



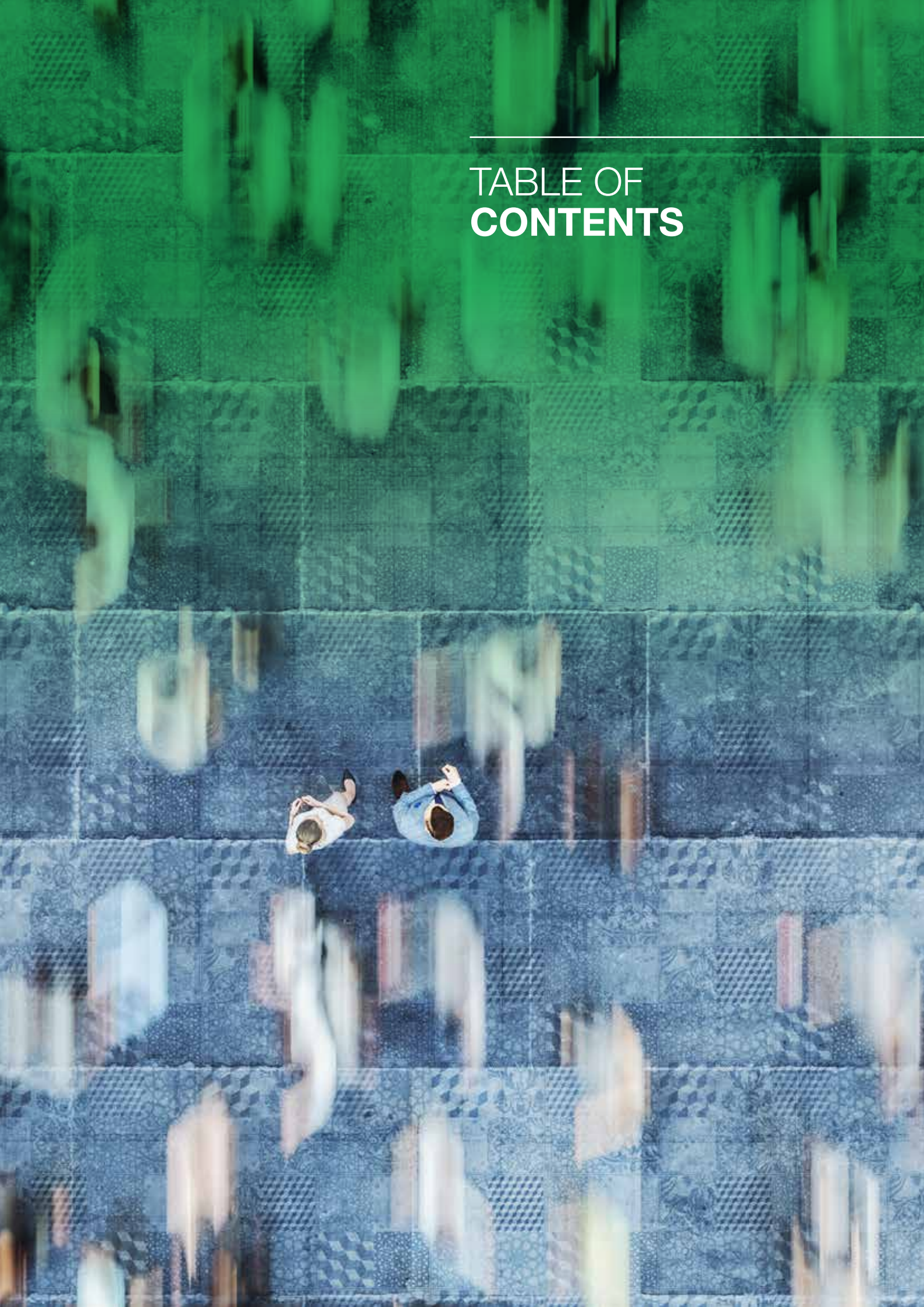
MONASH
University

MODERN
SLAVERY ACT
REPORT

**REPORTING
PERIOD
JANUARY TO
DECEMBER 2020**



TABLE OF CONTENTS



FOREWORD

Vice-Chancellor's foreword	3
----------------------------	---

KEY OUTCOMES

Key outcomes for 2020	5
-----------------------	---

ABOUT THIS REPORT

Our commitment	7
Feedback or further information	7

ABOUT OUR UNIVERSITY

Summary and key statistics	9
----------------------------	---

THE UNIVERSITY'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Structure	11
Reporting entities	12
Operations	12
Academic structure	14
Operational structure	14
Environmental and social governance	14

SUPPLY CHAIN

Monash University spend	15
Monash University foundation investments	15
Monash College spend	15

RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

Risk in operations	17
Risk in supply chain	18
Our modern slavery approach	19
Modern slavery governance structure	19
Identifying and managing supplier risk	21
Actions to assess and address operational and supply risk	21
Assessing the effectiveness of actions	24
Consultation with owned entities	25

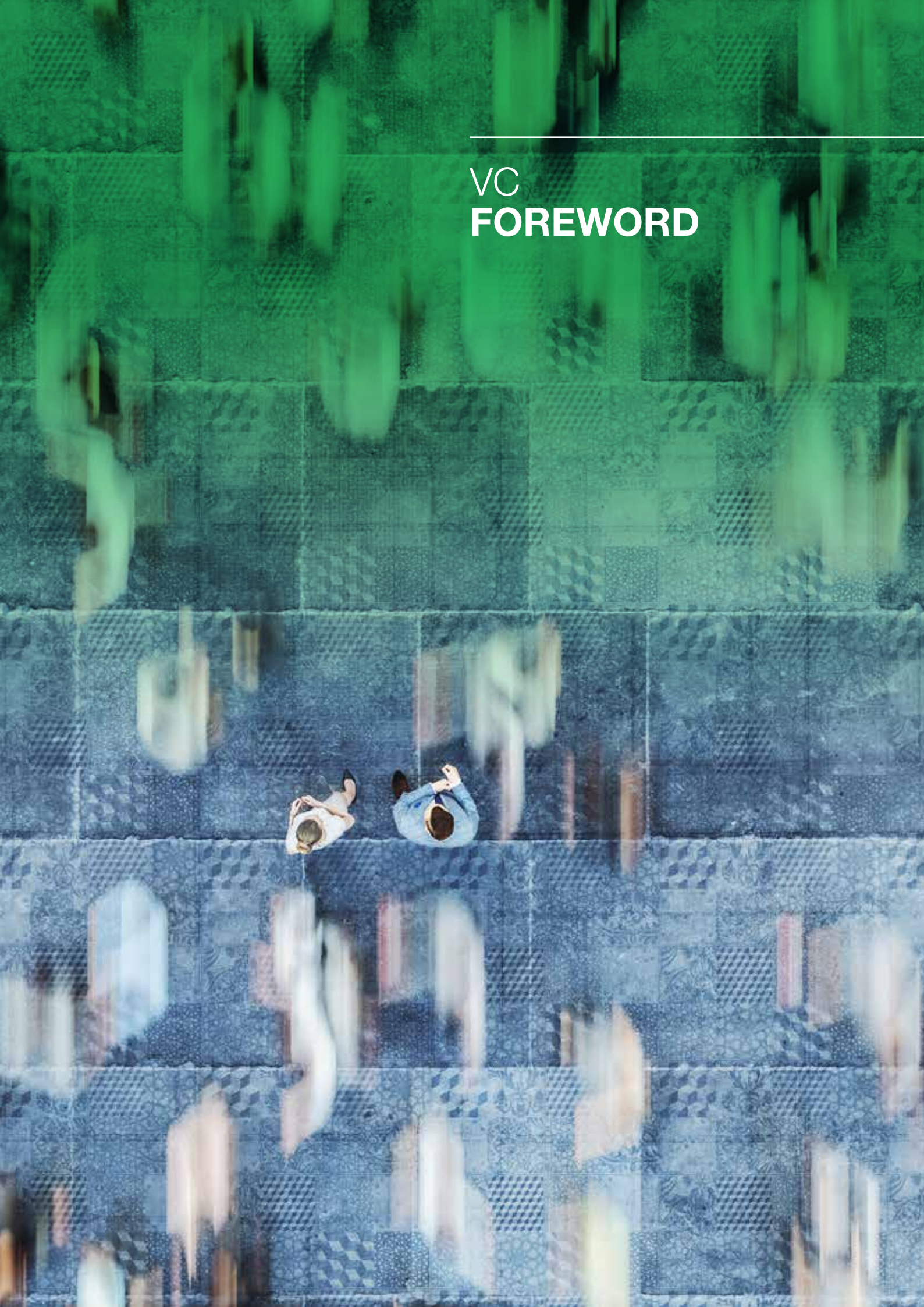
OTHER RELEVANT INFORMATION

Acknowledgements	27
Building a stronger higher education sector	27
AUPN modern slavery academic advisory board	27
Calendar year 2020 AUPN executed program of work	28

THE MONASH UNIVERSITY PLAN

The Monash University plan	31
----------------------------	----

VC
FOREWORD





Monash University supports universal human rights and stands strongly against all forms of modern slavery.

