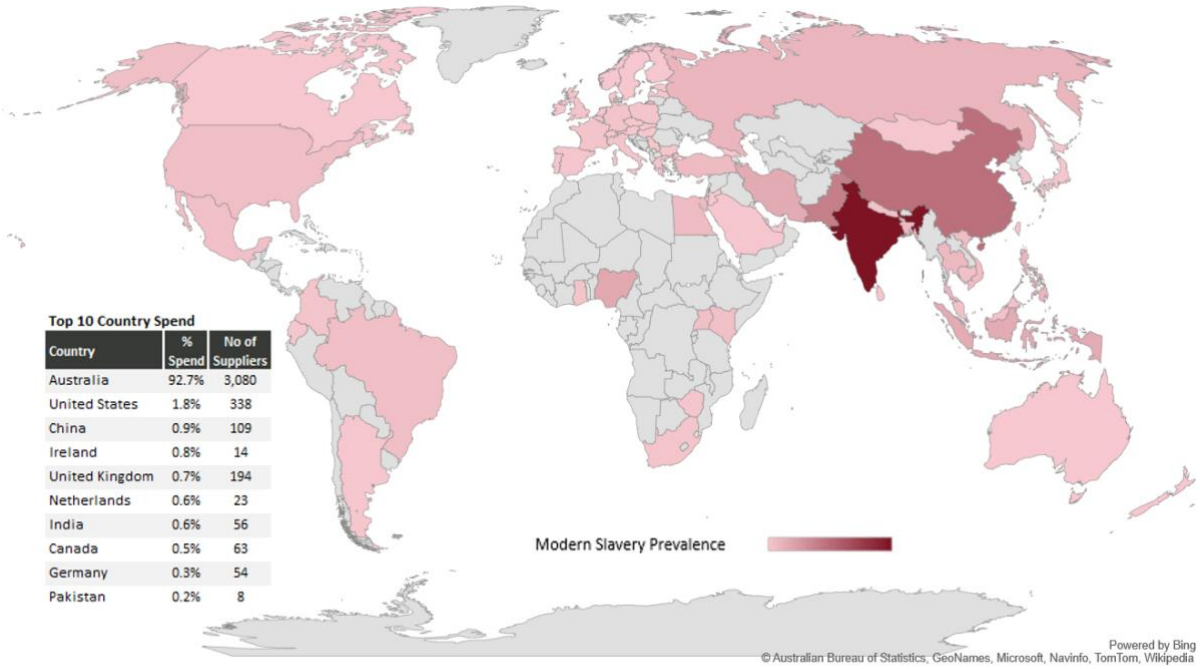
As part of the discovery phase, a modern slavery risk dashboard was developed and made available to all AUPN members in January 2020. To date, 27 Australian universities, including Macquarie, have submitted 2018 to 2020 spend data to support the modern slavery program. Data continues to be gathered from other universities. The dashboard is the first step in the AUPN's modern slavery program journey, providing an indication of individual university's and the university sector's exposure through two different lenses. These are the potential risks of modern slavery applied against:

- categories using the AUPN taxonomy
- country locations using supplier head office location.

These risks have been determined through the publicly available Global Slavery Index and information on the subject. The dashboard only gives an indicative view of where risks may exist, and the AUPN aims to continue to evolve risk ratings over time as the analytics mature. The aggregated data reflects the broad supply chains of the sector. Analysis of the spend data provided covers more than $14.6 billion annualised spend across more than 183,800 individual suppliers. In the university sector, suppliers with the highest spend expenditure are in the construction, information and communications technology (ICT), and research markets. The University's specific risk assessment process sets a base level of identification of modern slavery and human trafficking risk by considering product or service category risk as well as country risk. The process includes the analysis of our supplier portfolio based on the country of origin, sector, type of product or service and the business model. Our biggest spend categories are consistent with those in the sector and include construction, ICT and research. Figures 2 to 5 show the distribution of our supplier base across geographies and sectors. The University is committed to working with all our global partners to ensure that they:

- do not engage in any conduct which may contravene modern slavery laws,
- have policies relating to modern slavery regardless of their location,
- conduct their business in a manner that is consistent with modern slavery laws.

