



**MONASH**  
University

MODERN  
SLAVERY ACT  
REPORT

REPORTING  
PERIOD  
JANUARY TO  
DECEMBER  
**2021**



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MONASH UNIVERSITY recognises that its Australian campuses are located on the unceded lands of the people of the Kulin nations, and pays its respects to their elders, past and present.

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VC  
**FOREWORD**





Monash University supports universal human rights and is opposed to all forms of modern slavery.

With this, our second Modern Slavery Act Report, Monash University continues strengthening its commitment to sustainability and human rights. We remain committed to the United Nations' 17 Sustainable Development Goals, to achieve net zero emissions by 2030, and, as demonstrated in this report, to actively seek out and address any potential instances of modern slavery within our global operations and supply chains.

Throughout 2021, our second year experiencing pandemic conditions, we continued to operate in a highly dynamic, complex global environment. Despite changes and challenges within our supply chain and operations, a flexible approach to our program enabled improvements to our targeted focus on modern slavery.

We recognise that we cannot do this alone – it requires accountability and a sustained effort and collaboration with our suppliers, partners and the wider Monash community.

This effort is to contribute to the ability of people everywhere to live free from exploitation, experience safe work conditions, and receive fair pay and treatment.

Through Monash's education, research and innovation to make positive change around the world, we will continue to champion human rights and sustainability.

We know there is still much to do, and we are committed to reviewing and improving our supply chain and operations to assist in the drive to eradicate modern slavery.

A handwritten signature in black ink, reading "Margaret Gardner". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

**Professor Margaret Gardner AC**  
President and Vice-Chancellor

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THE  
MONASH  
UNIVERSITY  
**PLAN**



Last year, Monash published our first Modern Slavery Report in which we set out a five-year rolling program commencing 2021.

| 2021   | 2022   | 2023   | 2024  | 2025                            |
|--|--|--|---|---------------------------------|
| Supporting procurement systems and processes | Onshore and off-shore training                             | Training program review                          | Identify risks in onshore research and education activities   | Offshore research and education |
| Basic tracking system                        | Advanced tracking system                                   | Expanded compliance monitoring                   | Commence onboarding of offshore partially controlled entities | Continuous improvement          |
| Internal risk assessments                    | Industry deep-dive   | Offshore agreement and sourcing templates update | Continuous improvement for onshore entities                   | Program review                  |
| Risk assessments                             | Agreement and sourcing templates update                    | Implementation of operational framework          | Continue to expand offshore training                          |                                 |
| Compliance monitoring                        | Assessment of new risks                                    | Expand offshore training rollout                 |   |                                 |
|  | Operational framework                                      |  |   |                                 |
|  | Compliance monitoring                                      |  |   |                                 |
|  | Commence onboarding of offshore wholly controlled entities |  |   |                                 |

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## KEY OUTCOMES FOR 2021

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**850** NEW SUPPLIERS  
ACCEPTED THROUGH  
UPDATED ONBOARDING  
PROCESS

---

**32** ON-CAMPUS  
AUSTRALIAN  
RETAIL PARTNERS  
COMPLETED MODERN  
SLAVERY RISK TRAINING

---

**100%**  
EXISTING AND ACTIVE OFFSHORE PARTNERS  
OF MONASH COLLEGE COMPLETED ANNUAL  
DESKTOP REVIEW

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**74%** OF ASSIGNED STAFF  
COMPLETED MODERN  
SLAVERY TRAINING

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Over the 2021 reporting period, Monash University has identified no instances of modern slavery in our supply chain or operations. Significant progress on our five-year plan was made. We acknowledge that as the program evolves, we may uncover risks as yet unknown. The lessons from this year and subsequent years will continue to shape the program of work. An updated program and action plan are included in this report.

## PROCUREMENT SYSTEMS AND PROCESS

- Training and awareness
  - » Developed and delivered an interactive audio-visual modern slavery training module to Monash University and Monash College; 74% of assigned staff completed training in the first week of release.
  - » Delivered training to 32 on-campus Australian retail partners with a primary focus on the high-risk areas of rice, fish, cocoa, and apparel.
  - » Designed and deployed a publicly accessible Monash University modern slavery website and Monash College website.
  - » Internal digital communications via Monash Workplace and staff newsletter to raise awareness.
- Procurement process
  - » Reviewed the effectiveness of the modern slavery supplier onboarding gate, intended to prevent the on-boarding of suppliers – including preventing payment – in the event of non-compliance or identified risk. Manual intervention occurs for any compliance failures. There were 850 suppliers onboarded through this new gateway; 100 per cent of the suppliers intended for this compliance check went through the new process.
  - » Established, for certain categories, guidelines and indicators to identify and avoid opportunistic, new suppliers seeking to profit from COVID-19 via higher-risk supply chains.
  - » Provided delivery timeframe relief to suppliers on an as-needs basis, by selectively and temporarily waiving certain contractual rights.
  - » Monash College's offshore partner annual review process was expanded to include an update on the due diligence process for procurement in response to Modern Slavery Act obligations. This will be deployed in 2022.

- Policy and procedure
  - » Updated Monash College's people and culture policies and procedures to include reference to Modern Slavery Act and associated legislation.
  - » Updated Monash College's Contract Management Procedure.
- Contract clause update
  - » Drafting of a robust set of standard modern slavery-related terms with implementation scheduled for 2022.

## TRACKING SYSTEM

- Completed data cleansing and upload to a new higher education sector-wide advanced risk assessment and tracking tool – FRDM. System activation scheduled for early 2022. The first data set covers Monash University Australia and Monash College.

## INTERNAL ASSESSMENT

- Commenced analysis and action planning for additional high-risk areas – solar panels, catering services, security services, and cotton-based lab coats. Each will undergo detailed review in 2022.
- Reviewed our existing branded apparel supply chain, existing risk mitigation steps, and identified the actions required to further reduce risk.

## ASSESSMENT OF OFFSHORE ENTITY

- Commenced onboarding Monash University Malaysia as part of the second stage of the five-year modern slavery program. Completed preliminary procurement spend analysis and risk identification based on Global Slavery Index. Electronics, apparel, and construction were identified as key risk areas.

## COMPLIANCE MONITORING

- Implemented KPIs to measure progress of 2021 action items, and to provide forward-looking targets.
- Integration of the modern slavery program of work into the Monash University sustainable development framework, and Environmental, Social and Governance Statement 2021-2025.

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# ABOUT THIS REPORT



Monash University focuses on delivering high-quality and innovative education and research globally, with an emphasis on ethical and good social governance, while operating with integrity and respect.

Modern slavery is a pervasive problem that requires a robust solution based on collective action to generate change in global practice. Monash University recognises that, as part of the global community, we play an important role in helping eliminate exploitative labour practices.

Modern slavery refers to situations where threats, coercion or deception are used to undermine one's freedom and to inflict exploitation. These practices can include human trafficking, slavery, debt bondage, forced labour, the worst forms of child labour, domestic servitude, and forced marriage.

Exploited labour worldwide is estimated to number about 40 million people, including 16 million victims in the private sector – 5.4 victims for every 1000 people in the world<sup>1</sup>. Women and children are disproportionately impacted, with 71 per cent of victims being female, and one in four being children<sup>2</sup>.

This hidden, large-scale exploitation within our community often harms those least able to defend themselves.

This report is to demonstrate how Monash is working to identify the risks of modern slavery in our operations and supply chain, and the actions we have taken to address those risks. These are part of our five-year continuous improvement program to systematically address modern slavery within our operations and supply chain.

For the purposes of this report, references to “the University” includes activity for all the reporting entities listed in this report, unless indicated otherwise.

This is Monash University's second report under the Modern Slavery Act 2018 (Cth) (the Act).

**This report was approved by Monash University Council in its capacity as principal governing body of Monash University, on 15 June, 2022. President and Vice-Chancellor Margaret Gardner AC is the responsible member.**

## OUR COMMITMENT

Our commitment is to actively contribute to a future without labour exploitation and human rights violations.



Monash University supports human rights within its operations and supply chain in full compliance with the Act. This is supported by an [Environmental, Social and Governance Statement 2021 - 2025](#), and an endorsed five-year modern slavery program of work. This program is also supported as part of Monash University's [sustainable development framework](#).

Our program of work has significant leadership support, including the Vice-Chancellor's Group, the University Environmental, Social and Governance and Estates Committee, and the University Council.

As a leader in research and education, Monash University welcomes feedback and/or questions, or the opportunity to provide additional information concerning this report. Please contact [sustainable.procurement@monash.edu](mailto:sustainable.procurement@monash.edu)

This report outlines the actions taken by Monash University in relation to identifying and mitigating modern slavery risks within its operations and supply chain.

Although we located no instances of modern slavery in 2021, we continue to improve our program to identify and mitigate risks.

1.  [International Labour Organisation. Forced Labour, Modern Slavery and Human Trafficking](#), viewed 20 May, 2022.  
2.  [Global Slavery Index. Global Findings](#), viewed 20 May, 2022.

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# ABOUT OUR UNIVERSITY



Monash University was established in Melbourne, Australia, in 1958, and is a founding member of the Group of Eight. In just over 60 years, the University has earned an enviable international reputation, with campuses and centres across three continents. This has enabled the University to offer exceptional global opportunities to staff and students, catering to some of the world's brightest minds.



1.  Source: QS Graduate Employability Ranking, viewed 20 May, 2022.

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THE UNIVERSITY'S  
**STRUCTURE,  
OPERATIONS AND  
SUPPLY CHAINS**



## STRUCTURE

Monash University is constituted under the Monash University Act 2009 (Vic), which is supplemented by a framework of regulatory instruments, namely the Monash University statute, and a suite of regulations, as well as a range of policies and procedures. Monash University is regulated by the Higher Education Support Act 2003 (Cth) and the Tertiary Education Quality and Standards Agency Act 2011 (Cth), under which the University enjoys accreditation as an Australian higher education provider.

Monash University is the parent entity.

The principal governing body is Monash University Council, chaired by the Chancellor, Mr Simon McKeon AO.

Other members of the Council are:

- President and Vice-Chancellor, Professor Margaret Gardner AC
- Deputy Chancellor, The Hon. Simon Crean
- Deputy Chancellor, The Hon. Peter Young AM QC
- Deputy Chancellor, Dr Megan Clark AC
- President of the Academic Board, Professor Robert Brooks
- Ms Geraldine Johns-Putra
- Ms Julie Ligeti
- Ms Jenny Samms
- Mrs Pitsa Binnion
- Mr Peter Marriott
- Mr John Simpson
- Professor Gill Callister
- Elected staff member, Ms Catherine Rojas
- Elected student member, Mr James McDonald.

The Council is responsible for the overall superintendence of the University, with specific accountability to the relevant state and Commonwealth ministers under relevant legislation. The Council discharges its role by deliberating on strategies and policies to achieve the University's objectives, and by ensuring the University has in place appropriate and effective governance processes.