With this, our first Modern Slavery Act Report, Monash is strengthening its commitment to sustainability and human rights. We remain committed to the United Nations' 17 Sustainable Development Goals, to achieve net zero emissions by 2030, and, as demonstrated in this report, to actively seek out and address any potential instances of modern slavery within our global operations and supply chain.

We recognise that we cannot do this alone – it requires accountability and a sustained effort in conjunction with our suppliers, partners and the wider Monash University community.

Everyone, no matter where in the world they may be, has the right to live free from exploitation, experience safe work conditions, and receive fair pay and treatment.

Through Monash's education, research and innovation to make positive change around the world, we will continue to champion human rights and sustainability as part of our core values.

We know there is still much to do, and we are committed to reviewing and improving our operations to assist in the drive to eradicate modern slavery.

This report was approved by Monash University Council on 12 May, 2021.

A handwritten signature in black ink that reads "Margaret Gardner". The signature is written in a cursive, flowing style.

Professor Margaret Gardner AC
President and Vice-Chancellor

KEY
OUTCOMES
FOR 2020



- Initial geographic and industry-based risk assessment across suppliers
- Identification of existing high-risk agreements
- Supplier engagement, which resulted in real lessons and mutual development
- Introduction of new clauses to tendering-related template documents
- Introduction of a mandatory modern slavery gate in the supplier on-boarding process, irrespective of contract value
- The creation of a modern slavery governance structure, including a steering committee and working group
- Significant contributions to a higher education sector-wide approach to modern slavery
- Establishment of a five-year plan to continuously improve our modern slavery approach
- Presentations to offshore partners by Monash College on modern slavery requirements
- Utilisation of a robust, ongoing, investment review process, including an environmental, social and governance framework – with mandatory support and ongoing reporting from external fund managers.

ABOUT THIS REPORT



Monash University focuses on delivering high-quality and innovative education and research across the world, with a strong emphasis on ethical and good social governance – while operating with integrity and respect.

Modern slavery is a pervasive problem that requires a robust solution based on collective action to generate change in global practice. Monash recognises that, as part of the global community, we play an important role in helping eliminate exploitative labour practices.

Exploited labour includes 16 million victims in the private sector – 5.4 victims for every 1,000 people in the world – with one in four being children.

This hidden, large-scale exploitation within our community often harms those least able to defend themselves.

This report is to demonstrate how Monash is working to identify the risks of modern slavery in our operations and supply chain, and the actions we have taken to address those risks. These are part of our five-year continuous improvement program to systematically address modern slavery within our operations and supply chain.

This is Monash University's first report under the Modern Slavery Act 2018 (the Act).

OUR COMMITMENT

Our commitment is to be a leader in the field in contributing towards engagement with all stakeholders internally and externally, and working towards a future without labour exploitation and rights violations in the form of modern slavery.

Monash University supports human rights within its operations and supply chain in full compliance with the Act. This is supported by an environmental and social governance framework, and an endorsed five-year modern slavery program of work.

Monash's commitment to eliminating modern slavery is embedded using a number of processes and procedures that include revision and continuous improvement. This commitment is also supported as part of Monash University's sustainable development framework.

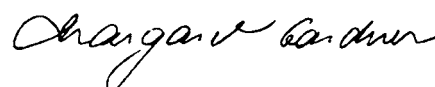
In 2016, Monash became a signatory to the University Commitment to the Sustainable Development Goals (SDG). The 17 Sustainable Development Goals, adopted by all countries at the United Nations, are aimed at bringing global economic prosperity, social inclusion and environmental sustainability.

FEEDBACK OR FURTHER INFORMATION

As a leader in research and education, Monash University welcomes feedback and/or questions, or the opportunity to provide additional information concerning this report. Please contact: sustainable.procurement@monash.edu

This report outlines the actions taken by Monash University in relation to identifying and mitigating modern slavery risks within its operations and supply chain.

This report has been approved by University Council on 12 May 2021



Professor Margaret Gardner AC
President and Vice-Chancellor

ABOUT OUR
UNIVERSITY



Monash University was established in Melbourne, Australia, in 1958, and is a founding member of the Group of Eight. In just over 60 years, the University has earned an enviable international reputation with campuses and centres across three continents. This has enabled the University to offer exceptional global opportunities to staff and students, catering to some of the brightest minds around the world.

Monash's strong display of educational excellence and ground-breaking research consistently ranks us in the top 100 universities worldwide.

Through continuous engagement with various stakeholders, including non-governmental organisations and suppliers, the University has a growing network of students, alumni and industry partners across the globe that help drive the future of education.

Monash University engages in both domestic and international research and teaching-related procurement and operations, student support services and investments.

THE UNIVERSITY IS CONSTANTLY RANKED AMONG THE TOP

100

IN THE WORLD FOR GRADUATE EMPLOYABILITY

5% + 8000+
OF PhD OF STUDENTS GLOBAL STAFF STRENGTH

80,000+
GLOBAL STUDENT POPULATION

THE UNIVERSITY'S
**STRUCTURE,
OPERATIONS AND
SUPPLY CHAINS**



STRUCTURE

Monash University is constituted under its own Act of Victorian Parliament (the Monash University Act 2009 (Vic), which is supplemented by a framework of regulatory instruments, namely the Monash statute, and a suite of regulations, as well as a range of policies and procedures. Monash University is regulated by the Higher Education Support Act 2003 (Cth) and the Tertiary Education Quality & Standards Agency Act 2011 (Cth), under which the University enjoys accreditation as an Australian higher education provider.

The governing body of Monash University is the Monash University Council, chaired by the Chancellor, Mr Simon McKeon AO, and supported by Deputy Chancellors Dr Megan Clark AC, The Hon Simon Crean and The Hon Peter Young AM QC.

The Council is responsible for the overall superintendence of the University, with specific accountability to the relevant state and Commonwealth Ministries for the University's fulfilment of its role in the Australian community. It discharges that role by deliberating on strategies and policies to achieve the University's objectives, and by ensuring the University has in place appropriate and effective governance processes.

The University has four Australian campuses (exclusive of Monash College), including five offshore campuses or learning centres, and is comprised of 10 faculties and seven portfolios.

The following controlled entities support the University:

- Monash University
- Monash College Pty Ltd
- Monash University Foundation Pty Ltd
- Monash University Foundation Trust
- Monash Accommodation Services Pty Ltd
- Monash Investment Holding Pty Ltd
- Monash Investment Trust
- Monash University Indonesia Ltd
- Monash Shenzhen Research Management Co
- Monash (Suzhou) Engineering Technology Co. Ltd
- Monash Property South Africa
- Monash Commercial Pty Ltd
- Monash University Malaysia Sdn Bhd
- Monash Indonesia.

Each of the 14 above-mentioned entities is overseen by a responsible person reporting through the University's senior management team portfolios. Reporting and governance are provided and audited as required by the Council and the President and Vice-Chancellor.

REPORTING ENTITIES

Relevant entities were identified with the assistance of the Risk and Compliance Unit and Executive Services. The entities were assessed in relation to the degree of control, revenue, location and relationship to the core operation of the University.

Of all of the Monash entities in existence at present, only three qualify as reporting entities for the purposes of the Act, as they are both controlled Australian entities and have greater than or equal to \$100 million revenue. Therefore they are deemed to be within scope of this report.

This 2020 report covers the following relevant entities within Australia:

- Monash University ABN 12 377 614 012
- Monash University Foundation Pty Ltd (the Trustee of Monash University Foundation Trust ABN 94 178 965 125
- Monash College Pty Ltd ABN 64 064 031 714.

OPERATIONS

Monash University has four campuses in Victoria, Australia, as well as international campuses and learning centres in Malaysia, China, India, Italy and Indonesia.

The University's core activities are education and research, however due to Monash's size and global presence, these are supported by the provision of complex student services, as well as global campus/ learning centres and research activities.