Figure 2: Breakdown of University spend based on a supplier country of origin



- A coloured country indicates that there is spend with suppliers in that country
- The colour (slider from light red to dark red) indicates the current prevalence of modern slavery in that country. Light red = less risk, Dark red = more risk)
- All risk ratings have been taken from the Global Slavery index https://www.globalslaveryindex.org/
- Excludes controlled entities

Figure 3: Breakdown of University spend by AUPN spend categories

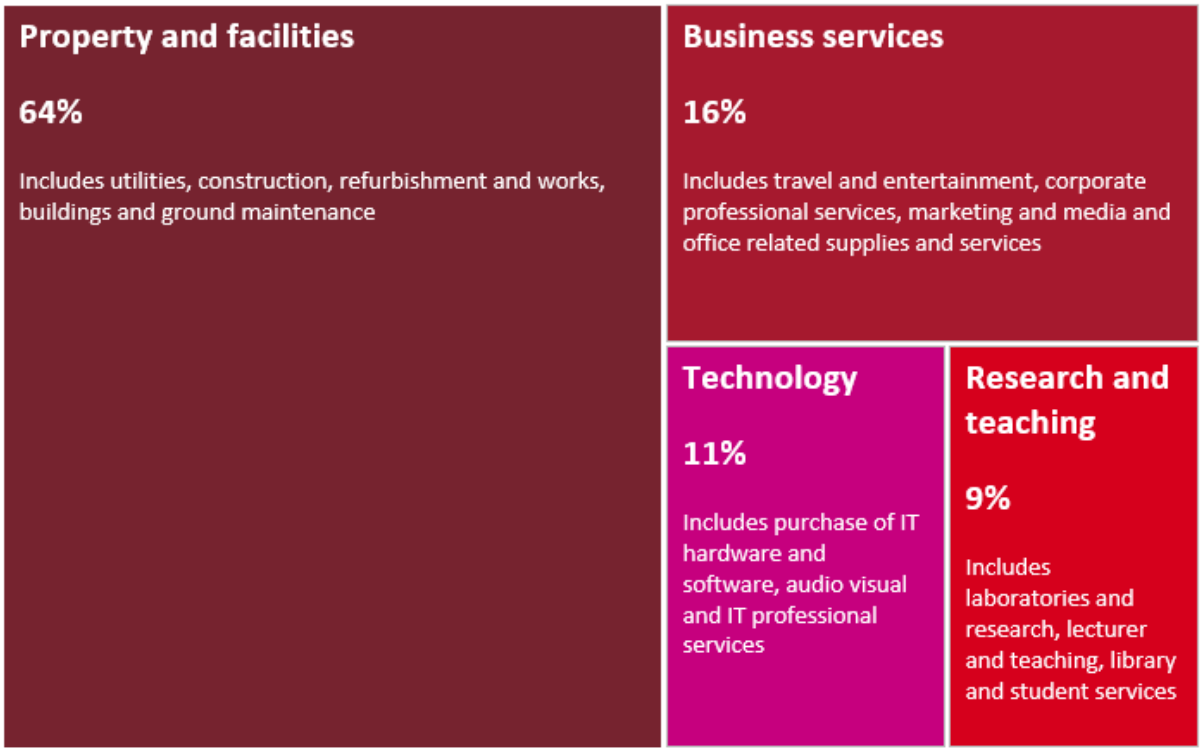
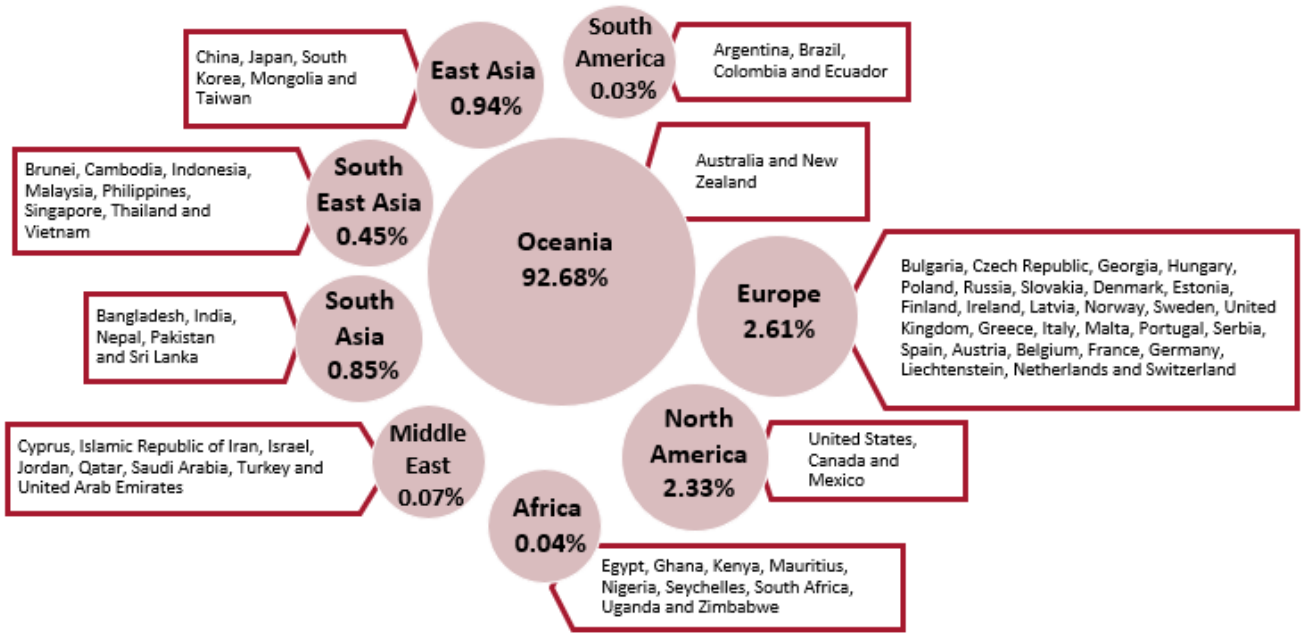


