

MODERN SLAVERY STATEMENT



2024



ACKNOWLEDGEMENT OF TRADITIONAL OWNERS

La Trobe University proudly acknowledges the traditional custodians of the lands where its campuses are located in Victoria.

We recognise that Indigenous Australians have an ongoing connection to the land and the University values their unique contribution to both the University and the wider Australian society.

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1. INTRODUCTION

La Trobe University (“the University”) is dedicated to ensuring that our operations and supply chains uphold human rights and adopts a zero tolerance stance against slavery and human trafficking in any manifestation. The University aims to engage with suppliers who share its commitment to upholding and safeguarding human rights within their own organisations and supply chains.

This is the University’s fifth Statement pursuant to Part 2 of the *Modern Slavery Act 2018* for the reporting period 1 January to 31 December 2024. The Statement sets out the steps the University has taken and will take across our research, teaching and operational activities to address modern slavery.

HELP AND ASSISTANCE

The University recognises that this document may evoke distress or concerns for individuals with lived experiences of modern slavery. If you, a close friend, or family member require assistance or would like to speak with someone, there are a range of support services available to help you.

If you are in immediate danger, contact triple zero (000) and follow the advice from the police. If you are on campus and feel unsafe, contact triple zero (000) and notify Campus Security on (03) 9479 2222.

If you are a student and require specialised help and support, contact our Health, Wellbeing and Inclusion team on (03) 9479 8988 or find support service on the [Health, Wellbeing and Inclusion Hub](#).

PSYCHIATRIC TRIAGE (OR CRISIS ASSESSMENT AND TREATMENT TEAMS):

CAMPUS	SERVICE	PHONE NUMBER
Melbourne (Bundoora)	Psychiatric Triage – North East	1300 859 789
Bendigo	Psychiatric Triage – Loddon Campaspe / Southern Mallee	1300 363 788
Shepparton	Psychiatric Triage – Goulburn & Southern	1300 369 005
Albury-Wodonga	Psychiatric Triage – North/Eastern Hume	1300 881 104
Mildura	Psychiatric Triage – Northern Mallee	1300 366 375

LA TROBE OUT OF HOURS CRISIS LINE

Call 1300 146 307 or text 0488 884 100

LIFELINE

24/7 telephone counselling
13 11 14

SUICIDE LINE

24/7 telephone counselling
1300 651 251

Further emergency contacts can be found at the University’s [Counselling and Emergency Support webpage](#).

REPORTING CONCERNS

If you observe or have concerns about modern slavery within the University’s operations or supply chains, please submit a confidential report using the University’s [Modern Slavery Reporting Tool](#).

2. ABOUT LA TROBE UNIVERSITY

La Trobe University (“the University”) is a higher education institution founded in 1964. The University was created to broaden participation in higher education among communities in Melbourne’s north and Victoria’s regional areas. The University is Victoria’s only true state-wide university, and our regional campuses continue to be central to the University’s identity, mission and purpose.

In 2024, the University climbed 25 places in the QS World University Rankings¹, now ranking 217th out of 1,500 universities evaluated. This marks an improvement of 183 places over five years.

In recognition of this significant progress, the University was honoured with the “Most Improved – Oceania” award in the global top 300 band.

The University also rose more than 200 places to be ranked 166 in the world in the QS Sustainability Rankings 2024.²

The University is ranked first in Australia and fifth globally in the United Nation’s Sustainable Goals 2 – Zero Hunger.³



OUR RESEARCH

The University’s refreshed Research Impact Strategy 2023 – 2025 aligns with five priority areas of the United Nations Sustainability Development Goals:

- sustainable food and agriculture
- resilient environments and communities
- healthy people, families and communities
- understanding and preventing disease
- social change and equity.

The University’s UN Global Compact Communication on Engagement (2023–2024) sets out our continued commitments in teaching and research, focusing on improving human rights.

The University initiatives aligned with UN Global Compact Principles 1⁴, 2⁵, 3⁶, 4⁷, 5⁸ and 6⁹ include:

- review and update of a range of policies respecting human rights and supporting a diverse and respectful learning community and workplace
- La Trobe Business School’s (LBS) Sharing Information on Progress 2024 Report (LBS are a signatory to the United Nations’ Principles for Responsible Management Education (PRME))
- teaching of a human rights law subject
- research focusing on improving human rights is conducted by La Trobe’s Violence Against Women Research Network (LAVAWN), which aims to foster innovative research in violence against women, its evaluation and knowledge translation, growing the University’s internal and external collaboration and partnerships on violence against women research
- the University’s **Centre for Human Security and Social Change** supports positive social change across the Pacific region through regional development and human rights projects in partnership with governments and NGOs
- the University’s recognition of the freedom of association and the right to collective bargaining are demonstrated through the University’s *Code of Conduct and Enterprise Agreement* (2023) negotiated with bargaining representatives from the National Tertiary Education Union
- the University’s refreshed 2025–2030 *University Strategic Plan* (expected to be launched in August 2025) will reinforce the University’s commitment to fostering a diverse, inclusive and psychologically safe university.

1 QS World University Rankings 2024

2 QS World University Rankings: Sustainability 2024

3 Times Higher Education Impact Rankings 2024

4 UN Global Compact, Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights

5 UN Global Compact, Principle 2: Make sure they are not complicit in Human Rights;

6 UN Global Compact, Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

7 UN Global Compact, Principle 4: The elimination of all forms of forced and compulsory Labour;

8 UN Global Compact, Principle 5: The effective abolition of child labour;

9 UN Global Compact, Principle 6: The elimination of discrimination in respect of employment and occupation.

3. THE UNIVERSITY'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS

3.1 STRUCTURE

The University is a statutory body corporate constituted in accordance with the *La Trobe University Act 2009* (Vic).

The University is governed by the University Council, which is chaired by the Chancellor.

