

# MODERN SLAVERY STATEMENT



THE UNIVERSITY OF  
NEWCASTLE  
AUSTRALIA

2022



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ABOUT THIS STATEMENT: This Modern Slavery Statement (Statement) is made in accordance with the Australian Modern Slavery Act 2018 (Cth). It applies to and describes the steps taken by the University of Newcastle (the University - ABN 15 736 576 735) in its entirety during the year ending 31st December 2022 to mitigate modern slavery within the University supply chains and other operations. It available to view on our website at [www.newcastle.edu.au](http://www.newcastle.edu.au)

# A MESSAGE FROM THE VICE-CHANCELLOR

## ACKNOWLEDGEMENT OF COUNTRY

The University of Newcastle acknowledges the Traditional Custodians of the lands on which our campuses are located - The Worimi nation and the Pambalong clan of the Awabakal nation (Newcastle) Darkinjung people (Central Coast) and the Gadigal clan of the Eora nation (Sydney). We pay respect to Elders past, present and emerging. We also acknowledge and pay respect to the other Aboriginal and Torres Strait Islander nations from which our students, staff and community are drawn.

## OUR APPROACH TO TACKLING MODERN SLAVERY

The University of Newcastle welcomes this opportunity to actively consider modern slavery and the efforts taken to assess and address the risks of modern slavery within our operations and supply chains. This Statement reflects the commitment of the University and its controlled entities to protect and respect human rights and reminds us of our capacity to reduce the impact of modern slavery within our sphere of influence.

Throughout 2022 the University of Newcastle has continued to work closely with the Australian University Procurement Network (AUPN) to ensure a coordinated approach to tackling complex modern slavery issues. Across the sector we have access to supplier risk ratings and alerts using aggregated data using supply chain risk management software.

During the year, 76 University staff completed Modern Slavery training through the University's new online procurement course. In 2023 Modern Slavery awareness training will be promoted to many more staff across the University. The University's Modern Slavery Working Group will be expanded in 2023 to ensure we are assessing a wide range of modern slavery risks. We will continue our involvement with the AUPN Modern Slavery Program.

We are guided by our values of excellence, equity, engagement and sustainability.

**Professor Alex Zelinsky AO**  
Vice-Chancellor and President, University of Newcastle  
March 2023



# INTRODUCTION

Modern slavery is a global issue affecting many industries and sectors, including higher education. In Australia, universities have been found to have supply chains that include goods and services from countries where slavery and exploitation are prevalent. This means that they may be at risk of supporting or benefiting from modern slavery practices.

Some of the specific risks in Australian universities include:

**Labor exploitation:** Universities may use contractors who engage in exploitative labor practices, such as paying workers below minimum wage or forcing them to work in hazardous conditions. Industries such as cleaning can be higher risk.

**Procurement of goods:** Universities may purchase goods and services from suppliers who engage in modern slavery practices, such as forced labor, debt bondage, or human trafficking. Such practices may be more difficult to detect if they are further down the supply chain.

**Student exploitation:** International students may be vulnerable to exploitation and abuse, such as being forced to work long hours for low pay or being housed in substandard accommodation. Domestic students may be vulnerable to working in high risk settings with sub-standard conditions and pay, or be asked to work for free within the university under the guise of volunteer work.

At the University of Newcastle, risks are identified through the Modern Slavery Working Group and actions designed to address areas of most risk. While many of the processes developed require further refinement, much has been done to strengthen our ability to detect and prevent modern slavery practices in our operations and supply chains.



# THE UNIVERSITY OF NEWCASTLE



**TOP 50**

university in the Asia-Pacific Region<sup>1</sup>



**RANKED 30TH**

in the world for impact<sup>2</sup>



**\$95 MILLION**

NUspace facility



**MORE THAN \$100  
MILLION**

invested into the Newcastle city campus over the past five years



**NO. 1**

university in Australia for industry collaboration<sup>3</sup>



**RANKED 12**

in the world for Good Health and Wellbeing<sup>4</sup>



**TOP 5**

in the world for Partnering for a Sustainable Future<sup>5</sup>



**RANKED 16**

in the world for Affordable and Clean Energy<sup>6</sup>



**3000+**

employer connections<sup>7</sup>

1 Times Higher Education Asia-Pacific University Rankings 2019 2 Times Higher Education Impact Rankings, 2022 3 Innovation Connections IC Report 2014 - 2020 4 Times Higher Education Impact Rankings 2022 5 Times Higher Education Impact Rankings 2022 6 Times Higher Education Impact Rankings 2022 7 The University of Newcastle Employability and Enterprise data

# STRUCTURE AND OPERATIONS

Since 1965, the University of Newcastle has delivered superior education and world-class research. We are Australia's largest provider of enabling programs, offering a range of alternate entry pathways to university for students from diverse backgrounds.