Figure 4: University supplier portfolio

Figure 5: University supplier portfolio by region of origin



5. Actions taken to address identified risks

The University Modern Slavery Working Group was convened in May 2020 to consider the University's risks and obligations under the Act. Members represent all faculties, portfolios, and controlled entities. The Group is working on the development of a Modern Slavery Policy and a broader framework. Under its oversight, Strategic Procurement, Risk and Assurance, and the Office of the General Counsel have partnered to begin work across the broad areas of detection, prevention, and mitigation of modern slavery in our operations and supply chain.

ONGOING

- Supply-chain mapping
- Identifying areas of vulnerability to subcontract and supply-chain risks
- Achieving visibility into tiers of subcontracting and supply chain by including request for such information in standard procurement documentation and by conducting appropriate due diligence before contract execution
- Looking for opportunities to extend our impact through university sector collaboration, University partners and other organisations
- Growing awareness and supporting ambassadorship and leadership across the University community through training and communication programs
- Embedding the University's modern slavery program using existing channels, processes and frameworks (eg., ProcureRight Framework) wherever possible, supported with specific tools and systems, as required

COMPLETED

- ☑ Initial supply-chain mapping (in association with AUPN)
- ☑ Incorporation of economic, social and sustainability concerns into procurement materials and decisions, and key contractual arrangements
- ☑ Development of modern slavery awareness training for working group members to present to their respective portfolios
- ☑ Development of clauses dealing with modern slavery for inclusion in all future contractual agreements and purchase orders
- ☑ Initial analysis of supply-chain vulnerability areas broken down by industry, geography, products and business models
- ☑ Initial engagement with key suppliers in vulnerable geographies and sectors