THE CHANCELLOR, VICE-CHANCELLOR AND SENIOR EXECUTIVE GROUP ROLES AND RESPONSIBILITIES INCLUDE:

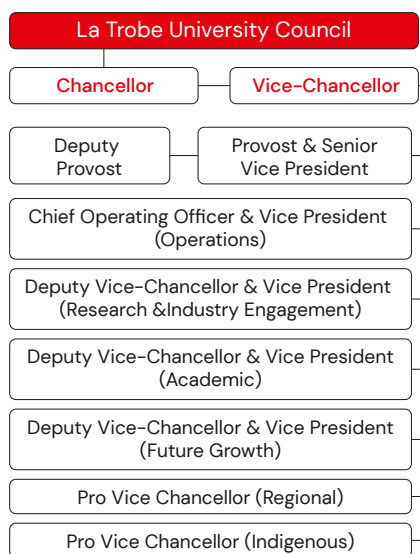
CHANCELLOR

- providing leadership to the Council in carrying out its responsibilities and functions under the La Trobe University Act 2009
- fulfilling the ceremonial, statutory and administrative functions of the role, including presiding at graduations
- promoting the University's strategic objectives and activities with external stakeholders
- establishing workplans and agendas for meetings in collaboration with the Vice-Chancellor to enable Council to effectively discharge its duties
- chairing University Council meetings
- serving as Council's central point of official communication with the Vice-Chancellor and senior management team
- in consultation with the Vice-Chancellor, setting the Vice-Chancellor's goals and completing performance evaluation and review

VICE-CHANCELLOR

Under the leadership of our Vice-Chancellor the Vice-Chancellor is responsible for leading and managing the University's academic, operational and external affairs, and shaping, articulating and implementing the University's strategic objectives in research, education and contribution to public policy development.

ORGANISATIONAL CHART OF SENIOR EXECUTIVE STAFF*



DEPUTY VICE-CHANCELLOR (RESEARCH AND INDUSTRY AND ENGAGEMENT)

- Research Office
- Industry Engagement
- Research Capability
- Global and Graduate Research

DEPUTY VICE-CHANCELLOR (ACADEMIC)

- Education Services
- La Trobe Library
- Quality and Standards
- Clever Learning Program
- Student Success including support for student transition, engagement and employability

- Student Administration
- Indigenous Strategy and Education
- Health, Wellbeing and Inclusion
- Student Experience and Employability

DEPUTY VICE-CHANCELLOR (FUTURE GROWTH)

- Recruitment and International Operations
- Educational Partnerships
- Media and Communications
- Marketing, Digital and Insights

PRO VICE-CHANCELLOR (REGIONAL)

- Albury-Wodonga, Bendigo, Mildura and Shepparton campuses
- Community engagement
- Regional research

PRO VICE-CHANCELLOR (INDIGENOUS)

- Engagement with Indigenous communities across our campus network
- La Trobe's Indigenous Strategy
- Learning and support services for Indigenous students

CHIEF OPERATING OFFICER

- Finance, Procurement and Data Analytics
- Human Resources
- Infrastructure and Operations
- Information Services
- La Trobe University City
- Commercial, Legal and Risk
- Strategy Realisation Office

PROVOST

The Provost is responsible for:

- oversight and accountability for the Schools
- ownership of the coursework portfolio
- academic leadership and culture
- academic performance.

*A structural change was implemented after May 2024, and the role of Deputy Vice-Chancellor (Research and Industry Engagement) no longer exists.

The Office of the Provost is responsible for providing operational leadership in the management of professional services including:

- Strategy, Planning and Executive Services
- Facilities and Technical Services
- Placement and Work Based Learning Operations
- Domestic and Transnational Education Operations Support
- Health Service Operations
- Widening Participation, Schools Outreach and Enabling Programs
- School Professional Services.

DEPUTY PROVOST

- culture and performance of the academic workforce
- overall strategic and operational support for the Provost
- high-level academic leadership for the academic functions within the Office of the Provost.

View the University's **Annual Report** for further information on the University's structure.

UNIVERSITY ENTITIES

In 2024, La Trobe University (ABN 64 804 735 113) owns two entities:

- LTU Services Ltd (ABN 62 642 748 463). Established in late-2020 for education services, this entity has not operated and holds no assets or revenue for the purposes of this Statement.
- La Trobe Ltd (ABN 78 618 827 615). Previously known as Unitemps, this entity was impacted by COVID-19 when its franchisor, Warwick University (UK) decided to withdraw from Australia during the FY 2020. As a result, the Franchise Agreement was mutually terminated on 30 September 2020, and La Trobe Ltd ceased its operations in Victoria. Since then, the entity has remained dormant.





3.2 OPERATIONS

The University's core activities are teaching and research and aims to support our community's:

- economic prosperity
- health and wellbeing
- progress towards gender equality
- recognition and acceptance of different cultures
- environmental sustainability.

OUR CAMPUSES

The University operates independently within Australia and has seven campuses:

1. **Melbourne (Bundoora) Campus:** the main and largest campus serving Melbourne's north.
2. **Albury-Wodonga:** Located on the border of Victoria and New South Wales, the spacious campus features modern facilities utilised by our local partners.
3. **Bendigo:** A distributed presence with three sites throughout the city complementing the main campus enabling a true integrated industry approach.
4. **Mildura:** Contributes to the local education ecosystem through our upgraded industry-standard teaching and research facilities.
5. **Shepparton:** The recently completed AU\$20m campus redevelopment doubles our footprint and further embeds us into community.
6. **City Campus (Collins Street, Melbourne):** a smaller campus offering postgraduate and business courses.
7. **Sydney Campus:** operates under a third-party teaching contract arrangement with Navitas Ltd, who delivers pre-university English language and academic pathway programs, undergraduate and postgraduate degrees on behalf of the University.

STUDENTS

In 2024, the University had a total of:

- 37,400 students (persons) (up from 2023 figures of 36,100). Of the 37,400 students, 27,300 were EFTSL
- 9,100 international students (persons)
- 28,300 domestic students (persons).

STUDENT PLACEMENTS¹⁰

- 18,151 placements undertaken in 2024
- 8,805 students had undertaken at least one placement in 2024.

STUDENT SATISFACTION¹¹

- 72.7% overall graduate satisfaction (Course Experience Questionnaire)
- 74% of graduates in full time employment (Graduate Outcomes Survey)
- 78.5% overall student satisfaction (Student Experience Survey)

STAFF

- 3155 staff (FTE) :
 - > 72.37% (2283) are full-time (a decrease from 2023 figures of 2733)
 - > 17.25% (544) are part-time (an increase from 2023 figures of 485)
 - > 10.37% (327) are casual (an increase from 2023 figures of 162)
 - > 54.46% (1718) are professional staff (an increase from 2023 figures of 1697)
 - > 45.52% (1436) are academic staff (an increase from 2023 figures of 1346).

The University respects all gender identities. We acknowledge the existing constraints with our data systems, which do not capture the full diversity of our University community.

Efforts are underway to enhance our systems and data practices in relation to representing gender diversity. Presently our systems report the gender breakdown of staff (3,162 individuals) for 2024 as follows:

- 65.1% (2,057) are female
- 34.7% (1,098) are male
- 0.2% (7) are self-described.

CONSOLIDATED REVENUE

The University had a total consolidated revenue of \$915,990,000 (up from 2023's total consolidated revenue of \$866,748,000).