The University is one of the largest employers in the Hunter Region with staff coming from diverse professional and cultural backgrounds. We are a recognised Employer of Choice for Women.

The University's principal governing body is the Council. It is responsible for acting in the University's best interest and driving performance through strategy and stewardship. Council operates in accordance with the University of Newcastle Act 1989 and the University of Newcastle By-law 2017, which set out the powers and functions of the University and how these must be performed.

An Executive Committee ensure the implementation of the Strategic Plan and provides advice to the Vice-Chancellor on matters of operational significance.

## THE UNIVERSITY OF NEWCASTLE ORGANISATION CHART





We're ranked in the top 200 of the world's universities by QS World University Rankings. Our degrees are shaped around flexible and transferable skills, work placements and entrepreneurial opportunities.

Across our campuses in Newcastle, the Central Coast, Sydney and Singapore, the University of Newcastle enrolls more than 39,000 students from diverse backgrounds, with a focus on equity and developing the world's next generation of socially-oriented leaders, entrepreneurs and innovators.

We are fully committed to building on our strengths in Indigenous higher education, and providing a supportive space for our Indigenous students and communities.

## THE UNIVERSITY OPERATES ACROSS THE FOLLOWING LOCATIONS:

- Callaghan (Newcastle) NSW
- Newcastle City campus - NUspace & Honeysuckle
- Ourimbah, NSW
- Sydney, NSW
- Port Macquarie, NSW
- Gosford, NSW
- Singapore
- Orange, NSW
- Tamworth, NSW
- Taree, NSW
- Armidale, NSW
- Moree, NSW
- Coffs Harbour, NSW
- Upper Hunter, NSW

# OUR CONTROLLED ENTITIES

## THE UNIVERSITY OF NEWCASTLE RESEARCH ASSOCIATES LIMITED (TUNRA)

In 1969, the University formed The University of Newcastle Research Associates (TUNRA) as a vehicle to build and promote applied research opportunities for the University and industry. As a controlled entity of the University, TUNRA plays an important role in the University's strategy by further leveraging research capabilities and assets to create additional value for the institution.

In 2022 TUNRA reported an income of A\$10.7m.

## NEWCASTLE AUSTRALIA INSTITUTE OF HIGHER EDUCATION PTE LTD

Established as a controlled entity of the University in 2006, UON Singapore has continued to deliver and expand both its full-time and part-time programs. Our strong partnerships with leading local institutions provide our diverse range of local and international students access to a broad variety of professional networks when they graduate. Our researchers work with world-class organisations and institutions in the Singapore region and across the globe on research projects, research seminars, and faculty-specific collaborations.

In 2022 Newcastle Australia Institute of Higher Education Pte Ltd reported an income of A\$10.3m.

## THE UNIVERSITY OPERATES FOUR CONTROLLED ENTITIES

### NU SERVICES PTY LTD

NU Services Pty Ltd is a controlled entity of the University responsible for managing Student Services. The entity operates several cafés and a retail shop at the Ourimbah campus as well as a restaurant at the Callaghan campus.

In 2022 NU Services Pty Ltd reported an income of A\$2.0m.

### NEWCASTLE UNIVERSITY SPORT (NUSPORT)

NUsport manages the only Fitness Australia Quality Accredited Business in the region - The Forum.

Through its programs, facilities and network of affiliated clubs, NUsport is uniquely positioned to enhance the physical and mental wellbeing of the University's students, staff and wider community. In 2022 Newcastle University Sport adopted the University's Procurement Policy and reported an income of A\$5.9m.





# OUR ACHIEVEMENTS 2022

- Regular meetings of the University's Modern Slavery Working Group facilitated assessment of modern slavery impacts and improvement of prevention measures
- Employee training rolled out to key staff
- Strengthened new contracts and templates with Modern Slavery clauses incorporated into Services Agreements, Consultancy Agreements and Construction Contracts
- Benchmarked the Supplier Codes of conduct used by other universities and agencies to inform amendments to our Supplier Code of Conduct, Ethical Due Diligence Questionnaire, Domestic Trade Creditor Application Form and Purchase Order Terms and Conditions
- Collaborated through membership with the Australian Universities Procurement Network providing leverage to better identify Modern Slavery risks within our supply chain
- Uptake of FRDM software allowed a risk analysis solution with quick access to information about supplier risk, industry alerts and country risk



# HUMAN RIGHTS AT THE UNIVERSITY

The University embeds a respect for human rights into key policies and processes. We are committed to ethical practice, widening participation, promoting diversity and fairness, overcoming injustice and increasing success for all. The University's Diversity and Inclusiveness Policy demonstrates the University's commitment to condemn any unwelcome or unfair treatment.

