



WESTERN SYDNEY
UNIVERSITY



MODERN SLAVERY STATEMENT

JANUARY 2023–DECEMBER 2023



ACKNOWLEDGEMENT OF COUNTRY

With respect for Aboriginal cultural protocol and out of recognition that its campuses occupy their traditional lands, Western Sydney University acknowledges the Darug, Eora, Dharawal (also referred to as Tharawal) and Wiradjuri peoples and thanks them for their support of its work in their lands (Greater Western Sydney and beyond).

We pay our respects to their Elders past and present and commit to ensuring Western Sydney University operates in a fair and ethical manner that respects First Nations peoples' rights and interests.

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ABOUT THIS STATEMENT

This Modern Slavery Statement (the Statement) has been prepared by Western Sydney University (Western) to meet the requirements of the Modern Slavery Act 2018 (Cth) for the period 01 January 2023 to 31 December 2023. Serving as our fourth statement, it is issued on behalf of Western Sydney University (ABN 53 014 069 881) (Western) and its affiliated entities (listed below) under our collective reference as “we”, “us”, “our”, “Western” or “the University”.

- Whitlam Institute within Western Sydney University Limited (ABN/ACN 50 100 342 309)
- Whitlam Trust 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 Limited (ABN/ACN 93 626 590 029)
- Western Growth Developments (Westmead) Pty Limited (ABN/ACN 93 625 406 411)

This statement was developed through consultation with each of the reporting entities it covers as well as owned or controlled entities listed above. The consultation process is outlined on page 22.

This Modern Slavery Statement was subsequently approved in June 2024 by the Board of Trustees of Western Sydney University, as the peak governing body of the University. The statement has been signed by Professor Jennifer Westacott AO, Chancellor as the Chair of the Board of Trustees and Professor Clare Pollock, Interim Vice Chancellor as University President.



MESSAGE FROM OUR CHANCELLOR AND VICE-CHANCELLOR



In accordance with the requirements and criteria of the *Modern Slavery Act (Cth)*, we are pleased to present Western Sydney University's Modern Slavery Statement for the Financial Year ending 31 December 2023.

In preparing Western Sydney University's fourth Modern Slavery Statement, we continued to be guided by our mission – through a commitment to excellence, sustainability, equity, transformation and connectedness our students will succeed, our research will have impact and our communities will thrive. This mission underpins our dedication to upholding human rights and freedoms and to taking action to address modern slavery.

In line with our decadal strategy *Sustainability and Resilience 2030* and our commitment to the United Nation's Sustainable Development Goals, we continued to enhance our actions to deepening our understanding and management of modern slavery risks. While we have made significant progress, we acknowledge the need to maintain focus on continuous improvement, including strengthening our ability to identify and address actual and potential modern slavery practices in our operations and supply chains. We have established a University wide modern slavery working group to proactively identify, address and implement initiatives to prevent and mitigate the risks of modern slavery.

Other key highlights in 2023 included:

- Western Sydney University being named number one in the world for the second consecutive year for its social, economic and environmental impact in the 2023 Times Higher Education (THE) University Impact Rankings.
- Achieving a deepened understanding of our supply chain risks through the development of a Supplier Risk Heat Map to help identify high-risk and high-spend areas.

- Improved internal procurement practices, including the allocation of dedicated resources to lead the University's social procurement initiatives.
- The establishment of a dedicated modern slavery webpage to provide information and resources focused on modern slavery.
- Ongoing support for our community and students through the Western Sydney University Justice Clinic.
- Continued sector collaboration to effect meaningful change through collective responses.

Pleasingly, we have commenced work to develop a Social Procurement Charter and Framework as part of our broader work in managing environmental, social and governance (ESG) risks. Active monitoring and governance of our supply chains and high-risk areas will provide us with the greatest leverage to effect change and to make an impact.

Guided by our mission and values, we remain resolute and committed to our obligations to human rights and to working with the University community, suppliers and stakeholders to proactively and collaboratively drive sustainable change.

A handwritten signature in black ink, appearing to read 'Jennifer Westacott'.

Professor Jennifer Westacott AO

Chancellor
Western Sydney University

A handwritten signature in black ink, appearing to read 'Clare Pollock'.

Professor Clare Pollock

Interim Vice-Chancellor and President
Western Sydney University

ABOUT WESTERN SYDNEY UNIVERSITY

Western Sydney University is a dynamic young global university and a leading advocate for the Western Sydney region. Western Sydney University ranked in the ‘Top 100 Young Universities in the World’ and among the ‘Top 500 in the World’ or ‘Top 3 per cent’ (THE rankings).

