

# **Modern Slavery Statement for 2020**

**Federation University Australia**

**Reporting period: 1 January 2020 to 31 December 2020**

## Contents

<b>Introduction</b>	<b>1</b>
<b>Definitions</b>	<b>2</b>
<b>Part A: The Reporting Entity</b>	<b>3</b>
<b>Federation University Australia</b>	<b>3</b>
About the University	3
Our Purpose	3
Our Present	4
Our Future	4
The University's Values and the	
Staff Code of Conduct	4
Probity and Ethics at the University	4
<b>Part B: Structure, Operations and Supply Chains</b>	<b>5</b>
Structure	5
Operations	6
Industry Collaborations	6
Supply Chain	7
Origin Countries for Supply Chain	7
<b>Part C: Risks of Modern Slavery Practices in Operations &amp; Supply Chains of the University and Subsidiaries</b>	<b>8</b>
Operational Risks	8
Supply Chain Risks	8
<b>Part D: Actions taken to assess and address risks</b>	<b>9</b>
The University's Procurement Framework	9
Working with the Australian Universities Procurement Network	10
Templates and Guidance	11
Technology and Data Gathering	11
Communications to Universities and Stakeholders	11
Support from Consultants and Academics	11
Industries Identified as High Risk and the Procurement Framework	12
Relevant Clauses Inserted into the University's Supplier Contracts and International Agreements	12
<b>Part E: Assessment of the effectiveness of the actions</b>	<b>13</b>
<b>Part F: Consultation Processes</b>	<b>14</b>
<b>Part G: Other Relevant Information</b>	<b>14</b>
<b>Part H: Looking Ahead</b>	<b>14</b>

## Introduction

This Modern Slavery Statement (**the Statement**) sets out actions taken by Federation University Australia to address its reporting obligations under the *Modern Slavery Act 2018* (Cth) for the reporting (calendar) year 2020 (**the Modern Slavery Act**).

The Modern Slavery Act requires entities based or operating in Australia, which entities have consolidated revenue equal to or greater than \$AUD100 million during a financial year, to submit a Modern Slavery Statement for that year. The Statement reports on the risks of modern slavery in entities' operations and supply chains, and the actions of entities to assess and address those risks.


Federation University Australia acknowledges that it has a responsibility under the Modern Slavery Act to report on the steps which it has taken with respect addressing the risks of slavery and human trafficking. Federation University Australia is committed to doing as much as it can to identify, assess and respond to risks of slavery and human trafficking in all University activities and in our supply chains.

This Statement covers the reporting period of 1 January 2020 to 31 December 2020.

## Approval and Signing

This Statement was approved by the University Council of Federation University Australia on 24 June 2021.

This Statement has been approved in accordance with Section 13 of the Modern Slavery Act by the University Council of Federal University Australia on 24 June 2021 and the University Council of Federation University Australia has authorised Professor Duncan Bentley, Vice-Chancellor and President to sign this Modern Slavery Statement on behalf of Federation University Australia:



Signature

**Professor Duncan Bentley**

**Vice-Chancellor and President**

.....  
28 June 2021

## Definitions

For context, definitions of the terms used in the *Modern Slavery Act 2018* (Cth) and the Walk Free Global Slavery Index 2018 (**Global Slavery Index**) are set out below.

Under the Modern Slavery Act the term 'modern slavery' broadly includes all forms of trafficking in persons, slavery and slavery-like practices. This includes forced labour, forced marriage, the worst forms of child labour, and other conduct that would be an offence under the *Criminal Code Act 1995* (Cth).

Specifically, **Modern Slavery** is defined in the Modern Slavery Act to mean conduct which would constitute:

- an offence under Division 270 or 271 of the Criminal Code; or
- an offence under either of those Divisions if the conduct took place in Australia; or
- trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, entered into in New York City on 15 November 2000 ([2005] ATS 27); or
- the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, entered into at Geneva on 17 June 1999 ([2007] ATS 38).

(According to the Global Slavery Index, approximately 40.3 million people were enslaved globally, of which approximately 25 million people were enslaved in the Asia Pacific region alone, and approximately 15,000 people were living in slavery-like conditions in Australia.)

**Human trafficking:** is the movement of a person into, out of, or within Australia using coercion, threats or deception for certain exploitive end purposes. These exploitive end purposes are slavery, servitude, forced labour, forced marriage and debt bondage.