When making decisions on behalf of the University, the 'standard for judgement' lies in the Ethical Framework rather than the personal beliefs of any individual.

Principles within the Ethical Framework provide the standard of judgement against which to test the quality of decisions. In realising the University's vision and giving effect to its values we:

- act on the basis of sound reasons, solid evidence and impartial judgement;
- aim to do good and minimise harm;
- aspire to deserve the trust and good opinion of the communities we serve as a university;
- be accountable for our choices;
- do what we say we will do;
- maintain the sustainability of our institution;
- promote safety and wellbeing; and
- respect the intrinsic dignity of people.

The University supports the fair and equitable treatment of people throughout its supply chain via activity that incorporates social, human rights, and environmental considerations into how we do business.

Suppliers are asked to ensure that all reasonable efforts are made to eliminate child labour, forced labour, exploitation of workers and/or associated deceptive practices in recruitment.

University investments are governed by an Environmental, Social and Corporate Governance (ESG) framework.

The University Council is responsible and accountable to ensure compliance with policies and processes, which are then formally delegated through the Executive structure.

The University of Newcastle's Human Research Ethics Committee (HREC) has responsibility for reviewing the ethical acceptability of human research and ensuring compliance with regulatory and legislative requirements, as well as University policies relating to human research.

Risk mitigation is led by the Delegation of Authority which ensures that only those with appropriate delegation can make changes to any processes.

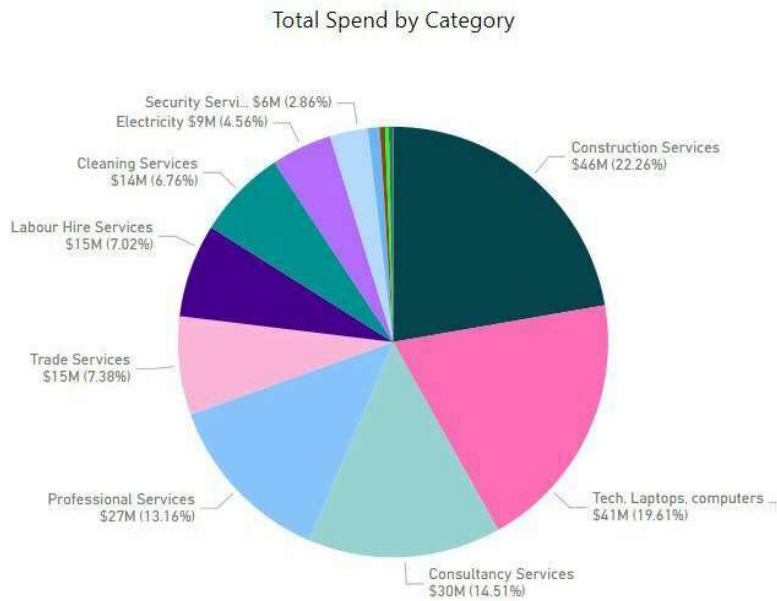


# SUPPLY CHAIN

## OVERVIEW

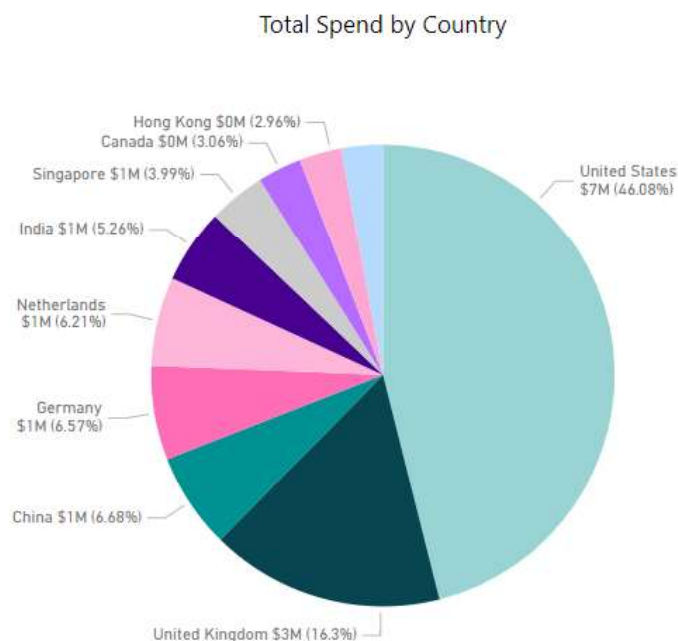
The University of Newcastle and its controlled entities engaged directly with **3,128** trade creditors (suppliers) in 2022, of which 522 were based outside of Australia.