In its capacity as the principal governing body of the parent entity, the University Council has approved this Modern Slavery Report. For the purposes of this report, President and Vice-Chancellor Professor Margaret Gardner AC is the responsible member.

The University has four Australian campuses (exclusive of Monash College), five offshore campuses or learning centres, and has ten faculties and eight portfolios.

### **The Monash University Group includes the following wholly controlled/owned entities:**

- Monash College (incorporated in Australia)
- Monash University Foundation Pty Ltd (incorporated in Australia)
- Monash University Foundation Trust (established in Australia)
- Monash Accommodation Services Pty Ltd (incorporated in Australia)
- Monash Investment Holdings Pty Ltd (incorporated in Australia)
- Monash Investment Trust (established in Australia)
- Monash University Indonesia Ltd (incorporated in Australia)
- Monash Shenzhen Research Management Co (incorporated in China)
- Monash Property South Africa (incorporated in South Africa)
- Monash Commercial Pty Ltd (incorporated in Australia)
- Monash University Malaysia Sdn Bhd (incorporated in Malaysia)
- Monash University Malaysia Research and Development Sdn Bhd (incorporated in Malaysia)
- Monash University Indonesia Foundation (Yayasan Monash University Indonesia) (incorporated in Indonesia)
- PT Monash Indonesia Services (incorporated in Indonesia)

- World Mosquito Program Ltd  
(incorporated in Australia)
- World Mosquito Program (Europe) SAS  
(incorporated in France)

Each of the 16 above-mentioned entities is governed by a board with all or a majority of directors (or, in the case of some entities registered outside Australia, governors) appointed by Monash University or a subsidiary of the University. The governance of these entities is overseen by the Council and the President and Vice-Chancellor.

## REPORTING ENTITIES

The Act requires Monash University to report on all its controlled entities. Due to the size, complexity, and geographic diversity of the University's global supply chains and operations, a staged approach has been used to prioritise the inclusion of entities via our detailed program onboarding and assessment. Over subsequent years, additional entities will be included as we progress down the entity priority list.

### Prioritisation of entities (high to low):

- a. All entities that would independently qualify to report under the Act, as they are Australia-based and have greater than \$100m revenue: Monash University, Monash University Foundation Pty Ltd, and Monash College Pty Ltd.
- b. All entities located offshore with greater than \$100m revenue: Monash University Malaysia Sdn Bhd.
- c. Other entities by revenue or operational size – in the order determined by the Modern Slavery Steering Committee.

Entities were identified with the assistance of the Risk and Compliance Unit and Executive Services. The entities were identified and also assessed in relation to the degree of control, revenue, and location.

Of all the Monash-controlled entities, three independently qualify as eligible entities for the purposes of the Act, as they are both controlled Australian entities and have greater than or equal to \$100 million revenue per annum. Those entities are Monash University, Monash University Foundation Pty Ltd, and Monash College Pty Ltd. These three entities are included within the scope of this 2021 report. In addition, Monash University Malaysia Sdn Bhd is included. Collectively, these four entities are referred to as "reporting entities" within this report. The report is issued by the parent entity, Monash University, on behalf of the reporting entities.

### This 2021 report covers the following entities within Australia:

- Monash University, ABN 12 377 614 012  
– the parent entity.
- Monash University Foundation Pty Ltd  
(the Trustee of Monash University Foundation Trust),  
ABN 94 178 965 125
- Monash College Pty Ltd, ABN 64 064 031 714.

### The report includes one entity that is a controlled entity outside of Australia that has greater than or equal to \$100M in revenue per annum:

- Monash University Malaysia Sdn Bhd,  
199801002475 (458601-U)

The following entities have Monash University as their parent entity, but less than \$100m in revenue. They are intended to be assessed in detail for subsequent reports. Before being included, spend data must be obtained and analysed, and the entity commences onboarding to the Modern Slavery program.

- Monash Accommodation Services Pty Ltd  
(incorporated in Australia)
- Monash University Indonesia Ltd  
(incorporated in Australia)
- Monash Shenzhen Research Management Co  
(incorporated in China)
- Monash Property South Africa  
(incorporated in South Africa)
- Monash Commercial Pty Ltd  
(incorporated in Australia)
- Monash University Malaysia Sdn Bhd  
(incorporated in Malaysia)
- Monash University Malaysia Research and  
Development Sdn Bhd  
(incorporated in Malaysia)
- Monash University Indonesia Foundation  
(Yayasan Monash University Indonesia)  
(incorporated in Indonesia)
- PT Monash Indonesia Services  
(incorporated in Indonesia)
- World Mosquito Program Ltd  
(incorporated in Australia)
- World Mosquito Program (Europe) SAS  
(incorporated in France)



## OPERATIONS

Monash University has four campuses in Victoria, Australia, as well as international campuses and learning centres in Malaysia, China, India, Italy, and Indonesia.

The University's core activities are education and research. Due to Monash's size and global presence, these are supported by a wide range of student services, as well as global campus/learning centres and research activities.

Monash University Foundation, which generates investment income for the future benefit of Monash University, is operated from within Monash University in the portfolio of the Chief Financial Officer and Senior Vice-President.

Monash College provides educational programs and services to international and domestic students.

It is a wholly owned company of Monash University, a registered charity with the Australian Charities and Not-for-profits Commission, and a higher education provider accredited by the Tertiary Education Quality and Standards Agency. Monash College is located in Melbourne, Australia.

Management of the University, including Monash College, is the responsibility of Professor Margaret Gardner AC, President and Vice-Chancellor, who oversees operations and the University's academic standards.

## ACADEMIC STRUCTURE

### FACULTIES

---

1. Faculty of Art, Design and Architecture
2. Faculty of Arts
3. Faculty of Business and Economics
4. Faculty of Education
5. Faculty of Engineering
6. Faculty of Information Technology
7. Faculty of Law
8. Faculty of Medicine, Nursing and Health Sciences
9. Faculty of Pharmacy and Pharmaceutical Sciences
10. Faculty of Science.

## OPERATIONAL STRUCTURE

The President and Vice-Chancellor is supported by members of the Senior Executive, who are responsible for the strategic direction of the University's activities across the portfolios.

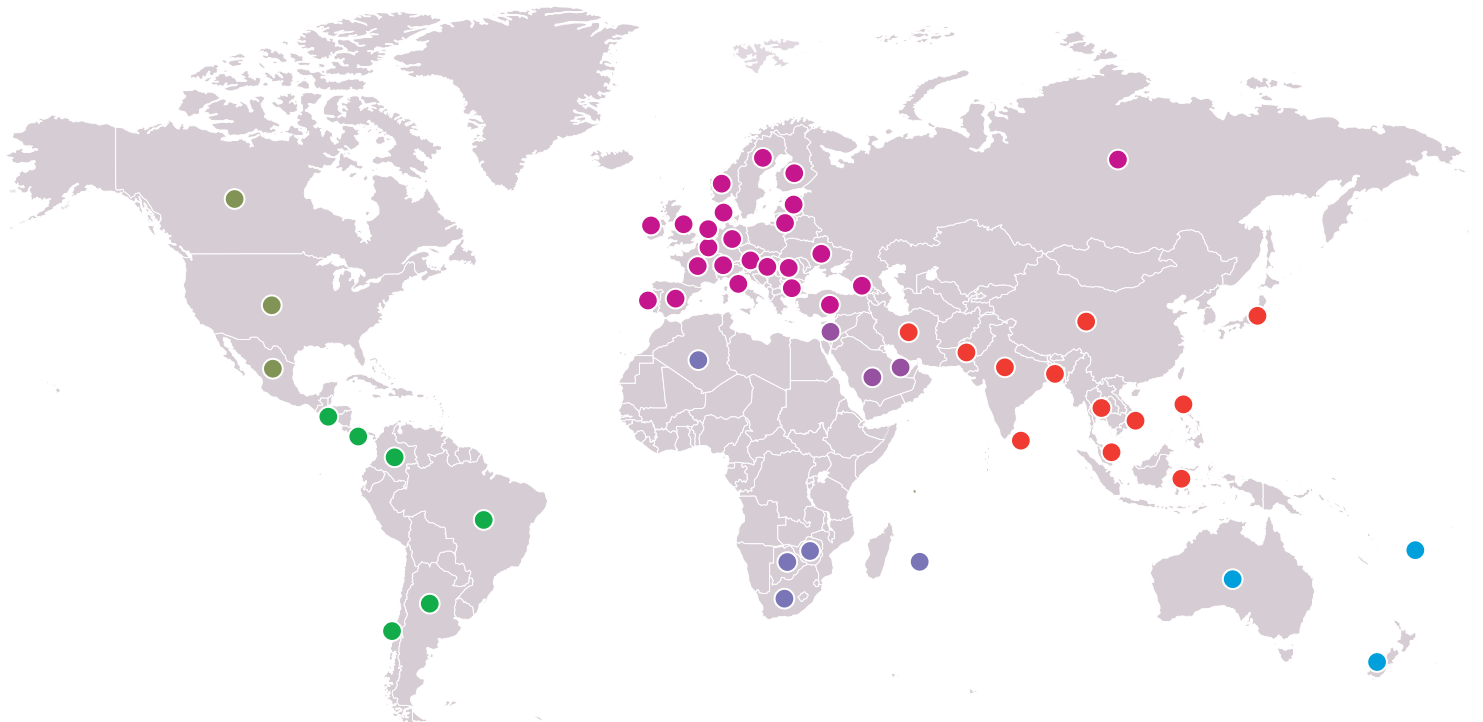
### Senior Executive portfolios (as of 31 December, 2021)

- President and Vice-Chancellor
- Provost and Senior Vice-President
- Deputy Vice-Chancellor (Enterprise and Engagement) and Senior Vice-President
- Deputy Vice-Chancellor (Global Engagement) and Vice-President
- Deputy Vice-Chancellor (Education) and Senior Vice-President
- Deputy Vice-Chancellor (Research) and Senior Vice-President
- Chief Operating Officer and Senior Vice-President
- Chief Financial Officer and Senior Vice-President.

## SUPPLY CHAIN

To support our global research and education operations, Monash engages with a wide variety of suppliers. These vary from common goods and services to some of the most specialised suppliers worldwide that support Monash's leading research projects.

Analysis was undertaken of our detailed purchase order information, for the 2021 reporting year. In 2021 we purchased from more than 7900 suppliers in 60 countries. Of these suppliers 850 were new suppliers in 2021 that were onboarded using the new mandatory modern slavery onboarding gate.