Through the year, we continued to be guided by our strategic plan reinforcing that the University is a values-based and ethical organisation, and a leader in sustainability. Sustaining Success 2021–2026 defines the future direction and priorities for the University. It maintains momentum and clarity during a period of uncertainty and ambiguity. It commits us to shared values, principles and actions fundamental to the University and region. We will remain committed to our core values while rethinking the role and position of the University locally, nationally and globally.

STRATEGIC OBJECTIVES AND OUTCOMES

Objectives: Sustaining Success 2021-2026

MISSION

Starting in Western Sydney, our students will succeed, our research will have impact and our communities will thrive through our commitment to excellence, sustainability, equity, transformation and connectedness.

VALUES

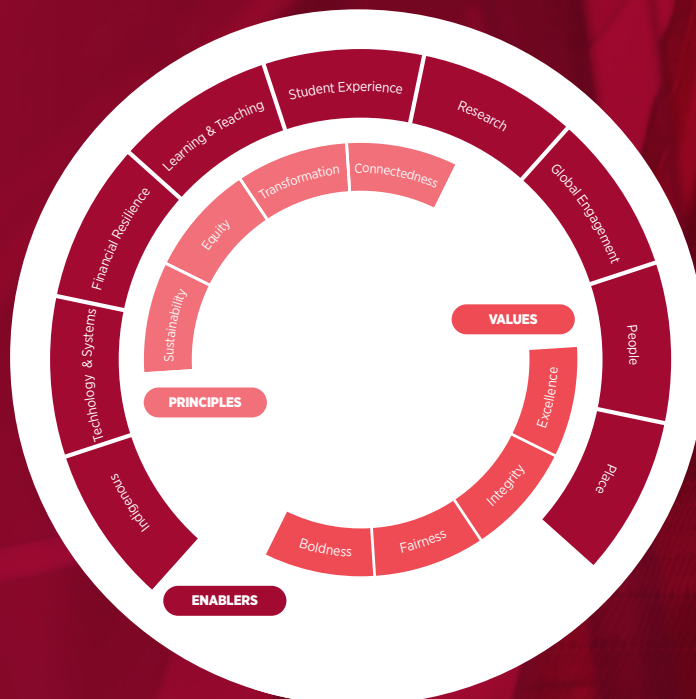
Our values define who we are and what we expect and encourage in each other. They are lived and embedded in the behaviours of everyone within the University community. Our values represent a commitment to our students, people and communities, both local and global. Our values are Boldness, Fairness, Integrity, Excellence.

PRINCIPLES

The University is accountable to its values. We will be guided by them in recovery and renewal. They inform and are realised through adherence to our four principles: Sustainability, Equity, Transformation and Connectedness.

ENABLERS

The University’s enablers set out the elements required to unlock and make possible the strategic imperatives embodied in Sustaining Success 2021–2026. They encapsulate our values and help to guide recovery and renewal for the University and the communities within which we are embedded. Our enablers are People, Place, Learning and Teaching, Student Experience, Research and Innovation, Global Engagement, Indigenous Perspectives, Technology and Systems, and Financial Resilience.





OUR COMMITMENT TO SUSTAINABILITY AND THE UN SDGs

Western's Decadal Strategy, Sustainability and Resilience 2030 sets out Western's nine interconnected priority statements for sustainability and resilience that guide our overall decadal action. Western Sydney University is committed to supporting and promoting the principles of the UN Sustainable Development Goals (SDGs) through our teaching, operations and outreach as evidenced by our Times Higher Education Impact Ranking.