UNDER CONSIDERATION OR DEVELOPMENT

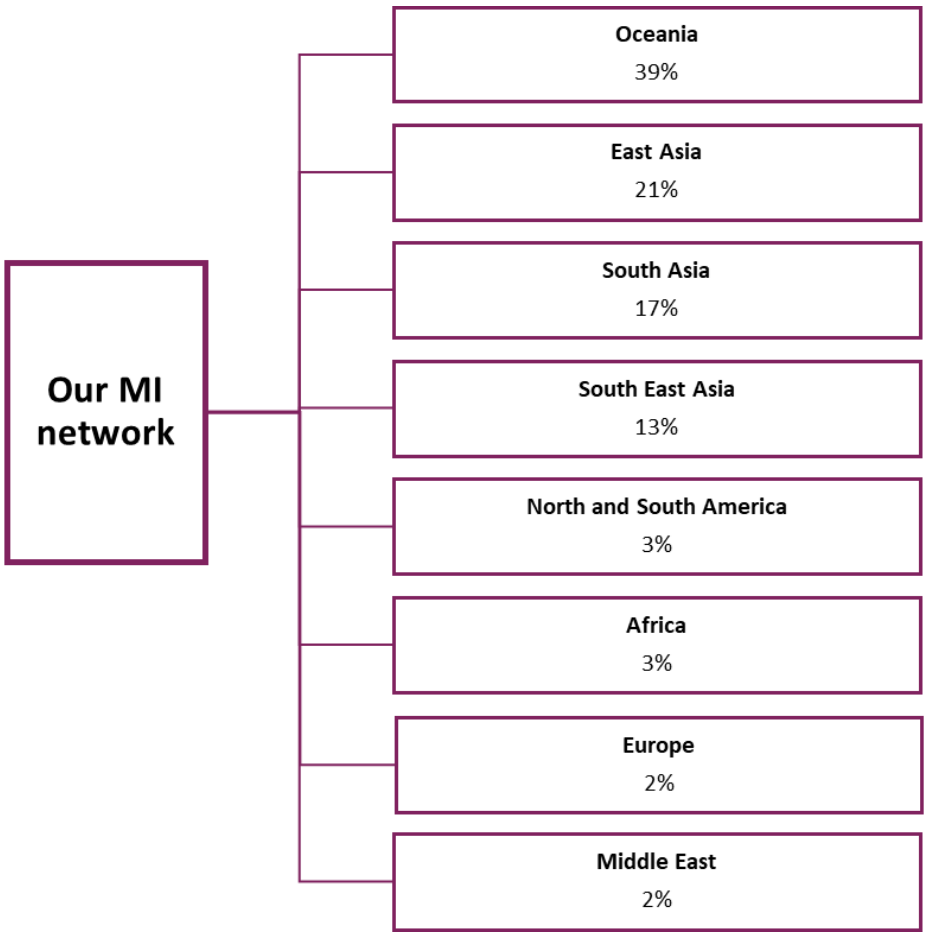
- Modern Slavery Policy framework
- Automated tools on supply-chain assessment
- Supplier assurance on adherence to labour laws throughout their supply chain
- Communication strategy and training for employees
- Resources and guiding principles for staff and students
- Ongoing review and updates to the contractual templates

International student recruitment

Macquarie International (MI) has a robust and effective operation to recruit international students overseas and manage Macquarie University students' overseas mobility opportunities. Although some regions have been identified as potential risks in terms of modern slavery activities, the University has a very low overall risk assessment due to appointment procedures, active management and review processes, and local expertise that mitigate potential issues.

Where modern slavery risks arise outside the University's direct control, the University will aim to engage collaboratively with suppliers and partners to identify and implement measures which contribute to the prevention, mitigation and remediation of those risks. Figure 6 below demonstrates the breadths of MI agent network by region.

Figure 6: MI network by region



Agent recruitment and review

All appointed education recruitment agents have their backgrounds checked with industry peers and are required to undertake professional training by industrial associations such as Professional International Education Resources (PIER), International Consultants for Education and Fairs (ICEF) and Qualified Education Agent Counsellor (QEAC) before being appointed by MI. The training includes relevant legislation and a code of ethics. Irrespective of the region the agents are operating within, the governing laws are those of New South Wales and the compliance is within the *Education Services for Overseas Students Act 2000 (Cth)* (ESOS Act)*, Education Services for Overseas Student Regulations 2000 (Cth)* (ESOS Regulations), and the National Code of Practice for Providers of Education and Training to Overseas Students.

The agency agreements are managed individually by MI experienced staff members in the Global Engagement and Business Development team. A robust annual agent performance and compliance review is conducted every year or at the University's discretion.

An agency is not permitted to appoint sub-agents without the University's explicit approval.

Termination requirements for any agency are clearly outlined in the agreement to regulate any potential wrongdoings.

Consultants and contractors

- MI has consultants and contractors located overseas to assist with Macquarie's international recruitment activities.
- All appointees have gone through background checks and are managed directly by MI senior continuing staff members.
- The governing laws of the contracts with consultants and contractors engaged in this area are generally New South Wales.

International mobility and PACE (Professional and Community Engagement)

- All Macquarie's exchange and mobility partners are chosen carefully based on below criteria:
    - input from in-country representatives
    - background checks, risk assessments and business case.

