

Modern Slavery Statement 2021

TABLE OF CONTENTS

| | |
|--|-----------|
| Introduction | 2 |
| Structure, Operations and Supply Chains (Mandatory Criterion One and Two) | 3 |
| 1. The University | 3 |
| 2. University 2025 Strategy | 3 |
| 3. University Governance | 3 |
| 4. University structure | 4 |
| 5. University procurement framework and supply chains | 6 |
| Identifying modern slavery risks (Mandatory Criterion Three) | 8 |
| 6. Risk management framework | 8 |
| 7. Risks in University supply chains | 8 |
| 8. Risks in University operations | 9 |
| Actions to address modern slavery risks (Mandatory Criterion Four) | 10 |
| 9. Actions to address risks in University supply chains | 10 |
| 10. Actions to address risks in University operations | 13 |
| 11. Impact of COVID-19 on actions to address modern slavery risks | 15 |
| Effectiveness (Mandatory Criterion Five) | 16 |
| 12. Assessing the effectiveness of the University's actions | 16 |
| Controlled Entities (Mandatory Criterion Six) | 17 |
| 13. Status of University controlled entities | 17 |
| 14. Consultation with University controlled entities | 17 |
| 2022 and beyond | 18 |
| 15. Moving forward | 18 |
| Declaration | 19 |

INTRODUCTION

The University of New South Wales (the **University**) is committed to human rights and the creation of a just and equal society. Through its strategic priority for social impact, the University strives to shape and progress a just society by mobilising our expertise to lead debate, sustainably address global challenges (including modern slavery) and foster equity, diversity and inclusion.

What is modern slavery?

Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine or deprive them of their freedom. Modern slavery is not the same thing as substandard or dangerous working conditions, or underpayment of workers, though the existence of such conditions may be an indicator of modern slavery. 'Modern slavery' is defined in the Act to refer to conduct which either amounts to a serious criminal offence under Australian law or to a violation of international Conventions to which Australia is a party.

The University's commitment

The University is committed to ensuring:

- its operations and supply chains do not cause, involve or contribute to modern slavery, and
- its suppliers, relevant stakeholders and others with whom the University does business respect and share the University's commitment with regard to minimising the risk of modern slavery.

Working collaboratively with suppliers and other organisations, the University seeks to identify and implement measures which will contribute to the prevention, mitigation and remediation of the risks of modern slavery in its supply chains and operations.

The University's statement

This statement is made in accordance with Part 2 of the *Modern Slavery Act 2018* (Cth) (the **Act**) and constitutes the University of New South Wales's Modern Slavery Statement for the reporting period 1 January to 31 December 2021. It was approved by the University Council in its role as the principal governing body of the University on 6 June 2022.

This statement explains what the University is doing to assess and address the risks that modern slavery practices may be occurring in the University's supply chains and operations (including those of its controlled entities) both in Australia and overseas. This statement improves transparency by making information available to our staff, students, alumni, suppliers, business partners and the broader community on our efforts to address modern slavery risks. Each section addresses actions taken in response to the mandatory criteria of the Act during the year ended 31 December 2021.



STRUCTURE, OPERATIONS AND SUPPLY CHAINS

(Mandatory Criterion One and Two)

1. The University

Since its foundation in 1949, the University has aimed to improve and transform lives through excellence in research, outstanding education and a commitment to advancing a just society.

The University is one of the world's leading research and teaching-intensive universities, known for innovative, pioneering research and high-quality education with a global impact. The University has a proud tradition of sustained innovation, focussing on areas critical to its future – from climate change and renewable energies to lifesaving medical treatments and breakthrough technologies.

2. University 2025 Strategy

The University's 2015-2025 Strategy provides the framework for UNSW to further advance its contribution in academic excellence, social impact and global engagement, in the best interests of society. The University's strategic priorities are:

- Academic Excellence
- Innovation and Engagement
- Social Impact

Delivering on the above strategic priorities is a focus for the University and is supported by five internal enablers, directed at:

- E1: Developing and supporting our people
- E2: Enhancing our profile, outreach and philanthropy
- E3: Supporting our services, systems and processes
- E4: Enhancing our campuses
- E5: Ensuring our financial Sustainability

A copy of the University's latest 2025 Strategy Update is available [here](#).