**UNI IN THE WORLD
2022 & 2023**

TIMES HIGHER EDUCATION IMPACT RANKINGS



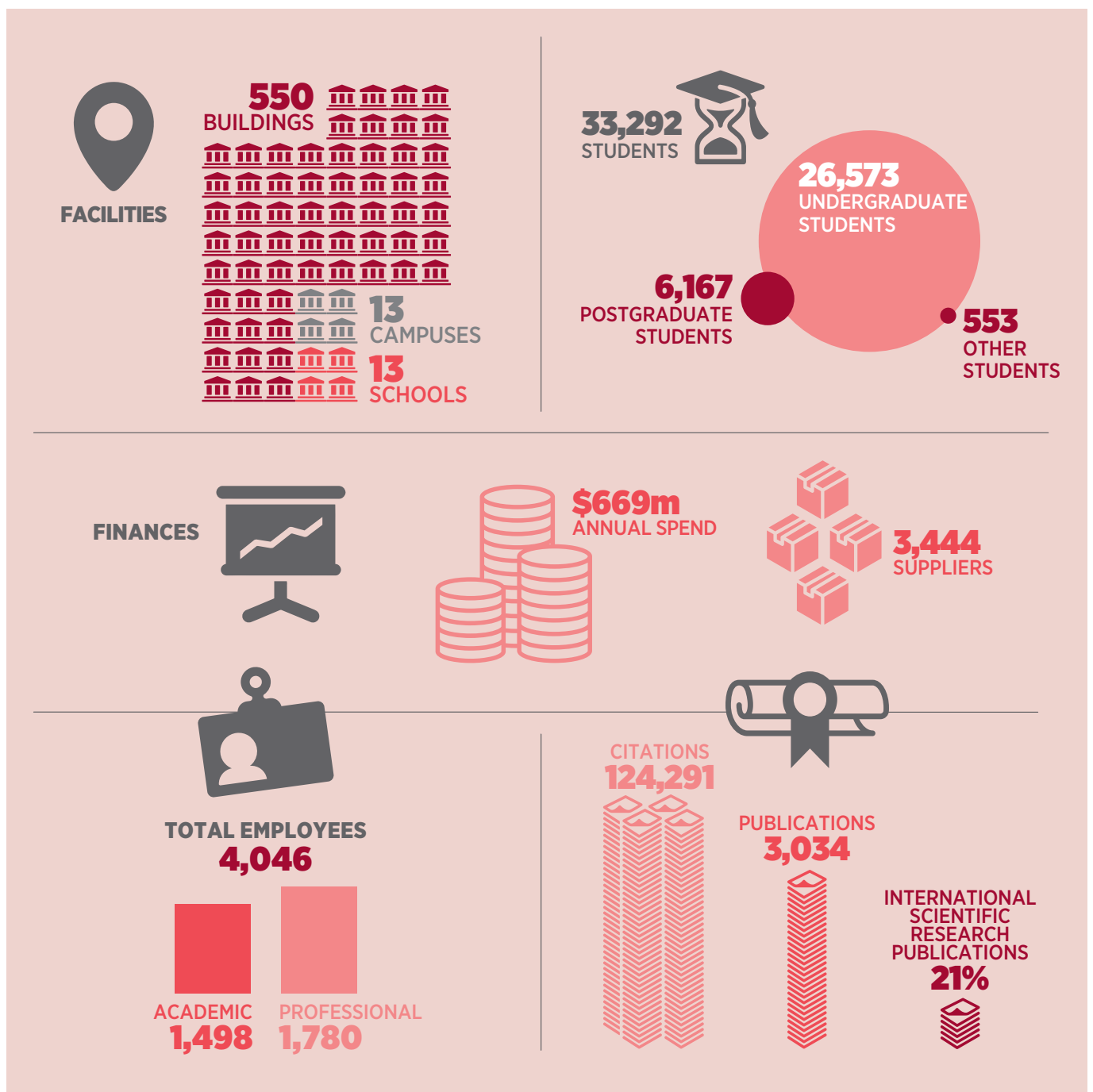
OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

OUR STRUCTURE AND OPERATIONS

Western Sydney University is a multi-campus, research-led university with integrated sites throughout Western Sydney, including Parramatta, Penrith, Campbelltown, Bankstown, Richmond and Liverpool.

Western Sydney University is established under the Western Sydney University Act 1997. The University operates by this Act and the associated Western Sydney University By-law 2017.

The Chancellor is the Chair of the Board of Trustees, the peak governing body of the University. The Vice-Chancellor President is responsible for managing all academic and administrative areas of the University.



OUR ENTITIES AND ITS OPERATIONS

The Whitlam Institute

The Whitlam Institute within Western Sydney University is a dynamic research and public policy think tank, prime ministerial archive, and public museum that commemorates and is inspired by the life and work of the Hon Gough Whitlam AC QC, Australia's twenty-first Prime Minister. The Institute advances the contemporary relevance of Mr. Whitlam's ideas and pursues the causes he and his Government championed.

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, and vocational programs are offered by The College's Registered Training Organisation (RTO).

Western Sydney University Early Learning Ltd

Western Sydney University Early Learning Ltd delivers high-quality care and education for children in their early years, providing a strong foundation for a lifetime of learning. Through sites across the Western campus network, Western Sydney University's Early Learning follows the latest research and best-practice models, including the National Quality Framework.

Western Sydney University International College

The Joint Venture between Western Sydney University Enterprises Pty Ltd and Navitas to operate the Western Sydney University International College (WSUIC) in Parramatta has entered its eighth year of operation.

WSUIC transitioned to independent operations, with WSUIC obtaining accreditation for its Diploma in Engineering. All commencing WSUIC students now enrol into the College's own TEQSA-accredited diplomas and Foundation Studies Program.