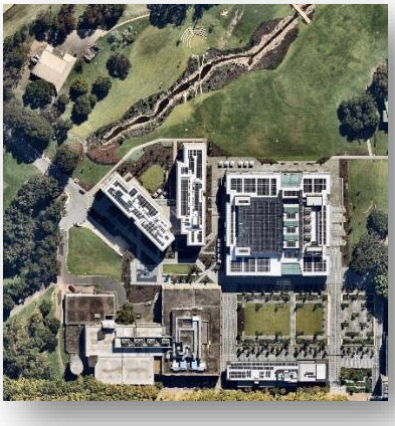
- MI has worked through the Department of Foreign Affairs and Trade's (DFAT) Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy and child protection requirements to ensure that partners involved in government-funded projects (notably, the New Colombo Plan) are aware of their obligations.

Professional staff and academic recruitment

About 70 per cent of the University staff are employed directly by the University in a permanent capacity or on a fixed-term contract. Most University employees are covered by either the Macquarie University Academic Staff Enterprise Agreement 2018 or the Macquarie University Professional Staff Enterprise Agreement 2018. The enterprise agreements prescribe minimum terms and conditions of employment and regulate the relationship between the University and its employees. The engagement of casual staff members (which was previously undertaken at faculty of office level) is now undertaken by the central Human Resources function and there is a standard casual employment contract which regulates casual employment. This high level of regulation significantly mitigates against the risk that the University is engaged in modern slavery practices.

MQ Health, U@MQ and MGSM refer to Modern Awards and the National Employment Standard for those who are not covered under a Modern Award. We ensure that all of our contingent labour is remunerated fairly, and all casual recruitment is done either directly or using licenced and accredited recruitment agents.

The University's ProcureRight framework provides clear guidance on the differences between a contractor/consultant and an employee to ensure that we engage with each and every individual using the appropriate arrangements, and that all employee entitlements and University tax liabilities are applied correctly.



Property

Macquarie University requires that Suppliers (contractors, consultants, suppliers) understand their own legal obligations in relation to the *Modern Slavery Act 2018* and how it specifically relates to their business. Through the application of the ProcureRight framework, suppliers are asked to provide evidence of compliance with anti-slavery laws, including:

- child/forced labour
- minimum wage
- living wages/working hours
- working conditions and hours
- freedom of association

The University is in the process of assessing the risks of modern slavery in relation to its existing major and/or long-term suppliers.

International research collaboration

The University has international research partnerships and other international student programs with non-government organisations and other universities. The University takes its responsibilities in the conduct of research seriously, and we have updated all of our research agreement templates to reflect the University's approach to modern slavery and other commitments, including those related to anti-bribery and preventing and reporting corruption. Also, the University conducts due diligence on each entity being proposed for a formal research collaboration.

Fundraising

The University accepts philanthropic donations and research funding from a wide range of sources. It is acknowledged that there is a risk that sources of potential funding could be linked to unethical or illegal activity, including exploitation (either directly to the prospective donor or as an underlying source of funding for the donation). The Office of Advancement has a robust due diligence policy in place. The purpose of this policy is to ensure that all streams of funding whose source raises potential red flags in relation to a range of ethical issues, including modern slavery, are subject to enhanced scrutiny.

The University screens all potential donations of $100,000 and over for a number of factors, which includes any potential connection to modern slavery. All due diligence is reviewed by the Director Campaign and Principal Gifts. Where due diligence checks indicate a significant issue or concern, the case is referred to the Vice-Chancellor and President.

During the year, we continue to give advice and guidance to the teams who have direct responsibility for fundraising and to build awareness of potential risks, and this includes modern slavery. We will further enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing donors and or supporters and in relation to our own operations. We understand the importance of being vigilant so that we can quickly identify and address any issues related to our activities associated with slavery and human trafficking. Advancement remains committed to continually developing and improving the protections and policies we have in place.

Investments

As a responsible investor, the University gives serious and due consideration to environmental and social governance and ethical issues in the process of selecting and monitoring investments. In light of this, the University positions itself as a responsible investor, believing companies and assets will not thrive over the long term if they ignore environmental, social, corporate governance and ethical issues. The University's Investment and Treasury Risk Management Policy requires that financial decisions are made with a strong focus on integrity and ethics and with an understanding of the paramount importance of wise stewardship to ensure the long-term success of the University. Financial probity underpins the University's approach to all investment decisions.