Respect for human rights and human dignity is fundamental to the achievement of the University's Vision and Values and its 2025 Strategy. This is reflected in the University's commitment to ensuring that its operations and supply chains do not involve or contribute to modern slavery.

3. University Governance

Established by the *University of New South Wales Act 1989* (NSW), the University is governed by a Council of 15 members led by, and including, the Chancellor. Members represent the interests of the University and the community, contributing expertise in a range of areas including finance, commercial activities, law, governance, management and strategic planning.

The Council has the following committees: Audit, Finance and Strategy, Honorary Degrees, Information Technology, Remuneration and People, and Risk. The Council is able to draw on additional, specialised expertise by appointing external members to its committees. Council and Council Committee members serve the University on a voluntary basis.



Under the University's Legislative Compliance Framework, compliance owners assigned to address modern slavery risks in supply chains and operations are required to complete an annual compliance certification, the results of which are reported through to the Audit and Risk committees of the Council, and in turn to the Council itself.

4. University structure

Organisational structure

The University consists of:

7 Faculties

- Faculty of Art, Design & Architecture
- Faculty of Engineering
- UNSW Business School
- Faculty of Law & Justice
- Faculty of Medicine & Health
- Faculty of Science
- UNSW Canberra (college) at the Australian Defence Force Academy (ADFA)

5 Divisions

- Academic and Student Life
- External Engagement
- Finance and Operations
- Planning and Assurance
- Research and Enterprise

45 Schools

125 UNSW and external centres and institutes

11 on-campus residential colleges

Campus number and locations

There are 3 University campuses, being:

UNSW Sydney – set on 38ha at Kensington, 7km from the centre of Sydney's CBD.

UNSW Art & Design – located at Paddington in Sydney, UNSW Art & Design is an internationally recognised centre for arts-led transdisciplinary research in science and technology, with strengths in art theory and criticism; film, television and digital media; and visual arts and crafts.

UNSW Canberra – located at the Australian Defence Force Academy in Canberra, it provides undergraduate education for officer cadets as well as postgraduate programs (open to all students in arts, business, engineering, IT, management and science).

Staff and student numbers (as at 31 March 2021)

Staff

| | |
|--------------------|------------------------------------|
| Academic staff | 3,081 |
| Professional staff | 3,422 |
| Total staff | 6,503 (6,008 full-time equivalent) |



Student/alumni

| | |
|---------|-----------------------------------|
| 65,600 | Total students |
| 24,982 | Students commencing 2021 |
| 42,654 | Local students |
| 22,946 | International students |
| 4,358 | Higher degree research candidates |
| 353,612 | UNSW alumni |

Controlled entities

The University has established controlled entities in Australia and overseas to support both its philanthropic and development activities and to further the commercial functions of the University. Refer to section 14 of this statement for further information of consultation conducted with controlled entities. The University had control over the following entities as at 31 December 2021:

| <i>Company Name</i> | <i>Jurisdiction</i> |
|---|---------------------|
| Horizons Future Learning Pty Ltd - Teaching and other activities | Australia |
| NewSouth Innovations Pty Ltd - Intellectual property management/commercialisation | Australia |
| Qucor Pty Ltd - Intellectual property management/commercialisation | Australia |
| Scientia Clinical Research Ltd - Clinical trials | Australia |
| The University of New South Wales Foundation Ltd - Philanthropy and donations | Australia |
| University of New South Wales Press Ltd - Press and publications | Australia |
| UNSW Global Pty Ltd - Teaching and other activities | Australia |
| UNSW Centre for Transformational Environmental Technologies (Yixing) Co. Ltd - Intellectual property development/commercialisation | China |
| UNSW Sino-Australia Innovative Technology & Education (Shanghai) Co. Ltd - Intellectual property development /commercialisation | China |
| UNSW Hong Kong Ltd - Promotion and recruitment | Hong Kong |
| UNSW Hong Kong Foundation Ltd - Philanthropy and donations | Hong Kong |
| UNSW Global India Pvt Ltd - Promotion and recruitment | India |
| UK Foundation of UNSW Australia - Philanthropy and donations | UK |
| UNSW & Study Abroad – Friends and US Alumni, Inc - Philanthropy and donations | USA |