Western Growth Developments (Parramatta Innovation Hub) Pty Ltd

Western Growth Developments (Innovation Hub Parramatta) Pty Ltd was incorporated on 4 June 2018 to pursue its purpose of promoting scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence. Principally, the entity was the co-developer with respect to the Parramatta Innovation Hub project. The entity divested its interest in the development to realise returns at project completion.

Western Growth Developments (Westmead) Pty Ltd

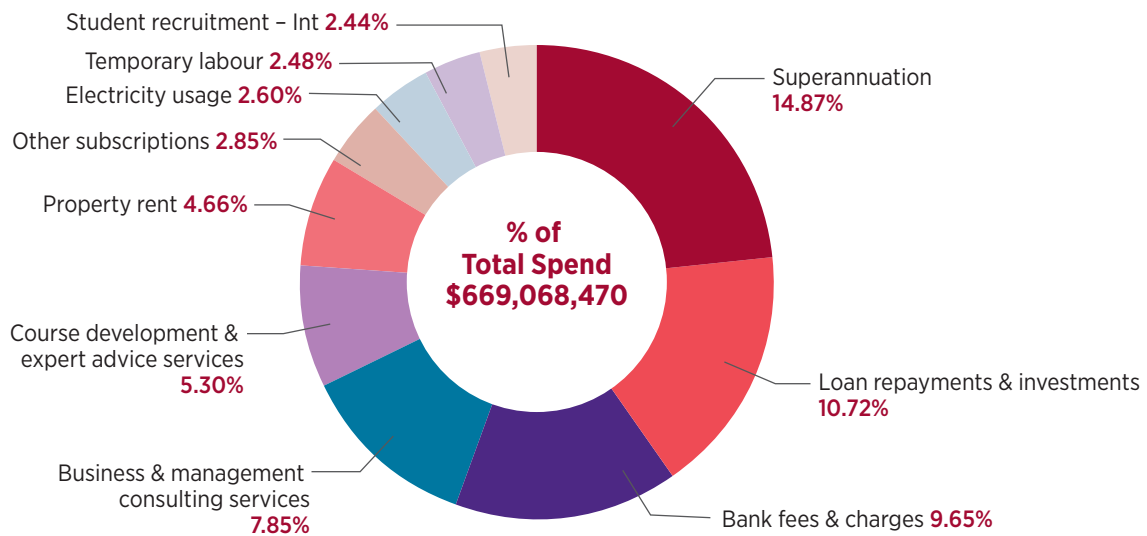
Western Growth Developments (Westmead) Pty Ltd was incorporated on 5 April 2018 to pursue its purpose of promoting scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence. Principally, the entity is the co-developer with respect to the Westmead Innovation Quarter project. The entity divested its interest in stage one of the development to realise returns at project completion. The entity will operate the completed project (stages 2 and 3) to generate returns for the purpose of pursuing its objectives.



OUR SUPPLY CHAIN

With a key focus on research, teaching, learning and our Western Growth strategy (Western Growth | Western Sydney University), our supply chains are complex networks of large, medium and small business providing goods and services. Our procurement activities encompass all aspects to effectively support the core activities of the University.

Western’s combined capital and operating expenditure, during the year, was approximately \$669.06 million with 3,444 suppliers. 95.4% of Western’s direct spend is within Australia with the greatest amount relating to the below categories.



Additional categories representing higher expenditure across the University during the year included IT consultancy, domestic student placements, security and cleaning services, insurance and regulatory fees.

The majority of the spend in the year was managed through contractual arrangements utilising (but not limited to):

- Individual contracts based on the templates developed and approved by Western’s internal Office of General Counsel.
- NSW schemes and agreements as a non-agency eligible buyer.
- Purchase orders for low-risk and low-value goods and/or services.
- Master agreements for long-term provision of goods and/or services.
- Bespoke or supplier agreements for high-value and/or complex goods or services.

Approximately 1.90% of spend was managed through using credit cards with majority of spend across the below categories.

SPEND CATEGORY	SPEND
General retail and wholesale	17.43%
Hotels and accommodation	10.29%
Restaurants and Food	7.40%
Professional Services	6.92%
Miscellaneous Industrial and Commercial supplies	6.52%
Computer equipment services	5.99%
Print and advertising	5.36%
Training	5.22%
Travel- Air/Rail/Road	4.94%
Clubs/Associations/Organisations	4.18%

ASSESSMENT OF MODERN SLAVERY RISKS

We assess how we may cause, contribute or be directly linked to risks of modern slavery in line with Western’s risk assessment guide.

