

WESTERN SYDNEY  
UNIVERSITY



# MODERN SLAVERY STATEMENT

JANUARY 2022–DECEMBER 2022

# ACKNOWLEDGEMENT OF COUNTRY

Western Sydney University acknowledges the peoples of the Darug, Tharawal, Eora and Wiradjuri Nations. We acknowledge that the teaching, learning and research undertaken across our campuses continues the teaching, learning and research that has occurred on these lands for tens of thousands of years.



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# MESSAGE FROM OUR CHANCELLOR AND VICE-CHANCELLOR



**We are pleased to present the Modern Slavery Statement for Western Sydney University (WSU) and its entities for the year ending 31 December 2022. The Statement has been prepared and delivered in accordance with the requirements and criteria of the *Modern Slavery Act 2018 (Cth)*.**

Approved by the University’s Board of Trustees on 13 June 2023, this represents our third annual Modern Slavery Statement, setting out the actions that Western Sydney University has taken to reduce the risk of modern slavery occurring within our business and supply chains.

Our efforts to combat modern slavery are founded on the fundamental principle of respect for the dignity of every human life. We are committed to improving the well-being and security of all individuals and have zero tolerance for practices and standards that compromise or exploit the basic human rights of integrity, safety and advancement.

As a leading educational institution deeply embedded in the Greater Western Sydney region, and with international campuses and with international students, our actions are guided by our purpose – that our students will succeed, our research will have impact and our communities will thrive through our commitment to excellence, sustainability, equity, transformation and connectedness – and our dedication to ensuring that people who interact with us are treated with dignity and respect.

The COVID-19 pandemic, international conflicts and resulting migration have fuelled further crises of inequality and forced labour with 10 million more people globally estimated to be in modern slavery in 2021 compared with 2016.

As signatories to the United Nations’ Sustainable Development Goals, in which SDG 8 promotes decent work and economic growth, and through our Decadal Strategy, Sustainability and Resilience 2030, we are committed to prioritising anti-slavery actions and continuously improving our practices to address evolving risks to human rights.

Our focus in 2022 was to establish a strong foundation of practice based on relevant policies and frameworks that assess and respond to modern slavery whilst building knowledge across the University. Key initiatives included:

- developing our Modern Slavery Prevention Policy to strengthen and guide all employees in identifying incidents and addressing risks of modern slavery in our operations and supply chains
- building awareness of our procurement personnel who are key sourcing decision makers
- incorporating provisions on modern slavery into our contractual documents, and
- conducting a risk assessment of our supply chains in partnership with the Australian University Procurement Network (AUPN).

Looking ahead, our priorities will be to focus on ensuring continual improvement and applying the appropriate risk management approaches needed to identify and address any instances of modern slavery. We remain committed to taking meaningful steps to ensure that the protection and wellbeing of all people working in our operations and throughout our supply chains is maintained.

**Professor Jennifer Westacott AO**  
Chancellor  
Western Sydney University

**Professor Barney Glover AO**  
Vice-Chancellor and President  
Western Sydney University

# STATEMENT ON REPORTING ENTITY

## Reporting Entities

This is Western Sydney University's Modern Slavery Statement which has been prepared in accordance with the mandatory reporting requirements of the *Modern Slavery Act 2018* (the Act) for the period 01 January 2022 to 31 December 2022. This is our third statement and is made on behalf of Western Sydney University (ABN 53 014 069 881) (WSU), and its controlled entities, herein referred to collectively as we, us, our or the University, which include:

- Whitlam Institute within Western Sydney University (ABN/ACN 50 100 342 309)
- Whitlam Institute within Western Sydney University Trust (ABN/ACN 42 247 216 279)
- Western Sydney University Enterprises Pty Limited trading as Western Sydney University – The College (ABN/ACN 44 003 474 468)
- Western Sydney University Early Learning Limited (ABN/ACN 39 155 993 445)
- Western Growth Developments (Parramatta Innovation Hub) Pty Ltd (ABN/ACN 626 590 029)
- Western Growth Developments (Westmead) Pty Limited (ABN/ACN 625 406 411)

## Principal governing body approval

This Modern Slavery Statement was approved on 13 June 2023 by the Board of Trustees of Western Sydney University, as defined by the Modern Slavery Act 2018 (Cth) (the Act).



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*“Modern slavery”* is defined as the serious exploitation of people through coercion, threats or deception which exploits, undermines or deprives them of their freedom.

**We do not tolerate any form of forced labour**

Our approach to responding to modern slavery risks is underpinned by our values and commitment to the community in a wider global context. Western Sydney University respects the dignity, wellbeing and human rights of its employees, workers in its supply chains, and the communities in which the University operates or from which it sources products and services.