### NORTH AMERICA

Canada  
Mexico  
USA

### SOUTH AMERICA

Argentina  
Brazil  
Chile  
Colombia  
El Salvador  
Panama

### AFRICA

Botswana  
Mauritius  
South Africa  
Zimbabwe

### MIDDLE EAST

Iran\*  
Qatar  
Saudi Arabia  
UAE  
Israel

### EUROPE AND RUSSIA

Austria  
Belgium  
Bulgaria  
Cyprus  
Czechia  
Denmark  
Finland  
France  
Georgia  
Germany  
Hungary  
Italy  
Ireland  
Latvia

Lebanon  
Lithuania  
Netherlands  
Norway  
Portugal  
Romania  
Russia  
Slovenia  
Spain  
Sweden  
Switzerland  
Turkey  
Ukraine  
United Kingdom

### ASIA

Bangladesh  
China  
India  
Indonesia  
Japan  
Korea  
Malaysia  
Philippines  
Singapore  
Sri Lanka  
Russia  
Thailand  
Vietnam

### OCEANIA

Australia  
Fiji  
New Zealand

\*Scholarship related spend

## SPEND AND INVESTMENTS

### Monash University spend

#### IN 2021, MONASH UNIVERSITY SPENT

**\$1.02B**

with its suppliers of goods and services. Of this, \$288m was spent with non-profits such as hospitals, universities, and medical research institutes.

#### The largest categories of spend were:

- business services
- facilities and services
- information technology
- laboratories



### Monash University investments

#### IN 2021, MONASH UNIVERSITY'S CONSOLIDATED INVESTMENTS TOTALLED

**\$2B**

(including Monash University Foundation)

#### The largest areas of investment were:

- term deposits
- diversified yield funds
- quality short-term money market securities
- low-carbon global shares
- investment properties



### Monash University Malaysia spend

#### IN 2021, MONASH UNIVERSITY MALAYSIA SPENT

**\$11.6M**

with its suppliers of goods and services.

#### The largest categories of spend were:

- advertising and media
- research equipment
- other research expenses
- subscription and membership.



### Monash College spend

#### IN 2021, MONASH COLLEGE SPENT

**\$35M**

with its suppliers of goods and services.

#### The largest categories of spend were:

- occupancy costs
- business services
- technology – software licences, support, and hosting services.



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ENVIRONMENTAL,  
SOCIAL AND  
GOVERNANCE  
**COMMITMENTS**



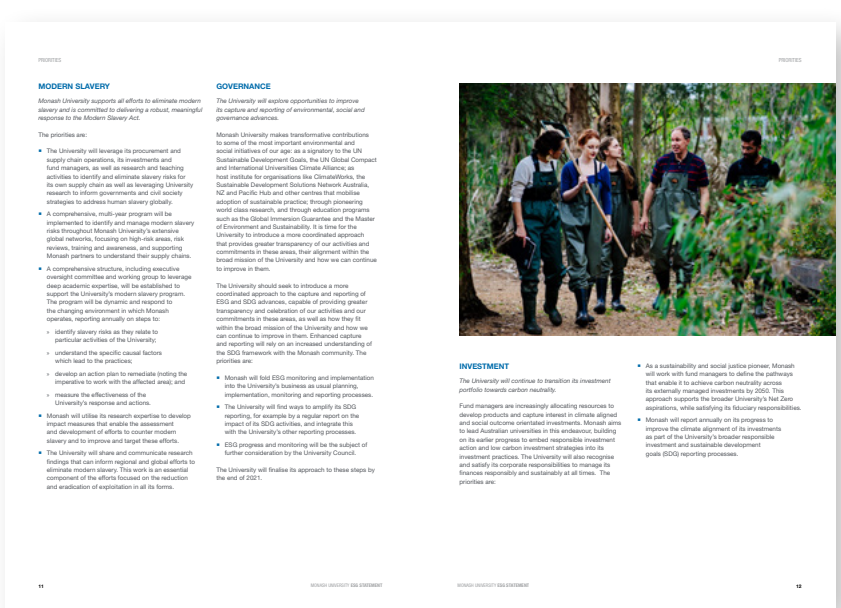
In the pursuit of excellence in sustainability, the University has an [Environmental, Social and Governance Statement 2021-2025](#) approved by the University Council in 2021. The University also has in place a [sustainable development framework](#).

The modern slavery program of work has been integrated into these two initiatives to facilitate a cohesive approach to the critical issues of global sustainability and modern slavery.

Protecting and promoting human rights is integral to Monash University, and requires a broad framework to cover both operations and our supply chains.

**Our commitment to the United Nations Sustainable Development Goals includes that we will:**

- support and promote the principles of the Sustainable Development Goals
- undertake research that provides solutions to sustainable development challenges
- provide the educational opportunity for our students to acquire the knowledge and skills needed to promote sustainable development
- contribute to the achievement of the Sustainable Development Goals by ensuring our campuses and major programs are environmentally sustainable and socially inclusive
- report on our activities in support of the Sustainable Development Goals.



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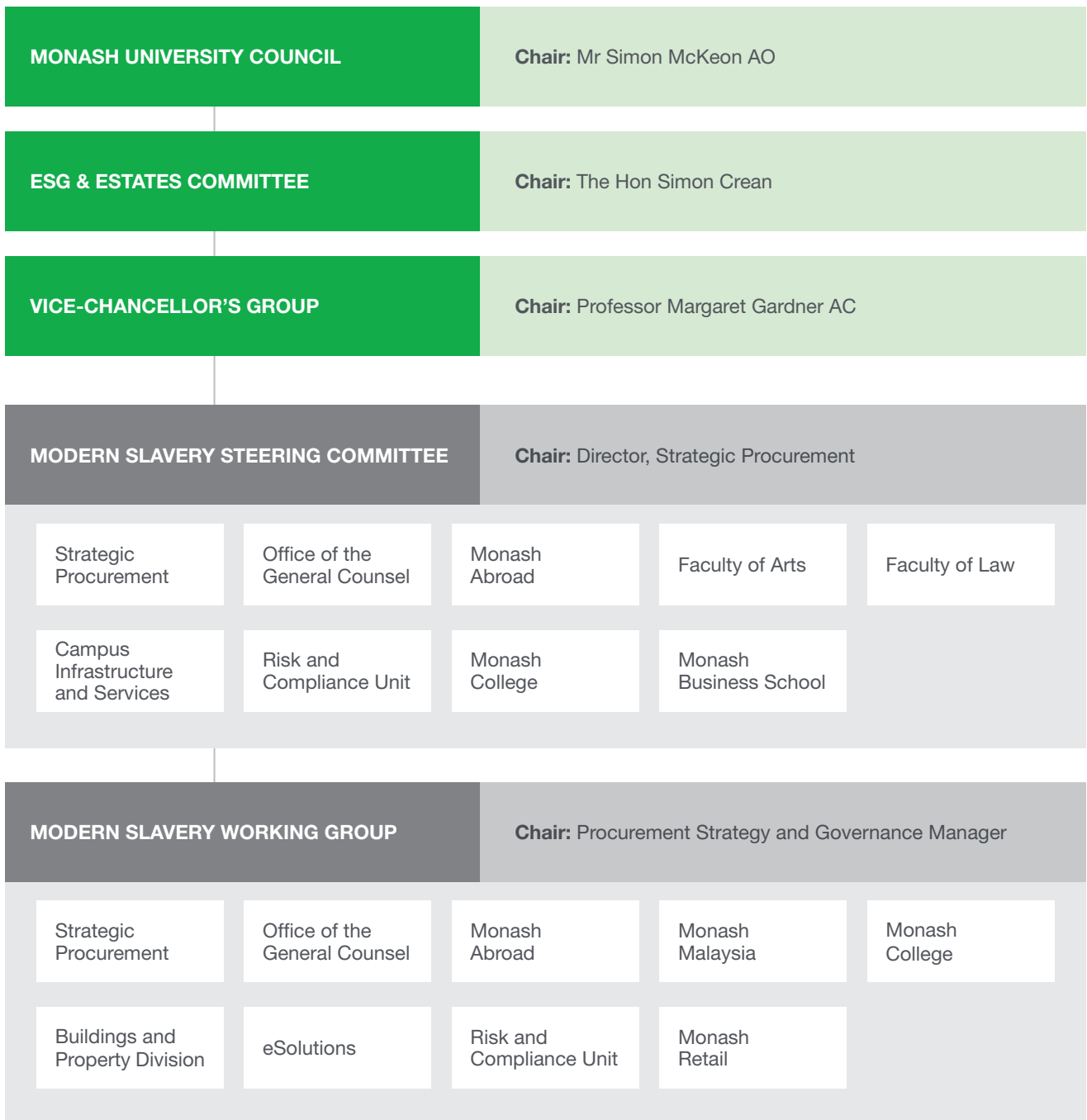
# MODERN SLAVERY GOVERNANCE STRUCTURE



Monash has a clearly defined governance structure supported by an expert advisory panel to oversee the development and implementation of the modern slavery program of work.

The remit of this structure is to develop, review and refine the University’s response to modern slavery within our operations and supply chains.

While the steering committee determines program direction, there is an escalation pathway that utilises the University’s management structure. As the modern slavery program of work is managed by Strategic Procurement, escalations are managed from Strategic Procurement to the Chief Financial Officer and Senior Vice-President (a member of the Vice-Chancellor’s Group).



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IDENTIFYING  
RISKS IN OUR  
**OPERATIONS AND  
SUPPLY CHAIN**





With such large-scale and global operations, more than \$2b in investment portfolios and cash equivalents, and more than \$1b in annual spend with suppliers, Monash acknowledges there is the potential to cause, contribute to, or be directly or indirectly linked to modern slavery risks in its operations and supply chains.

## RISK IN OPERATIONS

University operations include more than 80,000 students supported by more than 8000 staff across five countries. Each country has specific labour practice laws and obligations. At-risk groups both domestically and overseas include vulnerable populations due to job insecurity, economic hardship, cultural practices, literacy and language issues, or the lack of knowledge about local laws. Any of these can contribute to increased risk of exploitation.

There are two key operational risks for Monash:

### Recruitment practices for both staff and students

- Monash University works to ensure all recruitment activities actively avoid risks for staff and students, including international students, in relation to servitude, forced labour, debt bondage in a homestay environment, and in their search for employment. Monash University has developed rigorous policies, processes and monitoring to identify and avoid such risks. Monash is satisfied that our current set of relevant HR policies and procedures, and student services programs are in place to address these risks, and will continue to improve as we learn. Additional work is planned for 2024 and 2025 regarding research to better-understand the risk in our global research operations. This will include research projects undertaken in remote locations.

### Procurement practices

- Monash recognises our operations can impact our direct suppliers with potential flow-on effects to downstream suppliers that may in turn facilitate or incentivise modern slavery practices such as forced labour, debt bondage, and slavery.
- This supply chain influence from operations may come from:
  - » planned or unplanned business drivers
  - » internal stakeholder requirements or expectations
  - » procurement practices including contract terms, negotiated pricing, and requested tender response or delivery timeframes
  - » a lack of specifying clear requirements to suppliers in relation to their modern slavery response, leading to a lack of genuine, and timely, change.