Suppliers were assessed for risk of modern slavery by utilising the Global Slavery Index to the yearly data. The total non-salary spend for 2022 was **\$303.6 million**.



Our 2022 spend data highlights that 625 suppliers make up 83% of total University spend on third party goods and services. Risk analysis was conducted on the University's suppliers based on total spend, found that 94% of the third party goods and services sourced were provided by suppliers whose country of origin is Australia.

The image below illustrates the country of origin of the remaining 6% of tier one suppliers located **outside Australia**:



# RISKS AND IMPACTS

## ORIGIN OF COUNTRY RISK TO OUR SUPPLY CHAIN

The University of Newcastle acknowledges that it is likely to be exposed to some level of modern slavery risk in its supply chains - millions of people in the Asia Pacific are engaged in forced labour as an example of our potential exposure.

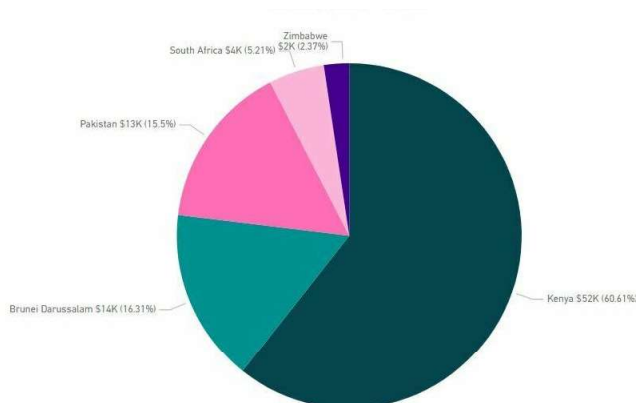
Based on our analysis, **96%** of the University spend on third party goods and services is with suppliers based in low-risk countries, as defined by Global Slavery Index. This includes the Australian-based suppliers and the one third of suppliers from non-Australian countries that are categorised as low risk.

The majority of the University's suppliers have Australian-based subsidiaries with whom we deal directly. As a result, a high percentage of our direct sourcing is conducted within Australia.



Of the \$18 million spent internationally, just \$85k was spent across countries categorised as extreme risk as defined by Global Slavery Index - those countries are South Africa, Zimbabwe, Kenya, Pakistan and Brunei Darussalam.

The majority (\$52k) of the \$85k spent in extreme risk countries was with five entities in Kenya.



# RISKS AND IMPACTS

## PRODUCT RISK IN OUR SUPPLY CHAIN

- 3128 SUPPLIERS
- 94% OF GOODS AND SERVICES PURCHASED IN AUSTRALIA
- 96% OF SPEND IN LOW-RISK COUNTRIES



### PRODUCTS IN THE EXTREME-RISK CATEGORY INCLUDE:

- Tech laptops and mobile phones - \$41m spend
- Clothing and apparel - \$1m spend

Only \$3m of this spent internationally.

### PRODUCTS IN THE HIGH-RISK CATEGORY INCLUDE:

- Construction services \$46m spend
- Cleaning \$14m spend

Only \$45k of this spent internationally.

# SUPPLIER ANALYSIS - CONTROLLED ENTITY

## NUSERVICES PTY LTD



Our controlled entities are also committed to detecting and addressing modern slavery risk in their supply chains. For significant procurement activities, they follow University procedures.

Below is some analysis of supply chain risk assessment undertaken by the controlled entity, NUServices Pty Ltd. NUServices manages on-campus commercial activities, campus services and amenities (such as food services and dining).

In 2022 NUServices procured \$311,000 worth of goods and services. Supply chain analysis revealed that 91% of this was sourced from low-risk countries (almost exclusively Australia). The remaining nine per cent of the 2022 spend was with two suppliers based in China - a country assessed to be at a higher risk for forced labour.

When undertaking direct procurement from suppliers in high-risk or extreme-risk countries and/or products in high-risk or extreme-risk categories, NUServices look for the following supplier accreditations when undertaking due diligence:

**SGS Certification:** The SGS certification process involves factory inspections and can be relied upon to verify claims made by overseas suppliers. SGS certification ensures adequate standards of working conditions have been met.

**ISO 45001 Certification:** A company that demonstrates they have held ISO45001 certification over a long period of time (several years or more) demonstrates a commitment to adequate work conditions with zero tolerance for slavery-like conditions, forced labour, or child labour.

**SAI SA8000 Certification:** SA8000 is one of the world's leading social certification programs. The standard and the rigorous certification program provides a framework for suppliers to conduct business in a way that is fair and decent for workers. SA8000 Certification ensures a supplier is compliant with International Labour Organisation (ILO) conventions and international human rights law as set out in the UN Declaration of Human Rights.