**Slavery:** occurs when a person exercises the rights of ownership over another person. This includes the power to make the victim an object of purchase or to use their labour or services in a substantially unrestricted manner.

**Servitude:** occurs when the victim does not consider himself or herself free to cease providing their labour or services or to leave their place or area of work because of the use of coercion, threats or deception. To be in a condition of servitude, the victim must also be significantly deprived of his or her personal freedom.

**Forced labour:** occurs when the victim does not consider himself or herself free to cease providing their labour or services or to leave their place or area of work because of the use of coercion, threats or deception.

**Forced Marriage:** occurs when the victim gets married without freely and fully consenting because he or she has been coerced, threatened or deceived or because he or she is incapable of understanding the nature and effect of a marriage ceremony.

**Debt Bondage:** occurs when the victim pledges his or her services or the services of a third person as security for a real or purported debt where the debt is manifestly excessive, or where the reasonable value of the victim's services is not applied to the debt or where the length and nature of the victim's services are not limited or defined.

## Part A: The Reporting Entity

### Federation University Australia

*Part A addresses the Modern Slavery Act's requirement for a modern slavery statement to identify the reporting entity (section 16(1)(a) of the Act).*

Federation University Australia is making this Statement as a single reporting entity for the reporting period of 1 January 2020 to 31 December 2020.

### About the University

#### Federation University Australia

The *Federation University Australia Act 2010* (Vic.) is the University's principal governing legislation.

The antecedents of Federation University Australia can be traced back to 1870 with the establishment of the School of Mines in Ballarat. The Ballarat School of Mines was the third institution of higher learning to be established in Australia, and the first such institution to be established in regional Australia.

In 1993 the *University of Ballarat Act 1993* (Vic.) established the University of Ballarat, replacing the former Ballarat College of Advanced Education. The University of Ballarat was one of the few Australian universities to take its name from an Aboriginal word: "Ballarat" means "resting place".

The University's commitment to improving the access of Aboriginal and Torres Strait Islander (**Indigenous**) peoples to tertiary education remains resolute today.

In 1998 the University of Ballarat was enlarged through mergers with the Ballarat School of Mines and the Wimmera Institute of TAFE.

In 2013 the University of Ballarat requested that its name be changed to Federation University Australia. This was to reflect the University's broadened focus beyond central and western Victoria. In 2014 the Monash University Gippsland Campus was incorporated into the operations of Federation University Australia.

Today, Federation University Australia is based on a federated network of campuses in regional Victoria, one campus in Brisbane, partner-provider institutions across Australia and overseas. In addition, it engages in national and international research collaborations. Federation University Australia aims to provide agile, relevant and work-ready academic, technical and research programs spanning the full breadth of the Australian Qualifications Framework.

### Our Purpose

Federation University Australia's Purpose, as set out in its *Strategic Plan 2021-2025* is "to transform lives and enhance communities". Underpinning that Purpose are the University's Values: Inclusion, Innovation, Excellence, Empowerment and Collaboration.

The University serves the Victorian, Australian and international communities by providing enriching educational and cultural experiences, by raising public awareness of educational, scientific and artistic developments, and by promoting academic freedom, freedom of speech and critical and free enquiry. It fosters informed intellectual discourse and public debate within the University, within our communities and in the wider society.

Federation University Australia provides and maintains a teaching and learning environment of excellent quality, offering world-class higher education (**HE**) and vocational education and training (**VET**) programs. We undertake education, scholarship, pure and applied research, invention and innovation of world-class standards and we apply these for the benefit and well-being of our communities: State, national and international.

We use our expertise and resources to involve the Indigenous peoples of Australia in the University's teaching, learning, research and its other activities directed to the advancement of knowledge and thought. This enables Federation University Australia to contribute to the realisation of Indigenous peoples' aspirations and their safeguarding of rich, ancient cultural heritage.

Federation University Australia provides educational programs and services in a way that reflects and embodies principles of equity and social justice, and we equip our graduates to excel in their careers and contribute to their communities.

## **Our Present**

Driven by a strong heritage, today Federation University Australia is known for its focus on educational and social equity, teaching excellence, research distinction, environmental sustainability and, most significantly, regional capacity building.

At Federation University Australia's campuses in Mount Helen, Ballarat, Berwick, Churchill, Horsham and Brisbane we offer a range of HE and VET programs to students of all ages and backgrounds. While our regional character informs our priorities, Federation University Australia remains very focused on serving our other communities and stakeholders, both in Australia, and around the world.