# INTRODUCTION

Western Sydney University’s (WSU) strategic plan, *Sustaining Success 2021-2026*, makes clear the values that underpin the core operations of Western Sydney University, namely education, research, scholarship, innovation and service.

*Sustaining Success 2021–2026* is framed by the values of boldness, fairness, integrity and excellence. These values define the University and what we do. The realisation of these values is guided by the principles of sustainability, equity, transformation and connectedness.

## Sustainable development goals

Western Sydney University’s Decadal Strategy, *Sustainability and Resilience 2030*, was developed to support the 17 Sustainable Development Goals (SDGs) adopted by the United Nations, and recognises our contribution and impact in a wider global context. The initiatives and actions implemented by Western Sydney University to continually identify, assess and address the risk of modern slavery in our operations and supply chains are based on our guiding principles, and reflect our deep commitment to supporting the United Nations’ Sustainable Development Goals (UN SDG), specifically SDG 8.7 which calls for the end of trafficking and modern slavery. Western Sydney University champions all SDGs through our shared engagement model, through our internal and outreach programs, our operational plan, our research and our campus operations.



# OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

## Who we are – Our operations

Western Sydney University is a multi-campus, student-focused and research-led university located in Greater Western Sydney. Our principal operations are the provision of tertiary level education and research through a wide range of undergraduate and postgraduate courses and research programs, with a particular focus on students of western Sydney.

Western Sydney University is a statutory corporation established under the *Western Sydney University Act 1997*. The University operates under this Act and the associated *Western Sydney University By-law 2017*.

The Vice-Chancellor is the University President and CEO, responsible for managing all academic and administrative areas of the University.



## WESTERN SYDNEY UNIVERSITY AT A GLANCE



**47,141 students**  
**8,205 international students**  
**38,936 domestic students**



**3,142 employees**  
**1,456 academic staff**  
**1,686 professional staff**

**3400+ suppliers**



**12 campuses**  
**11 domestic campuses**  
**1 international campus**



**392 courses**  
**3,334 publications**



**339 international partners**



## Other activities

### COMMERCIAL FUNCTIONS

We undertake commercial development of University facilities, resources and/or real property to contribute to the advancement and growth of Greater Western Sydney.

### REVENUE GENERATION

We undertake activities to generate revenue to contribute to the funding of the University's objective to be a research-led educational institution and for the provision of carrying out its operations.

### INTERNATIONAL OPERATIONS

We undertake activities as part of our internationalisation agenda via international education and building international partnerships.

### LEASING PROPERTY

We lease office and retail space to local businesses, including retail shops, commercial and other facilities within our various campuses.

## Our entities and its operations

The University's controlled entities undertake specific activities aligned with the mission of the University as outlined below:

### THE WHITLAM INSTITUTE

The Whitlam Institute of Western Sydney University is a public policy institute that commemorates, and is inspired by, the life and work of the Hon Gough Whitlam AC QC. The Institute delivers policy research and programs that promote common ground, inclusive national identity, and civic engagement for all Australians. The Institute includes the Whitlam Prime Ministerial Collection, the historic Female Orphan School, and the Whitlam Prime Ministerial Home in Cabramatta.

### WESTERN SYDNEY UNIVERSITY – THE COLLEGE

Western Sydney University – The College provides students with high quality academic pathways to further their studies at Western Sydney University through University preparation and diploma programs. The English Language Centre offers language proficiency training and testing services, while vocational programs are offered by The College's Registered Training Organisation (RTO).

### WESTERN SYDNEY UNIVERSITY EARLY LEARNING LIMITED

Western Sydney University Early Learning Ltd (WSU Early Learning) provides high-quality care and education for children in their early years, providing a strong foundation for a lifetime of learning whilst also directly supporting students, staff and the broader community with the provision of these services.

### WESTERN GROWTH DEVELOPMENTS

#### (PARRAMATTA INNOVATION HUB) PTY LIMITED

Western Growth Developments (Parramatta Innovation Hub) Pty Ltd was incorporated to pursue its purpose of promoting scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence. Principally, the entity was established as the co-developer with respect to the Parramatta Innovation Hub project. The entity divested its interest in the Innovation Hub, Parramatta, to realise return for the University at project completion.