# MITIGATION

## APPROACH TO MANAGING RISKS

The University employs a range of controls to manage any potential or actual risks of Modern Slavery within both its operations and supply chain.

### Policy and Procedure

The policies and procedures are available to all staff and relevant training is provided where responsible parties are directly involved and accountable.

POLICY/PROCEDURE	PURPOSE
Code of Conduct	Sets behavioural expectations including ethical and moral obligations.
Enterprise Agreements (EA's)	The University has two EA's to ensure lawful workplace obligations are met (Professional Staff and Academic Staff).
Procurement Policy	Contains ethical and moral obligations that must be met when procuring goods and services on behalf of the University.
Complaint and Grievance Policy	The policy establishes how the University will manage and assess formal complaints and grievances.
Ethical Framework	To guide and support decision-making at all levels. It is intended to be a 'compass' for navigating the University's complex ethical landscape.
Engagement of Contractors and Consultants Procedure	The procedure sets out risk mitigation strategies when engaging contractors and consultants.
Risk Management Policy	The policy sets out the University's commitment to risk management and outlines key roles and responsibilities.
Public Interest Disclosure Policy	Provides a framework for receiving, assessing and reporting breaches of Modern Slavery (amongst others).

### Probity Principles

University staff are required to consider the following through all stages of the procurement process:

- Open competitive process
- Fairness, consistency and transparency
- Identification and resolution of conflicts of interest
- Accountable decision making
- Monitoring and evaluating performance

### Contract Clauses

The University has embedded Modern Slavery compliance into its standard contracts.

Following is an excerpt of a modern slavery clause in contracts for the procurement of goods and/or services.

#### Compliance

The Supplier must ensure that:

- (a) in performing its obligations in connection with this document, the Supplier and its Representatives:
- (i) do not engage in any conduct or omission which may contravene any Modern Slavery Laws; and
  - (ii) comply with any University Policies relating to modern slavery;
- (b) it does all things required or necessary to mitigate or reduce modern slavery risks in its operations and supply chains and stay in compliance with all applicable Modern Slavery Laws; and
- (c) the terms of the contractual commitment entered into with any personnel engaged by the Supplier to provide goods or services in connection with this Agreement, permit termination of commitments where the Supplier has reasonable grounds to believe there has been or is likely to be a breach of any applicable Modern Slavery Laws.

#### Obligations

The Supplier must:

- (a) promptly notify the University if it becomes aware of a possible, potential, suspected or actual breach by it or its Representatives of any Modern Slavery Laws;
- (b) cooperate in good faith with the University in investigating the circumstances relevant to any possible, potential, suspected or actual breach of any Modern Slavery Laws, whether or not notification has been given under clause (a);
- (c) give assistance and access to the agreements and the Supplier Representative as the University may reasonably require under clause 43.3 and must provide (at the Supplier's cost) all reasonable assistance (including the provision of information) to the University to allow the University to comply with its obligations under the Modern Slavery Laws;
- (d) establish and maintain policies and procedures to ensure that the Supplier and the Supplier Representative comply with the obligations set out in this clause 43. The Supplier must ensure that its policies and procedures as contemplated in this clause (d) contain requirements that training will be provided to the Supplier Representative, as the case may be, in relation to the matters addressed by those policies and procedures; and
- (e) require its suppliers to implement their own binding guidelines for ethical behaviour and compliance with Modern Slavery Laws.

## Suspected breach

If the University has reasonable grounds to suspect a past, present or potential breach by a Supplier or its Representatives of any applicable Modern Slavery Laws or any University policies relating to modern slavery, in connection with this Agreement, the University may give notice to the Supplier requiring an explanation, copies of agreements, and access (for the purposes of interview by internal or external lawyers) to the Supplier's Representatives.

## Engaging consultants

Standard contracts for consultants include Modern Slavery clauses:

### 1.1 Warranties

The Consultant warrants that it and its Personnel:

- (a) have the full knowledge of and resources needed to comply with Modern Slavery Laws;
- (b) have not been convicted of an offence involving slavery or human trafficking;
- (c) will comply with the Modern Slavery Laws; and
- (d) will do everything needed to assist the University to comply with the Modern Slavery Laws, including providing the University with all information it requires to fulfil its reporting obligations under those laws.

### 1.2 Modern Slavery Breaches

(a) In performing this Contract, the Consultant must:

- (i) not violate a Modern Slavery Law; or
- (ii) place the University in breach or potential breach of a Modern Slavery Law;
- (iii) have in place policies and procedures and undertake due diligence to ensure the Consultant's compliance with the Modern Slavery Laws and ensure that its Personnel do likewise; and
- (iv) ensure that all relevant subcontracts and supply contracts include terms no less onerous than those included in this clause.