Monash University Foundation, which generates investment income for the future benefit of Monash University, is operated from within Monash University in the portfolio of the Chief Financial Officer and Senior Vice-President.

Monash College provides educational programs and services to international and domestic students. It is a wholly-owned company of Monash University, a registered charity with the Australian Charities and Not-for-profits Commission, and a higher education provider accredited by the Tertiary Education Quality and Standards Agency. Monash College is located in Melbourne, Australia.

Management of the University, including Monash College, is the responsibility of Professor Margaret Gardner AC, President and Vice-Chancellor, who oversees operations and the University's academic standards.

ACADEMIC STRUCTURE

FACULTIES

1. Faculty of Art, Design and Architecture
2. Faculty of Arts
3. Faculty of Business and Economics
4. Faculty of Education
5. Faculty of Engineering
6. Faculty of Information Technology
7. Faculty of Law
8. Faculty of Medicine, Nursing and Health Sciences
9. Faculty of Pharmacy and Pharmaceutical Sciences
10. Faculty of Science.

OPERATIONAL STRUCTURE

The President and Vice-Chancellor is supported by members of the Senior Executive, who are responsible for the strategic direction of the University's activities across the portfolios.

Senior Executive portfolios

- President and Vice-Chancellor
- Provost and Senior Vice-President
- Deputy Vice-Chancellor (Enterprise and Governance) and Senior Vice-President
- Deputy Vice-Chancellor (Global Engagement) and Vice-President
- Deputy Vice-Chancellor (Education) and Senior Vice-President
- Deputy Vice-Chancellor (Research) and Senior Vice-President
- Chief Operating Officer and Senior Vice-President
- Chief Financial Officer and Senior Vice-President.

ENVIRONMENTAL AND SOCIAL GOVERNANCE

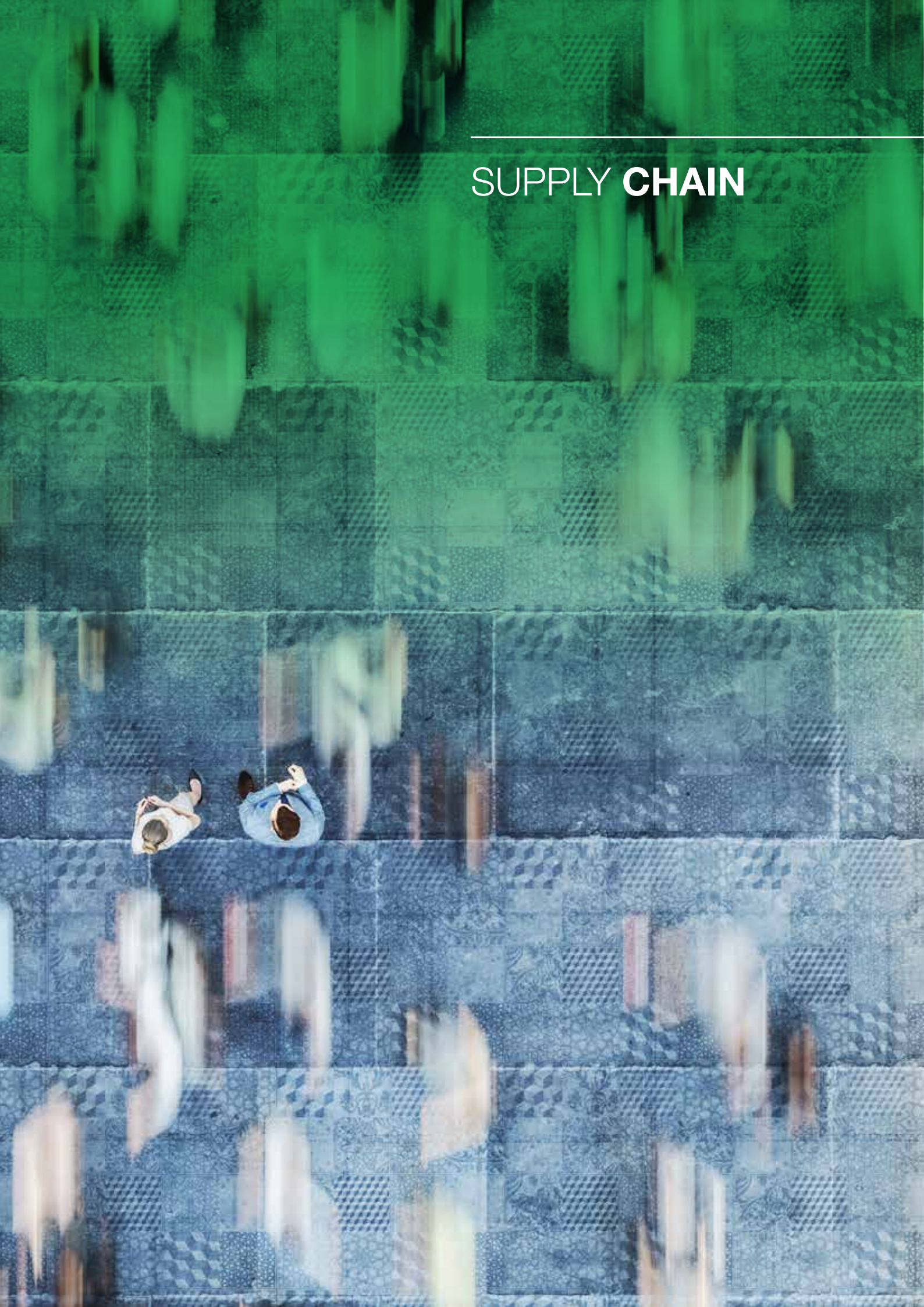
In ensuring Monash operates at the highest levels of excellence in sustainability, the University has an Environmental and Social Governance statement approved by the University Council in 2016.

Protecting human rights is integral to Monash University, and requires a broad framework to cover both internal operations and our supply chain.

Our commitment to the United Nations Sustainable Development Goals includes that we will:

- support and promote the principles of the Sustainable Development Goals
- undertake research that provides solutions to sustainable development challenges
- provide the educational opportunity for our students to acquire the knowledge and skills needed to promote sustainable development
- contribute to the achievement of the Sustainable Development Goals by ensuring our campuses and major programs are environmentally sustainable and socially inclusive
- report on our activities in support of the Sustainable Development Goals.

SUPPLY CHAIN



With complex and global research and education operations, the reporting entities partner with a wide variety of suppliers.

These vary from common goods and services to some of the most specialised suppliers worldwide that support Monash's leading research projects. The University also undertakes research in a multitude of remote areas across the world.

Analysis was undertaken of our supplier base within our ordering systems. To support these operations, the reporting entities have more than 7300 direct suppliers operating in 141 countries.

MONASH UNIVERSITY SPEND

During the reporting period, Monash University spent \$965 million with its suppliers of goods and services.

The largest categories of spend were:

- construction and facilities management
- business services
- information technology
- laboratories.

MONASH COLLEGE SPEND

During the reporting period, Monash College spent \$132 million with its suppliers of goods and services.

The largest categories of spend were:

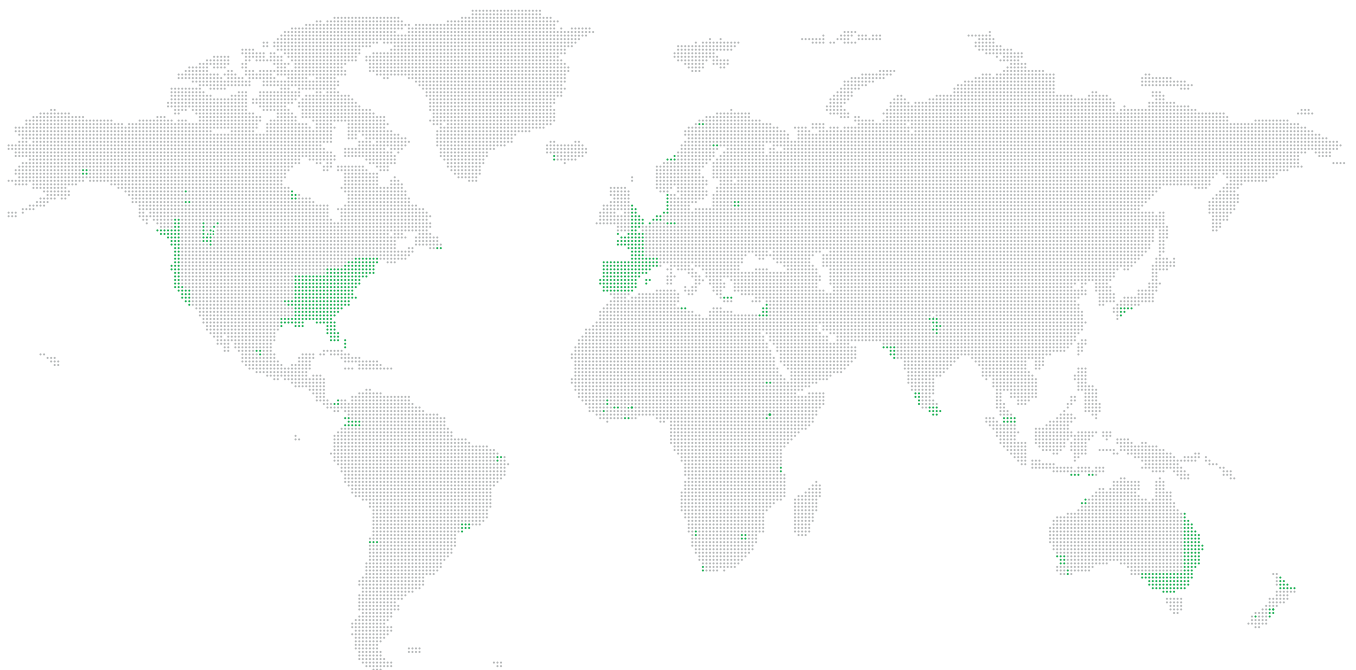
- educational partnerships
- education and migration agents
- homestay accommodation services
- International recruitment agents, who introduce a substantial proportion of international students to Monash College. These agents are managed by Monash University.

MONASH UNIVERSITY FOUNDATION INVESTMENTS

In FY20, Monash University Foundation invested \$1.68b

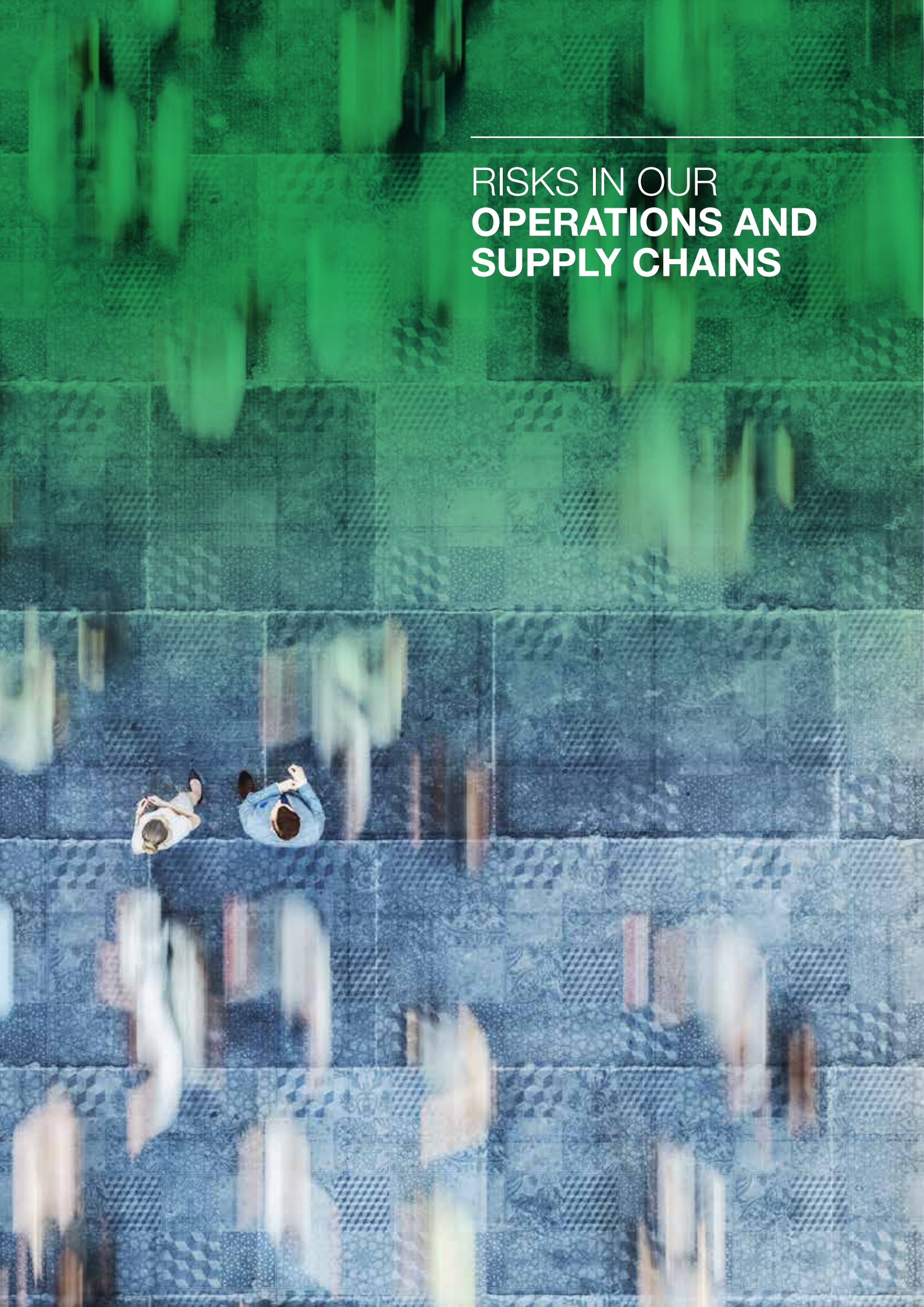
The largest areas of investment were:

- Term deposits
- Diversified yield funds
- Quality short-term money market securities
- Low-carbon global shares
- Investment properties.



Reporting entities have suppliers in 141 countries.

**RISKS IN OUR
OPERATIONS AND
SUPPLY CHAINS**



With such large-scale and global operations, significant investment portfolios, and more than \$1 billion in annual spend with suppliers, Monash acknowledges there is the potential to cause, contribute to, or be directly linked to modern slavery risk in its operations and supply chain.

RISK IN OPERATIONS

In line with its Environmental and Social Governance frameworks, Monash commits to its modern slavery program of work to actively seek out, identify, understand and address any modern slavery in its operations and supply chain.

Monash operations include more than 80,000 students supported by more than 8000 staff across five countries. Each country has specific labour practice laws and obligations. Risks include vulnerable populations due to age, being migrant workers and low skilled workers, in addition to forced overtime.

To mitigate these risks, clearly defined, published and widely available practices, procedures, oversight and grievance mechanisms are needed. These are in place and further discussed below.

Monash also recognises that our operations can directly influence the supply chain and the risk of modern slavery within our supply chain. Awareness programs will be required in order to prevent possible counterproductive behaviours or expectations that may occur across the University, including:

- setting unreasonable delivery or response timeframes
- acceptance of, or actively seeking, unreasonable below-market pricing
- seeking unreasonably high investment returns
- investing in known high-risk industries or countries without relevant due diligence
- the acceptance of ambiguous responses to modern slavery information requests in tenders.

Any of these operational practices may indirectly increase the risk of illegal or unsustainable business practices, including labour exploitation, in order to satisfy demand created by the University.

This supply chain influence from operations may come from:

- planned or unplanned business drivers
- internal stakeholder requirements or expectations
- procurement practices including contract terms, negotiated pricing and requested tender response or delivery timeframes
- a lack of specifying clear requirements to suppliers in relation to their modern slavery response, leading to a lack of genuine, and timely, change.

These will need to be addressed via education and changes to processes.

Monash is committed to furthering its understanding and support of human rights using its research and education capabilities. This includes ensuring a generation of leader is well-informed of the challenges and opportunities of ambitious human rights agendas. Monash has demonstrated its commitment to leadership in the pursuit of human rights in various ways, including our burgeoning response to modern slavery.

RISK IN SUPPLY CHAIN

Monash has a robust procurement framework in place, including a value and risk-based approach to procuring new goods and services, detailed policies, standardised templates, governance, auditing, and separation of duties. Monash typically engages known, quality, product and service providers. Non-typical suppliers are subject to an onboarding check about modern slavery compliance before they can be paid.