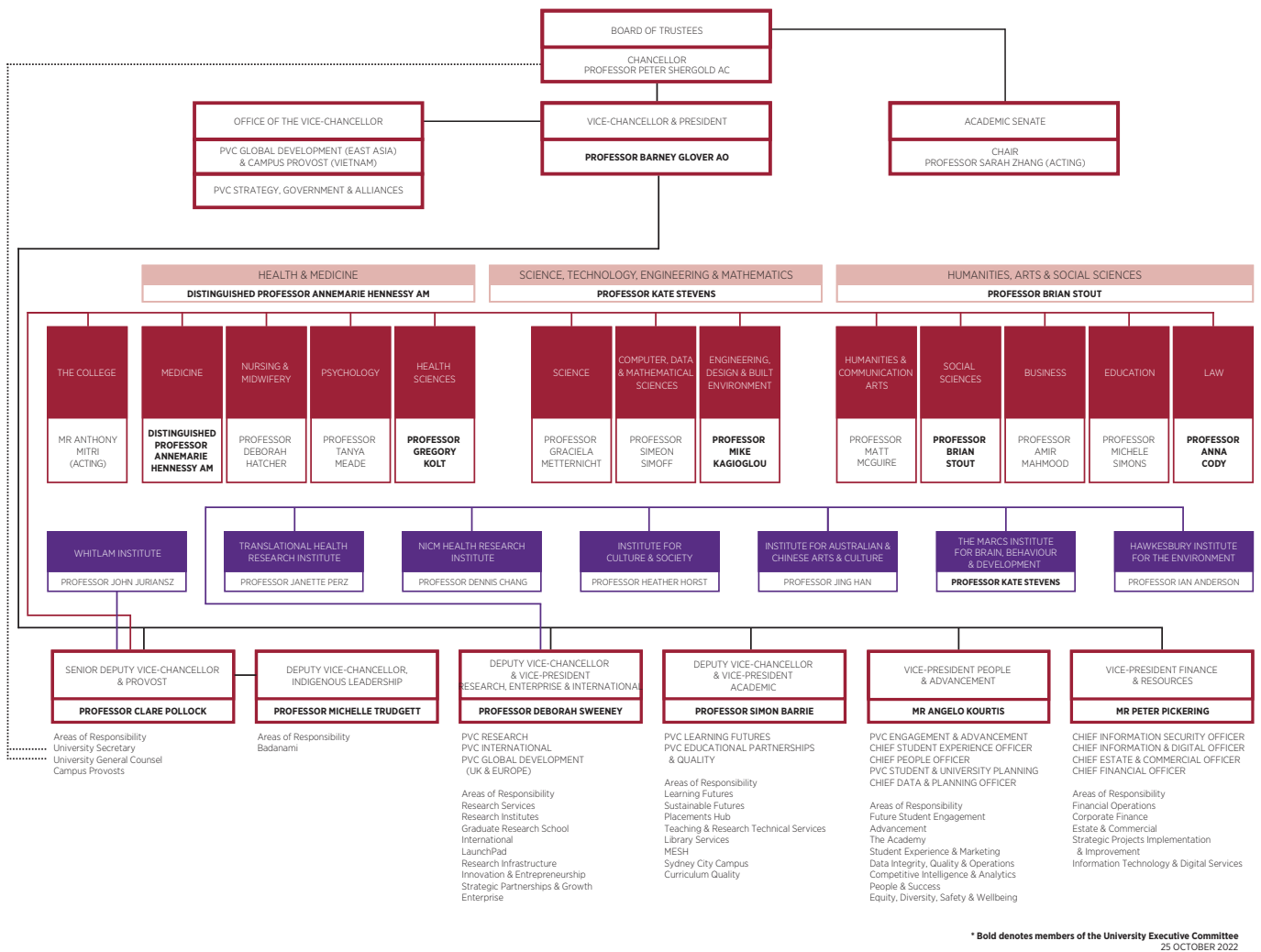
#### WESTERN GROWTH DEVELOPMENTS (WESTMEAD) PTY LTD

Western Growth Developments (Westmead) Pty Ltd was incorporated to pursue the University purpose of promoting scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence. Principally, the entity was established as the co-developer with respect to the Westmead Innovation Quarter project. The entity divested its interest in stage 1 of the Westmead Innovation Quarter to realise returns for the University at project completion. The entity will continue to operate stage 2 and 3 of the completed projects to generate returns for the purpose of pursuing its objectives.

## Our structure

The Principal Officers of the University as at 31 December 2022 comprise of:

- Chancellor
- Vice-Chancellor and President
- Senior Deputy Vice-Chancellor and Provost
- Deputy Vice-Chancellor and Vice-President (Academic)
- Deputy Vice-Chancellor and Vice-President (Research, Enterprise and International)
- Deputy Vice-Chancellor, Indigenous Leadership
- Vice-President (Finance and Resources)
- Vice-President (People and Advancement) and Registrar
- Chair of the Academic Senate



## Overview of our supply chain

To enable our operations and educational and research programs, Western Sydney University needs to procure a wide range of products and services. Our direct supply chain primarily consists of property and facilities, technology services, advisory and professional services.