(b) If the Consultant becomes aware of anything that does or could put a party or its Personnel in breach of a Modern Slavery Law, it must immediately:

- (i) notify the University in writing of all relevant facts;
- (ii) respond promptly to all questions asked and requests for information made by or on behalf of the University in respect of the Consultant's compliance with its obligations under this clause and the Modern Slavery Laws; and
- (iii) provide the University with all assistance required by the University to ensure compliance with Modern Slavery Laws and to minimise the effects of the event.

(c) If directed to do so by the University, a senior executive of the Consultant in a position to know all relevant facts must immediately execute and provide to the University a statutory declaration confirming the Consultant's compliance with this clause.

## Australian University Procurement Network - Modern Slavery Working Group

The University collaborates with the sector through the Modern Slavery Working Group (MSWG) within the Australian Universities Procurement Network (AUPN). The AUPN supports 35 member universities to meet the challenge of human rights transparency and risk management in their supply chains and contribute to the fulfillment of members' reporting requirements to the Modern Slavery Act 2018 (Cth).

The AUPN is developing a self-assessment questionnaire that any single university can send to a supplier with the response and risk rating available to all universities. This reduces the volume of work on the suppliers behalf in completing multiple questionnaires. The University of Newcastle will incorporate these into its procurement processes to reduce workload within the University and across the sector whilst reducing burden on suppliers.

The sector approach provides member universities with an efficient and effective means of identifying and actioning modern slavery risks through their supply chains.

The sector-wide program aims to deliver:

- a collection and aggregation of sector procurement data;
- a solution that allows members to identify risk, focus resources and inform action – supported by a third-party technology enablement solution (FRDM);
- a sector approach/action plan for addressing, mitigating and/or remediating identified risks;
- flexible templates and guidance; and
- continuous improvement.

## Volunteering by students

Students can volunteer on campus as a Uni Crew Volunteer, welcoming new students or assisting at graduation ceremonies and other events. Systems are in place to ensure no person at the University engages these student volunteers to do work as a substitute for providing paid work complying with National Employment Standards.

Students can also be referred to well-regarded organisations and opportunities in the community that have been vetted for appropriate standards and practices.



# SUPPORT FOR INTERNATIONAL STUDENTS

International students are a group at elevated risk of being exploited in a workplace.

International Student Support (ISS) provide critical information to students through the Orientation and Onboarding program and there are many other communications to new international students.

Online Pre-Arrival learning modules were developed in 2022 and are being rolled out for the first time in Semester One 2023. These include information regarding work rights in Australia.

ISS partner with the Careers Service and other external agencies to ensure international students are supported throughout the student journey while in Australia.

The International Student Drop-in Centre is operational at The House, at the Callaghan Campus.

Further information is provided in the University's Before You Leave information page covering workers' rights. The information provided to students reaffirms to students that the Australian system is governed by Awards and where to go to get help.

## Key Areas:

- Avoiding cash-in-hand work
- Regulatory Framework - Awards
- Superannuation
- Tax File Numbers and Tax Returns
- International Student Ombudsman
- Reputable job seeking sites
- Fair Work Ombudsman



# RESPONSIBLE INVESTING

## OUR APPROACH

The University of Newcastle is committed to responsible investment. The University's investment strategy is governed by an Environmental, Social and Corporate Governance (ESG) framework. All amounts invested are invested in a manner consistent with this Framework and in accordance with the University's Ethical Framework and Environmental Sustainability Plan as set out in the University's Investment Policy.

The University seeks to understand any material ESG risks embedded in its investments and manage them accordingly.

Mercer is the University's fund manager and undertakes activities to ensure compliance and progress with the ESG objectives set by University's Finance Committee.

Mercer's approach to assessing and addressing modern slavery risks includes:

- avoiding causing or contributing to modern slavery through its investment activities;
- seeking to assess and address modern slavery risk linked to its investment practices, through its appointed investment managers and in the portfolio; and
- providing appropriate access to remedy if there are any instances where Mercer's investments or linked entities are found to have caused or contributed to modern slavery (Mercer state that they expect to apply their influence to encourage proper access to remedy).

During the latest ESG review completed by Mercer, no modern slavery breaches were identified in the University's investments.

Mercer analyses its listed equity and corporate credit funds for any red flag incidents in relation to modern slavery (as aligned to the Principles of the UN Global Compact regarding forced labour and child labour). There were no holdings with red flag incidents found in any of the Mercer Funds in 2022.