Monash has both short-term tactical and longer-term strategic engagements with suppliers. Significant purchases follow a formal tendering process unless a formal exception is sought and granted. As part of this tendering process, suppliers are required to provide information in their response related to environmental and social responsibility. Included within the information requested on the subject of social responsibility is specific mention of modern slavery within the supplier and its supply chain, compliance and supplier actions taken to address modern slavery. Where a supplier has a modern slavery report, a copy is requested to form part of its tender response.

Drawing from our research, faculties and people, Monash can determine areas of focus, which increases our awareness of how various practices may influence our supply chain.

Monash has the potential risk of modern slavery practices in its supply chains, including:

- outsourcing to and/or directly contracting goods and services from third parties
- subcontracting to third parties, especially those that are low value and/or high risk
- investing with third parties.

The delivery of these goods, services and investment outcomes – both via direct engagement and indirectly from the support of the supply chain of the third parties – includes the use of both direct and downstream labour. Any exploitative practices in the engagement of that labour by third parties or their supply chains may be indirectly attributable to the demand created for goods, services or investments by Monash University.

The higher areas of risk include migrant workers, forced labour and below-market pay rates. In addition, Monash has identified some business practices that may position suppliers as vulnerable, and increase the risk within their business or supply chain. In working with some of its larger suppliers, Monash has also identified different supplier perspectives and varying knowledge levels of modern slavery. Monash has also learned from its supplier discussions, in addition to providing additional insight to our suppliers, the following key lessons:

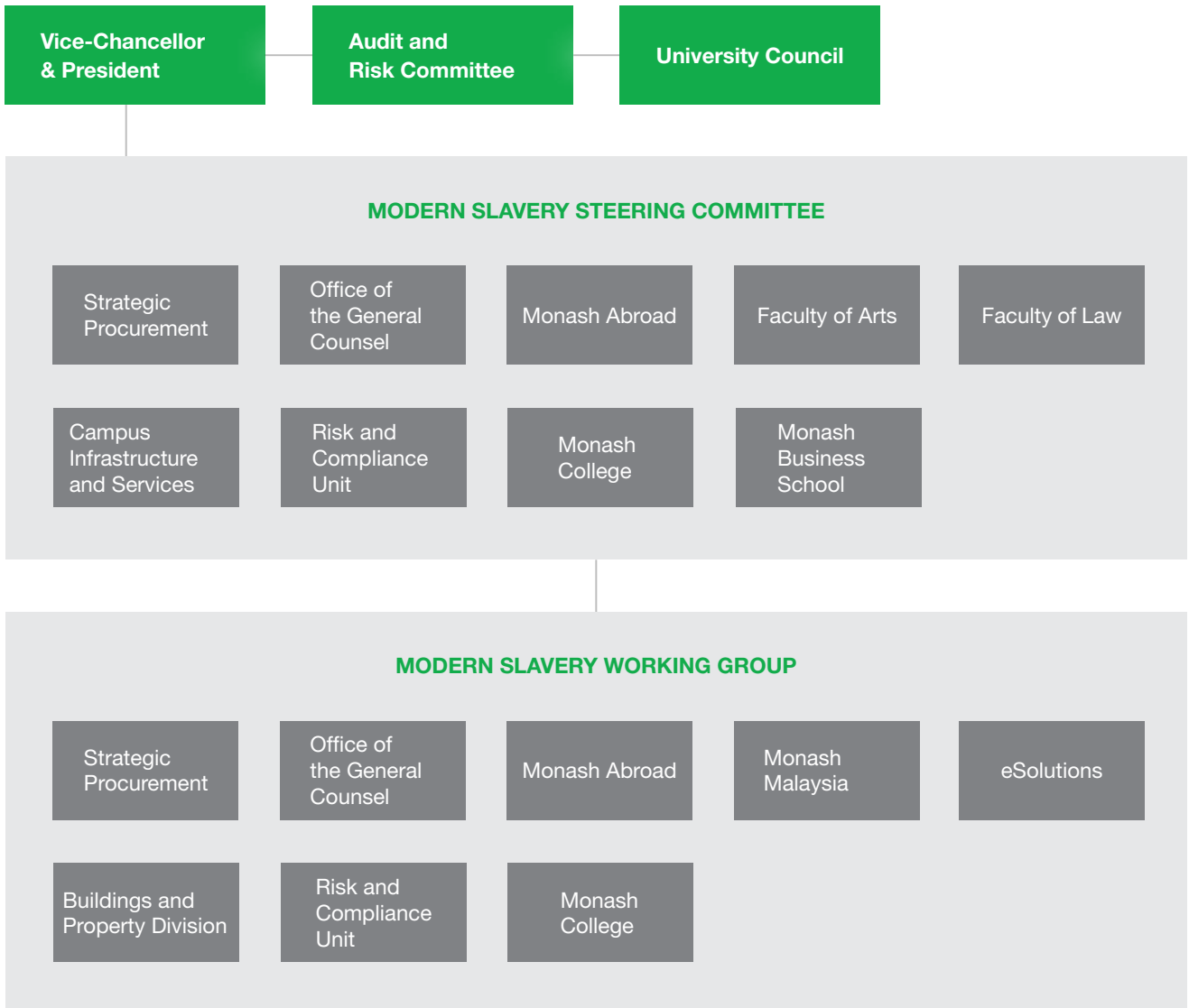
- The need to actively create and maintain an open dialogue with suppliers
- A clear, mutual understanding that the discovery and remediation of any instance of modern slavery is a success for all involved, and not typically a punitive event
- That the response to suspected or reported cases of modern slavery should not automatically be to terminate business with the supplier in question – due consideration of the entire situation and an appropriate response is needed before any actions are taken
- That the parties should openly and collaboratively work together to identify, understand and appropriately remediate any issues
- That not acting is worse than disclosing an issue and working together to address it
- That the existence of modern slavery in a supplier does not always indicate systemic bad practice – it could be localised in a smaller area of the business such as a manager forcing unpaid, involuntary overtime on their team to reach their targets
- That such exploitative practices may be within any organisation irrespective of geographic or industry-based risk assessments, as such behaviours can be driven at a lower level by any individual overseeing others. Modern slavery does not only exist in third parties, and an awareness of in-house practices is equally important
- Many suppliers that do not meet the modern slavery reporting threshold may have limited understanding or awareness of modern slavery issues, and may need additional support.

OUR MODERN SLAVERY APPROACH

Monash has a five-year plan to address modern slavery within its complex operations and supply chain – with a clearly defined governance structure supported by an expert advisory panel. The University recognises that as this plan is executed, it needs to remain responsive to new lessons and dynamic in execution.

MODERN SLAVERY GOVERNANCE STRUCTURE

The remit of this structure is to develop, review and refine Monash University’s response to modern slavery and to work collectively towards the shared goal of excellence and leadership in responding to this issue within our operations and supply chain.



Commencing with the three relevant entities within Australia, identified above, the approach will expand each year to include additional overseas entities and operations, training, audits and deep-dives.

Monash has a commitment to working in partnership with stakeholders. The University recognises the importance of open dialogue and sharing concerns, and developing best practice for cross-cultural discussion of risk indicators, reducing risk, and robust/effective responses to modern slavery.

In addition to its Modern Slavery Report, the University is a key participant in the Australian University Procurement Network (AUPN), comprised of 37 universities working together to ensure a more coordinated higher education industry approach to modern slavery. Additional information on the AUPN work undertaken is provided under 'Other relevant information'.

UNIVERSITY RISK (EMPLOYEES)

All Monash University employees are engaged via employment instruments that meet or exceed Australian legal requirements. Monash Human Resources (HR) maintains and manages these agreements, is involved in the engagement of all staff, and has robust hiring practices in place. This includes fair recruitment and hiring processes in addition to conditions of work and behaviour in the workplace requirements. Monash HR practises are subject to audit.

Monash staff and students have clearly proscribed rights via a number of readily available policies and websites. Bullying, discrimination, harassment (including sexual harassment), victimisation and vilification are unlawful and are not tolerated.

In addition to policies setting out the requirements and rights of all staff and students, Monash has a number of easily accessible complaint and grievance processes. This includes clear identification, explanation and access to both internal and third-party complaint avenues, anonymous complaint handling, and set timeframes for complaints to be addressed before escalation must occur.

MONASH COLLEGE RISK (EMPLOYEES)

Monash College has robust recruitment processes that includes 'right to work' and qualification checks, and ensures all employees are above minimum working age, in line with relevant Australian employment legislation. Periodically, the College engages with third-party recruitment agencies and consultants. Where possible, the College utilises the University's preferred suppliers. The network of homestay hosts and education and migration agents is subject to a recruitment and vetting process, and is actively monitored and managed in accordance with Monash College policies and procedures.