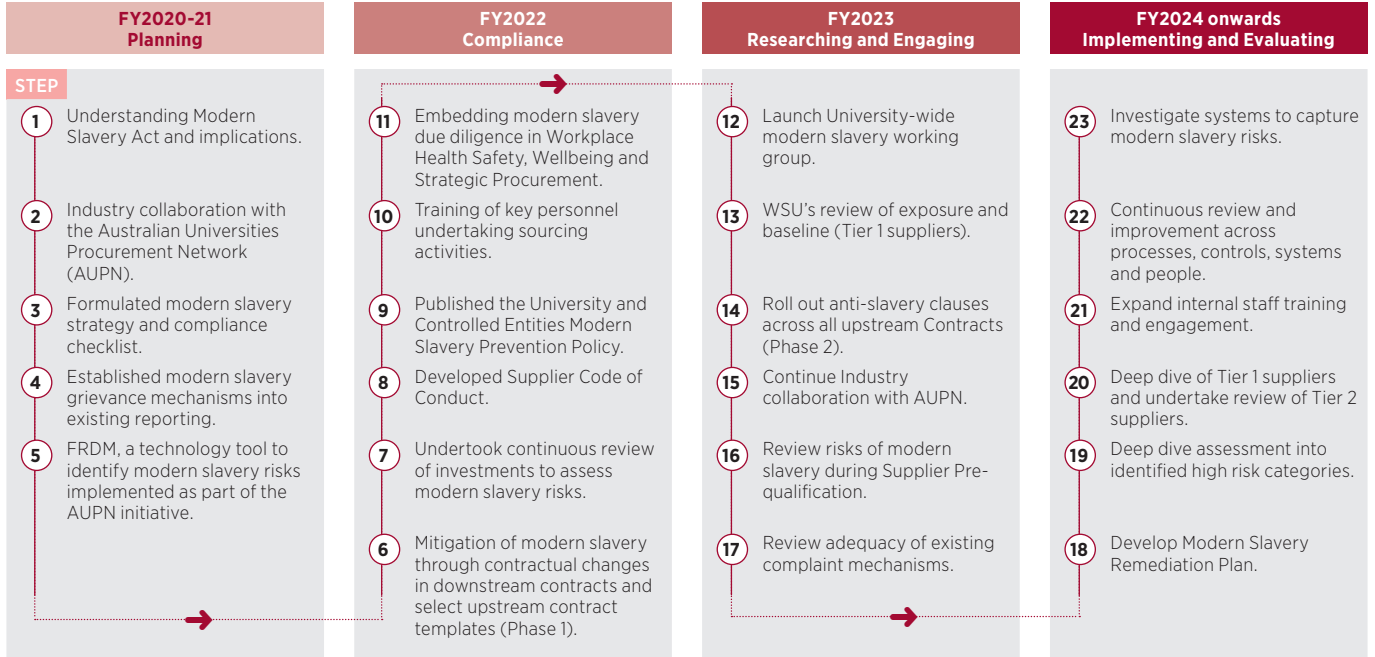
In financial year (FY) 2022, we conducted transactions with over 3,000 suppliers in our domestic and international supply chain with 91.7% of our spend being with local Australian entities of multinational organisations or Australian-based suppliers.