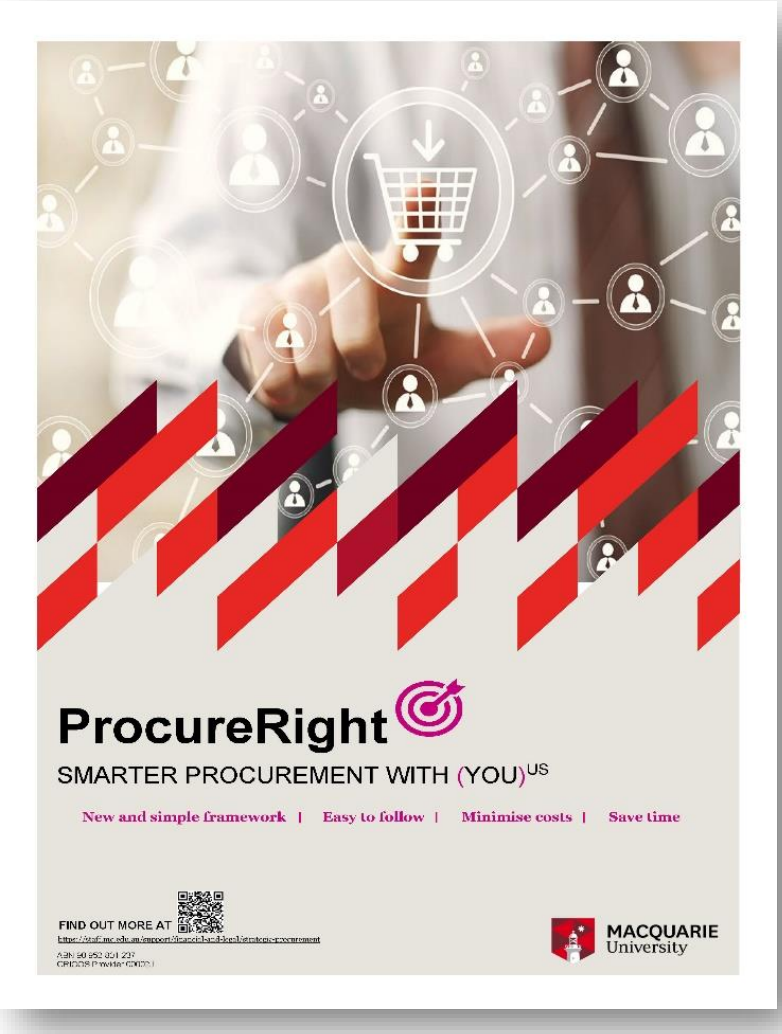
Strategic Procurement

Procurement has significant financial and reputational impact on the University. As a public institution we are bound by the principles of integrity, fairness, accountability, value for money, sustainability, corporate and social responsibility, and open and effective competition. Commitment to these principles and the desire to affect a positive change were fundamental to shaping the University's ProcureRight framework, which was officially launched in September 2019.

ProcureRight framework - Smarter procurement with (you)^{us} - is based on three fundamental principles: trust, empowerment, accountability. It comprises step-by-step ProcureRight Instructions, which provide interactive guidance through the end-to-end procurement processes, an interactive process map and a simple two-page procurement policy. The framework ensures that we comply with applicable laws and that all our activities are underpinned by principles of business ethics, human rights, and environmental protection.

The ProcureRight framework was designed to improve process governance and probity, achieve consistency in approach to corporate and social responsibility, adherence to legislation, and minimise financial and reputational risks, whilst delivering an easy and positive procurement experience for all parties.

ProcureRight framework comprises ProcureRight Instructions, an Interactive Procurement Process Map, which allows users to enter directly into a process relevant to their specific procurement activity, and a Procurement Policy that is embedded into ProcureRight Instructions. ProcureRight Instructions are central to the framework. These instructions are intuitive and interactive and have been designed as a 'one-stop shop' covering everything users need to know to successfully execute a procurement activity. The Procurement Policy and risk management are embedded in these Instructions.



Subcontracting and supply chain

We have incorporated the requirements of the Act into all our procurement activities and started their integration into supplier governance and management. The requirement to consider the Act throughout all steps of each procurement activity is embedded into our interactive ProcureRight framework. Some effort has also been undertaken in improving our supplier governance and management activities; this will continue throughout 2021 and beyond. ProcureRight framework sets out expectations for all direct suppliers in relation to human rights and responsible sourcing and provides guidance and tools to ensure that modern slavery practices do not penetrate our supply chain.