**\$915.99M
CONSOLIDATED
REVENUE**



**37,600 TOTAL
STUDENTS
(PERSONS)**



**7
CAMPUSES**



**3,100
STAFF (FTE)**



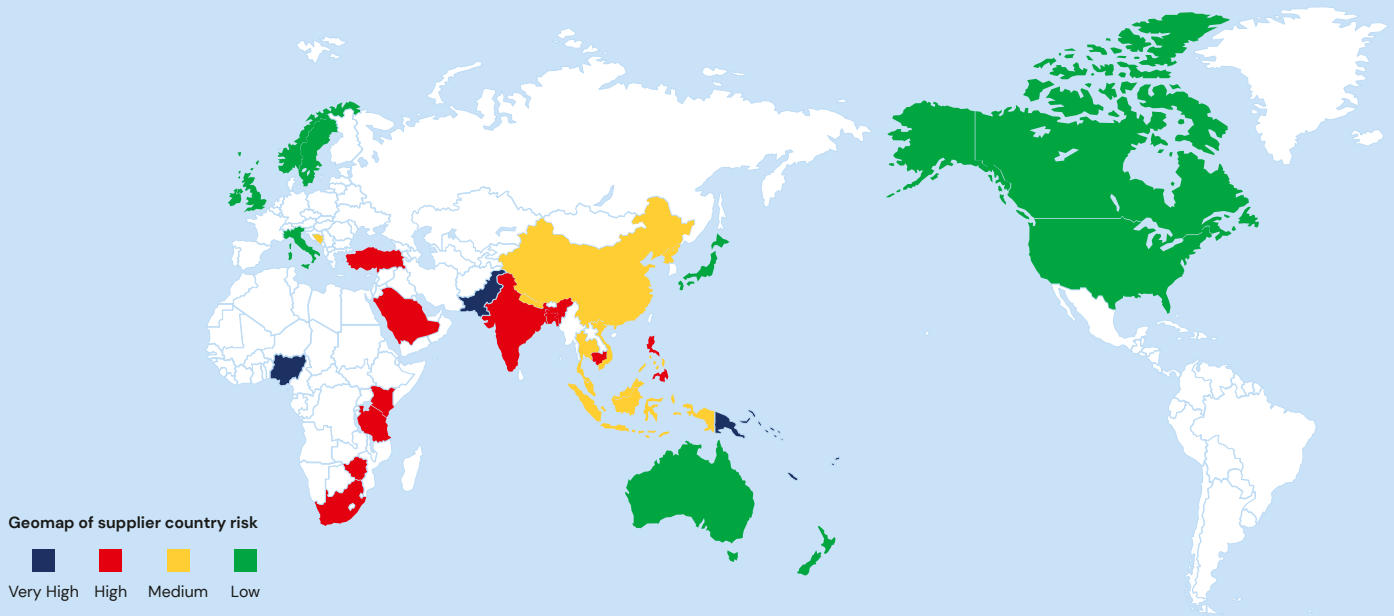
**3,100 ACTIVE
VENDORS**



¹⁰ This includes placements that were commenced as some are ongoing.

¹¹ Data reported on is undergraduate only from the Quality Indicators for Learning and Teaching (QILT) Australian Government initiative that collects and publishes data on student experiences and graduate outcomes at universities and higher education institutions.

¹² The total headcount represents the unique number of staff members. Some individuals hold both casual and continuing/fixed-term roles meaning the sum of category-specific headcounts may exceed the total headcount.



3.3 SUPPLY CHAINS

The University engages with a broad network of external suppliers, working with over 3,100 active vendors in 2024 (an increase of 200 vendors from the 2,900 recorded in 2023). To support its core business functions and campus operations, the University procures a wide range of goods and services, including but not limited to:

- technology (information services)
- telecommunications
- infrastructure and facilities management
- security
- cleaning
- construction
- marketing and media
- energy
- human resources and labour hire
- finance operations
- fundraising and investment
- library services
- travel services
- laboratory supplies
- catering
- printing.

The University is committed to responsible procurement practices, ensuring that suppliers align with ethical standards. The majority of first-tier suppliers are Australian-based companies. However, risks of modern slavery are more prevalent in the second, third and fourth tiers of our supply chain, where transparency is often limited.

These risks are particularly significant in manufactured goods, including components and materials used in:

- computer equipment and mobile phones
- vehicles
- solar energy panels
- laboratory supplies
- clothing and uniforms

To promote ethical procurement across the sector, the University participates in the Australian University Procurement Network (AUPN), a strategic initiative led by Higher Ed Services, a non-for-profit organisation owned by Universities Australia. This collaboration strengthens procurement capabilities within Australian universities, fostering responsible and sustainable supply chain practices.

In 2024, a collaboration of thirty-five universities, through the AUPN, continued their collective effort to identify modern slavery risks within their supply chains. Using a new procurement analytics tool, Sievo, to categorise our 2024 spend data (noting that this data does not include corporate card spend), the data was then loaded into the AUPN dashboard to analyse country, category, spend and our overall risk.¹³

ANALYSIS OF UNIVERSITY SPEND

In 2024, the University expended \$341M, engaging a total of over 3000 unique suppliers:

- \$306M (89.70%) of this spend was with first-tier Australian suppliers
- \$35M (10.30%) of this spend was with first tier international suppliers.

¹³ Category Spend and Overall Risk Ratings used in the AUPN anti-Slavery Supplier Risk Dashboard are sourced from the 2023 Global Slavery Index; the ACAN (Australian Catholic Anti-Slavery Network); the RESPECT (Responsible and Ethical Private Sector Coalition against Trafficking); and the NSW Anti-Slavery Commissioner GRS Inherent Risk Identification Tool.

OVERALL SUPPLIER RISK

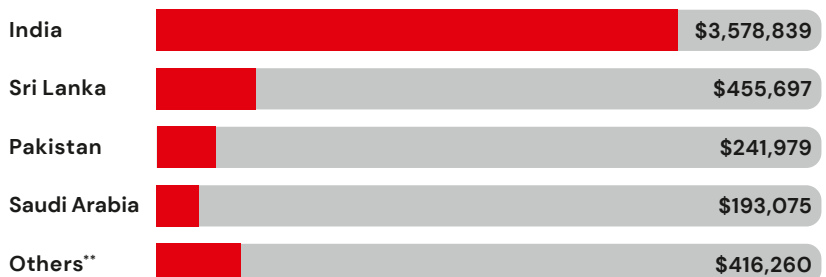
- \$4.9M (1.43%) of total spend was with 93 international suppliers in high-risk countries¹⁴ (down from 2023 spend of \$9M with 88 international suppliers in high-risk countries).
- The majority (87%) of high-risk country expenditure is allocated to student recruitment payments. The University’s approach to managing this high-risk expenditure is outlined in our **Education Agent Management Policy**, which ensures compliance with all relevant acts, regulations and standards. Updated contract clauses clearly define the responsibilities and obligations of both the University and its education agents under the **Education Services for Overseas Student Act 2000**, extending these requirements to their suppliers. Contracts undergo auditing and may be renewed at the end of their 2-year term to ensure ongoing compliance with legislative and University Policy requirements.
- \$639,571 (13%) of the remaining very high and high-risk category spend was predominantly spread across travel, IT software/subscriptions, electrical supplies, medical and lab consumables, research, marketing materials and administration costs.