While Federation University Australia is largely based in the regions, it is national in scope and international in reach.

## **Our Future**

Federation University Australia intends to continue to provide high-quality, lifelong learning opportunities for its HE, VET and research students across our federated network of campuses and partner provider institutions.

Federation University Australia will continue to provide its students with the necessary knowledge, skills and attributes to engage in meaningful work and community life and we encourage our students to become strong, engaged and effective local and global citizens.

Federation University Australia's extensive network of campuses and partnerships is a strength that we will continue to grow and develop. We will continue to conduct research that has a positive, meaningful impact on the communities which we serve, and all our stakeholders: regional, national and international.

## **The University's Values and the Staff Code of Conduct**

The University's Values of Inclusion, Innovation, Excellence, Empowerment and Collaboration inform and guide our actions and behaviours, and are underpinned by the principles of the Staff Code of Conduct ([https://policy.federation.edu.au/human\\_resources/staff\\_conduct/staff\\_code\\_of\\_conduct/ch1.pdf](https://policy.federation.edu.au/human_resources/staff_conduct/staff_code_of_conduct/ch1.pdf))

Our Values guide how we engage with our students, our staff members and our communities. The Staff Code of Conduct is directed at ensuring a culture of fair, respectful and ethical behaviour at all times and to support the University in discharging its obligations under State and Commonwealth requirements.

The Code of Conduct assists University staff members to safeguard public trust and confidence in their integrity and professionalism by mandating:

- appropriate standards of conduct;
- fairness, impartiality, honesty and equity in decision making; and
- behaviour that fosters and protects the reputation of the University.

Importantly, staff members expect that members of the Vice-Chancellor's Senior Team and members of the University's Council will set high standards of behaviour, leading by positive example and actively promoting compliance with the Code of Conduct.

In addition to expecting that all at the University will act with integrity, the University expects that all staff members are aware of and act according to the laws of the land at all times.

## **Probity and Ethics at the University**

'Probity' is defined as complete and confirmed integrity, uprightness and honesty: it evidences ethical behaviour in a particular process or context. Thus, probity is essential to sound procurement processes that accord equal opportunities for all participants.

Probity is integrated into all procurement planning and execution at the University. Risk management of probity in our procurement processes involves a high level of control (risk mitigation) over those processes.

Federation University Australia acknowledges and respects the importance of procurement decisions being made in a transparent as well as a fair manner, allowing those decisions to be understood by others and, if necessary or appropriate, to be justified at a later point.

Underpinning the University’s procurement activities are five essential probity principles, specifically:

- open competitive processes;
- fairness, consistency, and transparency of processes;
- identification and resolution of conflicts of interest;
- accountability in relation to decision-making; and
- monitoring and evaluating performance.

Federation University Australia understands that integrity and honesty in procurement activities is essential in order to:

- ensure conformity to processes designed to achieve value for money;
- provide accountability;
- ensure that all bids will be assessed against the same criteria;
- preserve public and participant confidence in University processes; and
- improve defensibility of decisions to potential legal challenge or other external scrutiny.

Moreover, the University acknowledges that the benefits of probity include:

- avoidance of corrupt practices;
- avoidance of conflicts of interest;
- better outcomes against stated objectives;
- improvements in organisational and attitudinal change;
- reassurance to the community and those wishing to do business with the University that its processes and outcomes can be trusted;
- the opportunity to assess the objectivity and independence of decision-making; and
- minimisation of the potential for litigation.

## Part B: Structure, Operations and Supply Chains

*Part B addresses the Modern Slavery Act’s requirement for a modern slavery statement to describe the structure, operations and supply chains of the reporting entity (section 16(1)(b) of the Act).*

### Structure

The *Federation University Australia Act 2010* (Vic.) created the University as a body corporate and a body politic. The University has two wholly-owned subsidiary entities, both of which are inactive.

**Figure 1. Subsidiaries**

Entity		Principal place of business	Ownership interest %
The School of Mines and Industries Ballarat Ltd	Inactive	Australia	100%
Brisbane Educational Services Pty Ltd	Inactive	Australia	100%

## Operations

The core business of Federation University Australia, as with other Australian universities, is to provide educational programs and to conduct research. The University undertakes these activities at campuses in Mount Helen, Ballarat, Berwick, Churchill, Horsham and Brisbane. During 2020 it employed a total of 1,618 members of academic and professional staff.