MONASH UNIVERSITY FOUNDATION

Monash University Foundation is operated within the portfolio of the Chief Financial Officer and Senior Vice-President. Therefore employment, support and grievance processes and services fall under Monash University.

AUSTRALIAN-BASED RISK FOR REPORTING ENTITIES

All Monash entities (including the three reporting entities) within Australia are compliant with relevant employment legislation and have ready access to formal grievance processes.

INTERNATIONAL RISK

Each Monash international entity, other than Prato, Italy, manages its own HR and employment practices and processes. All comply with their local employment laws and obligations. Prato is managed by Monash University Human Resources and is compliant with the relevant Italian employment laws and obligations.

IDENTIFYING AND MANAGING SUPPLIER RISK

As required, a suite of methods is used to delve into high-risk areas, including, but not limited to:

- ‘deep-dive’-type analyses
- bespoke supplier assessments
- engagement of third-party consultants or agents who specialise in industry best-practice to provide reports which may include them undertaking them onshore or offshore site visits or staff discussions, as required
- tabling concerns through the modern slavery governance structure panel for guidance on targeted actions and effectiveness measures.

Current areas of spend that have been identified as high risk, based on industry and geographic risk assessments, include:

- apparel
- electronics
- cleaning services
- conflict minerals used in electronics.

It was also identified that there is additional risk in suppliers with only basic commercial skills or with basic English language capabilities both onshore and offshore. Existing modern slavery legislation, information or the use of more formal English language may be beyond their practical understanding, and therefore they may fail to identify risk or drive change in their operations or supply chain.

ACTIONS TO ASSESS AND ADDRESS OPERATIONAL AND SUPPLY RISK

MONASH UNIVERSITY

1. New supplier onboarding:

All new suppliers must confirm they are compliant with relevant modern slavery requirements as part of Monash’s supplier onboarding process. They are not able to be paid until they have completed this process, including electronically confirming they are compliant with all relevant obligations. A failure to confirm compliance stops the onboarding process and initiates manual intervention and review. A supplier that has not been successfully onboarded is unable to be paid.

2. Template wording:

A robust framework of template wording has been created for implementation in key formal documents (where Monash is procuring goods or services), including a range of tender documents and template agreements. In addition, Monash provides comprehensive written responses to all queries from third parties seeking to clarify the Monash component of their supply chain or as part of sponsorship and funding applications.

3. Simplified questionnaires:

Recognising the wide diversity of Monash’s global supply chain, an additional supplier questionnaire has been created. This includes clear expressions of requirements and guided steps in English. This is used in conjunction with dialogue to achieve an understanding of the supplier’s practice and culture and to identify the best way to work in partnership with suppliers, beginning with directly-engaged suppliers.

4. Risk assessments:

Using risk assessments, supplier questionnaires, industry and academic knowledge, Monash has identified the following initial areas within its supply chain that are considered to be of higher potential risk, and has therefore increased focus on these areas.

Garments and apparel

- Monash University requests information from suppliers to identify those that may not be in compliance with their legal obligations such as the Fair Work Act 2009, and encourages suppliers and/or their supply chain to comply with industry codes such as Ethical Clothing Australia, Better Cotton Initiative and Fairtrade.

Computers and electronic equipment – including related conflict minerals

- Monash has engaged one of its key computer suppliers and review its approach addressing risks of modern slavery in its supply chain. The supplier was found to be well-advanced in this area.
- The supplier has a clear and well-known zero-tolerance approach to modern slavery in its supply chain and is a founding member of the Responsible Business Alliance, a leading global alliance aimed at improved corporate social responsibility within supply chains.
- The supplier publishes a Conflict Minerals Report detailing its efforts to purchase processed goods from non-conflict sources, as it has a heavy dependence on third-party manufactured components made from refined, mined minerals.
- Though satisfied with the actions of its primary supplier, Monash considers this industry to be of particular risk and will assess, during its forthcoming modern slavery program of work, additional measures to support heightened awareness of suppliers within this supply chain, with a focus on suppliers other than the primary supplier.

Glove manufacturing

Monash University, in conjunction with the AUPN, identified an instance of modern slavery within its supply chain for latex gloves. The following actions were identified as likely being implemented by a recruiting company that was a third party providing labour supply services to an offshore subcontractor to a Monash supplier:

- Deceptive recruiting practices
- High recruitment fees
- Passport withholding
- Forced salary deductions
- Forced overtime
- Substandard living conditions.

The subcontractor took steps to provide financial reparation to the affected migrant unskilled workers and to ensure passports were accessible, and also terminated use of the recruiting company. In addition, Monash's direct supplier ceased utilising the subcontractor in question.

The AUPN has also discussed alternative remediation techniques that could have been used, instead of simply ceasing to use the subcontractor in question.

Cleaning services

In Australia, Monash engages its cleaning staff via well-known third-party labour providers that are only engaged after a robust tendering process. Terms and conditions are made binding via comprehensive formal agreements. Further subcontracting of the work is only permitted with the approval of Monash University.

Despite these measures, Monash has identified this to be a particular area of potential modern slavery risk. Though there is no evidence to indicate any issues, as part of its forthcoming modern slavery program of work, Monash will undertake a deeper assessment of the industry due to the inherent risk in the wider cleaning industry, and may implement changes to further reduce risk in this area such as participation in the Cleaning Accountability Framework.

MONASH COLLEGE

Monash College has taken a risk-based approach in identifying the various risk categories in its offshore partners and conducted a high-level risk assessment exercise. The risks assessed were based on sector, geography, supply chain and internal operations/human rights, and identified and evaluated based on the self-assessment questionnaire completed by all current international partners. The country/geographic risk varied, based on the government's response rating to mitigating modern slavery risk by country – the latter according to Global Slavery Index 2018 and Walk Free (©The Minderoo Foundation Pty Ltd). Monash College also formulated various risk mitigation strategies after evaluating the completed questionnaires from the partners, and is committed to ensuring they are implemented.

Monash College has assessed its procurement and supply chain operations, and developed and implemented a Modern Slavery Practice and Procedure. Monash College engages with a number of suppliers that are low risk with respect to modern slavery.

The categories within the supply chain that pose a higher potential risk of modern slavery include:

- office furniture
- office stationery supplies
- IT hardware
- labour hire
- catering services
- cleaning services.

Monash College engages reputable suppliers that have either addressed modern slavery or are working towards doing so. Monash College analysis of the direct supply chain indicated that the majority of goods and services provided were sourced from Australian-registered businesses, including through multinationals based in Australia.

In addition to updating contract templates to include modern slavery clauses, Monash College presented on modern slavery requirements to offshore partners in 2020 to raise awareness of modern slavery and Monash College's reporting requirements, and to explain the process to complete the self-assessment questionnaire.

MONASH UNIVERSITY FOUNDATION PTY LTD

Monash University aims to be at the forefront of developing and leading the incorporation of environmental, social and governance (ESG) principles into its investment policy. Monash, via its investment advisor and investment managers, actively engages on ESG issues to influence corporate behaviour where possible.

The ESG investment process will:

- require the University and investment fund managers to be signatories to the United Nations Principles for Responsible Investment (PRI). The PRI works to understand the investment implications of ESG factors, and to support its international network of investor signatories in integrating these factors into their investment and ownership decisions
- utilise a best-practice rating scheme or third-party review to select investment fund managers and/or investment funds
- invest in some tailored portfolios that exclude exposure to coal, tobacco, uranium and cluster munitions
- incorporate the investment managers' approach to integrating ESG in the annual manager reviews and sector reviews
- review opportunities to invest in ESG-oriented investment strategies which meet the investment objectives of the long-term investment pool
- require fund managers to actively engage with investment companies on ESG issues. In the course of engagement with investment fund managers, if the University finds such managers to be unresponsive or unwilling to become responsive to our approach to ESG principles within a timeframe that the Monash University Council considers reasonable, Monash will divest from all investments with those managers
- seek annual updates from all investment managers on what they have done in relation to the Modern Slavery Act over the past 12 months.

ASSESSING THE EFFECTIVENESS OF ACTIONS

Monash recognises the complexity of modern slavery, and has established the Monash University Modern Slavery Governance Structure to guide and assess its modern slavery program, the initial and evolving framework, specifically for review and remediation of any concerns or instances identified.