BREAKDOWN OF TIER 1 HIGH-RISK COUNTRIES AND CATEGORIES

HIGH-RISK SUPPLIER NUMBERS

VERY HIGH-RISK COUNTRIES	CATEGORY OF GOODS AND SERVICES	NO. OF SUPPLIERS
Pakistan	student agency	7
	courier/freight services	
Papua New Guinea	research support	1
Nigeria	agency commissions	1
HIGH-RISK COUNTRIES		
India	– travel agency and airfare services	48
	– couriers	
	– student/recruitment services	
	– marketing materials	
	– advertising services	
Sri Lanka	– student recruitment	13
	– agency commissions	
	– research support	
Philippines	– student/recruitment services	3
	– research support	
OTHER HIGH-RISK COUNTRIES		
Saudi Arabia, Bangladesh, Cambodia, Kenya, Türkiye, Senegal, Democratic People’s Republic of Korea, Uganda, Zimbabwe, Mongolia, South Africa	– student/recruitment services	13
	– medical and lab consumable items	1
	– research support	1

HIGH-RISK COUNTRY SPEND



¹⁴ Country risk ratings used in the AUPN Anti-Slavery Risk Dashboard are sourced from the **Walkfree Global Slavery Index/downloads**

** Other countries include: Bangladesh, Cambodia, Democratic People’s Republic of Korea, Kenya, Mongolia, Nigeria, Papua New Guinea, Philippines, Senegal, South Africa, Türkiye, Uganda, Zimbabwe.

4. THE RISKS OF MODERN SLAVERY PRACTICES IN THE UNIVERSITY'S OPERATIONS AND SUPPLY CHAINS

There are two primary areas of modern slavery risk within the University's operations:

- 1 our people
- 2 our operations and supply chains

OUR PEOPLE

STAFF ENGAGEMENT AND DUE DILIGENCE IN RECRUITMENT

The University is committed to promoting positive change and addressing major societal challenges through a culture of connection, inclusion and excellence. As part of this commitment, the University implements robust due diligence in its recruitment and employment practices to ensure ethical and legally compliant hiring processes.

The University's recruitment process covers a wide range of roles, including academic, administrative and support positions. It is managed by an internal recruitment team and, when necessary, in collaboration with third-party agencies for permanent, fixed-term, continuing employment and contingent labour.

To maintain integrity and fairness in its hiring practices, the University ensures that:

- all vacancies are advertised on the University's official **Jobs at La Trobe** page and reputable job portals

- a structured selection process is followed, including application screening, candidate shortlisting, interviews and job offers, while ensuring full compliance with employment standards and laws
- staff are employed under the *University's Enterprise Agreement 2023 (EA)* which came into effect on 8 January 2024. This agreement provides job security, stability and fair working conditions, aligning with the University's strategic vision to be sustainable, relevant and successful.

To mitigate risks of modern slavery and labour exploitation, the University applies strict due diligence by:

- conducting background checks and verifying employment conditions for all staff, including those hired through third-party agencies
- ensuring all employment contracts comply with labour laws and the terms set in the *Enterprise Agreement 2023*
- partnering with reputable recruitment agencies that adhere to ethical hiring standards and responsible workforce management
- providing staff training and awareness on fair employment practices and workers' rights.

Through these measures, the University aims to ensure that its recruitment and employment processes align with ethical standards, promote fair working conditions, and help mitigate the risks of exploitation and modern slavery within the University.

Our staff and students come from diverse backgrounds, with our international student community being particularly vulnerable. Often young and new to the country, they are still adapting to unfamiliar customs, cultures and laws. This adjustment period can increase their risk of exploitation by employers engaging in deceptive employment practices.

INTERNATIONAL STUDENTS

La Trobe University is committed to fostering an inclusive and supportive environment for all students. We recognise that international students are particularly vulnerable to exploitation and modern slavery risks, especially in employment and recruitment practices.

A significant proportion of our international students are recruited through education agents, which poses potential risks such as deceptive recruitment, forced labour or debt bondage. To mitigate these risks, the University strictly adheres to the **National Code of Practice for Providers of Education to Overseas Students 2018** and the **Education Services for Overseas Students Act 2000** (ESOS Act 2000). Our Education Agent Management Policy ensures compliance with these standards, with agents reviewed twice annually based on both commercial and ethical criteria. Any alleged breach of the conditions in an agreement by the agent or sub-contractor of an agent must be reported immediately to the Director International Recruitment, who will investigate the alleged breach in consultation with the Assurance & Risk Manager and take any steps to mitigate associated risks.

To further protect international students, the University provides comprehensive support services from enrolment to graduation. Our orientation program ensures students receive essential information on employment rights, campus safety, and available legal, health and emergency services. Resources such as the **Living in Australia** website and webinar series offers guidance on living safely in Victoria and Australia, health system and emergency services support, tenancy rights and financial management. International students receive comprehensive support to ease their transition opportunities.



Additionally, International Student Advisors offer one-on-one support, assisting with academic concerns, personal challenges and overall wellbeing.

International students often seek part-time employment in low-wage industries such as cleaning, hospitality, food manufacturing and construction, where risks of exploitation may be higher. To address this, the University provides a dedicated **International Students and Work Rights in Australia website**, offering:

- information on allowable work hours and fair conditions
- resources for employers and workers on legal rights
- links to the Office of the Fair Work Ombudsman and fact sheets on minimum wages and workplace protections.
- access to a career hub for resume assistance, interview preparation, and job search support.

By implementing strong due diligence in recruitment, enhancing student support services and ensuring compliance with national regulations, the University continues to prioritise student welfare and mitigate modern slavery risks within its operations.

WELLBEING AND INCLUSION SERVICES

Our **Wellbeing Services** team provides support to international students. Students can be referred to any of the Wellbeing Services by teaching staff, or by other staff concerned for a student (with the student's consent). Students can also self-refer.

Our Wellbeing Services page services a central hub connecting students to a wide range of resources. Students can self-refer via this page by pressing "Connect with us".