The University also has a network of onshore partner providers for international students in Melbourne, Sydney and Adelaide, as well as offshore partners in Hong Kong, Sri Lanka and China. We work closely with our partner providers to provide a high-quality educational experience with recognised educational qualifications. Our onshore partner providers offer undergraduate and postgraduate level qualifications in the fields of Information Technology, Information Systems, Business Management, Commerce and Accounting.

The University has entered into articulation agreements with a number of Chinese universities, which facilitate students commencing their undergraduate or postgraduate studies at the relevant Chinese university, and then to transfer to a Federation University Australia campus to complete their study programs. These agreements often also provide opportunities for inter-university collaborative research..

Federation University Australia also employs international agents to recruit international students to study onshore.

Examples of our international partnerships include:

- *Federation University Information Engineering Institute at Hebei University of Science and Technology (HUST)*: the University is one of only six Australian universities to be granted 'approved institute' status in China, which allowed the establishment a major information technology centre at HUST. There are 126 universities in the Hebei Province, but this Joint Institute is one of only two in that Province, and the only one with information technology (IT). Eight hundred students are expected to complete the IT program over the first four years and the partnership will also provide opportunities for joint research and research grant applications.
- *Zhejiang University of Technology (ZUT) Civil Engineering joint program*: this transnational educational partnership commenced in 2013 with 98 students, with Federation University Australia working with ZUT to deliver civil engineering to one of the top industrial universities in China.
- *Nawaloka College of Higher Studies*: this is Federation University Australia's newest transnational education partner and it is located in Colombo, Sri Lanka. Delivery of undergraduate programs in IT and Business disciplines will commence in July 2021.

During 2020 a total of 16,617 domestic and international onshore HE students were enrolled in one of the following Schools:

- School of Arts
- School of Education
- School of Health
- School of Science, Psychology and Sport
- School of Engineering, IT and Physical Sciences
- Federation Business School

A total of 4,946 students were enrolled in VET programs at Federation TAFE during 2020.

## Industry Collaborations

- *IBM Australia*: Under the terms of the University's agreement with IBM Australia Ltd, approximately 360 domestic and international students are enrolled in the Bachelor of IT (Professional Practice). they will also complete a 1,600-hour internship. Many of these students will be employed by IBM Australia after they graduate. Based at the University's Ballarat Technology Park, our long-standing partnership with IBM Australia also provides opportunities for research collaborations at the very cutting edge of technology.



- *CT4*: CT4, a cyber-security specialist in the Asia Pacific region, established its Australian headquarters at the Ballarat Technology Park in 2019. Our partnership with CT4 includes professional placements and work opportunities for both HE and TAFE students. There is also the potential for higher education students to engage in research collaborations.
- *SERCO Australia*: Serco Australia set up operations at the Ballarat Technology Park in 2019. Serco is a global government services company which provides a 24-hour call centre and web-based support to Victoria Police, as well as creating work and development opportunities in the Ballarat region.
- *World Academy of Sport*: the World Academy of Sport delivers programs for athletes, officials, coaches and people working in high performance-level sport around the world. As their chosen global university partner, Federation University Australia is well-placed to offer a Bachelor of International Sport Management online in Australasia, the Asia-Pacific, UK, Europe and India. A pathway program for secondary school students through the International Baccalaureate is also offered.

## Supply Chain

Federation University Australia procures a wide range of goods and services in order to deliver its educational and research programs and to pursue other strategic objectives. For example, during the previous calendar year (2019) the University engaged directly with more than 1,991 vendors.

The major 'spend' categories for the University are as follows:

- Construction services – building, construction, major repairs, upgrades, restoration;
- Facilities management – cleaning, security, grounds maintenance, plant and equipment maintenance, Fleet services;
- Medical consumables – personal protective equipment such as gowns, masks and gloves, medical devices, laboratory equipment;
- ICT hardware and software – PCs and laptops, printers, peripherals, cabling, software, network services;
- Travel services – accommodation, airfares;
- Utilities – electricity, gas, water, telecommunications;
- Office supplies – general office products, furniture, office machines; and
- Consultancies (various).

## Origin Countries for Supply Chain

A recent analysis of the University's 'point of direct supply' showed that 90% of the goods and services obtained by the University possessed Australian-supply origin or were obtained through Australian-based subsidiaries of suppliers from low risk countries.