These may drive possible counterproductive behaviours or expectations across the University, including:

- » setting unreasonable delivery or response timeframes
- » acceptance of, or actively seeking, unreasonable below-market pricing
- » seeking unreasonably high investment returns
- » investing or purchasing from known high-risk industries or countries without relevant due diligence
- » the acceptance of ambiguous responses to modern slavery information requests in tenders.

Any of these operational practices may indirectly increase the risk of illegal or unsustainable business practices, including labour exploitation, in order to satisfy demand created by the University.

These risks will need to be assessed and, if necessary, addressed via education and changes to policies and processes.

## RISK IN SUPPLY CHAIN

Monash University engages with a mix of resellers, head contractors and direct providers in our procurement of goods, services and works. Depending on the nature of the procurement and its associated supply chain, Monash may contribute or be directly linked to modern slavery risks.

Supply chains involving multiple layers of international suppliers inherently carry higher risks, and can include various forms of modern slavery practices depending on the type of raw materials, components, and the countries involved in the supply.

For goods procurement and construction in particular, the risks of modern slavery are often buried deep in the supply chain. While Monash may be directly linked to the risks that exist at the raw material and/or manufacturing levels, by purchasing those products through a reseller or head contractor, our current ability to identify our risks may be restricted.

Where the supply chains are shorter and predominantly based in the countries in which we operate, Monash may be in a better position to minimise our contribution to the risks through responsible procurement practices, education, and contract management.

It's important to note that where the delivery of goods, services and investment outcomes includes the use of both direct and downstream labour from vulnerable communities, any exploitative practices in the engagement of that labour by third parties or their downstream suppliers may be indirectly attributable to the demand created for goods, services or investments by Monash University.

In addition, as shown in "Risk in Operations" above, Monash has identified some business practices that may position suppliers as vulnerable, and increase the risks within their business or supply chain.

The University, both directly and as part of the Australian University Procurement Network, has discussed modern slavery with a number of common suppliers as part of a consultative process.

It was identified, as part of this process, that there were different supplier perspectives and varying knowledge levels of modern slavery.

Our discussions during consultation included:

- The need to actively create and maintain an open dialogue with suppliers.
- A clear, mutual understanding that the discovery and remediation of any instance of modern slavery is a success for all involved, and not typically a punitive event.
- That the response to suspected or reported cases of modern slavery should not automatically be to terminate business with the supplier in question – due consideration of the entire situation and an appropriate response is needed before any actions are taken. Contract termination rights may not be available, or termination may not help achieve a positive outcome for victims.

- That the parties should openly and collaboratively work together to identify, understand, and appropriately remediate any issues.
- That the existence of modern slavery in a supplier does not always indicate systemic bad practice – it could be localised in a smaller area of the business such as a manager forcing unpaid, involuntary overtime on their team to reach their targets.
- That such exploitative practices may be within any organisation irrespective of geographic or industry-based risk assessments, as such behaviours can be driven at a lower level by any individual overseeing others. Modern slavery does not only exist in third parties, and an awareness of suppliers' in-house practices is equally important.
- Many suppliers that do not meet the modern slavery reporting threshold may have limited understanding or awareness of modern slavery issues, and may need additional support.

## CASE STUDY 01: THE IMPACT OF COVID-19 ON OUR OPERATIONS AND SUPPLY CHAIN RISKS

COVID-19 continued to drive a multitude of complex changes in both operations and supply chain.

### OPERATIONS

The health and safety of our staff, students and contractors is always considered the top priority. Maintaining a safe operating environment under pandemic conditions required significantly increased sourcing of certain products that were subject to a massive increase in global demand, and corresponding shortages and unpredictable supply chains. Key examples included cleaning products (such as hand and surface sanitiser), disposable gloves, masks, and end-user electronics.

Dynamically balancing operations with government directives and health and safety through a comprehensive program was the mandate of the University's Chief Medical Officer. This included the identification, segregation and recording of hundreds of campus micro-work locations according to physical environment and use-case risk, and the application of specific rule sets to each risk level.

Every utilised part of the University had a specific set of rules developed and applied, and these rules also varied depending on the way that area was to be utilised at any time (as some areas are multi-functional with varying use cases). Modelling was undertaken to understand the demand created for each personal protective equipment (PPE) product type.

For example, at one point hands-on-patient medical work required a P2-level mask and gloves. Large lecture rooms allowed a maximum of one person per four square metres density limits, video conferencing capability, and required L2 three-ply surgical masks to be worn by all in-person attendees.

At later stages, staff attendance to campus was limited to critical staff such as security and those maintaining ongoing research validity. Staff were prevented from unapproved attendance using unique staff access cards via electronic door access systems. The changing requirements were clearly – and continue to be – communicated with staff via email, line management, and communication campaigns.

Monash standardised its COVID-19 mask specification and usage requirements according to use-case and based on scientific evidence and government guidance, and then sought supply for each. In addition to COVID-19-driven demand, Monash already has large-volume requirements for these products to maintain normal operations outside of pandemic conditions – the absence of these products prevents various critical areas from functioning, such as laboratories and areas of medicine. This means that to maintain operations in pandemic conditions, Monash required additional large volumes of these products in addition to the existing large requirements.

There was no material impact on our ability to execute our modern slavery program of work.

While the University was able to successfully manage its operations, the pandemic created additional demand for PPE and hygiene-rated products at a time when they were in global short supply.

## SUPPLY CHAINS

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The increased risks due to COVID-19 and the subsequent Australian Border Force (ABF) guidance on the impact of COVID-19 on supply chains (and workers in vulnerable positions) is noted by the program, and continues to be considered and addressed.

Due to our relationships and collaboration with our suppliers, no material changes to existing supply chains occurred, minimising the opportunity for pandemic-related worker abuse in our supply chains, aside from one additional, vetted supplier being engaged for the provision of masks. A number of contracts were extended under existing terms. These contracts did not have material changes to modern slavery-related terms, as the newly updated standard terms were not yet finalised and approved.

The following measures were implemented to specifically remove undue stress on the supply chain at a time when suppliers globally faced difficulties maintaining normal sourcing, production, and transport. These measures were intended to help reduce the pressures facing suppliers, and mitigate any temptation for suppliers to try to deliver by using higher-risk supply chains or by engaging in unreasonable labour practices with their staff.

### Commercial and relationship measures put in place on a case-by-case basis:

- Increased collaboration occurred in relation to supply risks with various entities including AUPN, other universities and suppliers.
- Increased collaboration with suppliers on demand forecast and pulled forward orders to allow for extra lead time where appropriate.
- No undue pressure was placed on suppliers in regard to shortages, failure to deliver on time, or extended lead times caused by supply chain interruptions.
- Relief was provided from contractual obligations when appropriate. Examples of appropriate relief included products with global shortages, higher-priority (but later) orders receiving their stock first, such as hospital and Victorian government PPE orders, and periods where there were known global transportation issues. This was conducted on a case-by-case basis via the close management of key outstanding orders.
- Variability in supplier input and transport costs were acknowledged, and temporary pricing adjustments were allowed as appropriate.
- Demand reduction was utilised to relieve pressure where possible, such as limiting the use cases for P2 and N95 masks to those with scientific justification for their use.
- In recognition of the difficult operational environment facing companies globally, there was an increased awareness of the potential for uncertain financial performance of suppliers. This led to increased due diligence on the financial viability for some suppliers.

## Examples of how we manage the impact of COVID-19

### ELECTRONICS

Electronics demand was managed by the eSolutions team through the:

- prudent placement of orders very early in the pandemic
- maintenance of increased inventory buffers
- implementation of redeployment-of-assets policies
- extension of the duration of use of laptops for an additional year.

Close collaboration and relationships with our suppliers enabled ongoing supply to be carefully managed. This supported the increase in laptop usage as most staff moved to a work from home model.

### MASKS, GLOVES AND SANITISERS

Masks, sanitiser and glove supply chains saw significant changes both globally and locally. Existing pre-COVID-19 orders and early ordering at the start of the pandemic allowed Monash to continue to operate. Additional buffer stock was ordered, and the buffer size increased to help mitigate varying order lead times.

More than a dozen profit-driven transactional resellers rapidly appeared. These presented both a modern slavery and health and safety risk. These suppliers were purposefully not engaged, and additional due diligence was undertaken on any new suppliers being considered for these areas.

These new opportunistic suppliers were characterised by:

- random availability of varying types of products
- suppliers of unknown origin with no known background in this area
- non-transparent supply chains where even the veracity of the products on offer was impossible to know – fake branded products, and products that don't meet their claimed safety specifications also appeared, especially for masks
- generally opportunistic high pricing as the result of multiple levels of profit-driven global arbitrage, further increasing the opacity of the supply chain.

## To mitigate both the modern slavery and health risks resulting from COVID-19, Monash:

- undertook a rapid deep-dive to assess the latest state of supply chains
- placed additional orders with existing reputable suppliers in recognition of variable delivery timeframes
- located new storage areas to store an increased buffer stock
- worked with our OH&S team to review any new types of products inclusive of review of their specifications, samples, and testing documentation
- identified and engaged a new supplier, which also supplies the Victorian government, for assessment, the engagement undertaken with an awareness that supplying Victorian government health needs to take precedence over the University's operational activities
- identified new local high-quality manufacturers, including businesses that had shifted from their normal products to products such as masks and hand sanitisers as a business continuity plan due to normal business being impacted by COVID-19
- implemented sensible, science-backed and government guidance-aligned controls on the use and deployment of these products to actively reduce unnecessary internal demand
- specifically chose not to engage with profit-driven transactional resellers, as they represented the highest risk of both modern slavery and risk to health.

These mitigation methods allowed the complete non-engagement of any COVID-19-driven opportunistic and high-risk supply chains, despite these products being business critical to ongoing operations.

## CASE STUDY 02: SUPPLY CHAIN RISK ASSESSMENT, INVESTIGATION AND ACTION - MONASH-BRANDED APPAREL

This case study describes an assessment of the inherent risks in Monash's apparel supply chain, the role of Monash in relation to the risks, and the actions in response to the assessment.

### RISK ASSESSMENT

The Global Slavery Index indicates apparel is high risk<sup>1</sup>. A desktop assessment was undertaken on the supply chain of Monash-branded apparel. The risks associated with this category primarily relate to the prevalence of human rights violations including but not limited to, child labour, forced labour, human trafficking, and debt bondage in raw material harvesting, processing, and manufacturing stages. The key drivers of these risks are a combination of a high demand for large-volume, low-cost products, and short lead time.

Monash-branded apparel is predominantly made from cotton, cotton/polyester mix or polyester. Suppliers may change over time, though there are efforts to consolidate supply.