5. University procurement framework and supply chains

The University defines procurement as "the acquisition of goods, services, infrastructure and capital works whether purchased or leased". Under the University's [Procurement Policy](#) all procurement must be underpinned by the following six core principles:

1. Value for Money
2. Probity and equity
3. Risk management
4. Fit for purpose
5. Sustainable
6. Recordkeeping

The University's [Procurement Procedure](#) identifies the processes that govern procurement.

Sustainable Procurement Vision 2018-2025

The University's [Sustainable Procurement Vision 2018-2025](#) aims to deliver strong environmental, social and economic benefits to the University's students, staff and community through understanding and strengthening the University's supply chains. "Sustainable procurement" is the term used to describe any and all practices within the procurement lifecycle, including formed partnerships and/or affiliations.

Within this vision are sub-principles that include individual focus plans to be created and delivered against key targets. This includes, but is not limited to:

- Human Rights
- Modern Slavery
- Gender equality
- Health and safety
- Environment
- Equity, diversity and inclusion
- Carbon, Energy, Water, Waste.

For 2020-2022 the University is dedicating its efforts to three Focus Plans, being:

1. Addressing Modern Slavery risks across the University's Supply Chains;
2. Supplier Diversity and Inclusion
3. Carbon Emissions (Net Zero Strategy).

Each Focus Plan:

- outlines strategy, actions, treatment, management, monitoring and measurement of risk
- includes key activities, associated timeframes, vendor classifications, threats and opportunities
- includes key performance indicators to allow the University to measure performance at various maturity milestones.

Supply chains

The University works with over 10,000 suppliers annually. The supplier base is diverse, as the nature of the industry in which we operate is global and varied. The University’s supply chain supports not only our academic programs and research activities, but also our infrastructure, administrative and commercial functions.

The following Table provides details of the University’s suppliers:

| | |
|--|---|
| Top 10 countries of spend: | <ol style="list-style-type: none"> 1. Australia 2. United States of America 3. China 4. India 5. Hong Kong 6. Argentina 7. Singapore 8. Ireland 9. Indonesia 10. Papua New Guinea |
| Country of operation of top 10 vendors by spend | <ol style="list-style-type: none"> 1. Australia 2. Australia 3. Australia 4. Australia 5. Australia 6. Australia 7. Indonesia 8. Australia 9. Australia 10. Australia |



IDENTIFYING MODERN SLAVERY RISKS

(Mandatory Criterion Three)

6. Risk management framework

Under its [Risk Management Framework](#), the University is committed to building a risk-aware culture that is supported by a tailored, practical and integrated approach to the identification and management of risk arising from the uncertainty inherent in the University's strategy, operations and the global environment. This commitment is articulated in the [Risk Management Policy](#) and championed by University leaders.

In accordance with the [Risk Management Framework](#), identified risks are recorded in risk profiles at the Faculty and Divisional level as well as in the University's enterprise risk profiles. These risk profiles are drawn on in formulating the University's Internal Audit Plan and are overseen by the Risk Committee of the Council. During 2021 modern slavery was included in the risk profiling activities of the University.