In addition to an existing control framework to ensure compliance in the following areas, the University's modern slavery program has established an advisory committee with decades of global expertise and experience in the areas of:

- human trafficking and slavery
- criminology
- operations and supply chain management
- employment law and regulation
- temporary migration
- business law
- human rights
- global business
- migration and inclusion
- violence against women.

When instances of modern slavery are identified, the committee is consulted to identify the best way forward with a special focus on helping the victims and implementing realistic actions in response to the issue through to its identified reasonable resolution and follow-up plans.

Effectiveness of actions can be assessed at different levels. In subsequent years of its five-year modern slavery program, Monash will undertake a robust assessment of the effectiveness of its actions, with these reviews reflecting the progressing program of work:

1. Internal compliance checks, with checklists designed in conjunction with our academic experts.
2. External sector engagement, such as via the AUPN, to assess cross-university effectiveness, combined supplier influence and compare sector performance with Monash's.
3. External stakeholder engagement to continue the dialogue with third parties in relation to risk identification and strategising in relation to identified risk.
4. Affected labourers identified as being subject to modern slavery practices – how they are progressing after remediation steps have been taken. This is a longer-term goal.

Monash College will undertake audits of offshore partners to evaluate their modern slavery supply chain management. Monash College is also working with Monash University to develop appropriate review metrics to assess effectiveness.

CONSULTATION WITH OWNED ENTITIES

Monash University has a distributed procurement model within most of the entities within scope of this report. Primary University-wide procurement policies and procedures are managed by Strategic Procurement, which provides support, as required, across any procurement projects, typically high-value/risk and/or University-wide contracts. The Strategic Procurement team annually completes the Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement and Supply eLearning Programme and Test. Strategic Procurement has the primary relationship – and visibility of all procurement – with all in-scope entities and, as a result, is leading the modern slavery program and the joint Modern Slavery Act Report for Monash University. Direct engagement with relevant entity staff has occurred to understand their situation and procurement, and to assist with their compliance.

Strategic Procurement is responsible for coordinating all procurement activity across the University, implementing procurement policy and procedures, and providing category management for strategic categories across the University. Strategic Procurement also provides strategic sourcing support across the University and expert support, advice and tools to all procurement specialists. Procurement specialists are located in business portfolios for specialist procurement categories (for example, Buildings and Property Division and eSolutions), and are responsible for the procurement and contract management of specified categories.

Monash College has its own procurement function that works closely with Monash University to ensure alignment where necessary.

Monash University Foundation is managed within the portfolio of the Chief Financial Officer and Senior Vice-President. The Foundation was identified as being closely aligned with the Monash University Strategic Procurement team in its approach to modern slavery.

**OTHER
RELEVANT
INFORMATION**



ACKNOWLEDGEMENTS

This report received input from the following Monash University academics:

- Faculty of Arts
 - » Associate Professor Marie Segrave, Criminology
- Monash Business School
 - » Associate Professor Dayna Simpson, Operation and Supply Chain Management
 - » Ms Ingrid Landau, Business Law and Taxation
- Faculty of Law
 - » Professor Jean Allain, International Law

We acknowledge and pay respects to the elders and traditional owners of the land on which our four Australian campuses stand.

BUILDING A STRONGER HIGHER EDUCATION SECTOR

As a leading education and research institute, Monash University recognises the importance of supporting the wider Australian higher education sector. One of the ways Monash has assisted in this manner by significantly contributing to the Australian Universities Procurement Network (AUPN). This higher education sector-level contribution by Monash is in addition to Monash's own modern slavery program of work.

The AUPN has assembled a Modern Slavery Working Group, aimed at building a sector-based approach to reduce modern slavery risk by producing supporting solutions and materials to enable member universities to drive efficiencies and create opportunities to identify issues across the sector. This includes standardised contract clauses, key supplier engagement forums and a cross-university Modern Slavery Academic Advisory Board.

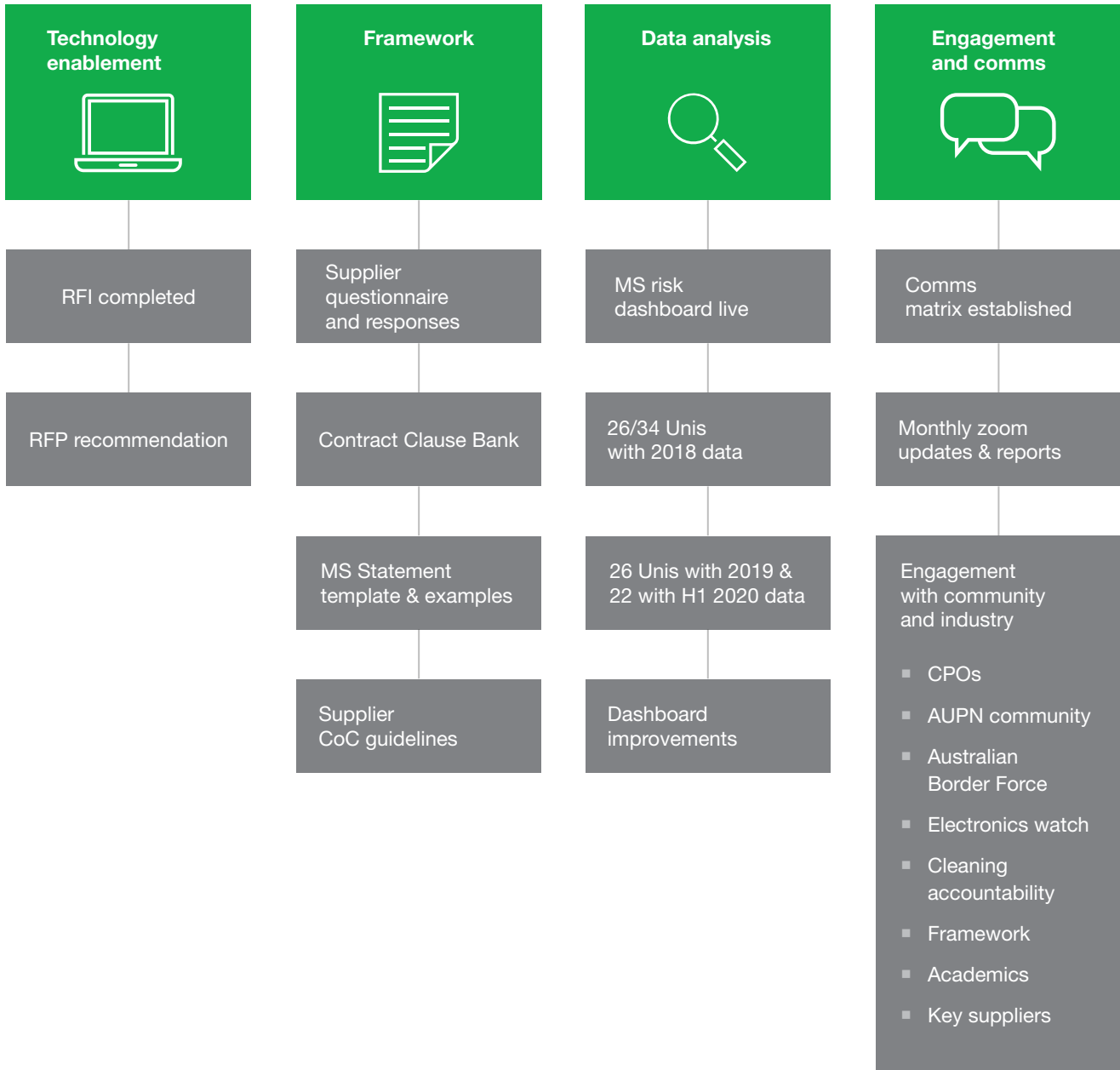
The AUPN has completed a tender for the procurement of a technology solution to act as a dynamic information bank for supplier data, to create greater visibility across the higher education supply base (a key ongoing requirement of the Act), as well as develop a risk assessment tool and scorecard instrument. Powerful aggregated data and exceptionally high-quality subject-matter expertise continues to flow from the AUPN work, and is expected to continue to do so over the next six to 12 months. Elements of the AUPN sector approach, where appropriate, will contribute to Monash's existing modern slavery program.