COMPLETED

- Supplier portfolio has been reduced from about 5769 in 2018 to 4423 in 2020, a reduction of 23%.
- Updated our procurement processes to ensure that the suppliers that we enter into direct relationships with do not practice modern slavery – refer ProcureRight tools section.
- Developed a Modern Slavery Supplier Questionnaire.
- Updated the standard contract templates, including research and international agreements, to reflect our obligations with respect to modern slavery.
- In November 2018, the University conducted a preliminary audit of the University vendor portfolio (via an analytics company, Bureau van Dijk), which identified no instances of modern slavery in our supply chain.
- In March 2021, the University launched an in-house designed and built contract management system – ContractUs, which will assist with reporting and monitoring compliance.

ProcureRight – smarter procurement with (you)^{us}

ProcureRight tools

The key modern slavery risk factors are included in the pre-procurement risk assessment: high-risk countries, high-risk industries and/or high-risk business models.

Standard tendering documentation and evaluation criteria include a section on corporate social responsibility. In response to this section, all suppliers tendering for our business must address a modern slavery requirement and provide copies of policies, a statement or other evidence that confirm that the goods and services provided to the University comply with the key provisions of the Modern Slavery Act.

ProcureRight framework contains a chapter on how to interpret the Act and what it means in terms of the procurement process.

Our default position is to contract on our own terms. Relevant contract templates have been updated to include modern slavery–specific provisions.

UNDER CONSIDERATION OR DEVELOPMENT

- Active consideration of vetted supplier panels with a number already in place.
- The University is investigating extending its category management capabilities.
- Review of due diligence on supply chain risks for existing suppliers in the high risk categories.
- Consideration of options (potentially automated) that will allow us to have a subcontractor/supply-chain check as part of our tendering due diligence.

6. Assessing the effectiveness of actions

As we gain better insights into our data and develop new investigative and monitoring tools, we will continue to evolve our programs and practices that support detection and elimination of modern slavery in our operations and supply chain. We are working via our Modern Slavery Working Group on devising appropriate mechanisms and key performance indicators to measure the effectiveness and impact of the many initiatives described in this statement.

GOVERNANCE			
Activity	**Measurement**	**In place**	**Under development**
Training	% of staff trained		✓
Policy development and review	Modern Slavery Policy developed; completed other relevant policy reviews		✓
Development of contractual provisions	Incorporating specific modern slavery clauses into all contractual templates	✓	
Embedding modern slavery provisions into every step of the procurement process	All relevant provisions of Modern Slavery Act are incorporated throughout ProcureRight framework	✓	
Supply-chain data disclosure	Roll-out Modern Slavery Supplier Questionnaire	✓	
Participate in external benchmarking	Active involvement in AUPN Modern Slavery Program	✓	
Category Management and Supplier Governance framework development	Category analysis undertaken Reporting dashboards rolled out Engagement with the industry		✓
Supplier Code of Conduct development	Supplier engagement terms of reference and communication approach		✓
RISK ASSESSMENT			
Activity	**Measurement**	**In place**	**Under development**
Supplier segmentation	Regular reporting on supplier segmentations by geography and sector is established	✓	
Supplier onboarding	% of supplier questionnaires returned		✓
Annual risk assessment	% of risk assessments undertaken by country and sector		✓
MONITORING			
Activity	**Measurement**	**In place**	**Under development**
Internal audit	Zero instances	✓	
Supplier assessment questionnaire	% returned; % of non-compliances		✓
Development of AUPN Modern Slavery Dashboard	Active participation in the development of AUPN Modern Slavery Dashboard		✓
GRIEVANCE MANAGEMENT			
Activity	**Measurement**	**In place**	**Under development**
Review communications mechanism to ensure relevance and ease of use	Safe channels for reporting non-compliances are developed for all constituents		✓

7. Consultation process

This statement has been prepared in consultation with each controlled entity covered by the statement.

As is the case with any policy or compliance framework development across the University, broad consultation on the Modern Slavery requirements has already commenced to govern our overall approach.

An internal Modern Slavery Working Group was established to enhance consultation and share knowledge throughout the University and controlled entities. This will be an ongoing process as our Modern Slavery framework matures.

Given compliance is a shared responsibility across the University and controlled entities it has been important to ensure that all our operational activities are undertaken in a consistent manner with respect to procurement, employment, training and engagement.

The University and controlled entities have a consistent approach to the compliance, and the controlled entities are subject to key University policies that relate to them.

8. Other relevant information – policies and practices for the prevention and mitigation of modern slavery

Policy framework – Human Resources

Our Human Resources policies and practices set out workplace rights and responsibilities at the University and include:

The University Code of Conduct confirms a commitment that staff are ethical, enquiring, creative, inclusive, agile and excellent. All staff are expected to perform their duties and conduct the academic and business activities of the University with efficiency, fairness, impartiality, integrity, honesty and compassion.