7. Risks in University supply chains

The University has been working to identify and assess modern slavery risks within its supply chains. Risks are often embedded within complex layers of a supply chain. Sources of risk with the highest risk profile in terms of labour, modern slavery and other human rights infringements include:

1. Catering
2. Cleaning contractors
3. Construction contractors
4. Recruitment and search- overseas operations
5. ICT software/professional services
6. Laboratory consumables
7. Promotional material
8. IT hardware
9. Office supplies
10. Personal Protective Equipment (PPE)

Based on the ongoing risk analysis work of the Australian Universities Procurement Network (AUPN), of which the University is a member, the University has been actively working to incorporate modern slavery due diligence (consistent with the framework set out in the UN Guiding Principles on Business and Human Rights) within its supply chains. This approach includes:

- identification and assessment: conducting independent reviews, assessment, monitoring and planning to better understand risks in key areas of focus
- collaboration: participating in and actively contributing to the AUPN's university sector wide approach to strengthen the integrity of supply chains (across the sector)
- response and remediation: escalating, reporting and determining appropriate actions to respond to and manage modern slavery risks



8. Risks in University operations

The University recognises that, in addition to its supply chains, the breadth and scope of its operations may expose the University to risks of modern slavery. The University's core activities are education and research, and key operational areas where modern slavery risk may arise include:

▪ Investments

There is the risk of modern slavery being prevalent in the organisations in which the University invests indirectly through its funds managers.

The University's [Investment Policy](#) commits the University to managing its financial investments in an ethical and responsible manner, with an expectation that its funds managers exert influence over and encourage the organisations they invest in to operate ethically, responsibly and in a manner that contributes to a sustainable and better world.

▪ Human Resources

The University's conditions of employment are determined by applicable legislation and enterprise agreements that act to prevent risks of modern slavery. However, modern slavery risks can occur where services previously conducted by staff are contracted to third parties, especially in industries where labour exploitation is known to occur.

To minimise these risks, the University addresses modern slavery risks through the use of Requests for Capability and Requests for Proposal, through which the University can assess the credentials of potential third party service providers. Such contracts are then monitored and periodic audits undertaken to ensure compliance with modern slavery obligations.

▪ Research and Enterprise

The University conducts research and knowledge exchange activities in many countries around the world. Modern slavery risks can occur where activities are conducted in countries that may have higher risks of modern slavery due to poor governance, weak rule of law, corruption and other socio-economic factors. Research project in these countries that present potential links to modern slavery risks include:

- clinical and research trials including human tissue and data collection
- projects that utilise and rely on third party service providers in these countries
- projects that require partnerships and affiliations with organisations in these countries

The University's [Research Code of Conduct](#) commits the University's researchers to conducting their activities in a responsible and ethical manner.



ACTIONS TO ADDRESS MODERN SLAVERY RISKS

(Mandatory Criterion Four)

9. Actions to address risks in University supply chains

New in 2021

UNSW partners with Electronics Watch to support remediation of IT hardware modern slavery risks

UNSW partners with 33 other universities to develop FRDM Higher Education Modern Slavery tool to identify and assess modern slavery risks

Continuing from 2020

Procurement team driving action through the Modern Slavery Supply Chain Output Framework

Ensuring that suppliers commit to the University's Procurement Supplier Charter

Requiring suppliers to complete Modern Slavery Questionnaire

Modern slavery questions included in all Requests for Quote and Request for Proposal templates

Modern slavery clauses included in all procurement contract templates

University partnership with Electronics Watch

In November 2021 the University signed a partner agreement with [Electronics Watch](#) to support the remediation of IT hardware modern slavery risks in the University's supply chains.

Electronics as a category has been deemed as the **second highest risk** across the university sector, based on analysis of 28 universities nationwide, with sector spend upwards of \$260m annually. At the University, upwards of \$25-\$30 million is spent on IT hardware each year. It is one of the largest categories of spend that the University incurs annually.

[Electronics Watch](#) was launched in 2015 as an independent monitoring organisation, established as a not-for-profit non-governmental organisation incorporated under Dutch law. It brings together public sector buyers and civil society organisations in electronics production regions, guiding public procurement demand for decent working conditions in electronics supply chains. It currently has over 320 partners in 7 countries.