Students may seek Wellbeing Services to gain support around any life issues they may experience. If a student is identified as a victim of modern slavery, the counsellors and case manager will support the student to access safety, support the student to report the issue to relevant authorities, and provide confidential support and guidance.

The Wellbeing Services team provides free support to students including counselling, case management (**Student Wellbeing Connect**) and support to students for a range of issues, including: mental health concerns, financial challenges, legal concerns, LGBTIQ+ health and wellbeing matters, men's health and wellbeing matters, and support around spiritual wellbeing. The team also has an after-hours crisis line that can be accessed from 5pm to 9am on weekdays and all hours over the weekend. We have a Student Wellbeing Senior Coordinator role dedicated to providing targeted support to international students.

Wellbeing Services works alongside **Safer Community**, who provide a free, confidential support service and intervention if a student has experienced concerning or threatening behaviour, such as: sexual harm, bullying, aggression, violence, discrimination, stalking or threats. Wellbeing Services can liaise with Safer Community with a student's consent, or a student can **self-refer via this link**.

For ease, students can access services such as **AccessAbility** and the **Women's Safe Places** via the Wellbeing Services and Safer Community links respectively.

In 2024, Wellbeing Services were involved in the Australian Red Cross **Work Right Hub** consultation steering committee which included facilitating a number of staff and students to participate in the consultation process to review the online resources and training module. Three University staff members participated in the consultation group for frontline staff and two University students took part in the consultation for international students.

OUR OPERATIONS AND SUPPLY CHAINS

The University operates within a complex network, engaging with over 3,100 vendors that supply goods and services essential to our academic activities and campus operations. Within these operations and supply chains, modern slavery may be present, particularly among suppliers and their extended supply chains.

This risk is heightened in regions with documented human rights violations, weak legal frameworks and high reliance on low-skilled labour.

Identifying supply chain risk is complex. In 2024, the University used several tools and resources to assess potential risks and enhance our due diligence processes, including (but not limited to):

- **AUPN Modern Slavery Risk Rating Tool**
- **NSW Anti-Slavery Commissioner's Guidance on Reasonable Steps to Manage Modern Slavery Risks in Operations and Supply Chains**
- **OECD Due Diligence Guidance for Responsible Business Conduct**
- **Australian Border Force Register of Sanctioned Sponsors**
- **USA Uyghur Forced Labor Prevention Act (UFLPA) Entity List**
- **(US Dept of Labor) Lists of Goods Produced by Child Labor or Forced Labor and List of Goods.**

The University acknowledges that some goods and services we procure may originate from supply chains where modern slavery has influenced raw material sourcing or manufacturing processes. To assess potential risks, we consider both the nature of the goods and services we procure, and geographic sourcing locations.

Additionally, our research activities may have indirect links to modern slavery, whether through the procurement of lab consumables, the nature of research projects or global research partnerships. We remain committed to identifying and addressing these risks to uphold ethical and sustainable procurement practices.



PROMOTING USE OF PRE-QUALIFIED CONTRACTED SUPPLIERS

The University actively promotes the use of pre-qualified, socially responsible suppliers who align with social procurement principles and take proactive steps to identify and mitigate modern slavery risks within their supply chains. The University's *Procurement Policy and Procedure* requires staff to engage with existing vendors wherever feasible. These vendors have undergone onboarding and are provided with educational materials on modern slavery. This includes guidance on identifying indicators of modern slavery within their own supply chains, along with a University contact number to report any suspicions of modern slavery occurring within the University's operations or in their own supply chains.

The University holds its suppliers to the same high ethical standards, expecting them to conduct due diligence within their supply chains to identify and address modern slavery risks. Suppliers may be asked to provide information on their own risk assessments and the measures they have implemented to mitigate potential risks.

MODERN SLAVERY CONSIDERATIONS IN SUPPLIER TENDERING

When tendering for potential suppliers, the University employs comprehensive tender documentation incorporating a risk-reducing sourcing strategy. This process includes inquiries into:

- the supplier's modern slavery policies and supply chain transparency practices
- the availability of training programs or resources to support their own suppliers in improving compliance with the *Modern Slavery Act 2018 (Cth)*.

This approach enhances the University's ability to assess and understand potential modern slavery risks within suppliers' supply chains. Risk assessments consider key factors such as:

- industry and category type
- manufacturing locations
- the likelihood of modern slavery occurring within the supplier's supply chains.

RAISING CONCERNS OF SUSPECTED MODERN SLAVERY

The University has launched a **Modern Slavery Reporting tool**, accessible via the University's **Modern Slavery Statement** page and **Doing Business with La Trobe** pages. This tool allows both internal and external stakeholders to confidentially report concerns about modern slavery within the University's operations or supply chains.

If a report were submitted, the Executive Director, Procurement & Business Services would be required to initiate an investigation to address identified issues and safeguard vulnerable workers, ensuring they have access to appropriate grievance mechanisms. The investigation would include:

- engaging in discussions with relevant individuals within the supplier organisation
- requesting corrective actions to resolve concerns and protect at risk workers.

All discussions and actions taken would be documented for audit and reporting purposes to the Senior Executive Group and Corporate Governance, Risk, Internal Audit and Safety Committee.

5. ADDRESSING MODERN SLAVERY

5.1 PRIOR ACTIONS AND ONGOING COMMITMENT

Since the enactment of the *Modern Slavery Act 2018 (Cth)*, the University has implemented strategic measures to mitigate modern slavery risks within its operations and supply chains. These initiatives include refining policy, enhancing vendor qualification processes and regularly reviewing contract clauses to strengthen compliance.

The University expects its suppliers to uphold the same high ethical standards and to extend these requirements throughout their supply chains, ensuring compliance with relevant legislation. Through active sector-wide collaboration, the University continues to assess high-risk expenditure across both category and geographic levels to enhance risk management and due diligence efforts.

5.2 ACTIONS COMPLETED IN 2024

5.2.1 – REPORTS OF MODERN SLAVERY

While there were no formal reports to our Executive Director, Procurement and Business Services, of suspected modern slavery in the University's operations or supply chains in 2024, the University's Strategic Procurement team remains vigilant in assessing potential modern slavery risks in our supplier relationships. The University's ongoing actions include:

- regular assessments of new suppliers for modern slavery risks
- monthly checks of the **Australian Border Force Register of Sanctioned Sponsors List**, cross-referenced with our supplier list
- conducting desktop audits to verify suppliers' modern slavery policies, procedures and actions taken to identify and address modern slavery within their supply chains. These audits also include reviewing evidence of education and training on modern slavery, as well as sustainability certifications, working with children checks, insurances and progress on commitments to net zero.