To identify and assess risks of modern slavery within our operations and supply, Western considers how we may cause, contribute or be directly linked to risks of modern slavery which in turn informs our level of intervention, prevention and remediation actions. Our risk identification and assessment processes are applicable across all of Western Sydney University, including the entities Western controls.

MODERN SLAVERY IN OUR OPERATIONS

68.3% of the University’s workforce is employed on a fixed or permanent basis via protected enterprise agreements. With our workforce based in Australia and well-defined internal policies and processes in place, the University considers it is unlikely to cause or contribute to modern slavery. We appraise the risk of modern slavery in our operations to be low.

Western academic and professional staff are free to engage in collective bargaining, join unions, leave their employment without material restrictions and receive mandatory workplace training on ethical business practices, anti-bribery and corruption, harassment, bullying, discrimination, whistleblowing services and grievance channels and remedies. Employees’ understanding of provisions and mechanisms are assessed within the mandatory training modules as part of induction or ongoing required training.

The University’s Ignite Indigenous Traineeship Program, an internship initiative for anyone identifying as Aboriginal and/or Torres Strait Islander, currently targets school leavers. Delivered by the Office of the Deputy Vice Chancellor Indigenous Leadership, the program is offered as a one-year fixed term of employment in combination with enrolment into a Certificate III in Business Administration traineeship provided by The College. The interns are offered training, induction sessions, Indigenous staff wellbeing programs and mentoring to ensure their support and safety.

During the year, the Anti-slavery Commissioner raised one matter with the University concerning a student at Western.

As part of our investigation and remediation, the Office of General Counsel led discussions with the NSW Anti-slavery Commissioner. In accordance with our grievance and remediation policies and guidelines, stakeholders from various areas were enlisted to respond to the concerns raised in the case.

The University ensured the student’s wellbeing by offering short-term accommodation, counselling and financial welfare support as required. The reporter who initially raised the matter was subsequently provided a contact point for any further issues or concerns.







MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

We identify that our greatest exposure to modern slavery risks is through our supply chain.

Western’s greatest exposure to modern slavery is through its supply chain where we can be directly linked to risks via our goods and services suppliers. Our top supply chain risks remained largely the same as the previous reporting period. These high-risk categories comprised 26% of our total spend in the year.

Key factors considered:








-  Sector and industry risk
-  Product and service risk
-  Geographic risk
-  Entity risk








SUPPLIER RISK HEAT MAP

Our Supplier Risk Heat Map developed in the year provides a macro view of our upstream supply chain risk profile. Given the size and complexity of our supply chain, data captured in our procurement and finance systems during FY23 targeted spend with Tier 1 suppliers to best assess and address modern slavery risks.



Risk assessment outputs

HIGH RISK CATEGORY	PRODUCT/SERVICE PROCURED	MODERN SLAVERY RISK FACTORS	KNOWN MODERN SLAVERY RISKS	% OF SPEND	RISK RESPONSE
Professional services	<ul style="list-style-type: none"> → Bank fees and charges → Labour hire and temporary workforce → IT service delivery → Management consultants → Cleaning and security service providers → Catering providers → Construction workers → International recruiters 	   	<p>Banking and other support activities may be conducted in high-risk countries overseas which may be difficult to monitor.</p> <p>Temporary and contract workers in Australia and overseas performing these services may be vulnerable to modern slavery due to a range of factors, including subcontracting arrangements which may be difficult to audit or monitor.</p> <p>The use of migrant workers for outsourced services such as cleaning and construction with lower wages and manual labour involve high modern slavery risks including workers who may not understand their workplace rights and entitlements.</p> <p>International students are considered a vulnerable group. International recruiters may employ unethical practices and students may be susceptible to scammers who pose as recruitment agents.</p>	19.4%	<p>Modern slavery clauses and obligations included in relevant agreements and in contract variations issued.</p> <p>Western’s policy framework.</p> <p>Adoption of NSW schemes and contracts where relevant.</p> <p>Use of media check tools to monitor, track and deliver insights on supplier brand reputation, reported instances of modern slavery, industry trend and public opinion.</p>
Logistics and warehousing services	<ul style="list-style-type: none"> → Subcontracted logistics and freight services via Tier 1 suppliers 	  	<p>Outsourced freight and logistics services provided by third parties to Tier 1 suppliers could involve worker exploitation.</p> <p>There are also particular risks associated with working conditions for seafarers.</p>	0.37%	As above