As a monitoring and remediation organisation [Electronics Watch](#) focus on the working conditions of electronics assembly factories and their component suppliers in affiliates' supply chains and produce reports to inform how organisations can best reduce identified risks. These range of reports include:

- regional risk assessments based on consultations and work testimonies in regions where factories in affiliates' supply chains are located
- factory risk assessments to identify potential and actual violations of the code of labour standards as well as recommending ways to mitigate and prevent risk
- compliance investigations and workers' rights alert, ensuring that workers are supported and are able to report breaches of labour rights or safety standards to an independent third party, and



Through this partner agreement, the University now has access to a range of analysis and tools that the University is now able to use to strengthen social responsibility within its supply chains.

University partnership with FRDM – higher education sector wide modern slavery tool

The University is a member and an active contributor of the AUPN, which, throughout 2021, worked to implement a tool for the sector to allow participating universities to address modern slavery risks within their supply chains.

The AUPN identified [FRDM](#), a supply chain technology company, to provide a tool that will algorithmically identify modern slavery risks throughout universities' supply chains, enabling each university or the sector collectively to make informed decisions and take action to address modern slavery risk. With the [FRDM](#) tool, the AUPN and participating universities will be able to:

- improve transparency of modern slavery across university domestic and international supply chains, from direct suppliers through to possible bill of material suppliers
- support an increase in capability of universities to identify, understand and action modern slavery risks;
- enable collaboration on actions to reduce duplication and inefficiencies, and
- provide useful reporting and dashboards that can be used in annual modern slavery statements.

In 2021 the University, along with 33 other participating universities, committed to use the FRDM tool. The participating universities committed to support various implementation activities including participating in a Change Management Group, collating and categorising a collective \$16 billion of procurement spend and supporting User Acceptance Testing.

The University itself has classified 300 individual suppliers through the FRDM tool, allowing the University to assess the proximity (that is, the depth of the supply chain) of these suppliers to any incidence or allegation of modern slavery (caused, contributed or directly linked) and to prioritise engagement and consultation with these suppliers.

The tool was fully launched in early 2022.

The University's Procurement Supplier Charter

The University is committed to strengthening supplier relationships, including with non-commercial and research partners. This includes supporting the people, communities and supply chains that work with the University, both locally and overseas. This commitment results in value for money through strong supplier partnering, sustainable sourcing practices and consistent and transparent commercial processes. All suppliers that deliver goods or services to the University are expected to commit to the [Procurement Supplier Charter](#), which includes a commitment to respect human rights and reduce modern slavery risks.

Modern Slavery Supply Chain Output Framework

The University's Procurement team drives action in regard to modern slavery risks in supply chains, taking responsibility for:

- establishing a framework for Sustainable Procurement and a Modern Slavery Focus Plan
- actively participating in the AUPN including its Modern Slavery Working Party and Modern Slavery Academic Advisory Board



- assessing modern slavery risks across the University's spend data
- raising supplier awareness, supplier training and supplier engagement
- determining records management, metrics for progress and corrective action plans.

The **Australian Universities Procurement Network (AUPN)** is a collaborative group with over 30 member institutions. Its mission is to "significantly improve procurement practices in Australian universities through a collaborative approach." The intent of the group is to share expertise, promote benefits and create greater efficiencies across the procurement and university sectors.

Staff from the University have played, and continue to play, a key role in supporting and advising AUPN modern slavery working groups.

The University's Modern Slavery Questionnaire for Suppliers

The University assesses modern slavery risks pre-contract by requiring suppliers to complete a modern slavery questionnaire. Responses are reviewed against key categories of University procurements of a high value, high impact nature, including:

- supply of personal protective equipment
- integrated platform design and build
- laboratory supplies
- digital assessment platform
- research equipment
- print services.

In 2021, a total of 161 suppliers completed the questionnaire, an increase of 81% from 2020. Of the responses received:

- 103 had a modern slavery policy, 21 had an equivalent policy, and 37 did not have a policy
- 65 were reporting entities under the Act
- 119 had reviewed and taken steps to identify and mitigate modern slavery risks
- 84 stated that they did not use any overseas labour.

The questionnaire also addresses other key criteria including sub-contracting, training and awareness through the organisation of modern slavery risks, contractual arrangements with sub-contractors and partners, and controls and mitigation techniques.