### Cotton:

An industry assessment showed that 22 per cent of global cotton comes from one country<sup>2</sup> – the same country the University primarily purchases from. Up to 87 per cent of that country's cotton is believed to be produced with the use of forced labour<sup>3</sup>. Cotton from this country of concern is widely exported as raw material, semi-processed or final products that are widely sold both domestically and internationally.

The cotton growing, processing and apparel manufacturing supply chains within that country are known to be opaque. Cotton from identifiable safe sources may be blended with cotton from unsafe sources, and forced labour may be trafficked from one location to another.

Further, the use of independent third-party auditing within the country is also known to be problematic, particularly in cotton-producing regions where auditors may experience access restrictions and heavy policing. This is a network of global supply chains where modern slavery risks could be very widespread, and difficult to trace and verify.

### Polyester:

Two-thirds of global apparel material is synthetic, with polyester being the most utilised synthetic fibre, representing half of the volume of synthetic fibre<sup>4</sup>. The polyester value chain includes the high-risk textile industry.

1.  Global Slavery Index. *The Global Slavery Index 2018*, viewed 19 October, 2021.
2.  US Department of Agriculture. *Cotton and Wool Outlook*, viewed 19 October, 2021.
3.  US Department of Agriculture 2021, *Cotton and Products Annual Report*, viewed 19 October, 2021.
4. Palacios-Mateo C, van der Meer Y, Seide G. Analysis of the polyester clothing value chain to identify key intervention points for sustainability. *Environ Sci Eur.* 2021;33(1):2. doi:10.1186/s12302-020-00447-x

## INVESTIGATION

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Purchasing of apparel is largely centralised to one University area, however smaller ad-hoc purchases exist from various other areas of the University, including sports clubs. Our supply chain includes at least two manufacturers located in the country mentioned above.

An in-depth discussion with the area mostly responsible for the branded apparel procurement (that is also represented in the modern slavery workgroup) established that Monash's spend on branded apparel was relatively small, and that there was no evidence to suggest that the University paid below market rates or demanded unreasonable delivery lead times. Ad-hoc purchases have not been investigated in detail, but there is some evidence to suggest that they may include considerable focus on pricing.

The manufacturers were also contacted by our suppliers about modern slavery risks within their operations, and subsequently provided audit reports prepared by reputable ethical trade membership organisations – amfori BSCI and SEDEX.

### Manufacturer 1:

During our investigation, we witnessed a photo of a framed SEDEX audit certificate issued to a third manufacturer. Independent verification with SEDEX identified that evidence of certification provided by the supplier was falsified. We queried our supplier who provided this photo. The supplier confirmed they did not engage this manufacturer, as the manufacturer could not substantiate their credential with a SMETA report.

### Manufacturer 2:

This manufacturer provided a follow up audit report by amfori BSCI. The audit was conducted in 2020 and showed an “acceptable” rating. It was found that workers were being paid fairly, no forced or child labour was employed, adequate rest time between shifts was allowed and worker representatives were elected to engage in dialogues with management. The supplier has improved in their compliance with the amfori BSCI Code of Conduct since an audit the year prior. However, excessive overtime and some aspects of health and safety practices remained as improvement opportunities.

Monash will continue to monitor the progress of these manufacturers. At this stage, Monash was unable to gain visibility of downstream suppliers including raw material supply.

## LESSONS

To increase transparency of the cotton-based apparel supply chain, Monash has identified that within Australia, cotton DNA testing may be available to determine the source of cotton supply. This mechanism will be explored in 2022, if needed.

Monash also commenced searching for an ethical apparel supplier with a traceable supply chain. A Melbourne-based supplier was identified. A simplified cost estimation was carried out to assess the financial feasibility of switching supply. It was estimated a switch would result in a 20 per cent rise in cost, but would provide full visibility of the full supply chain in addition to other sustainability improvements.

### This case study resulted in the following lessons for our apparel supply chain risk assessment:

- Due to our responsible procurement practice, and being a relatively small player, it is unlikely that Monash has materially contributed to the modern slavery risks in the supply chain of our branded apparel. However, we acknowledge that we are related to the risks.
- True seed-to-product transparency is required to be confident of the cotton supply chain, yet this is very difficult to achieve. For polyester, transparency to the textile industry is needed.
- Verification via DNA can be utilised to check claims on the source of cotton.
- Third-party auditing report needs to be reviewed in full to uncover areas of concern hidden in the details. Pre-announced audits may not always be able to provide an independent review of a supply chain, to the required degree of confidence.
- In the presence of conflicting claims about modern slavery in a supply chain, a decision may need to be made on the balance of probabilities, considering the different views on the matter.
- A change of supplier should be considered to increase supply chain confidence in this high-risk area, acknowledging that whilst a change of supply may mitigate risk for Monash, it does little to address the risks in the industry.
- Third party certification should be verified.


## ACTION PLAN


### As the University product ranges and suppliers can vary over time, in 2022 we will:

- Identify and undertake a risk assessment of all current Monash apparel suppliers, including those utilised by Monash Retail, Monash Malaysia and Monash College.
- Put in place a checklist for pre-contract assessment and prequalification of proposed new apparel suppliers.
- Centralise the approval for Monash-branded apparel to ensure vetted suppliers are used across a consolidated supplier base, minimising ad-hoc purchases by other areas across the University – this will involve an awareness campaign across faculties and portfolios, and supporting process changes.
- To continue consultation with the responsible area and academic experts in the supply chain area to evaluate the best approach to tackle this high-risk area, and escalate this issue through the Modern Slavery Steering Committee.
- Explore the use of DNA verification to trace the source of supply of our branded apparel.
- To further refine our method of deep-diving into high-risk areas, and resultant actions, in line with best practice.

The University will commence the next steps in line with OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector<sup>5</sup> and Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities<sup>6</sup>.

Our first step will be to work with existing suppliers to understand their supply chain and operations, and seek to influence them where needed. A potential alternate supplier has also been identified for evaluation, should our work with existing suppliers not produce timely or adequate results.

5.  [OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector](#), pp. 78-82, viewed 12 May, 2022

6.  [Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities](#), Appendix 2, viewed 12 May, 2022.



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ACTIONS TO ASSESS  
AND ADDRESS  
**OPERATIONAL AND  
SUPPLY CHAIN  
RISKS**



Monash recognises our operations and supply chains are complex. In our attempt to address modern slavery risks, there will be unforeseen circumstances and challenges that lie ahead. We're just beginning to understand the existing risks, and are exploring ways to address them. We'll continue to collaborate with our peers, our suppliers, and our external affiliations, as well as drawing on the extensive knowledge of our academic experts and other industries' experience to develop a meaningful solution for the identified risks. The actions described below will be reviewed and fine-tuned as knowledge comes to hand.

## OPERATIONAL RISKS

### Recruitment practices

One of the key operational risks for Monash relates to recruitment practices for both staff and students. Monash works to ensure all recruitment activities actively avoid risks for staff and students, including international students, in relation to servitude, forced labour, debt bondage in a homestay environment and in their search for employment. Monash has developed rigorous policies, processes, and monitoring to identify and avoid such risks. Monash is satisfied that our current set of relevant HR policies and procedures, and student services programs are in place to address these risks and will continue to improve as we learn. These are described below.

All Monash University employees are engaged via employment instruments that meet or exceed Australian legal requirements. Monash Human Resources (HR) maintains and manages these agreements, is involved in the engagement of all staff, and has robust hiring practices in place. This includes fair recruitment and hiring processes, in addition to conditions of work and behaviour in the workplace requirements. Monash HR practices are subject to audit.

Monash staff and students have clearly prescribed rights via a number of readily available policies and websites. Bullying, discrimination, harassment (including sexual harassment), victimisation and vilification are unlawful and are not tolerated.

In addition to policies setting out the requirements and rights of all staff and students, Monash has a number of easily accessible complaint and grievance processes. This includes clear identification, explanation and access to both internal and third-party complaint avenues, anonymous complaint handling, and set timeframes for complaints to be addressed before escalation must occur.

Monash College has robust recruitment processes that includes "right to work" and qualification checks, and checks that all employees are above minimum working age, in line with relevant Australian employment legislation.

In 2021, Monash College updated its Recruitment and Selection Policy and Procedure to include reference to modern slavery and associated legislation.

Periodically, the College engages with third-party recruitment agencies and consultants. Where possible, the College utilises the University's preferred suppliers. The network of homestay hosts, and education and migration agents is subject to a recruitment and vetting process, and is actively monitored and managed according to Monash College policies and procedures.

It was identified that students, in particular international students, in the early phase of their work careers may be at risk – even though in many cases this employment is not formally part of University operations or supply chains. To reduce employment-related risk for students, the Executive Director, Campus Community Division, has in place the [Career Connect](#) program. This seeks to educate students by providing employability workshops, workplace rights advice such as tax, residency status, work conditions, pay rates, Fair Work Ombudsman, and Fair Work links. This important information is promulgated to the various student organisations and student cohorts on each campus.

The modern slavery program will hold an annual discussion with the Executive Director, Campus Community Division to maintain ongoing awareness of the Career Connect program and its proactive management of this risk.

The risk from student employment with third parties is now considered to have a comprehensive education, risk mitigation program and grievance mechanism in place. It's actively managed by the Executive Director, Campus Community Division.

### Procurement practices

As a leading institution in the higher education sector, Monash is committed to educating our staff and students regarding the challenges and opportunities of the human rights agendas. Monash's academic expertise is central to meeting this commitment.

In consultation with our academic experts, Monash developed and launched a procurement-focused modern slavery training module at end of 2021. The training aims to raise awareness of hidden slavery practices in supply chains, and signs of potential issues. The training was assigned to staff with significant procurement responsibilities in the first stage of deployment. Further deployment to all staff with procurement responsibilities and all new staff will occur in 2022.

In addition, Monash has a mature procurement framework in place, including a value and risk-based approach to procuring goods and services, detailed policies, standardised templates, governance, separation of duties, training and auditing.

Our procurement policies and procedures, as well as sourcing document templates, provide detailed guidance to staff on responsible procurement practices, including allowing sufficient time for procurement planning, clear specifications, setting realistic expectations, ethics, confidentiality, and probity.

The Strategic Procurement team, which leads the implementation of the modern slavery program of work, also completes the Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement and Supply eLearning program and test on an annual basis.

Further work remains to be carried out to identify and improve potential undue pressures that may be placed on our supply chain by the setting of short delivery times or unreasonable results. These may occur due to individual or business practices or expectations.

## SUPPLY CHAIN RISKS

Considering the wide spectrum of goods, services and works Monash procures, and the extensive network of both domestic and global suppliers, we expect most forms of modern slavery exist in varying degrees and at various stages along our supply chains, particularly where low-skilled and vulnerable migrant workers are involved, and where conflict or political instability exist.