Discrimination, Bullying and Harassment Prevention Policy outlines the rights and responsibilities of the University community for the achievement of a diverse, equitable, inclusive and safe campus environment, free from unlawful discrimination, bullying and harassment. The Policy sets out the requirement to read and acknowledge the Discrimination, Bullying and Harassment – Prevention and Response policy as well as undertake classroom training in the topic.

Reporting Wrongdoing – Public Interest Disclosures Policy is designed to establish an internal system for receiving, assessing and dealing with internal reports of suspected wrongdoing.

The University Complaint Management Procedures recognise that while the University aims to provide a high-quality teaching, research and learning environment which promotes respect, safety and embraces diversity, there will be occasions when problems, misunderstandings or complaints may arise which need to be managed in a fair, transparent and timely manner. Staff complaints, Student Complaints, Complaints from the Public and Complaints about Threatening Behaviour are just some of the pathways for reporting a complaint. Also, the University has a dedicated Risk Online Active Reporting (ROAR) that allows staff, students or members of the public to contact the Workplace Health & Safety and Risk & Assurance teams directly about anything that they may consider risky, hazardous or threatening.

Macquarie University Student Employment helps students become job ready by coaching them through the recruitment process. It facilitates paid employment opportunities on and off campus. Paid employment while studying helps students to enhance their employability and develop a range of skills while easing the cost of university study. While rates of pay will vary according to the role, hourly rates offered must comply with the National Minimum standards. Each new student employed by the University is provided with a Fair Work Information Statement that contains a summary of minimum employment standards in Australia.

Policy framework – Procurement and supply chain

The University is committed to acting with integrity in all its dealings, relationships and supply chains. It expects the same standards from all its suppliers, contractors and others with whom we do business. In September 2019, the University launched ProcureRight framework that governs all our procurement activities. ProcureRight Instructions provide tools to enable a positive procurement experience while ensuring that all our activities are underpinned by principles of business ethics, human rights and environmental protection. ProcureRight Instructions incorporate Procurement

Policy, probity principles, relevant legislation and risk management. Strict approval processes embedded into ProcureRight Instructions ensure that accountability for decisions resides with the authorised officers of the University.

Policy framework – other related policies and practices

The University through its Framing of the Futures strategic framework, has made a commitment to adhering to the principles of sustainability in all it does, which is also reflected in the Investment and Treasury Risk Management Policy and Donations and Fundraising Policy.

The Code for the Responsible Conduct of Research is central to the University's commitment to the highest standards of research integrity. We expect researchers to manage and conduct their research with the utmost professionalism and with respect and regard for humans, animals and the environment, irrespective of their funding situation, research area, experience or working arrangement. Our code is aligned with the standards set out in the Australian Code for the Responsible Conduct of Research (2018).

The Controlled Entities Policy establishes the University's governance framework for controlled entities.

Sustainability

The University aligns its operational activities with the UN Sustainable Development Goals (SDG). A mapping exercise is underway to ensure that our research activities are undertaken in full compliance with the SDG, and that its basic principles are incorporated into all our learning and teaching activities.

Student Wellbeing and Code of Conduct

All University students have access to wellbeing assistance via wellbeing@mq.edu.au and can easily report concerns about wellbeing and safety via the Student Care and Reporting Network. The online portal has been brought into alignment with DFAT's PSEAH Policy, to help identify students who may be experiencing sexual exploitation that may be part of modern slavery.

All current international MQ students have free access to My Legal Mate app. The information in the app focuses on the issues most likely to affect students, such as employment, accommodation and housing, as well as serious issues such as sexual assault.

The Student Code of Conduct gives students notice of general conduct which is prohibited. It is binding on all students and any misconduct may be subject to disciplinary action.

9. NEXT STEPS

- Continue to build on the changes we have introduced to develop a formal Modern Slavery Framework.
- Conduct data analysis for the controlled entities.
- Collaborate with our suppliers and research partners to improve everyone's understanding of the risks of modern slavery and human trafficking.
- Invite modern slavery subject matter experts to present to the targeted groups at the University.
- Improve transparency within the University supply chains by working with our contracted suppliers to understand their business practices.
- Once developed, deploy the AUPN modern slavery monitoring tool.