Information from the questionnaires is used by the University to guide active engagement with suppliers to build collaboration in addressing supply chain modern slavery risks and to identify any corrective action items that are able to be developed and delivered.

Other actions

The standard University Request for Quote (RFQ) package for suppliers incorporates the Supplier Modern Slavery Questionnaire as part of its Sustainable Procurement Criteria which suppliers are expected to address. The Request for Proposal (RFP) templates also have modern slavery criteria integrated into the Conditions of Participation.

A modern slavery clause is included in procurement contract templates for consultancies, contractors, goods, panel agreements, IT and construction. The clause commits suppliers to ensuring that they do not contravene any modern slavery laws, do all things necessary to mitigate



or reduce modern slavery risks in their operations and supply chains, and that they notify the University if they become aware of any suspected or actual breach of a modern slavery law.

There were no notifications during the reporting period.

10. Actions to address risks in University operations

New in 2021

Membership of Modern Slavery Working Group updated to include newly assigned modern slavery compliance owners

Modern slavery clause added to campus retail leases and licences

Review of UNSW Investment Policy completed

Continuing from 2020

Controls to identify, assess and action modern slavery risks included in the University's annual compliance certification questionnaire

Systems to receive and address complaints that relate to modern slavery

Training for staff to understand and identify modern slavery risks

Modern Slavery Working Group

The University's initial Modern Slavery Working Group, established in 2019, comprised a range of internal stakeholders from business units where modern slavery risks could occur in their operations. Following the approval of the University's [Modern Slavery Prevention Policy](#), and the assignment of modern slavery compliance owners in key units of the University, in 2021 the Working Group was reconvened to include all modern slavery compliance owners and other key stakeholders from across the University.

Under the Policy, the University's Management Board is responsible for overseeing and supporting modern slavery compliance owners to develop protocols, processes and procedures to identify and address risks of modern slavery. The Working Group is refining a plan of action for the University (and its controlled entities) to comply with reporting obligations under the Act. This includes establishing milestones and performance measures, staff accountabilities, resourcing requirements, and reporting requirements. The Working Group supports the University's modern slavery compliance owners to meet responsibilities prescribed by the University's [Modern Slavery Prevention Policy](#).

Modern slavery clause added to campus retail leases and licences

The University identified the potential for modern slavery risks to arise in food retail outlets and other retail businesses that operate on the University's campuses.

To address this risk, the University developed a new modern slavery clause that is now included in all new and renewed campus retail leases and licences. The clause commits the retailer to:

- not engage in or authorise modern slavery in their business operations, and to take reasonable steps to ensure that there are no modern slavery practices in any part of their business or supply chains
- implement reasonable due diligence measures to ensure to its suppliers and sub-contractors have not been convicted, or been the subject of complaints or investigations, relating to modern slavery offences



- notify the University of any actual, suspected or potential activities that may involve modern slavery by the retailer or its suppliers or sub-contractors.

There were no notifications during the reporting period.

Review of the University's Investment Policy

In 2021 the review of the University's [Investment Policy](#) was completed, ensuring that the University manages its financial investments in an ethical and responsible manner, balancing capital protection, return and risk. The Policy:

- states the University's belief that environmental, social, and corporate governance factors can impact investment risk and returns and contribute to sustainable growth
- confirms the University's expectations that its funds managers exert influence over and encourage the organisations they invest in to operate ethically, responsibly and in a manner that contributes to a sustainable and better world
- commits the University to not invest, directly or indirectly, in any sector, industry, or product excluded by resolution of the University Council.

Receiving and addressing complaints about modern slavery risks

The University has grievance systems to receive and address complaints and reports of wrongdoing, including those that relate to modern slavery. This includes the University's complaints procedures and its [Report Wrongdoing Policy](#) and [Procedure](#), which incorporate processes for receiving public interest disclosures under the *Public Interest Disclosures Act 1994* (NSW) and the whistleblowing provisions of the *Corporations Act 2001* (Cth). Complaints and reports of wrongdoing can be made through the University's website:

www.unsw.edu.au/complaints

During the reporting period no complaints or public interest disclosures were received by the University concerning modern slavery practices in the University's supply chains and operations.