HIGH RISK CATEGORY	PRODUCT/SERVICE PROCURED	MODERN SLAVERY RISK FACTORS	KNOWN MODERN SLAVERY RISKS	% OF SPEND	RISK RESPONSE
IT hardware and software	<ul style="list-style-type: none"> → Desktop hardware → IT accessories 	  	<p>Modern slavery risks are present in the supply chains that provide IT companies with the necessary materials to produce electronic goods, and parts of those goods, due to geographical location of manufacture.</p> <p>Mining of raw materials for the manufacture of products may also exploit children, including deceptive practices and forced labour.</p> <p>Modern slavery risks may also be present with the use of offshore call centres and other telecommunications and software suppliers.</p>	1.54%	As above
Apparel	<ul style="list-style-type: none"> → Uniforms → PPE → Branded merchandise/ promotional items 	 	<p>This sector and geographical locations for manufacturing is recognised as a high-risk sector for modern slavery due to the use of raw materials such as cotton which may be produced using modern slavery, as well as exploitation in factories manufacturing textiles.</p>	3.03%	As above
Teaching and research consumables	<ul style="list-style-type: none"> → Medical equipment → Laboratory consumables → Scientific equipment 	 	<p>Consumables for teaching, laboratory and research purposes are manufactured in high-risk countries.</p> <p>The raw materials utilised for the manufacture of the products can also involve child labour, hazardous working conditions and unethical practices.</p>	0.72%	As above

An instance of modern slavery was reported during the year, and this is currently being externally investigated.

OUR APPROACH

Western Sydney University undertook key initiatives in line with our Modern Slavery Roadmap prioritising continuous improvement and risk management.

GOVERNANCE FRAMEWORK

Western's governance framework is underpinned by a range of policies. This ensures material risks, including those associated with modern slavery, are escalated to the Board of Trustees through our executive leadership, board executive committee, and the audit and risk committee.

We have a range of policies and guidelines that clearly articulate human rights expectations of our employees, contractors and students and provides information on how to report or lodge grievances.

POLICY	PURPOSE
Bullying Prevention Policy and Guideline	Articulates expectations of all members of the University community towards other members to create a safe, respectful and inclusive environment. This also articulates the procedures to deal with bullying in line with the Bullying Prevention Guidelines.
Code of Conduct Student Code of Conduct	Reflects the University values of excellence and quality, scholarly rigour and integrity, equity and inclusiveness, collegiality and participation, academic freedom, commitment and accountability, and sets the tone of behaviour expected of our staff, students and affiliates.
Complaint Management Policy	Explains how the University deals with complaints from current and prospective students, staff and members of the public.
Discrimination, Harassment, Vilification and Victimisation Prevention Policy and Guideline	Expectations of our staff, student and University members to ensure an environment free from unlawful discrimination, unlawful harassment, vilification, victimisation and unlawful adverse action in line with Commonwealth and state laws and regulations.
Domestic and Family Violence Support Policy and Guideline	Outlines the University's commitment to supporting students and staff affected by domestic and family violence.
Equal Opportunity and Diversity Policy	Provides a framework and expectations of staff, students and contractors of the University to ensure equal opportunity, respect and inclusion.
Gender Equality Policy Gender Equality Procedures and Guidelines	Sets expectations of University staff, students and contractors to improve gender equity and ensure flexible and inclusive provisions for students and staff.
Health, Safety and Wellbeing Policy Health, Safety and Wellbeing Procedures – Alcohol and Drug Control Health, Safety and Wellbeing Procedures – Dangerous Weapons Mental Health and Wellbeing Policy	Outlines the University's commitment to the physical and psychological safety of our staff, students and all University community members.

POLICY	PURPOSE
Modern Slavery Prevention Policy	Outlines the University’s commitment and approach to prevent, assess and remediate modern slavery within its operations and supply chain.
Motting and Hazing Prevention Policy	Outlines the University’s commitment and approach to prevent, assess and remediate modern slavery within its operations and supply chain.
Respect and Inclusion in Learning and Working Policy	Outlines behavioural expectations of its staff, students and visitors to ensure a safe and respectful working and learning environment. It also describes ways in which the University will respond to a range of adverse behaviours if they occur.
Sexual Harassment Prevention Policy	Articulates the University’s expectations from its staff, students and visitors to ensure a working and learning environment free from sexual harassment. It also specifies actions and procedures for addressing and reporting.
Whistleblowing (Reporting Corruption and Other serious wrongdoing) Policy and Guideline	Outlines the framework for reporting and managing reports of serious wrongdoing and the University’s actions to deal with and investigate such reports.



MODERN SLAVERY WORKING GROUP

The Modern Slavery working group was established to identify and implement initiatives to address and mitigate risks of modern slavery across the University and its entities.

The working group meets regularly and comprises of representatives from Procurement, Legal (OGC), Governance, Student experience, Infrastructure and Commercial, Human resources, International, The College, Research, Risk and Strategy, Government and Alliances.