In 2024, Strategic Procurement conducted two investigations related to modern slavery concerns:

INVESTIGATION 1: UYGHUR FORCED LABOR PREVENTION ACT ALERT

- In 2024, a previous modern slavery technology tool (FRDM) flagged a supplier as high risk due to potential links to entities on the **US Uyghur Forced Labor Prevention Act (UFLPA) Entity List**. AUPN University Anti-Slavery Program Manager identified four universities (one of which was La Trobe University) using the identified supplier. The University of Melbourne volunteered to investigate further with FRDM and the supplier on behalf of the four universities.
- The logistics companies Trans Union and Costco Shipping were identified as intermediaries.
- Data indicated no direct exchange of goods or services between the flagged supplier and sanctioned entities, with the issue mainly involving the logistics companies.
- The supplier confirmed that no transactions had occurred with the sanctioned entities.
- The investigation was closed with the conclusion that the risk associated with this supplier was low.
- This investigation highlighted the need to test high risk alerts; to investigate reports thoroughly to understand if there is a direct impact or a high risk by association.

INVESTIGATION 2: SANCTIONED SUPPLIER DUE DILIGENCE

- In October 2024, a Mildura hotel listed on the **Australian Border Force Register of Sanctioned Sponsors List** was flagged during the University's monthly due diligence checks. Given concerns that the sanction on the hotel could potentially involve University international students working for the entity, an investigation was initiated which included several outreach attempts:
- Multiple emails and phone calls were made to the hotel management.
- On 18 December, contact was finally made with the hotel manager, who indicated that the hotel was in the process of being sold, with new ownership commencing on 19 December. The manager was unable to provide details about the new owner. They did, however, share contact information for the previous owner. A follow-up communication was sent directly to the director of the entity that owned the hotel and was listed under the Australian Border Force Sanction. No response was received.
- The new owner contacted the University in January 2025 to confirm that the business had been sold and was under new management, with no links to the previous entity.
- The investigation was closed, as the sanctioned entity had sold the business. No further action was required, but the incident underscored the need for regular due diligence checks.
- These investigations reflect the University's continued commitment to rigorous monitoring, due diligence and addressing modern slavery risks across our supply chains. The University remains committed to maintaining transparency, protecting vulnerable workers, and ensuring our operations and partnerships are free from modern slavery practices.

5.2.2 – MIGRANT JUSTICE INSTITUTE

- The Migrant Justice Institute, in partnership with several community organisations, conducted a national survey targeting international students and other migrant workers in Australia. Supported by Universities Australia, all Australian universities were encouraged to promote participation.
- At La Trobe University, Senior Leadership actively facilitated engagement by promoting the National Temporary Migrant Work Survey through internal communication channels, ensuring it reached current and former international students. The survey aimed to:
 - > identify experiences of modern slavery indicators and other forms of workplace exploitation across various industries in Australia
 - > assess support needs and barriers
 - > evaluate international students' understanding of workplace rights.
- A total of 217 students who participated in the survey identified La Trobe University as their current education provider.
- With over 150 responses achieved, the University will receive a confidential summary of the findings, allowing for targeted actions to address inform future initiatives.

5.2.3 – SUPPLIER RELATIONSHIP MANAGEMENT

The University engages in regular discussions with our key internal and external stakeholders regarding supplier transparency and the potential risks of modern slavery within supply chains. We advocate for collaboration among industry leaders, similar to the collaboration universities engage in through the AUPN, to mitigate modern slavery risks across supply chains.

5.2.4 – STRATEGIC PROCUREMENT

In 2024:

- all Strategic Procurement and Procurement Operations team members completed the **UTS Anti-Slavery Australia eLearning course on Modern Slavery**
- team member participation in AUPN Modern Slavery Working Group and Modern Slavery Risk Groups
- ongoing modern slavery risk assessments of new vendors.

5.2.5 – POLICY, PROCEDURE AND GUIDELINES

The University regularly reviews and updates policy, procedure and guidelines to reflect its commitment to human rights principles, fostering a diverse and respectful learning environment and workplace. Key policies that reinforce our zero-tolerance approach to modern slavery and human trafficking include:

- **Public Interest (Whistleblower) Disclosure Policy**
- **Equity, Diversity and Inclusion (Staff) Policy**
- **Gender Equity Policy**
- **Student Charter**
- **Student Behaviours Policy**
- **Workplace Behaviours Policy**
- **Sexual Harm Prevention and Response Policy**
- **Sexual Harm Prevention and Response Procedure – DFAT Funded Program and Activities.**
- **Working with Children Policy**
- **Child Safety and Wellbeing Policy**
- **Code of Conduct.**

These commitments are communicated through staff and student induction, training and communication channels.

The University Policy Library is the sole authoritative source of all organisational policy documents for the University and is accessible to all staff and external suppliers via our public-facing website.



5.2.6 – SCHOLARSHIPS

LA TROBE HUMANITARIAN SCHOLARSHIPS:

La Trobe University remains committed to supporting individuals from refugee and asylum seeker backgrounds and values the significant contributions they make to the Australian community.

In 2023, the Commonwealth Government amended HECS-HELP criteria to extend access to certain students previously excluded. The introduction of the Resolution of Status (ROS) Visa now allows eligible students to apply for a Commonwealth Supported Place (CSP) and access HECS-HELP. However, students on bridging visas remain ineligible for this Commonwealth support.

Taking these changes into account, La Trobe University has renewed the Humanitarian Scholarships program for a further four years, through to 2028, with the following structure:

- two full-fee waiver scholarships with a \$5,000 annual stipend, available for students on eligible bridging visas or temporary humanitarian concern visas
- three stipend-only scholarships of \$5,000 annually, available for students holding a Resolution of Status (ROS) Visa.

These scholarships are designed to provide critical support to students commencing undergraduate studies and will ensure that the University continues to address the financial barriers faced by individuals from refugee and asylum seeker backgrounds.

La Trobe University is proud to champion access to education and equity for all students, regardless of their circumstances.

5.2.7 – OUR RESEARCHERS

Our researchers and teaching staff play a vital role in educating staff, students and the broader community on modern slavery and human rights through lectures, articles, webinars and books. They are committed to investigating, exposing and raising awareness of the harsh realities of modern slavery and exploitation across numerous industries.

One notable example is La Trobe University’s Centre for Human Security and Social Change (CHSSC) collaboration with the Australian Government-funded ASEAN-Australia Counter Trafficking program (ASEAN-ACT) that explores the intersection between disability and trafficking persons in Indonesia, the Philippines and Thailand.¹⁵

This research raises awareness about the exploitation of vulnerable individuals and provides regional level recommendations to help prevent trafficking of persons with disabilities; protection of victims; law enforcement and prosecution of crimes for trafficking in persons.