Certification through the University's Legislative Compliance Framework

The University's Legislative Compliance Framework establishes principles of action within the University with respect to achieving demonstrable compliance with its legislative obligations. This includes assigning Compliance Owners, whose responsibilities include developing, implementing, monitoring and reporting on the effectiveness of internal compliance controls for legislative obligations. Under the Framework, modern slavery Compliance Owners are assigned across the following key operational areas of the University:

- Facilities Management
- Information Technology
- Human Resources
- Education and Student Life
- Research and Enterprise
- Procurement
- Investments

The Compliance Owners in these areas are responsible for:

- reviewing existing internal controls and ensuring consistency with the [Modern Slavery Prevention Policy](#)



- developing, implementing and monitoring new internal controls to meet obligations to identify and address modern slavery risks
- completing an annual compliance certification to assess coverage and effectiveness of internal controls to manage the obligation.

In 2021, the overall certification results from the modern slavery compliance owners indicated that the effectiveness of internal controls for addressing modern slavery risks was assessed as “Improvement Required” (assessed using the University’s Risk Ratings and Categories matrix). This is reflective of the impact of the workplace change that occurred across the University in late 2020, reducing capability through a decrease in resources.

Under the University’s Legislative Compliance Framework, all obligations where controls are assessed as “Improvement Required” are reviewed to determine actions required to update controls to a level where they are “Well Based” or “Effective”. The controls are then reassessed during the next annual compliance certification. The 2021 results from the modern slavery compliance owners therefore identified where action is required during 2022 to improve compliance management.

Training on Modern Slavery Act obligations

The University has developed a training package in relation to the Act and the [Modern Slavery Prevention Policy](#) that can be delivered to staff. The “Modern Slavery 101” training course informs staff about modern slavery, how it is relevant to the operations of the University and what the University is doing to respond to its obligations under the Act. It covers key aspects of the University’s [Modern Slavery Prevention Policy](#) and how staff can contribute to identifying, managing and reporting modern slavery risks.

In 2021, all staff in the University’s IT department were provided with face to face training on modern slavery.

11. Impact of COVID-19 on actions to address modern slavery risks

Like all organisations, the COVID-19 pandemic continued to impact the University in 2021, changing the way the University approached our work, teaching and research. The University’s staff and students faced long periods of remote working and learning until they could safely return to campus. The continued reliance on online teaching required a considerable effort by staff to continue to provide best possible student experience in the circumstances. This included maintaining a COVID-19 website that provided students with information to support them during the transition to online learning, including support services for health, safety and wellbeing.

The financial impact on the University arising from the COVID-19 pandemic necessitated a significant workplace change program across the University in late 2020. The resulting loss of staff across the University had an impact on progressing projects and initiatives aimed at addressing modern slavery risks throughout 2021. The Modern Slavery Working Group met less frequently, staff training activities were delayed and capacity to undertake supplier engagement activities was reduced.



EFFECTIVENESS

(Mandatory Criterion Five)

12. Assessing the effectiveness of the University's actions

The University's modern slavery compliance framework provides the foundations for the University to identify and progressively address modern slavery risks into the future. The [Modern Slavery Prevention Policy](#), the assignment of modern slavery Compliance Owners across the University, and the embedding of tools and processes to address modern slavery risks in the procurement function have positioned the University to strengthen its ability to respond to and tackle issues of modern slavery in its operations and supply chains.

Importantly, this framework provides the means for the University to assess the effectiveness of its actions to address modern slavery by:

- requiring modern slavery Compliance Owners in key operational areas to certify they have systems in place to identify and assess modern slavery risks and the effectiveness of related controls, with such certifications being reviewed and reported to the University's Risk and Audit committees of the University Council
- modern slavery compliance certifications informing the preparation of the University's internal audit plans including control testing, and related risk profiles informing the Risk Management Framework
- working closely with, and supporting the work of, sector groups to implement and assess modern slavery prevention initiatives in university supply chains and operations.