Key topics discussed by the working group in the year were:

- International student recruitment risks
- Student awareness campaigns and student safety
- Modern slavery training for staff and students
- Progress in supplier due diligence
- Integration of modern slavery in inductions and orientation events
- Effectiveness and measurement of our actions

SUPPLIER RISK ANALYSIS

Acknowledging that risks of modern slavery may be more prevalent in our supply chain, we continued a risk analysis of our suppliers in the year.

A supplier risk alert process was implemented and a restricted supplier list maintained to monitor high-risk suppliers and industries, utilising various sources such as media, human rights organisations, and sector-wide networks.

SOCIAL PROCUREMENT

The University updated its internal procurement practices to expressly comply with modern slavery requirements. This included:

- Updating contractual templates explicitly outlining supplier obligations in relation to the Act.
- Developing a supplier assessment questionnaire which will be rolled out across identified strategic partners in FY24.
- Appointing dedicated resources to lead social procurement initiatives.

COMMUNICATION AND AWARENESS

As part of our awareness campaign, we created a webpage (Modern Slavery) to explain modern slavery, outline our roadmap and the University's commitment to combat this exploitation, and associated links to report concerns or instances. The webpage also provides staff and students access to external resources to further understand risks of modern slavery.

Throughout the year, we also built awareness across the University by publishing relevant news and articles on our internal social networking site and via emails to relevant University staff. This included sharing a documentary showing the use of child labour in cobalt mining to cater for the increasing adoption of clean energy options. While not directly linked to Western, the documentary demonstrated the interconnections between modern slavery, environmental decline, climate change and the critical importance of considering all aspects in strategy and procurement decisions.

INDUSTRY COLLABORATION

As a member of the Australian Universities Procurement Network (AUPN), Western connects with other universities via monthly collaborative sessions to discuss and identify key initiatives. This includes:

- Understanding the changing global environments and frameworks to manage emerging or new risks across the sector.
- Engaging with community and industry partners (Australian Red Cross, The Mekong Club, Australian Catholic Anti-Slavery Network, Be Slavery Free).
- Improving visibility of the sector's supply chain.

WESTERN SYDNEY UNIVERSITY JUSTICE CLINIC

The Western Sydney University Justice Clinic (referred to as "Justice Clinic") is Western Sydney University's community legal service and School of Law's experiential learning program. The Justice Clinic is at the centre of the School of Law's engagement and impact strategy.

In 2023, the Justice Clinic continued to provide pro bono legal advice and services to victim-survivors of modern slavery through a referral pathway established with the Salvation Army's Trafficking and Slavery Safe House. The Safe House programs provide specialist supported accommodation and complex case management for people who have experienced modern slavery including forced marriage, forced labour, trafficking, servitude and other slavery-like practices. Justice Clinic lawyers work with victim-survivors of modern slavery to remediate their modern slavery experiences by accessing support through Victims Services NSW and other jurisdictions, where applicable.

The Justice Clinic also runs the University’s Student Legal Service, a free legal advice and referral service for all domestic and international students of Western Sydney University. The Justice Clinic lawyers running the Student Legal Service can be first responders for University students experiencing, or at risk of experiencing, modern slavery, and help them access legal and non-legal support. In the year, the Justice Clinic filmed a video as part of the University-wide International Student Educational Video series, which covered the topic of workplace exploitation to raise awareness within the international student cohort about potential forced labour issues (Legalities and Scams).

Through the year, the Justice Clinic continued to build on earlier parliamentary submissions and advocacy in relation to the establishment of a national compensation scheme for survivors of modern slavery in Australia and statutory review of existing victims’ support. The Justice Clinic’s Director was involved as an expert panel member in workshops led by the NSW Anti-slavery Commissioner to develop the vision and strategic plan to combat modern slavery in NSW.

Our Justice Clinic’s Director is also an invited member of professional and expert bodies – the Commonwealth Attorney-General’s Forced Marriage Civil Society Consultation Group, the Australian Institute of Criminology’s Human Trafficking and Modern Slavery Research Network, and the NSW Law Society’s Human Rights Committee.

The Western Sydney University Justice Clinic possesses a deep understanding of modern slavery legal frameworks and reporting regimes, dedication to access to justice for victim-survivors, practical experience in responding and delivering modern slavery-related legal services, and involvement in modern slavery research and law reform activities. The Justice Clinic is well placed to recognise and respond effectively to risks or instances of exploitation, and contribute that expertise to University-wide efforts to combat modern slavery.

RESEARCH PARTNERSHIPS

Through the year, we continued to conduct thorough due diligence on research partnerships to assess potential modern slavery risks. This involved examining supply chains, partner backgrounds and legal disputes. These assessments – using indices to gauge the risks – scrutinised supplier relationships, funding and collaborations.