Our approach to mitigating these risks is through creating awareness and asserting influence through supply chain risk analysis, sourcing, contractual instruments, and training.

## RISK ASSESSMENTS

### Assessing risk in Australia

- Our risk assessment methodology is multi-pronged and dynamic. Each year we utilise the latest Department of Homeland Affairs and Global Slavery Index advice for high-risk focus areas for Australian imports. We also used our spend-based risk assessment system created via our work with AUPN. Additional guidance is provided from our academic experts.

### Assessing risk in countries other than Australia

- We utilised the Global Slavery Index for identifying high-risk imports to Malaysia, and will expand to include the countries we operate in over time, as we expand our scope to include additional offshore entities in subsequent years. During the onboarding process for Monash University Malaysia, it was noted that the Global Slavery Index also highlighted that Malaysia is a country of concern in relation to labour rights, identifying that beyond imports to Malaysia, local practices may be of particular concern.

### Preparations undertaken for the deployment of an advanced supplier risk assessment system

- We're in the final stages of implementing an advanced spend-based supplier analytics system called FRDM (pronounced "Freedom"). This is the result of a higher education sector collaboration we have been undertaking with AUPN.
- FRDM will complement the industry and country-based risk assessment system currently in place. It utilises a significant global supplier database, product material breakdown data, and news monitoring with alerts. The new tool also enables risk identification on a sector level.
- FRDM has the potential to reduce the workload for common suppliers between universities by allowing an efficient "reply once, share to 30-plus universities" approach to modern slavery information requests from the sector.
- Monash University and Monash College supplier data has been cleansed and uploaded. We are working through the final steps of system implementation with both AUPN and the system provider. Over time other Monash entities' spend data will be uploaded and risk assessed using the FRDM tool.

### Spend-based risk assessment

- An assessment of spend against known high-risk countries and categories was undertaken in 2021, with the outcomes below. A key outcome is that our supply chain risks predominantly lie in the types of goods and services procured rather than where we procure from, and that we have a small number of suppliers that account for the majority of spend in high-risk categories. This has informed our approach to address the risks, where efforts are to be directed to high-risk categories and, more specifically, the high-spend suppliers within these categories.

## SUPPLY CHAIN RISKS SUMMARY

## 9 HIGH-RISK COUNTRIES WITH SPEND

(China, Bangladesh, India, Malaysia, Thailand, Vietnam, Pakistan, Iran\* and Sri Lanka)

**141**  
SUPPLIERS

**\$7.7M**  
COMBINED  
SPEND

**80%**  
of the spend is concentrated  
with 10 suppliers

- » Most of the spend is on lower-risk professional support services in those countries, such as auditing, research, and marketing. One key exception is chemicals, which may include some that could be high-risk, especially at the raw materials extraction stage – though the location of extraction may be in another country.
- » These figures include some scholarship-related spend, and excludes some Monash-related entity spend.
- » Iran may be considered as low-risk and excluded, as it's a scholarship-related spend.

## 5 HIGH-RISK CATEGORIES

(Cleaning services, Electronics, Security services, Apparel and Catering)

**1092**  
SUPPLIERS

**\$61.3M**  
COMBINED SPEND

**80%**  
of the spend is concentrated  
with 6 suppliers

- » Taking into consideration our proximity to the risk, bargaining power, supplier dependency, availability of alternative suppliers, and level of spend, each of these categories is either being addressed via a specific action, or has an action plan in place. These are further discussed in the “Areas of focus” section.

## SOURCING PROCESSES

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Monash has both short-term tactical and longer-term strategic engagements with suppliers. Significant purchases follow a formal tendering process unless a formal exception is sought and granted. As part of this tendering process, suppliers are required to provide information in their response related to environmental and social responsibility. Included within the information requested regarding social responsibility is specific mention of modern slavery within the supplier and its supply chain, compliance, and supplier actions taken to address modern slavery. The information requested within standard tender templates will be updated when the standard contract terms are approved for release.

## NEW SUPPLIER ONBOARDING

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All new suppliers must confirm they're compliant with relevant modern slavery requirements as part of Monash's supplier onboarding process. They are not able to be engaged, nor paid until they have completed this process, including electronically confirming they're compliant with all relevant obligations. A failure to confirm compliance stops the onboarding process, and initiates manual intervention and review. A supplier that has not been successfully onboarded is unable to be ordered from or paid.

## CONTRACT AND SOURCING DOCUMENT TEMPLATE WORDING

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A framework of template clauses has been created by Strategic Procurement, an academic expert, and the Office of the General Counsel for implementation in key documents where Monash is procuring goods or services, including sourcing documents and relevant template agreements.

### The template clauses include:

- "low-risk" provisions for general use
- "high-risk" provisions applicable to high-risk suppliers or procurements
- specific terms related to electronics hardware.

The "low-risk" provisions require suppliers to identify, assess and address modern slavery risks within their operations and supply chain, and notify Monash of any instances of modern slavery practice. The "high-risk" provisions place additional obligations on suppliers to provide a detailed report on their efforts in identifying, assessing, and addressing modern slavery risks, as well as to request their downstream suppliers to comply with similar conditions. Where risk is deemed very high, an inspection provision will be added to enable Monash or its nominated agent to conduct investigations.

These clauses are drafted and being readied for final approval. Once approved, they will be integrated into relevant template agreements and deployed for use in Australia for procurement related contracts.

It's intended that the scope will be updated over time to include overseas entities. Appropriate clauses will be developed based on the overseas entity, its country's unique legal requirements, and its specific methods of contracting.

Once the clauses are approved, standard tendering documents will be updated with modern slavery items that are in line with the updated contract clauses.

## SIMPLIFIED QUESTIONNAIRES

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Recognising the diversity of Monash's global supply chain, an additional supplier questionnaire has been created. This includes clear expressions of requirements and guided steps in simplified English. This is used in conjunction with dialogue to achieve an understanding of the supplier's practice and culture, and to identify the best way to work in partnership with suppliers, beginning with directly engaged suppliers.

## TRAINING AND COMMUNICATIONS

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An engaging training module was developed and deployed using real-life scenarios to create awareness among staff with procurement responsibilities.

A publicly accessible [Monash University modern slavery website](#) has been designed and deployed as the homepage for the University's modern slavery program of work. This website will host the annual Modern Slavery Reports as they're published, outline our approach to tackle modern slavery, and provide additional educational resources. Its content will continue to grow as the program progresses. Also published was a [Monash College modern slavery website](#).

An integrated digital communications campaign using both internal and social platforms was implemented. This campaign is intended to raise awareness, promote discussion, and provide additional skills and information on the topic to staff and students. It includes social media and web-based communications.

## AREAS OF FOCUS

Using risk assessments, supplier questionnaires, industry, and academic knowledge, Monash has identified the following areas within its supply chain that are of higher potential risk. We have increased our focus on these areas.

### Cleaning services

- Monash incurs significant cleaning services' expenditure due to the size of its various campuses. There are 66 suppliers, and a concentration with one supplier.
- Due to the higher proportion of low-skilled, temporary and/or migrant workers employed in cleaning services, we acknowledge that the risk of forced labour and debt bondage may exist within the labour practice of our suppliers. As a significant customer, we are mindful of the demand our service requirements place on the suppliers, which may contribute to malpractice. Monash will continue to engage our suppliers in an open dialogue about our expectations regarding labour practice, as well as to work with the Cleaning Accountability Framework (CAF) where practicable to increase supply chain transparency.
- In Australia, Monash engages its cleaning services via third-party service providers that are only engaged after a robust tendering process. Terms and conditions are made binding via comprehensive formal agreements. Further subcontracting of the work is only permitted with the approval of Monash University.
- Despite these measures, Monash has identified cleaning services to be a particular area of potential modern slavery risk. Though there's no evidence to indicate any issues among our current suppliers, we have continued to assess the CAF for integration within our cleaning services framework.
- When our key cleaning agreements are to be refreshed via a tender, we will include these requirements within any new tender specifications and template agreements. Any new requirements will form the foundation for new cleaning engagements and their supporting contracts – a more commercially reasonable method than seeking to revise multiple existing complex agreements that are currently nearing the end of their term.
- Our ongoing risk management strategy includes using updated contract terms incorporating modern slavery clauses, the CAF as a third-party expert to collaborate with Monash and its key provider, and sector leverage (the AUPN and the CAF). The proposal to collaborate with the CAF is still subject to further assessment, and approvals processes.

### Security services

- Monash has a material spend on security services. There are 23 suppliers, but a heavy concentration with one supplier.
- Security services have a similar risk profile to cleaning services. Monash's spending is also significant in this area. We will adopt a similar approach to cleaning services to address the risks.

- As part of our prioritised risk approach, a deep-dive into this area may occur in subsequent years. Currently, the concentration with one key "tier one" supplier affords us the opportunity to apply a focused approach to closely work with this supplier. However, this is not considered to be a comprehensive approach, and it may be improved.
- Offshore entities will be considered when they are risk-assessed.
- Within Australia, Monash plans to leverage the expertise of the CAF in further assessing and managing the risks. The CAF may be able to include security services. The introduction of CAF is subject to further due diligence.

### Computers and electronic equipment – including related conflict minerals

- Monash procures and incurs significant costs on electronics. The supply base is diversified with 514 suppliers, but has a concentration of expenditure with four global suppliers.
- Electronics have both a high risk and complex supply chains, from raw materials to component manufacture to primary assembly of the device, where modern slavery can occur at multiple stages along the supply chain. Risks include forced labour, the worst forms of child labour, slavery, human trafficking, and debt bondage. Supply chain transparency is generally opaque, and the entities within the supply chain may also be commercially sensitive.
- Despite the large spend, Monash is likely to be a relatively small buyer to our global suppliers. While we may often buy directly from original equipment manufacturers (OEMs), our influence on their supply chains would be limited due to proximity to risk and bargaining power considerations. Our relationship with the risk in electronics is directly linked.
- The current focus is on increasing the transparency of the primary assembly location for all relevant products Monash purchases – typically an offshore factory assembling the final components into branded products on behalf of OEMs.
- In the first year of our program, Monash engaged one of its key computer suppliers and reviewed its approach addressing risks of modern slavery in its supply chain. The supplier was found to be well-advanced in this area. Though satisfied with the actions of this key electronics supplier, Monash considers this industry to be of particular risk, and in 2021 undertook the following steps to improve transparency:

- » Monash has been working closely with a third-party global monitoring and compliance entity, Electronics Watch, with a view to becoming an affiliate member in 2022. This will significantly increase the transparency of the assembly and manufacturing of many of the electronics acquired by the University. An affiliation contract was in the final stage of negotiations, and will undergo internal approvals in 2022.
- » Electronics-specific contract terms are in the final stage of revision that include practical terms supporting risk identification, reporting, reduction, and remediation in electronics supply chains. These terms are compatible with the operational model of Electronics Watch, which we intend working with to identify, reduce and monitor electronics supply chain risks.
- Our ongoing risk management strategy includes using contract terms, third-party monitoring and sector leverage through AUPN and Electronics Watch's extensive network of affiliates. Each of Monash's offshore controlled entities will be integrated into our electronics risk mitigation strategy once they reach that stage of onboarding.