## Part C: Risks of Modern Slavery Practices in Operations & Supply Chains of the University and Subsidiaries

*Part C addresses the Modern Slavery Act's requirement for a modern slavery statement to describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls (section 16(1)(c) of the Act).*

### Operational Risks

Federation University Australia recognises the risk of Modern Slavery in its operations. The University is especially aware of that risk with respect to the activities of our overseas partners and overseas suppliers as, inevitably, we have less visibility of their operations on a day-to-day basis.

The University aims to reduce or mitigate the risk of Modern Slavery through the insertion of relevant clauses in our contracts with suppliers and partners; also through our operations, governance structure and employment practices: in other words, through our internal control framework. That control framework includes:

- a robust corporate governance and compliance framework;
- mandatory employment screening practices and verification of 'right to work' in Australia for all employees;
- high-quality Human Resources policies and procedures that mandate bona fide and merit-based recruitment processes and outcomes;
- the terms of our industrial instruments, such as the University's *Union Enterprise Agreement 2019-2021*, which govern employer-employee relationships;
- notification procedures, 'whistle-blowing' and complaints mechanisms for reporting concerns/complaints; and
- a Staff Employment Assistance Program through which all employees can access confidential support and guidance.

### Supply Chain Risks

According to Global Slavery Index data, the risk of Modern Slavery in Australia appears to be lower than in many other jurisdictions. However, the University recognises that our Australian suppliers provide us with goods and services across all high-risk categories. Accordingly, we also recognise that deeper engagement with and closer assessment of those suppliers is necessary.

Our spend, supplier and category risk prioritisation work in 2021 and 2022 will inform our ongoing Modern Slavery risk management and supplier engagement and review program.

Federation University Australia recognises that the identification, mitigation and management of Modern Slavery risks are critically important, though challenging, processes which will evolve and improve over time.

Accordingly, the University will focus on continuous improvement in this vital aspect of our supply chain management.

For the purposes of our actions for this reporting period, we conducted a high-level risk assessment based on the Global Slavery Index and the Modern Slavery Act.

The high-level risk assessment is set out on the next page.

## High-Level Modern Slavery Risk Assessment

Aspect	Category	Modern Slavery risk factors
Supply Chain		
	Engineering and construction	Inherent High-Level Risks: these exist in construction and the extended construction materials supply chain. Risks include the employment of lower-skilled and migrant employees, as well as potentially dangerous working conditions.
	Security	Inherent High-Level Risks: asset security services are associated with the employment of lower skilled and migrant labour.
	IT services and software	Inherent High-Level Risks: these are present in IT equipment manufactured in higher-risk countries, most prominently forced and bonded labour. A lower level of inherent risk was identified in the provision of IT services and software delivered in Australia.
	Trade services and maintenance	Inherent High-Level Risks: these exist in the use of lower skilled or migrant labour and in the use of labour hire services. Additional risks within the extended materials supply chain are again associated with the use of lower skilled or migrant employees, as well as potentially dangerous working conditions
	Apparel, uniforms and merchandise	Inherent High-Level Risks: may exist in the extended and complex apparel, uniforms and merchandise supply chain. These risks have a higher likelihood of occurrence offshore and include deceptive recruitment practices, forced or bonded, child labour and human trafficking.

## Part D: Actions taken to assess and address risks

*Part D addresses the Modern Slavery Act's requirement for a modern slavery statement to describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes (section 16(1)(d) of the Act).*

### The University's Procurement Framework

The University's Procurement Framework provides strategic and operational guidance to staff members who are responsible for purchasing goods and services on its behalf.

This guidance covers the entire value of the University's procurement spend and sets out the auditable processes necessary to comply with the University's Procurement Policy and Procedure (at [https://policy.federation.edu.au/finance/procurement/purchasing\\_and\\_procurement/ch01.php](https://policy.federation.edu.au/finance/procurement/purchasing_and_procurement/ch01.php) and [https://policy.federation.edu.au/finance/procurement/purchasing\\_and\\_procurement/ch2.pdf](https://policy.federation.edu.au/finance/procurement/purchasing_and_procurement/ch2.pdf)) respectively.

Federation University Australia actively seeks out and offers opportunities wherever possible for competitive local and/or regional industries.

The University's procurement objectives are to:

- guide and assist University staff in obtaining best value for money throughout the acquisition of goods and services;
- ensure that the University and others are not exposed to undue personal or commercial risk; and
- purchase goods and services in an environmentally and socially responsible framework.

## Working with the Australian Universities Procurement Network

As a member of the Australian University Procurement Network (**AUPN**), Federation University Australia is part of the AUPN's Modern Slavery Network.