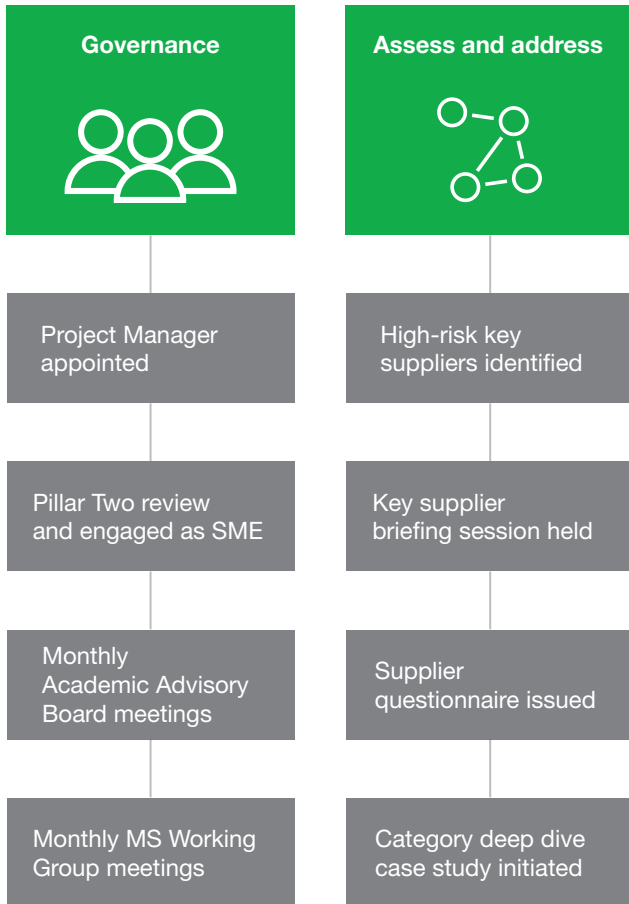
The AUPN has formed an Academic Advisory Board to function as objective experts, advisers and reviewers of the AUPN Modern Slavery program's activities. Three of the 12 board members are Monash academic staff members who have significantly contributed to Monash University's modern slavery program development.

AUPN MODERN SLAVERY ACADEMIC ADVISORY BOARD

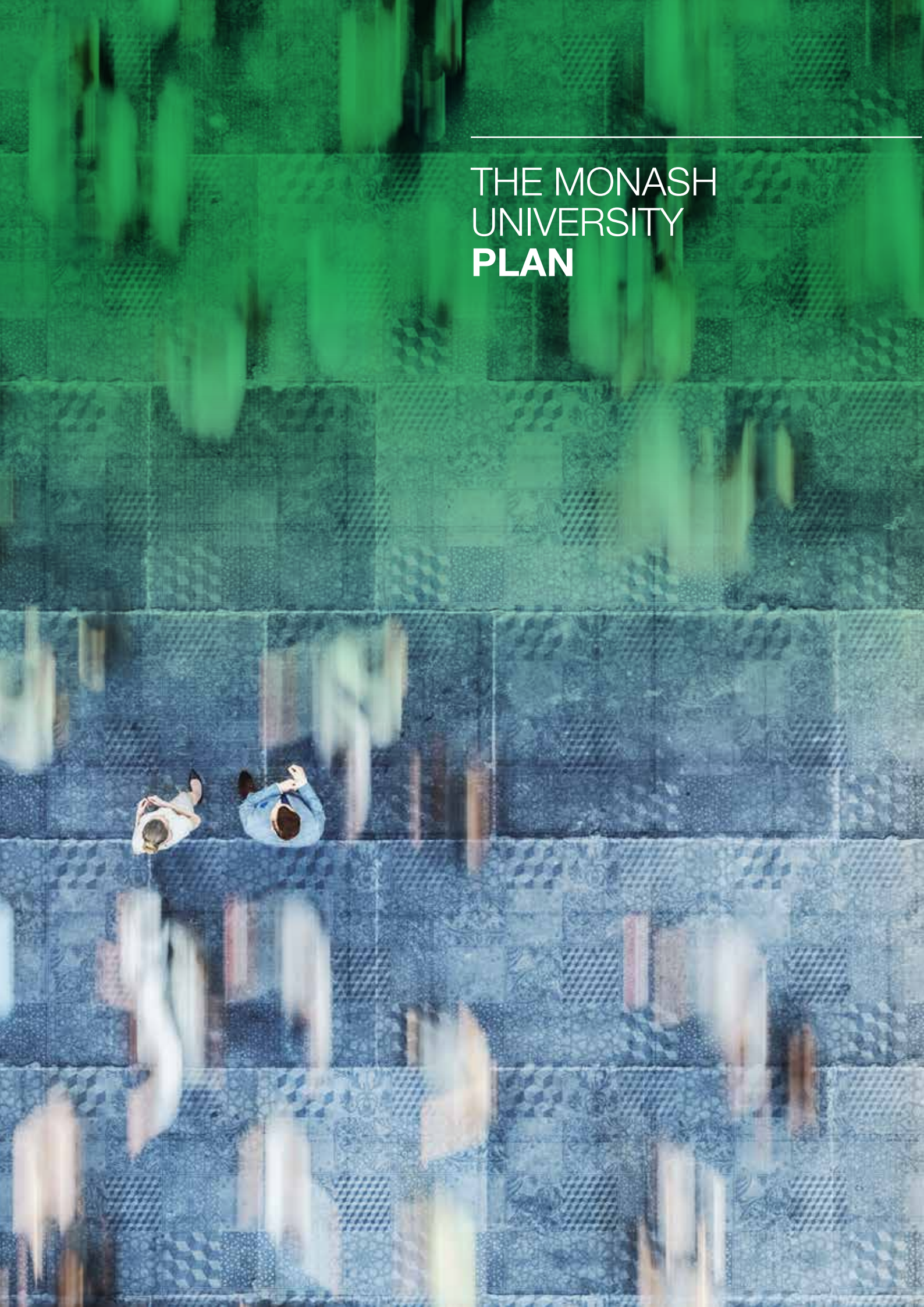
Board member	University
Marie Segrave	Monash University
Ingrid Landau	Monash University
Dayna Simpson	Monash University
Justine Nolan	University of New South Wales
Paul Redmond	University of Technology Sydney
Martijn Boersma	University of Technology Sydney
Jolyon Ford	The Australian National University
Jimmy Donaghey	University of South Australia
Laurie Bonney	University of Tasmania
Vikram Bhakoo	University of Melbourne
Joy Murray	University of Sydney
Bridget Lewis	Queensland University of Technology

2020 AUPN MODERN SLAVERY WORKING GROUP KEY ACHIEVEMENTS





THE MONASH
UNIVERSITY
PLAN



THE MONASH UNIVERSITY PLAN

Monash University (including the Monash University Foundation) has a five-year plan in place, approved by the University's Vice-Chancellor's Group, to increase the scope of entities covered by each subsequent annual Modern Slavery Act Report until all relevant Monash entities and operations are within scope of the report – including those offshore.

At this time, the total number of Monash entities expected to be relevant over the five-year plan is 20 out of the 23 currently identified controlled entities. The number, makeup and relevance of entities to each annual Modern Slavery Act Report may change over each year of the five-year plan as the University continues to evolve.

The below figure illustrates the areas that have been the focus of work to date, as well as 2022 and beyond.

Separately from the plan being followed by Monash University, at this stage it is clear Monash College has the following actions planned for 2021:

- Update offshore partner audit process to evaluate modern slavery supply chain management
- Implement training module for staff
- Continue to develop the maturity of our supplier analysis to assess and appropriately mitigate risk of modern slavery in the supply chain
- Embed supplier compliance and ethical due diligence questionnaires into procurement procedures and documents
- Update relevant people and culture policies and procedures to include reference to modern slavery, associated legislation and the College's Modern Slavery Act Report
- Ensure current processes relating to the collection of new employee documents ('right to work' checks, etc) is robust and compliant with recruitment policy and relevant legislation
- Ensure engagement of third-party service providers complies with relevant policies and procedures, including modern slavery and procurement
- Mitigate risk of working with third parties through the procurement of services from Monash University-preferred providers or organisations with their own modern slavery reports.

2021	2022	2023	2024	2025
Supporting procurement systems and processes	Onshore training	Onshore research & education	Onshore continuous improvement	Continuous improvement
Basic tracking system	Advanced tracking system	Offshore less than 100% owned controlled entities	Offshore research and education	Program review
Internal risk assessments	Cleaning and electronics – deep dive	Expanded compliance monitoring	Expanded offshore training	
Initial risk assessments	Compliance monitoring	Initial offshore training		
Compliance monitoring	Offshore 100% owned and controlled entities			

CONTACT DETAILS

211 Wellington Rd
Mulgrave 3170
Australia

Email: sustainable.procurement@monash.edu
Web: monash.edu

 facebook.com/Monash.University

 twitter.com/MonashUni