The La Trobe Asia team continues to play a vital role in raising awareness of human right issues through its **seminar program**. In 2024, University academics delivered presentations highlighting modern slavery, shedding light on the crimes and activities that threaten human rights. These initiatives reinforces the University’s commitment to combatting modern slavery and advocating for human rights protections.

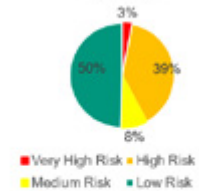
5.2.8 – AUSTRALIAN UNIVERSITIES PROCUREMENT NETWORK (AUPN) ANTI-SLAVERY PROGRAM

The University Procurement team continues the strong relationship with AUPN. Our Executive Director Procurement and Business Services is Co-Chair of the AUPN, and our Procurement Process and Projects Advisor is a member of the Modern Slavery Working Group attending the monthly forum groups and is also a member the Modern Slavery Risk Group.

The monthly University Anti-Slavery forum program key achievements for 2024 included:

- launch of the AUPN Modern Slavery SAQ Dashboard
- 33 universities submitted supplier spend data with a combined spend of \$12.8b and over 91,000 suppliers risk assessed¹⁶

Supplier Overall Risk Levels



2,807 suppliers across 33 participating universities are identified as very high risk

- a Risk Category Working Group was established; a sector category selected (Medical Equipment and Laboratory Supplies) and 72 suppliers were sent supplier assessment questionnaires (“SAQs”) for due diligence insights
- of those 72 SAQs sent, 47 suppliers completed the SAQs (22% of the category spend across the sector) – responses were scored via the AUPN Inherent Risk Assessment Tool
- responses revealed an overall lack of policies and controls:
 - > 33% of suppliers had not mapped and assessed risks across their supply chains
 - > 50% of supplier responses stated they don’t conduct supplier training
 - > limited number of suppliers conduct responsible sourcing audits
 - > there were a high number of responses indicating that they ‘were not aware of sourcing materials from countries at risk’ but answered yes to high-risk commodities within their supply chain.



- five suppliers were selected to pilot a collaborative remediation plan, based on their high-risk exposure, the number of universities they supply, their total SAQ scores, and the presence of an Australian headquarters
- universities have been paired with these suppliers to meet to discuss their scores and explore ways to support them in enhancing education, awareness and compliance
- the working group developed a remediation plan matrix, providing a structured approach for universities to help suppliers strengthen their processes and awareness while also establishing a framework to track year-on-year improvements in modern slavery compliance
- training: monthly University Modern Slavery Forum with expert guest speakers.
- monthly anti-slavery program update newsletters
- engagement with community and industries:
 - > AUSFOG Conference presentation
 - > Australian Red Cross
 - > Electronics Watch
 - > Telco Together
 - > SA Modern Slavery Network
 - > Anti-Slavery Australia
 - > Migrant Justice Institute
 - > ACRATH
 - > The Freedom Hub (real life impacts of modern slavery (Australian Survivor stories) and (best practice when engaging with suspected victims of modern slavery in a University setting)).

5.2.9 – NEXT STEPS

During 2025, the University aims to:

- as part of the Modern Slavery Awareness Initiative, a collaboration between ACRATH (Australian Catholic Religious Against the Trafficking of Humans), Flinders University, the University of South Australia, and the Attorney-General’s Department, the government-funded project ‘Educating for Change’ aims to:
 - > raise awareness of modern slavery
 - > upskill university staff to identify and respond to risks
 - > empower future frontline professionals in key sectors such as medicine, nursing, education, social work and law.
- the ACRATH project has developed six eLearning modules designed to educate University staff and students about modern slavery. In 2025, the University will make these modules available to key procurement staff and students preparing for frontline roles. The eLearning modules include:
 - Introduction to Modern Slavery (for both students and staff)
 - Modern Slavery in University Settings (for University staff)
 - Modern Slavery in Healthcare Settings
 - Modern Slavery in Social Work Settings
 - Modern Slavery in Legal and Criminal justice settings
 - Modern Slavery in School settings.

- the Strategic Procurement team remains committed to addressing modern slavery risks within the University’s operations and supply chains through the following initiatives:

- > will continue to enhance awareness and understanding of modern slavery, ESG principles, and ethical and sustainable procurement practices among targeted groups across the University.
- > we will review and enhance relevant policies to better identify and mitigate modern slavery risks
- > align and collaborate with other universities within the sector through the AUPN Anti-Slavery Working Group initiatives, including becoming an Electronics Watch affiliate. This partnership will support efforts to protect workers’ rights in electronics supply chains, while working alongside civil society monitor partners that are based in key electronics production regions
- > the Procurement team will strengthen collaboration with key suppliers and other universities to share knowledge and reduce duplication of supplier efforts – this collaboration aims to educate and empower suppliers to identify and address potential instances of modern slavery within their own supply chains

Through the implementation of these measures, the Strategic Procurement team will reaffirm its commitment to responsible and ethical procurement practices, reduce the risk of modern slavery, and strengthen the University’s focus on social responsibility and sustainability.

¹⁵ Jackson, E., Manlapaz, A. Saidah, C., & Sivathorn, A. (2024) “Exploring the intersection between disability and trafficking in persons in Indonesia, the Philippines, and Thailand”

¹⁶ University spend and risks were assessed via the AUPN Inherent Risk Assessment Tool

6. HOW THE UNIVERSITY ASSESSES THE EFFECTIVENESS OF ITS ACTIONS

In 2024, the University assessed the effectiveness of its actions in addressing modern slavery through several key measures:

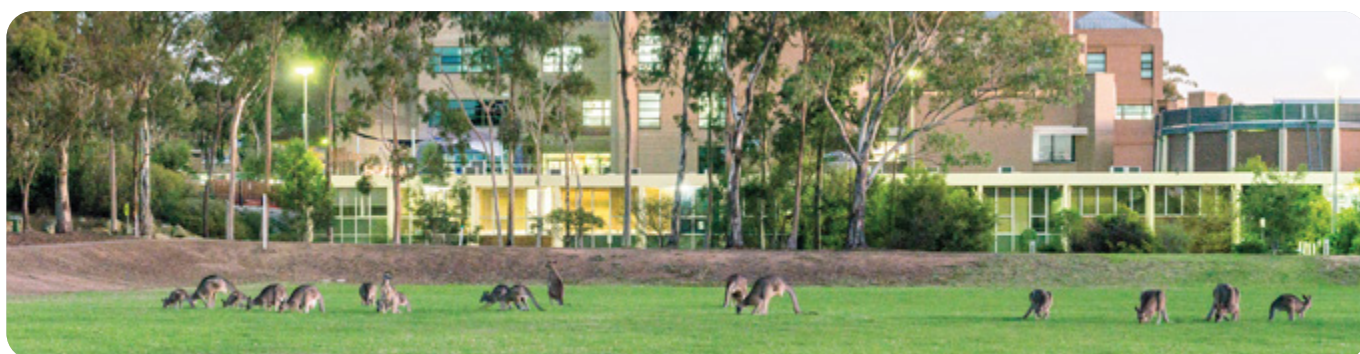
- **Regular monitoring and due diligence:** the University conducted regular assessments of suppliers through monthly cross-checks of suppliers against Australian Border Force Register of Sanctioned Sponsors and desktop audits to evaluate supplier's modern slavery policies, training and compliance measures.
- **Investigations and follow ups:** two notable investigations were undertaken:
 - **Uyghur Forced Labor Prevention Act Alert** – a supplier was flagged due to potential connections to entities on the US Uyghur Forced Labor Prevention Act (UFLPA) Entity List. A collaborative investigation with other universities confirmed there was no direct risk, demonstrating the effectiveness of thorough vetting.
 - **Sanctioned Supplier Due Diligence** – a Mildura hotel on the Australian Border Force Sanctions List was flagged, raising concerns about potential exploitation of international students. A follow-up investigation confirmed the hotel

had changed ownership, and no further action was required. However, this case reinforced the importance of regular due diligence checks.

- **Data and risk analysis:** the University participates in the AUPN sector-wide collaboration efforts using Sievo procurement analytics tools and the AUPN Anti-Slavery Dashboards to analyse and assess supply chain risks.
- **Supplier engagement:** the University promotes pre-qualified, socially responsible suppliers, requires modern slavery compliance in tendering processes and requiring suppliers to provide details about their supply chain transparency and any training or resources they offer their own suppliers.
- **Training and awareness:** Strategic Procurement, Procurement Operations staff and key stakeholders across the University complete modern slavery training. Strategic Procurement team member participated in the AUPN Modern Slavery Working Group and Modern Slavery Risk Group to stay updated on best practices.
- **Collaboration:** the University worked with external organisations (AUPN Risk category Working Group, Australian Red Cross, ACRATH and the Migrant Justice Institute) on projects to develop resources for

international students; participation in a national survey and a pilot Supplier Assessment Program on medical equipment and laboratory suppliers with next steps piloting remediation plans for a small group of identified high risk suppliers.

- **Student and staff engagement:** surveys like the Migrant Justice Institute's National Temporary Migrant Work Survey provides insights into student experiences, informing future initiatives and support services. The University provides a dedicated International Students and Work Rights in Australia website with employment rights information, and provides access to student wellbeing and legal support services.
- **Governance and reporting:** All modern slavery related investigations and supplier engagements are formerly documented and reported. The University's Modern Slavery Reporting Tool allows internal and external stakeholders to confidentially report concerns. University policies reinforce the University's zero-tolerance approach to modern slavery.
- **Through these measures,** the University continuously refines its approach to identifying, preventing and addressing modern slavery risks across its operations and supply chains.



UNIVERSITY'S COMPLIANCE MANAGEMENT FRAMEWORK AND RISK MANAGEMENT STRATEGY

The University's **Compliance Management Framework and Compliance Management Policy** reinforces its commitment to legislative compliance and establishes a structured approach to managing legal obligations.

The University Council prioritises risk management as a fundamental aspect of corporate governance and effective decision-making. Oversight of risk management and assurance activities is provided by the Corporate Governance, Risk, Internal Audit, and Safety Committee (CGRISRC).

If a report of suspected modern slavery is received by the Executive Director, Procurement and Business Services, it must be formally reported to the University Compliance Manager, along with any subsequent investigation findings.

ASSURANCE GROUP

The University Assurance Group is responsible for delivering key strategic and operational risk management programs.

Risk management is undertaken using a university adaptation of the Victorian Government Risk Management Framework and Australian and New Zealand Standard (AS/NZS ISO 31000:2018). Critical Incident Management and Business Continuity Management is undertaken in accordance with the Australian and New Zealand Standard for Business Continuity: Security and Resilience – Business Continuity Management Systems AS/NZS ISO 22301:2020 and the Australasian Inter-Service Incident Management System (AIIMS). Identification, assessment and progress on risk treatment is reported to management and CGRIASC at quarterly meetings.

FINANCIAL INVESTMENTS

The University's responsible investment framework is guided by clear objectives that align with its Investment Policy, which dictates the exclusion of certain products or services from investment portfolios if they do not align with the University's principles.

ONBOARDING ASSET TRANSFORMATION AND FACILITIES, ASSETS, AND SERVICES CONTRACTORS

Proposed partners of Asset Transformation and Facilities, Assets, and Services are required to provide comprehensive details within their quotation/tender submission regarding the measures implemented by their organisation to eliminate modern slavery practices within both their operations and supply chain. This must include a formal policy or statement, which should be uploaded to the University's contractor management system, Rapid. The Quality Team evaluates these submissions against key criteria, including commitment, actions undertaken, training initiatives and risk assessments within the organisation. Following this evaluation, the Quality Team assign a rating to the partner, which highlights areas requiring ongoing improvements. Furthermore, the Quality Team supplies partners with pertinent information, including the University's Modern Slavery Fact Sheet.



7. THE PROCESS OF CONSULTATION WITH UNIVERSITY ENTITIES

The Finance team consulted with the Director and Company Secretary of LTU Services Ltd and La Trobe Ltd regarding the structure and status of the entity. Neither LTU Services Ltd nor La Trobe Ltd had any revenue or assets in 2024 and are not required to report under the Modern Slavery Act 2018.

8. OTHER RELEVANT INFORMATION

NATIONAL TEMPORARY MIGRANT WORK SURVEY RESULTS

Given the significant participation of current and previous La Trobe University international students in the 2024 survey, the University will receive a tailored report from Migrant Justice Institute in April 2025 which will detail the survey findings. These findings will be used by the University to inform future initiatives, enhance support services for international students and strengthen our efforts in raising awareness of modern slavery and workplace exploitation.

The public report is expected to be released in July 2025.

9. APPROVAL

This Statement was approved by the University Council on 12 May 2025 [Council Ref no. #536]



(sgd)

Professor Theo Farrell
Vice-Chancellor and President
La Trobe University

Dated: 14-05-2025

CONTACT

La Trobe University
Victoria 3086 Australia

General enquiries
T +61 3 9479 1111
F +61 3 9478 5814