Research staff also received training to identify and report modern slavery signs. Regular audits were also conducted to ensure compliance with anti-modern slavery standards and other regulations.

Through these multifaceted approaches, our research services team ensured the evaluation and compliance of research programs with relevant legislation, guaranteeing the University did not contribute to modern slavery’s persistence within its research space.

INVESTMENTS

The University is committed to Responsible Investment and seeks to ensure environmental, social and governance (ESG) issues are integrated into the development and implementation of the University’s investment portfolios. The University is a signatory to the United Nations Sustainable Development Goals (SDGs) and seeks to support these through its investments where possible.

The University appointed Mercer as its implemented consultant. Mercer is a founding signatory to the Principles for Responsible Investment (PRI), which began in 2006 as a United Nations-supported network of investors.

In keeping with the requirements of the Modern Slavery Act and our commitment to protecting human rights, Western reviewed its investments for any potential exposure to modern slavery incidents or risks. As of 31 June 2023, the University’s portfolio was found to have no holdings with modern slavery red flags.

MEASURING EFFECTIVENESS

Western has undertaken a range of actions to understand and reduce the risks of modern slavery within our operations and supply chain. These actions have helped us identify areas for improvement and potential gaps that will be strengthened in line with our roadmap.

We understand measuring the impact of our actions is critical to reducing the risks of modern slavery in our operations and supply chain. Whilst the measures for effectiveness remain largely the same as the last reporting period, we strive to continuously improve our mechanisms in line with sector and industry changes. Set out below are the controls and indicators used to gauge effectiveness of our actions.

AREA	CONTROLS	INDICATORS
Modern slavery working group	Quality of actions developed by the Modern Slavery Working Group and progression of these actions	Attendance and active participation by Modern Slavery Working Group members. Actions implemented in accordance with the plan.
Feedback and reporting	Annual Culture and Engagement survey, regular Vice Chancellor all-staff webinars	Consolidated feedback on company and leadership confidence, workplace health and safety, wellbeing, social connection, alignment, diversity and inclusion, teamwork and more.
	Reports and instances raised via our grievance and whistleblowing mechanisms	Number of instances reported, investigated and remediated.
Governance	Policies and guidelines	Regular review of policies and guidelines relating to modern slavery.
	Integration of modern slavery into sourcing matters directly managed by the Procurement team	Inclusion of modern slavery requirements into all procurement requirements directly managed by the Procurement team. Suppliers required to provide evidence of their ability to meet Western's policies and guidelines. Tender schedules for major activities required. Tenderers to provide details on their approach to mitigating modern slavery risks.
	External collaboration and benchmarking	Collaboration with sector peers and benchmarking progress and initiatives against sector.

CONSULTATION

The reporting entities and its controlled entities operate under the direction and governance of the University. As such, this statement reflects the risks of the University including its controlled entities as well as the approach to address those risks.

The Modern Slavery Working Group comprised members from across the University and its controlled entities which were consulted throughout the year on key initiatives and actions undertaken. Controlled entities receive all communication and information pertaining to modern slavery, including how to report.



LOOKING FORWARD

In FY24, our priorities are:

TRAINING AND AWARENESS

- Roll out and embed mandatory modern slavery training across University staff and contractors.
- Extend information sharing and awareness communications for University staff responsible for managing high-risk categories and contractual operations within our supply chain.
- Raise awareness and accessibility of grievance and whistleblowing mechanisms across University staff, students and contractors.

CONTINUOUS IMPROVEMENT

- Develop our Supplier Risk Heat Map to gain insights into our supply chain and potential risks.
- Roll out supplier assessment questionnaires to existing and new suppliers as part of our supplier screening process.
- Update tender documents and roll out modern slavery requirements and questionnaires across all tenders.

SOCIAL PROCUREMENT

- Develop a social procurement charter embedding key aspects of modern slavery risks.
- Develop framework and awareness to provide specific and targeted support to international students who have been identified as a vulnerable group across the sector.

INDUSTRY COLLABORATION

- Ongoing collaboration with the Australian Universities Procurement Network (AUPN) to strengthen modern slavery responses to risks across the sector.
- Partner and collaborate with suppliers to strengthen their response and our response to risks of modern slavery.

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Assessing effectiveness of actions	<ul style="list-style-type: none"> → Measuring effectiveness (pg.21)
Consultation process with entities	<ul style="list-style-type: none"> → Consultation (pg.22)
Any other relevant information	<ul style="list-style-type: none"> → Message from the Chancellor and Vice Chancellor (pg.5) → Looking forward (pg.23)



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