#### **Cotton and apparel**

- The expenditure of Monash's Australian campuses within this area is comparatively low compared to the other high-risk areas, but the risks are material. There are 14 suppliers, but a concentration of spend with four suppliers. It's possible there are additional small suppliers not identified by category-based spend analysis – for example, incorrect coding of small one-off orders, or purchases made by credit card.
- Similar to electronics, the supply chains of apparel are long, complex, opaque and global in scale. The risk profiles between apparel and electronics are similar. Where raw materials supply and/or manufacturing occur in countries known to have human rights violation issues, the risk level increases. Due to proximity to risk, low spend and restricted visibility of supply chains, our relationship with the risks inherent in our apparel supply chain is directly linked.
- Monash University requests information from local suppliers to assess their compliance with legislation such as the Fair Work Act 2009. We encourage suppliers and/or their supply chain to comply with industry codes such as Ethical Clothing Australia, Better Cotton Initiative, and Fairtrade.
- To further mitigate risks, foundational work has been undertaken to identify best practice to increase transparency within our supply chain to provide a step-change improvement in Monash-branded apparel procurement, from raw materials through to manufacturing. Additional work is required before a decision can be made.
- Minimal apparel spend is attributed to our offshore entities. They will be considered when their onboarding is at the appropriate stage, including the potential to share suppliers used by Monash's Australian entities.
- Also see: Case Study 02: Supply chain risk assessment, investigation and action - Monash branded apparel

#### **Catering and food services**

- Monash's Australian campus expenditure on catering and food services is comparatively low. However, the risks are material. There are 449 suppliers, but a concentration of spend with 16 suppliers.
- Catering and food services have a similar labour force and risk profile to cleaning and security services. It is also an industry popular with students, both local and international, seeking employment. The production of ingredients may also be a risk. Monash may contribute to risks at the service level due to student involvement (as discussed in the "Operational risks" section) and via our lease agreements with on-campus providers. However, Monash may be directly linked to the downstream risks due to our proximity to risks.
- The risks identified are:
  - » tier one and two food services labour
  - » ingredients at the farm level
  - » rice, cocoa, and fish sourced from countries of particular concern.
- Monash is aware food services staff may also be engaged by retail partners for service within retail food outlets that operate on our campuses, and that this is a high-risk area.
- We've started identifying the various commercial engagement methods for catering suppliers, and to understand the types of standard lease documents used.
- A briefing to 32 retail partners was undertaken to explain modern slavery, identify the specific risks of offshore rice, cocoa, and fish, and highlight wholesalers that carry well-regarded labour rights and sustainability certifications for these products, and other practical steps that may minimise risk when purchasing these products. It was noted that Monash has no ability to direct the retailers to purchase specific items from specific suppliers, so an education campaign was undertaken.
- Offshore entities will be considered when they are risk-assessed.

### **Glove manufacturing – an update on a key issue from 2020.**

- In 2020, Monash University, in conjunction with the AUPN, identified an instance of modern slavery within its supply chain for latex gloves. It was identified it was likely that a third party providing labour supply services to an offshore subcontractor to a Monash supplier was engaging in:
  - » deceptive recruiting practices
  - » high recruitment fees
  - » passport withholding
  - » forced salary deductions
  - » forced overtime
  - » substandard living conditions.
- The outcome of this globally significant issue continues to be monitored as it progresses, and has been the subject of global media coverage. Sources monitored include the supplier's published continuous improvement report.
- The supplier's due diligence of recruiting agencies has been improved, including ensuring they comply with SEDEX Members Ethical Trade Audit (SMETA) or the Business Social Compliance Initiative (BSCI) Code of Conduct.
- The glove manufacturer terminated the use of the labour supplier in question, and undertook remediation steps such as significant payments to impacted workers and ensuring the return of passports. This matter is now considered substantively remediated.
- Although the University does not have a large spend in this area, we recognise the impact our spend has on creating demand in this supply chain.
- This supplier and the entire glove manufacturing industry continues to be monitored as a high-risk supply chain.

### **ADDITIONAL AREAS OF CONCERN IDENTIFIED IN 2021**

As we identify additional areas of concern, they are factored into our program of work. The guiding principle we apply is to, where possible, improve the outcomes for victims.

#### **The steps include:**

- tabling the new concern with the working group
- prioritising the concern according to the working group's preliminary perception of the risk
- verifying the perceived risk level via a risk assessment including consulting the Global Slavery Index and Department of Home Affairs materials, and other data sources
- making any proposed changes to our program of work, according to the now confirmed risk rating
- tabling the final risk rating and logic with the steering committee
- documenting the risk management steps and outcomes, including documenting the reason for any decision to reduce the rating of a risk
- execution of the plan, and monitoring for effectiveness.

Once proven to be effective, the framework will be formalised into a procedure.

#### **In 2021, the following areas of concern were identified:**

- During internal discussions in relation to apparel, we identified the common use of cotton-based lab coats. These coats include both purchased and leased coats (leasing includes the provision of coats and specialist coat cleaning services due to potential chemical and other contamination). These will be added to our potential high-risk product list and assessed.
- Solar panels were also identified as potentially high-risk, but also outside the current scope of our computer and electronics strategy. They will also be assessed. Due to the specific nature of this industry, a bespoke assessment and solution may be necessary.



## ADDITIONAL ENTITY-SPECIFIC AREAS OF FOCUS:

### MONASH COLLEGE

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#### Monash College focused on:

- implementing systems and processes to better-understand procurement risks
- informing staff of modern slavery risks and issues
- enhancing the audit process for offshore partnerships
- supporting the implementation of training to key staff.

#### Offshore partner audit process

- The offshore partner annual desktop review process was updated to include an update on the due diligence process in place for procurement in response to modern slavery obligations. This was completed by all established and active partners in 2021, with a total of four partners completing the desktop review.
- The due diligence process for new partnerships was updated to request modern slavery compliance evidence, and the agreement includes the modern slavery compliance clause, which was signed by the new partnerships established in 2021.
- While progress is being made in embedding this requirement in audit and due diligence processes, the evaluation of the effectiveness of these processes is yet to occur.

#### Implement training module for staff

- Monash College was included in the scope of the Monash University training module. Stage one was the rollout to staff involved in procurement and purchasing, including the college's CEO and senior leading team, in December 2021.

#### Continue to develop the maturity of supplier risk analysis

- This did not progress as planned due to delays in data cleansing. This will continue to be a focus of 2022 activities via the implementation of the FRDM tool, which includes Monash College in its scope.

#### Embed supplier compliance and ethical due diligence questionnaires into procurement procedures and documents

- The vendor management onboarding process was updated to include modern slavery compliance and to align with the Monash University process, for implementation in 2022.
- The update of the recruitment and selection policy and procedure was completed.

#### Check new employee documents are robust and compliant with recruitment policy and relevant legislation

- Due to staff movements, this was not completed in 2021, and has been rescheduled for 2022.

#### Engagement of third-party service providers complies with relevant policies and procedures

- Currently, the template agreements for industry-based agreements are under review and will be considered for incorporating modern slavery clauses where practicable. The Contract Management Procedure was updated in June 2021 so that the contracts entered into by Monash College are managed in a way that helps reduce modern slavery risks.

#### Mitigate risk of working with third parties through the procurement of services from Monash University preferred providers or organisations with their own modern slavery statements

- This will continue to be an area of focus in 2022, as well as updating the vendor management and onboarding process to include modern slavery compliance.

## MONASH UNIVERSITY INVESTMENTS, INCLUDING THE MONASH UNIVERSITY FOUNDATION PTY LTD

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Monash University aims to be at the forefront of developing and leading the incorporation of environmental, social and governance (ESG) principles into its investment policy. Monash, via its investment advisor and investment managers, actively engages on ESG issues to influence corporate behaviour where possible.

### The ESG investment process will:

- require the University and investment fund managers to be signatories to the United Nations Principles for Responsible Investment (PRI), which works to understand the investment implications of ESG factors, and to support its international network of investor signatories in integrating these factors into their investment and ownership decisions
- utilise a best-practice rating scheme or third-party review to select investment fund managers and/or investment funds
- invest in some tailored portfolios that exclude exposure to coal, tobacco, uranium, and cluster munitions
- incorporate the investment managers' approach to integrating ESG in the annual manager reviews and sector reviews
- review opportunities to invest in ESG-oriented investment strategies that meet the investment objectives of the long-term investment pool
- require fund managers to actively engage with investment companies on ESG issues –in the course of engagement with investment fund managers, if the University finds such managers to be unresponsive or unwilling to become responsive to our approach to ESG principles within a timeframe that the Monash University Council considers reasonable, Monash will divest from all investments with those managers
- seek annual updates from all investment managers on what they have done in relation to the Modern Slavery Act over the past 12 months.

## MONASH UNIVERSITY MALAYSIA

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Monash University Malaysia is part-way through onboarding to the modern slavery program. It's the first of the overseas entities to do so.

Engagement with senior representation has been completed, and a representative is in the modern slavery working group.

Spend analysis is underway to allow a clearer understanding of the supply base and prepare data for uploading to the FRDM supplier risk assessment tool.

A risk assessment for Monash University Malaysia has been undertaken, primarily using the Global Slavery Index report of high risks for Malaysia.

### High-risk areas relevant to Monash University Malaysia are:

- Malaysia is characterised by a large vulnerable local population and the use of low-skilled migrant labour. Even when using tier one suppliers there may be risk, especially if there are additional layers of labour subcontracting where supply chain opacity becomes an even larger issue.
- Garments and apparel are high-risk. Although spend in this area is low, we'll seek to address this, including, if possible, utilising the solution deemed suitable for Monash in Australia. This solution is still being assessed.
- Construction services in Malaysia, even when tier one suppliers are used. Large construction projects that are likely to involve one or more levels of subcontracting are of particular concern.
- Construction materials are high-risk.
- The electronics purchased by Monash University Malaysia are from tier one OEMs and will be captured by the whole-of-Monash electronics risk reduction program we plan to implement with a third-party affiliation. In addition, Malaysia also has factories producing electronics that are considered high-risk.

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# ASSESSING THE EFFECTIVENESS OF ACTIONS



## GENERAL APPROACH

Monash recognises the complexity of modern slavery, and has established the Monash University Modern Slavery Governance Structure to guide and assess its modern slavery program and the evolving framework, specifically for review and remediation of any concerns or instances identified.