AUPN is leading a sector collaboration to support all member universities to meet the challenge of human rights, transparency and risk management in their supply chains. It plays a key role in supporting its members' reporting under the terms of the Modern Slavery Act. AUPN has set up a Modern Slavery Working Group (**MSWG**) which focuses on consultation and collaboration within the higher education sector.

The MSWG undertook and exercise called the 'Discovery Phase' and subsequently developed the following sector-wide Modern Slavery Project outlined in the figure below:

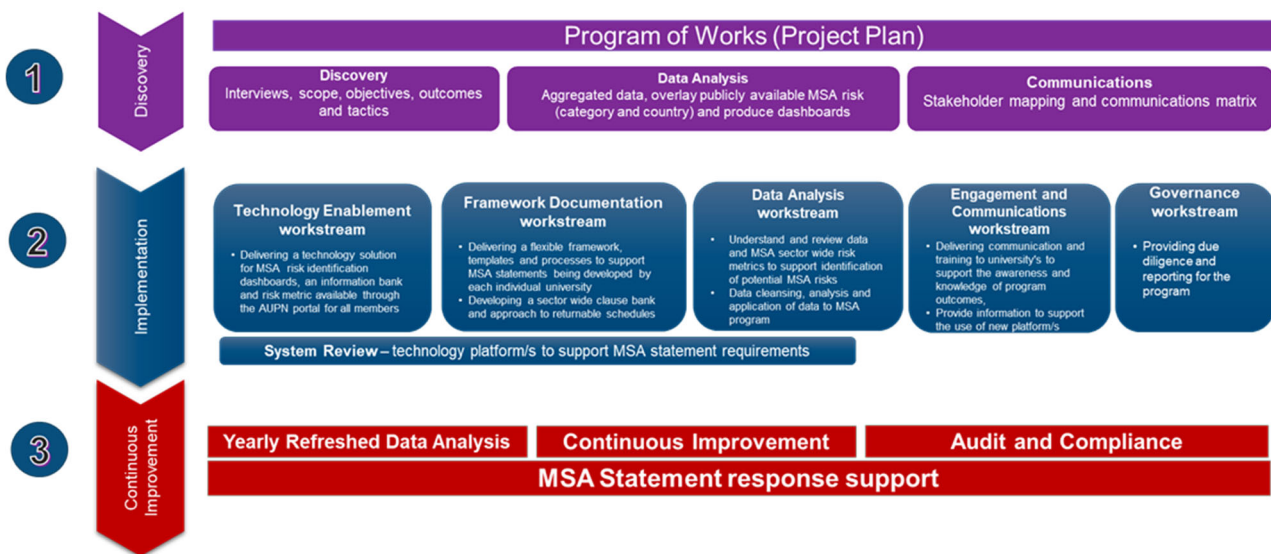


Image 1. AUPN MS Program – Developed by MSWG with support from ArcBlue Consulting.

The Modern Slavery Project (the MSWG's Program of Works) aims to deliver the following:

- 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;
- a sector approach/action plan for addressing, mitigating and/ or remediating identified risks;
- flexible templates and guidance; and
- continuous improvement.

The AUPN members and their suppliers benefit from the improved operational efficiencies of the collaboration and gain improved effectiveness in mitigating risk and improving social performance within supply chains.

Federation University Australia endorses the work of the MSWG and takes support and guidance from it.

## Templates and Guidance

The MSWG has developed the following templates and guidance available to all AUPN members via a dedicated online AUPN portal:

- A Supplier Assessment Questionnaire/Response Schedule;
- Standard/Template contract clauses;
- Supplier Code of Conduct Guidelines; and
- Supplier Engagement Terms of Reference and Communication approach.

Federation University Australia intends to consider and, where possible, to apply these resources as part of its approach to identify and addressing Modern Slavery risks.

## Technology and Data Gathering

As part of the Discovery Phase, a Modern Slavery Risk Dashboard was developed and made available to all AUPN members in January 2020. Australian universities have submitted 2018 to 2020 spend data into the dashboard and Modern Slavery Program. Data continues to be gathered from other universities.

The Dashboard is a key development in the AUPN's Modern Slavery Program, providing indications of universities' risks across two different lenses:

1. potential risks of Modern Slavery applied against spend categories using the AUPN taxonomy, and
2. potential risks of Modern Slavery applied against country locations using supplier head office location.