# ASSESSING MODERN SLAVERY RISKS IN OUR OPERATIONS AND SUPPLY CHAIN

## Our journey

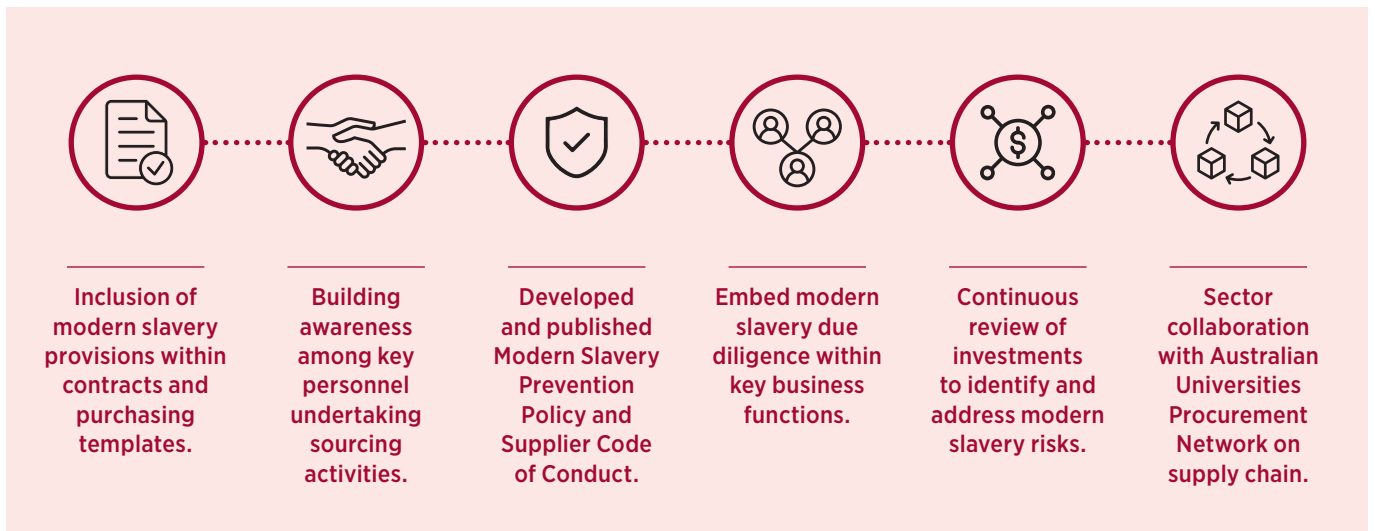
Our Modern Slavery Roadmap is founded on prioritising continual improvement and risk management to identify and address modern slavery instances. We believe the following actions will enable us to steadily improve transparency within our operations and supply chain.



## Our actions in 2022

In 2022, Western Sydney University focused efforts on developing and embedding clear policies, frameworks and obligations to identify, address and prevent instances of modern slavery within our operations and supply chain.

We met our 2021 Modern Slavery Statement commitments through:



## Within our operations

With the University's operations in 2022 primarily being based in Australia and its employees and students also being based in Australia, the risk of modern slavery within our local Australian-based operations is **considered low**. We also have a number of University policies and procedures to encourage open and transparent reporting, including with respect to public interest disclosure and staff grievance mechanisms, that enable staff to report and seek action where there is evidence of modern slavery breaches within our workforce.

The University's workforce is governed by the Staff Enterprise Agreement 2022 (Academic Staff Agreement & Professional Staff Agreement) which are instruments that make provision for a variety of workplace arrangements as negotiated and agreed by Western Sydney University representatives, relevant staff representative unions and approved by the Fair Work Commission. These agreements demonstrate the University's acceptance and commitment to minimising the prevalence of unfair work practices and the instance of modern slavery within our workforce.

University Policies and procedures include:

- Modern Slavery Prevention Policy
- Code of Conduct
- Gender Equality Policy
- Whistleblowing (Reporting Corruption and Other Wrongdoing) Policy
- Procurement Policy
- Bullying Prevention Policy
- Complaint Management Policy
- Discrimination, Harassment, Vilification and Victimisation Prevention Policy
- Sexual Harassment Prevention Policy