The results of these processes guide the University in adapting and strengthening our actions to continually improve the University's response to modern slavery.

Some observations on the effectiveness of these actions:

- the University's Strategic Procurement team engaging with and actively contributing to the AUPN (especially its Modern Slavery Working Party and Modern Slavery Academic Advisory Board) has been critical in driving initiatives to address modern slavery risks in our supply chains, and will continue to be important if the University is going to fully leverage the data in the FRDM higher education sector modern slavery tool
- though the University is extracting valuable data (including through the FRDM tool, Electronics Watch and the Supplier Modern Slavery Questionnaire), more time analysing the data will enable the University to better identify and address modern slavery risks
- while the [Modern Slavery Prevention Policy](#) has clearly articulated responsibilities for identifying and addressing modern slavery risks in the University's supply chains and operations, much is still to be done to ensure that projects and initiatives in this space are coordinated and progressed in a timely manner through the Modern Slavery Working Group action plan.

Overall, the University has taken some effective actions and is making progress in identifying and addressing modern slavery risks in its supply chains and operations.



CONTROLLED ENTITIES

(Mandatory Criterion Six)

13. Status of University controlled entities

For the 2021 reporting period none of the University's controlled entities, as listed in section 6 of this Statement, were "reporting entities" under the Act.

14. Consultation with University controlled entities

During the 2021 reporting period, the University consulted with the executive teams of relevant controlled entities in the development of this Statement. Controlled entities that do not have sufficient operations or supply chains to give rise to risks of modern slavery were not consulted.

This consultation focused on:

- framing the University's expectations, raising awareness and understanding each controlled entity's approach to mitigating modern slavery risks
- briefing each controlled entity on the University's [Modern Slavery Prevention Policy](#) and the need for each entity to adopt its own policy that was consistent that that of the University
- the need to ensure that for each controlled entity:
 - modern slavery risks were recorded in risk registers
 - template clauses addressing modern slavery risks were adopted in relevant contracts
 - relevant staff were identified for training in modern slavery risks
 - modern slavery risks were mapped in supply chains and operations.
- integrating controlled entities into the University's formal annual compliance certification and assurance program (by which each controlled entity demonstrates effective management of their legislative compliance obligations, including those relating to modern slavery).



2022 AND BEYOND

15. Moving forward

The focus in the current year and beyond is:

- enhancing governance processes responding to modern slavery risks, including defining key targets and goals so that the University can better monitor and track progress
- increasing staff and supplier awareness, education and training on modern slavery risks that impact operations and supply chains
- mitigating, managing and remediating identified modern slavery risks and the continued identification and assessment of risks identified in future including developing a response plan for managing and remedying any instances of modern slavery.

Moving forward – supply chains

To continue to address modern slavery risks in its supply chains the University will:

- on an annual basis (with quarterly reviews) develop new category management plans for high value, high risk procurement activities
- continue to assess supplier responses to the Modern Slavery Supplier Questionnaire and determine risk rating prior to contractual engagement
- engage with existing suppliers across high risk categories and, where necessary, develop remediation plans with clear targets and measurable outcomes
- support the implementation of the FRDM tool for measuring and managing risks as part of the AUPN sector wide approach

Moving forward – operations

The University will focus on identifying, assessing and managing modern slavery risks by:

- through the Modern Slavery Working Group, engaging with modern slavery compliance owners across University operations to identify issues and risks relating to modern slavery identified within their areas of compliance responsibility, and to define key targets and goals to address such risks
- undertaking further consultation and engagement with University controlled entities to ensure that each entity has systems in place to identify and address modern slavery risks arising from their operations and supply chains, and to report on their actions to address such risks through the annual certification program of the University's Legislative Compliance Framework;

DECLARATION

This **Modern Slavery Statement 2021** was tabled at and approved by the University Council in its role as principal governing body at its meeting on 6 June 2022.



Professor Attila Brungs
Vice-Chancellor and President