Those risks have been determined through publicly available Modern Slavery risk (e.g. Global Slavery Index) together with some assumptions generally deemed to be 'reasonable'. The Dashboard provides only an indicative view of where risks may exist and the AUPN will aim to continue to evolve risk ratings over time as the analytics matures.

The aggregated data reflects the broad supply chains of the university sector. Analysis of the spend data provided covers over AUD \$14.6 billion annualised spend across more than 183,800 individual suppliers. Suppliers with the highest spend are in the construction, ICT and research markets.

The MSWG undertook a two-stage tender process to appoint a third-party technology solution to further support its members to gather and interrogate expenditure supplier data, identify risk, focus resources and inform action. The company 'FRDM' was selected to provide the technology solution that will support collaboration of AUPN members to gather and interrogate supplier data, identify risk, focus resources, inform action, and measure effectiveness.

## Communications to Universities and Stakeholders

The MSWG provide progress updates on its Modern Slavery Program on a monthly basis via email correspondence and regular project status uploads into the AUPN portal. Monthly virtual sessions are used to update the AUPN members on the progress of its Modern Slavery Program and provide a vehicle for feedback, discussion, and education within the AUPN community.

The Chief Procurement Officers of AUPN members aim to also be engaged directly to provide awareness o Programs' progress and ensure alignment with university strategies.

These channels of communications greatly assist Federation University Australia as it explores and charts its course to reduce the risk of Modern Slavery in its supply chains and operations.

## Support from Consultants and Academics

In the beginning of 2019, ArcBlue Consulting was engaged to facilitate the AUPN's Discovery Phase and supported development of the AUPN Modern Slavery Program and the Modern Slavery Risk Dashboard.

ArcBlue continues to support the AUPN with managing the online AUPN portal, including maintaining the Risk Dashboard and shared modern slavery documentation.

Modern Slavery specialist Pillar Two was engaged in May 2020 following a tender process to provide Modern Slavery subject matter expertise and support to the AUPN's Modern Slavery Program. To date, Pillar Two has provided:

- a complete a review of the AUPN Modern Slavery Program, including making 25 recommendations to enhance the sector's approach to identifying and mitigating risk;
- Modern Slavery subject matter expertise support throughout the entire technology solution tender process; and
- review of the Modern Slavery Risk Dashboard and risk ratings.

An Academic Advisory Board was established by AUPN in July 2020, initially comprising 12 academics from nine Australian universities possessing expert knowledge of Modern Slavery prevalence, practices and risk identification. This Board adds an important layer to the AUPN's capacity to lead the sector in establishing best practice, Modern Slavery risk mitigation.

## Industries Identified as High Risk and the Procurement Framework

The robust Procurement Framework introduced by Federation University Australia in 2019 includes guidance on purchasing in an environmentally and socially responsible manner.

'Social Procurement' is the activity that takes into consideration the real, or potential, impacts associated with the production or sale of goods and/or services including: health, safety, human rights, ethical production, social justice, indigenous businesses, fair trade, diversity, access, and purchasing locally and domestically made goods and/or services.

One of the University's key objectives in terms of social procurement is supporting safe and fair workplaces, endeavouring to procure goods and services only from suppliers that comply with industrial laws and which promote secure employment.

Today, the University's template tendering documents incorporate:

- Corporate Social responsibility compliance documents; and
- a Modern Slavery questionnaire.

## Relevant Clauses Inserted into the University's Supplier Contracts and International Agreements

Federation University Australia has created important obligations with respect to Modern Slavery risks for its contractual partners in the form of template clauses, and these clauses are incorporated into all of its new contracts.

Thus, the following clause is included in all Federation University Australia supplier contracts:

### ***'Modern Slavery***

*The supplier acknowledges and agrees that the supplier must:*

- a. Comply with Modern Slavery Legislation to the extent that such legislation is applicable to the supplier;*
- b. In any event, facilitate the University complying with any of the Modern Slavery Legislation applicable to the University, by reporting in a timely manner, and providing all information its supply chain and of its suppliers which the University may acting reasonably require, such reporting and other information being provided no later than 60 days after the expiry of the period to which the reporting relates to, or earlier as required in order for the University to meet its obligations under the applicable Modern Slavery Legislation and;*
- c. Ensure that such reporting is accurate, complete and in such for that the University in its discretion requires.'*

Included in each of Federation University Australia's international agreements is the following clause:

*'The Provider [the other party] must:*

*comply with all applicable Laws (including the Regulatory Requirements), University Policies, University Statutes and University Regulations in the provision of the Services;*

*comply with its obligations under any Group Lease and Third Party Lease to which it is a party;*

*provide the Services in a manner which supports the University in fulfilling its responsibilities under applicable Laws (including the Regulatory Requirements), University Policies, University Statutes and University Regulations; and*

*not do (or omit to do) any act which would result in the University failing to comply with any Law (including the Regulatory Requirement), University Policy, University Statute or University Regulation'.*

## Part E: Assessment of the effectiveness of the actions

*Part E addresses the Modern Slavery Act's requirement for a modern slavery statement to describe how the reporting entity assesses the effectiveness of such actions (section 16(1)(e) of the Act).*

Federation University Australia is beginning to develop a variety of methods to assess the effectiveness of our actions in identifying and addressing the risks of Modern Slavery. There is considerable work still to be done in this area. It will be a key focus of our continuous improvement program.

In particular, the University's ability in 2020 to closely monitor or scrutinise the practices of our suppliers and international partners in high-risk countries was hampered by sensitive geo-political factors and COVID-19-related international border closures.

Accordingly, we have had to rely largely on relevant undertakings from those suppliers and international partners.

Generally, a key method of assessing the effectiveness of our actions aimed at mitigating the risk of Modern Slavery is to monitor and enforce monitoring compliance by our contractual partners. This can be done in connection with our Australian-based suppliers and partners.

An informal Modern Slavery Steering Group was established at the University in April 2021 which will be formalised into a Modern Slavery Mitigation Steering Group by the end of 2021. This Steering Group will:

- consider and monitor the risks of Modern Slavery in our operations and supply chains;
- review the actions taken to date by Federation University Australia to identify and mitigate the risks of Modern Slavery;
- assess the effectiveness of those actions; and
- report on developments and initiatives proposed by the AUPN and other key stakeholders and experts.

Key areas of focus for the formalised Modern Slavery Mitigation Steering Group will be:

- **Governance:** further strengthening our supply chain governance through updates to policy, procedures, audits and contract documents relevant to modern slavery risk.
- **Education and training programs:** embedding changes into the University operations through targeted training and education on modern slavery risks.
- **Enhanced supplier analysis and engagement:** conducting more detailed risk assessment of our supply chains. Addition to the AUPN analysis and engagement with identified higher risk suppliers.

## Part F: Consultation Processes

*Part F addresses the Modern Slavery Act's requirement for a modern slavery statement to describe the process of consultation with (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a joint statement—the entity giving the statement (section 16(1)(f) Act).*

In preparing this Statement we have collaborated with and consulted key stakeholders at Federation University Australia, including close engagement with our internal procurement, international, legal and risk management and assurance teams. We have also consulted members of the Vice-Chancellor's Senior Team and obtained external advice.

Federation University Australia's two subsidiaries are not active entities and accordingly there has been no consultation in that regard in preparing this Statement.

We expect that our internal and external consultation processes will continue to evolve and increase as we submit Modern Slavery Statements in future reporting periods.

## Part G: Other Relevant Information

*Part G addresses the Modern Slavery Act's requirement for a modern slavery statement to include any other information that the reporting entity, or the entity giving the statement, considers relevant (section 16(1)(g) of the Act).*

During 2020 Federation University Australia was significantly affected by the COVID-19 pandemic and the closure of international borders, and we continue to be so affected.

Major disruption was caused to our delivery of programs, our supply chains, our current, future and prospective students, and to our staff members. Subject to considerable improvements in the operating environment, we anticipate that it will be a long and quite difficult recovery process for the University in the years 2021-24.

## Part H: Looking Ahead

Other options which Federation University Australia is considering in order to address and assess the risks of Modern Slavery in our operations and supply chains include:

- drafting and implementing an Anti-Slavery and Anti-Trafficking Policy;
- reviewing and amending our human resources policies and procedures to ensure compliance with the Anti-Slavery and Anti-Trafficking Policy;
- implementing a communications program to ensure that the University's Departments, Schools and Directorates are aware of, and apply, anti-slavery and anti-trafficking requirements and practices; and
- implementing a communications program with current trade suppliers, with confirmation of attendance/compliance recorded as part of that process.

Federation University Australia looks forward to reporting enhanced strategic measures and practices aimed at addressing and mitigating the risk of Modern Slavery in our future reports to the Minister for Home Affairs.

---