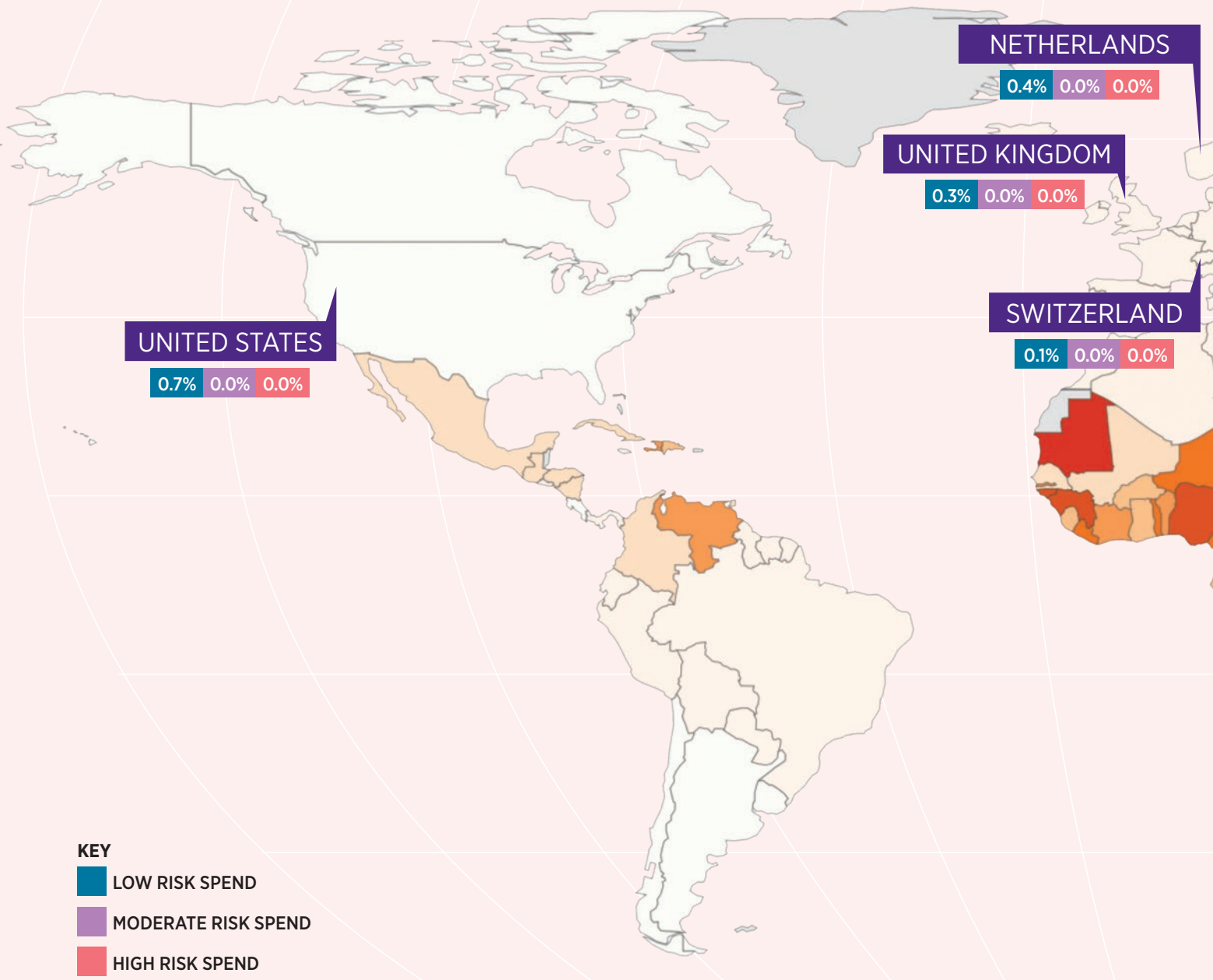
## Within our supply chain

We have **not identified** any instance of modern slavery within our supply chain for the reporting period. However, with Western Sydney University's operations traversing multiple activities such as research programs, third party labour hires, international student recruitment, property and facilities management, the risk of modern slavery is potentially high within our supply chain.

## Partnerships and collaboration

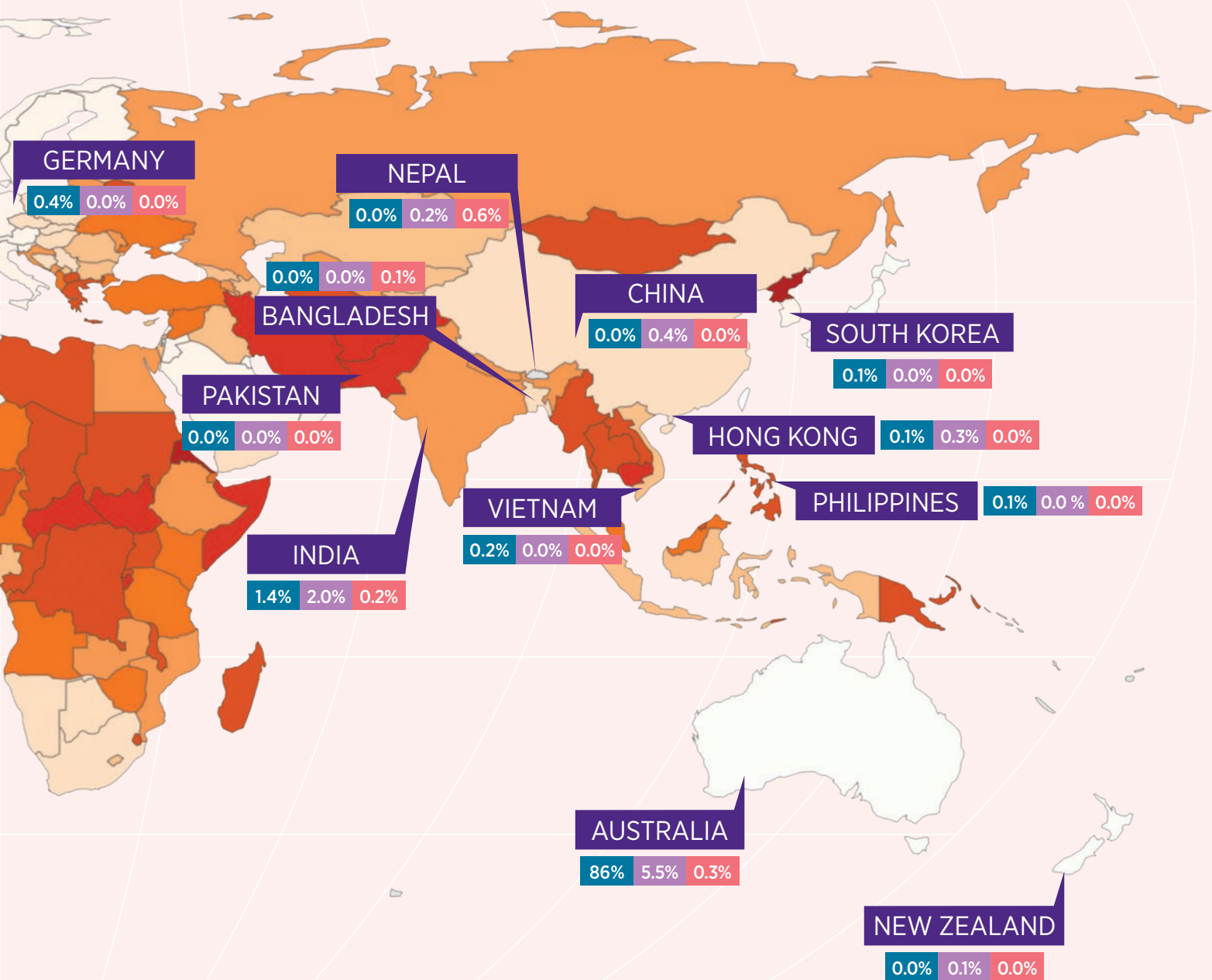
In 2022, Western Sydney University has partnered with other universities as part of the Australian Universities Procurement Network (AUPN) to collaborate and develop a tool kit to determine higher education sector risks related to modern slavery, and to review associated internal due diligence processes. As part of the AUPN initiative, Western Sydney University undertook an initial risk assessment of our suppliers via the FRDM tool, a technology tool that enables risk identification across the supply chain of 33 universities. Based on our initial risk assessment of supplier country location and goods and services procured, 90% of our spend has been categorised as low risk.