# PREVENTION

**THE UNIVERSITY TAKES A MULTILAYERED APPROACH TO PREVENT ANY BREACHES OF THE MODERN SLAVERY ACT TO ENSURE WE CONTRIBUTE POSITIVELY TO THE ERADICATION GLOBALLY.**



## OBJECTIVES

- Building collaborative partnerships
- Risk based engagement
- Recognising power to influence
- Supplier onboarding
- Collaboration and stakeholder engagement

- Open and direct communication
- Awareness raising
- Impacting sphere of influence

- Mapping supply chain risks
- Monitoring supplier chain
- Benefits from supply chain risk management software

- Policy and processes
- Timely response
- Mitigation and remediation

# DUE DILIGENCE

Due Diligence is a cornerstone of the University's Risk Framework and is incorporated into all we do across the business. The University considers how it may cause, contribute to, or be directly linked to modern slavery practices and its ongoing risk management process of human rights diligence aims to identify, prevent and mitigate adverse impacts.

## University Policy and Procedures

- FRDM - offers a risk assessment solution relevant to the University's supply chain for products, countries, industries, and suppliers. It allows the University to stay on top of risk through data visualisations, reports, and alerts.
- Policy / Process - continuous reviews of policy and procedure ensures alignment with outcomes relevant to modern slavery obligations.
- Enterprise Agreements - ensure our staff are not impacted by Modern Slavery, unfair work practices, conditions or environments.
- Code of Conduct - ensures compliance with ethical standards, legal obligations and other University expectations and commitments.

## Suppliers

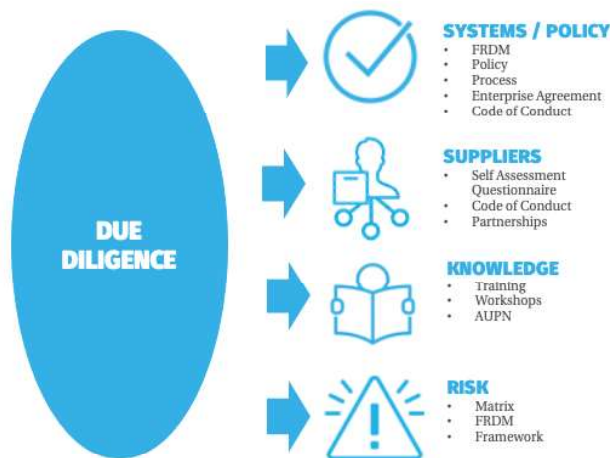
- Self-Assessment Questionnaires - allows suppliers to identify any real or potential breaches of Modern Slavery Act.
- Code of Conduct for Suppliers - helps to ensure they abide by the University's expectations.
- Partnerships - the University works with its suppliers to identify any breaches and continues to work with them to mitigate any risks collaboratively.

## Knowledge

- Training - staff can undertake training to equip them to identify and respond to modern slavery risk.
- Training - modern slavery training is offered to all staff who procure goods on behalf of the University.
- International students are informed of modern slavery related risks and are aware of support services available to reduce their risk of exploitation.
- AUPN - collaborative engagement occurs to address any potential or real risks.

## Risk

- Risk Profiles - modern slavery compliance risk is outlined within the Operational Risk Profile for Strategic Procurement. Risk events and associated controls to be identified and documented across all Divisions and Colleges as relevant.
- FRDM - allows greater visibility of end-to-end supply chains to identify possible risks.



# SUPPLIER CODE OF CONDUCT

The University is committed to understanding and managing social, ethical and environmental issues along its supply chain in a responsible manner. The Supplier Code of Conduct outlines the minimum terms and conditions of doing business with the University.

The Supplier Code of Conduct is mandatory for all suppliers, including:

- construction vendors;
- ICT vendors;
- research vendors and partners including those subject to a Funding Agreement; and
- all procurement vendors.

The University requires these suppliers to comply with the standards set out in the Code and to work with the University to assess and manage compliance in their supply chain.

The Code is based on the University's own Ethical Framework and the Ethical Trading Initiative (ETI) Base Code.

Contractors working for the University, have reporting channels available under the University's Public Interest Disclosure Policy, and the Independent Commission Against Corruption (ICAC) in instances of actual or suspected fraud, corruption, misconduct or maladministration.