“Based on our initial risk assessment of supplier country location and goods and services procured, **90% of our spend has been categorised as low risk.**”



**KEY**  
LOW RISK SPEND  
MODERATE RISK SPEND  
HIGH RISK SPEND

Based on the goods and/or services procured, suppliers have been classified as low risk, moderate risk, or high risk within each country. In 2023, we intend to further build on our initial risk assessment and deep dive into our Tier 1 supplier activity along with a focus on our research and international supplier engagements.





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“Western Sydney University’s governance framework is underpinned by a range of policies that guide and set requirements for how we operate and how we work with our suppliers.”



# OUR APPROACH TO MITIGATING MODERN SLAVERY

## Governance and policy

Western Sydney University's governance framework is underpinned by a range of policies that guide and set requirements for how we operate and how we work with our suppliers.

In 2022, Western Sydney University focused efforts on developing and embedding clear policies, frameworks and obligations to identify, address and prevent instances of modern slavery within our operations and supply chain.

Our Modern Slavery Prevention Policy was developed in 2022 and adopted by the University Board. The Policy sets out our approach for modern slavery prevention and our commitment to identifying incidents and addressing risks of modern slavery within our business and supply chains. Additionally, eight key policies were reviewed and updated to include relevant provisions related to mitigations of modern slavery risks.

Our Supplier Code of Conduct outlines the principles, standards and behaviours we expect of all contractors and suppliers to the University, to which they must adhere when working with us. Any breach of this Code will be actioned in accordance with the relevant supplier contractual obligations.

## Review of contractual templates

As part of Phase 1 of the University contract template review, Western Sydney University included clauses pertaining to modern slavery obligations within downstream contracts and select upstream contracts.

All University contract templates will be progressively reviewed and revised to include obligations that reflect the University's position on modern slavery. These contract templates are published on the Office of General Counsel's website for enterprise-wide access and use.

## Internal training and engagement

In 2022, Western Sydney University's employees who perform procurement tasks and/or make sourcing decisions have undertaken training to ensure an understanding of the obligations in relation to the *Modern Slavery Act 2018*.

## Record of modern slavery risks

Modern slavery risks were included as an operational risk within risk registers maintained by key business functions – Work Health Safety and Wellbeing and Strategic Business Development and Procurement. Risks related to modern slavery are included in operational risk assessments of business units within the University as part of overall compliance with legislative or statutory obligations.

Within our procurement processes, project risks are identified and recorded via the Risk and Compliance Determination (RCD) which is reviewed by Procurement Services, Digital Strategy, Security and Risk and the relevant business stakeholder procuring the services.

## Review of investments

Western Sydney University has engaged Mercer, a founding signatory to the Principles for Responsible Investment (PRI), as our investment advisor. We are committed to responsible investment and ensuring that environmental, social and governance (ESG) issues are integrated into the development and implementation of the University's investment portfolios. In keeping with the requirements of the *Modern Slavery Act* and our commitment to protecting human rights, we undertook a review of investments, in FY22, for any potential exposure to modern slavery.

# REMEDICATION OF MODERN SLAVERY

We have not identified any instances of modern slavery within our operations or supply chain during this reporting period.

If instances of modern slavery are identified within our operations, Western Sydney University staff may report these instances in accordance with the Whistleblowing (Reporting Corruption and Other Wrongdoing) Procedures.

If instances of modern slavery are identified within our supply chain through any of our established reporting channels, Western Sydney University will work with the identified supplier to develop and implement corrective actions within an agreed timeframe. Suppliers will be required to provide evidence of the corrective action. If these instances cannot be remedied in an acceptable manner, Western Sydney University may terminate the contract with the supplier.



# ASSESSING EFFECTIVENESS

Western Sydney University utilises multiple mechanisms to assess the effectiveness of our mitigation strategies.

- Through regular engagement with the AUPN Modern Slavery Working Group to seek advice, share learnings and assess best practices.
- Conducting an annual review of the supply risk assessment and review of the assessment measures.
- Instances of modern slavery within our operations and supply chain may be reported to our Compliance Program Unit (CPU).
- Investigation of grievances and reports of instances received through our reporting mechanisms.
- Our risk register and reporting procedures.



# CONSULTATION PROCESS

For this reporting period, the University followed up with a discussion paper to document progression of the University's modern slavery reporting requirements. All controlled entities agreed to be bound by the University's Modern Slavery Prevention Policy, once adopted.

Controlled entities receive all communication and information on modern slavery including how to report. They can also access and undertake any communicated modern slavery training modules.

At minimum annual consultations are scheduled for the future years, where the University Compliance Manager meets and reports to each controlled entity's Board. The consultation process for future reports will include identifying how the University can strengthen risk control within its controlled entities, including by adopting standard University policies, templates and processes across controlled entities.

The University Secretary, who is now the Corporate Secretary to 3/5 of the controlled entities, has been assigned the *Modern Slavery Act 2018* (Cth) as a watchlist item under the University Compliance Management Program to ensure robust liaison continues. The assignment of this Act to the other University controlled entities (The College and Early Learning Ltd) will occur in the next year.

# FUTURE COMMITMENTS AND CONTINUOUS IMPROVEMENT

Looking ahead, we are committed to building on the strong foundations we have established to identify, prevent, mitigate and remediate modern slavery risks within our operations and supply chain. This will include:

- Engaging with our key partners and suppliers to share learnings and understanding of modern slavery risks within our supply chains.
- Creation of a formal University-wide Modern Slavery Working Group to enable shared engagement in the identification, prevention, mitigation and remediation of modern slavery risks.
- Increase understanding of modern slavery and Western Sydney University's obligations in line with the Act across the wider University stakeholders.
- Include modern slavery compliance provisions across all upstream contracts.
- Review mechanisms to assess risks of modern slavery during supplier pre-qualification.
- Deep dive and review of Western Sydney University's exposure across Tier 1 suppliers and identify high risk suppliers.



# INDEX

The table details where each criterion is addressed within the statement.

CRITERION	SECTIONS WITHIN THE MODERN SLAVERY STATEMENT 2022
Details of reporting entity	<ul style="list-style-type: none"> <li>→ Statement of reporting entity (p.5)</li> <li>→ Introduction (p.7)</li> </ul>
Reporting entities' structure, operations, and supply chain	<ul style="list-style-type: none"> <li>→ Our structure, operations and supply chain (p.8)</li> </ul>
Modern slavery risks in operations and supply chain	<ul style="list-style-type: none"> <li>→ Assessing modern slavery risks in our operations and supply chain (p.12)</li> </ul>
Actions taken to assess and address risks	<ul style="list-style-type: none"> <li>→ Our actions in FY22 (p.12)</li> <li>→ Our approach to mitigating modern slavery (p.17)</li> </ul>
Assessing effectiveness of actions	<ul style="list-style-type: none"> <li>→ Assessing effectiveness (p.19)</li> </ul>
Consultation process with entities	<ul style="list-style-type: none"> <li>→ Consultation process (p.20)</li> </ul>
Any other relevant information	<ul style="list-style-type: none"> <li>→ Message from our Chancellor and Vice-Chancellor (p.4)</li> <li>→ Introduction (p.7)</li> <li>→ Our journey (p.12)</li> <li>→ Future commitments &amp; continuous improvement (p.21)</li> </ul>



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