## SOME KEY FEATURES OF THE SUPPLIER CODE OF CONDUCT

Employment is freely chosen

Freedom of association and the right to collective bargaining are respected

Working conditions are safe and hygienic

Child labour is not used

Living wages are paid

Working hours are not excessive

No harsh or inhumane treatment is used

# GRIEVANCE MECHANISMS AND REMEDIATION

## GRIEVANCE

The University has a strong grievance framework for the reporting of any suspected breaches relating to Modern Slavery incorporating:

- Complaint Management Framework
- Complaint Management Policy and Complaint Management Procedure
- Public Interest Disclosure Form – as per Public Interest Disclosures Act 1994
- Breach Reporting Function through Legal and Compliance
- Support mechanisms

## REMEDiation

The University remains committed to providing remediation to any identified potential or actual breaches of the Modern Slavery Act 2018 (Cth) in an open and transparent manner to ensure that appropriate action has been taken to eliminate future breaches.

Remedying or counteracting negative human rights impacts may include apologies, termination of relationship or contract, or efforts to ensure non-repetition and similar future occurrences.

The University will provide for, or cooperate in, remediation where the University has caused or contributed to an adverse impact. It is expected that internal teams responsible for the University complaints/grievance frameworks (eg. Legal and Compliance, Governance) will lead complex remediation.

Where the University is directly linked to modern slavery practice, the next actions will depend on factors such as:

- leverage over the entity concerned;
- how crucial the relationship is;
- severity of the impact (victim focused);
- the risk appetite of the University; and/or
- whether termination of the relationship will potentially create adverse human rights impacts.



# ASSESSING EFFECTIVENESS

The University is focused on continuous improvement. An integral component of this cycle is assessing the effectiveness of our actions.

ACTIVITY	PERFORMANCE MEASURE	IN PLACE	UNDER DEVELOPMENT
Modern Slavery awareness training	Completion rate - for staff in Procurement and associated roles and other relevant staff	X	
Review of all policies relevant to Modern Slavery	Modern Slavery information is within relevant policy documents and status is current / recently reviewed		X
Modern Slavery awareness across the University	Risk Profiles for Colleges and Divisions identify Modern Slavery risk events and associated controls where relevant		X
Risk Mitigation - Supplier risk	Supplier onboarding undertaken; FRDM scores checked and/or self assessment questionnaires completed		X
Stakeholder engagement	Increased participation in Modern Slavery Group - new members including Human Resource Services. Increased collaboration with Controlled Entities		X
Clauses and provisions in Contracts	Incorporating specific Modern Slavery clauses into all contractual templates	X	
Modern Slavery embedded into procurement processes	Procurement workflows and records reflect appropriate steps	X	
Sector benchmarking and collaboration	Participation in AUPN	X	
Supplier Code of Conduct	Developed and embedded in process	X	
Grievance mechanisms	Complaints Management Framework includes multiple safe avenues for concerns to be raised by stakeholders	X	
Regular reporting - supplier information and risk	Upload University data to FRDM for inclusion in supplier reports for sector produced via AUPN Modern Slavery Program	X	
Introducing shared Supplier Self Assessment Questionnaires through AUPN	Proportion of questionnaires returned. Reasons for non-completed questionnaires with follow-up undertaken where potential concerns identified.		X

# LOOKING AHEAD

## IMPROVING OUR RESPONSE TO MODERN SLAVERY WILL INVOLVE:

- further scoping of high risk products and industries;
- making sure all the right people are involved;
- ensuring goods and services align with workers' pay and assessing volunteer roles;
- promoting grievance mechanisms;
- working with suppliers;
- embedding modern slavery response across business practice;
- engaging with senior leadership and other stakeholders; and
- promoting and enhancing University-wide awareness.



## WORK TO BE DONE IN 2023:

Continue uploading spend data to support the AUPN's Modern Slavery Program

Commence use of the AUPN Supplier Self Assessment Questionnaires to be imbedded in relevant procurement workflows to improve risk assessment of suppliers

Ongoing review to further strengthen documents such as Supplier Code of Conduct, Ethical Due Diligence Questionnaire, Domestic Trade Creditor Application form, Purchase Order Terms and Conditions and other contract clauses relevant to Modern Slavery where relevant

Increase membership of the University's Modern Slavery Working Group to enhance capacity to assess risks and implement preventive strategies related to workforce and employment practices and any vulnerable student groups

Review training needs of relevant staff to determine need for a stand-alone e-learning module (independent of the procurement module) and/or wider roll-out of existing module

Increase collaboration between Modern Slavery Working Group and the controlled entities to help identify and assess risks through learnings from AUPN



# VERSION HISTORY

VERSION	EDIT	DATE	APPROVED BY
1	Document Creation	22/03/2023	Council

This statement was approved by the University Council and signed by:



Professor Alex Zelinsky AO | Vice-Chancellor and President  
12 May 2023

We value all feedback. Please forward any comments on this statement or requests for additional information to [strategicprocurement@newcastle.edu.au](mailto:strategicprocurement@newcastle.edu.au)  
This statement has been endorsed by the University of Newcastle's Council.



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