In addition to an existing control framework to ensure compliance in the following areas, the University's modern slavery program has established an advisory committee with decades of global expertise and experience in the areas of:

- human trafficking and slavery
- criminology
- operations and supply chain management
- employment law and regulation
- temporary migration
- business law
- human rights
- global business
- migration and inclusion
- violence against women.

When instances of modern slavery are identified, initial data is sought, and the working group and steering committee are consulted to identify the best way forward, with a focus on helping the victims and implementing realistic actions in response to the issue through to its identified reasonable resolution and follow-up plans.

As further high-risk areas are identified, and as our program continues to mature, a framework is being developed based on the lessons we've learned. This framework, once proven to be efficient, effective and meaningful, will form the basis for a policy.

Effectiveness of actions can be assessed at various levels. In subsequent years of its five-year modern slavery program, Monash will undertake a robust assessment of the effectiveness of its actions, with these reviews reflecting the progressing program of work:

1. Internal compliance checks, with checklists designed in conjunction with our academic experts. Examples already identified include:
  - a. confirming the use of the correct contract and RFT templates containing the latest modern slavery terms
  - b. the supplier onboarding gate being effectively in place
  - c. training completion rate by key staff
  - d. supplier questionnaires
  - e. documentation of all high-risk areas and their status through to completion.
2. External sector engagement, such as via the AUPN, to assess cross-university effectiveness, combined supplier influence, and compare sector performance with Monash.
3. External stakeholder engagement to continue the dialogue with third parties in relation to risk identification and strategising in relation to identified risk.
4. Affected labourers identified as being subject to modern slavery practices – how they are progressing after remediation steps have been taken. This is a longer-term goal.
5. Where appropriate, the use of third-party partners or auditors to check on suppliers and factories – including offshore – to check that real and meaningful progress has been made, and remains in effect.

## KEY PERFORMANCE INDICATORS

KPIs will be utilised where possible to measure progress and set targets. Our first KPIs have been developed (see below), and additional KPIs will be implemented over subsequent reporting periods, in line with continuous improvement.

### Supplier onboarding

KPI: Percentage of supplier compliance (excluding one-time suppliers)

|           |      |
|-----------|------|
| Target:   | 100% |
| Achieved: | 100% |

The new modern slavery supplier onboarding gate has been in place for 850 new suppliers since March 2021.

There has been 100 per cent compliance from new suppliers. There were no manual exceptions processed. This meets our KPI of 100 per cent compliance for normal supplier onboarding. Exceptions to this rule are low-value, low-risk one-time suppliers and credit card transactions or manual supplier onboarding exception approval, should it be justified. One-time suppliers and credit card transactions are deemed suitable for an alternate procurement approach at this time. This is by design as part of a prioritised approach, and they will be considered for inclusion at a later time.

### Staff training

KPI: Percentage of key procurement and legal staff completing the training

|          |      |
|----------|------|
| Target:  | 100% |
| Achieved | 74%  |

Forty-six key staff were assigned to undertake modern slavery training late in December 2021, with 34 completing the training before the end of the year. The training was deployed about a week before the University’s end-of-year holiday period, with some staff already on leave. Completion rate of this cohort at the end of first- quarter 2022 was 89 per cent. Additional training deployment will occur in 2022 to include all staff with procurement responsibility, and all new staff.

### Modern slavery reporting by fund managers

KPI: Percentage of fund managers providing annual update on their modern slavery report

|           |      |
|-----------|------|
| Target:   | 100% |
| Achieved: | 100% |

Monash University investment fund managers must provide an annual report to the University. This includes a mandatory report on modern slavery-related actions undertaken over the previous 12 months.

All reports were reviewed, and included an acceptable level of detail and listed meaningful and reasonable actions such as supplier risk assessments, investment risk assessments, and staff training. Reporting on meaningful modern slavery progress by fund managers has a 100 per cent KPI, and this has been satisfied.

### Update offshore partners review process (Monash College only)

KPI: Percentage of offshore partners completed the updated desktop review process

|           |      |
|-----------|------|
| Target:   | 100% |
| Achieved: | 100% |

The offshore partner annual desktop review process was updated to include an update on the due diligence process in place for procurement in response to modern slavery obligations. This was completed by all established and active partners in 2021, with a total of four partners completing the desktop review. Further work is needed in measuring the effectiveness of new compliance clauses recently implemented in partner agreements, including creating new audit processes.

## REMEDIATION

Monash identified no remediation requirements in 2021.

We acknowledge we may not have visibility of all areas where remediation may be required.

We also acknowledge that ensuring the effectiveness of any remediation may be very difficult. When the opportunity to remediate arises, it will be discussed with the working group and academic experts, and reported to the steering committee. Solutions for impacted parties may include:

- direct monitoring
- indirect monitoring via a qualified third party
- termination of the engagement.

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CONSULTATION  
WITH WHOLLY  
OWNED  
**AND CONTROLLED  
ENTITIES**



## Procurement

Monash University has a distributed procurement model within most of the entities within scope of this report. Primary University-wide procurement policies and procedures are managed by Strategic Procurement, which provides support, as required, across any procurement projects, typically high-value/risk and/or University-wide contracts.

The Strategic Procurement team annually completes the Chartered Institute of Procurement and Supply (CIPS) Ethical Procurement and Supply eLearning program and test. Strategic Procurement is leading the modern slavery program for all in-scope entities and the preparation of the joint Modern Slavery Report for Monash University. Direct engagement with relevant entity staff has occurred to understand their situation and procurement, and to assist with their compliance.

Strategic Procurement is responsible for coordinating all procurement activity across the University, implementing procurement policy and procedures, and providing category management for strategic categories across the University. Strategic Procurement also provides strategic sourcing support across the University, and expert support, advice and tools to all procurement specialists. Procurement specialists are located in business portfolios for specialist procurement categories (for example, Buildings and Property Division and eSolutions), and are responsible for the procurement and contract management of specified categories.

Monash College and Monash University Malaysia have their own procurement functions. They work closely with Monash University to drive alignment and the application of suitable policies and procedures where necessary. Representatives from both Monash College and Monash University Malaysia are on the modern slavery working group.

Monash University Foundation is managed within the portfolio of the Chief Financial Officer and Senior Vice-President. The foundation was identified as being closely aligned with the Strategic Procurement team in its approach to modern slavery.

## Operations

Reporting structures are structured so that in all situations Monash University, the parent entity, is aware of operational concerns and key decisions for all controlled entities. An operations representative is present on both the Modern Slavery Steering Committee and the Modern Slavery Working Group.

## CONSULTATION AND ONBOARDING OF ENTITIES

The onboarding process is still being refined as the program evolves and matures, but already involves a structured approach that includes both engagement and consultation. It's envisaged additional entities outside of those that currently exist will be created over time, so an efficient, standardised approach is warranted.

The following key steps are undertaken for onboarding new entities. This was first undertaken with Monash College, but has now expanded to include Monash University Malaysia. A phased approach is used for thorough onboarding.

- **Engagement:**  
Raising the topic of modern slavery and the program of work with a suitable member of the senior executive group of the entity. Due to a clear reporting line of the CEOs of wholly owned entities through to the Vice-Chancellor, initial engagement is efficient and simple.
- **Entity representation:**  
A request is made for the nomination of appropriate staff to represent the entity on the working group and steering committee.
- **Knowledge transfer:**  
Background briefings are provided to relevant staff from the entity to increase awareness and the level of modern slavery knowledge within the entity.



■ **Supply chain risk assessment:**

The cleansing and inclusion of the entity’s procurement data into our database, including uploading into the FRDM tool for risk assessment. An assessment of the entity’s home country’s specific risks as identified by the latest Global Slavery Index report.

■ **Additional consultation specific to the entity, including:**

- » the identification of the unique risks and concerns the entity may have
- » obtaining an understanding of the operations and supply chains the entity has in place
- » the identification of template agreements, processes, procedures, and any sourcing documents that may need to be reviewed, including any that may be in foreign languages
- » relevant legal nuances (for an offshore entity), including any existing modern slavery-related legal obligations that apply in their country, and staff employment instruments in place
- » planning and socialisation of timing, expectations, and outcomes – these are updated in conjunction with the entity representatives
- » subsequent phased introduction of the modern slavery program of work for that entity, followed by the commencement of inclusion in the next annual Modern Slavery Report.

■ **Training:**

The identification of key staff in the entity to undertake modern slavery training, the rollout of the multimedia training module to those staff, and the tracking of its completion.

The work required to onboard an entity, including any risks identified, and the plans to address them, are discussed in the working group and steering committee meetings, and factored into the work program. The entity’s representative in the working group and/or the steering committee creates a central, knowledgeable, conduit back into the entity for all aspects of the program.

The degree to which these steps apply may vary. Reasons for this may include the provision of certain services by Monash University (the parent entity) to some related entities. This may vary from entity to entity.

In this way, the process is continually refined until such time that we have a well-defined, common onboarding methodology.

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**OTHER  
RELEVANT  
INFORMATION**



## BUILDING A STRONGER HIGHER EDUCATION SECTOR

As a leading education and research institute, Monash University recognises the importance of supporting the wider Australian higher education sector. Monash has made considerable contribution to the AUPN Modern Slavery Program through active participation in various working groups, and through having a significant representation on the AUPN Modern Slavery Academic Advisory Board. This sector-level contribution by Monash is in addition to Monash's own modern slavery program of work.

The AUPN has assembled a Modern Slavery Working Group, aimed at building a sector-based approach to reduce modern slavery risk by producing supporting solutions and materials to enable member universities to drive efficiencies and create opportunities to identify issues across the sector. This includes standardised contract clauses, key supplier engagement forums, and a cross-university Modern Slavery Academic Advisory Board.

Three of the nine board members are Monash academic staff members, and are leading experts in employment law, criminology and international human rights matters.

| Board member    | University                         |
|-----------------|------------------------------------|
| Marie Segrave   | Monash University                  |
| Ingrid Landau   | Monash University                  |
| Dayna Simpson   | Monash University                  |
| Justine Nolan   | University of New South Wales      |
| Martijn Boersma | University of Technology Sydney    |
| Jolyon Ford     | The Australian National University |
| Jimmy Donaghey  | University of South Australia      |
| Vikram Bhakoo   | University of Melbourne            |
| Joy Murray      | University of Sydney               |

The benefits of the coordinated higher education sector approach that the AUPN facilitates includes efficiencies in assessing, identifying and remediating risks across supply chains. This coordinated approach also supports bespoke reporting by individual universities, depending on their situation.

For those universities utilising the FRDM supplier risk assessment tool, the efficiencies also flow on to suppliers who may benefit from responding to modern slavery-related requirements from more than 30 universities through a single portal.

Apart from AUPN, Monash is also an active participant in a number of higher education sector initiatives. Examples include:

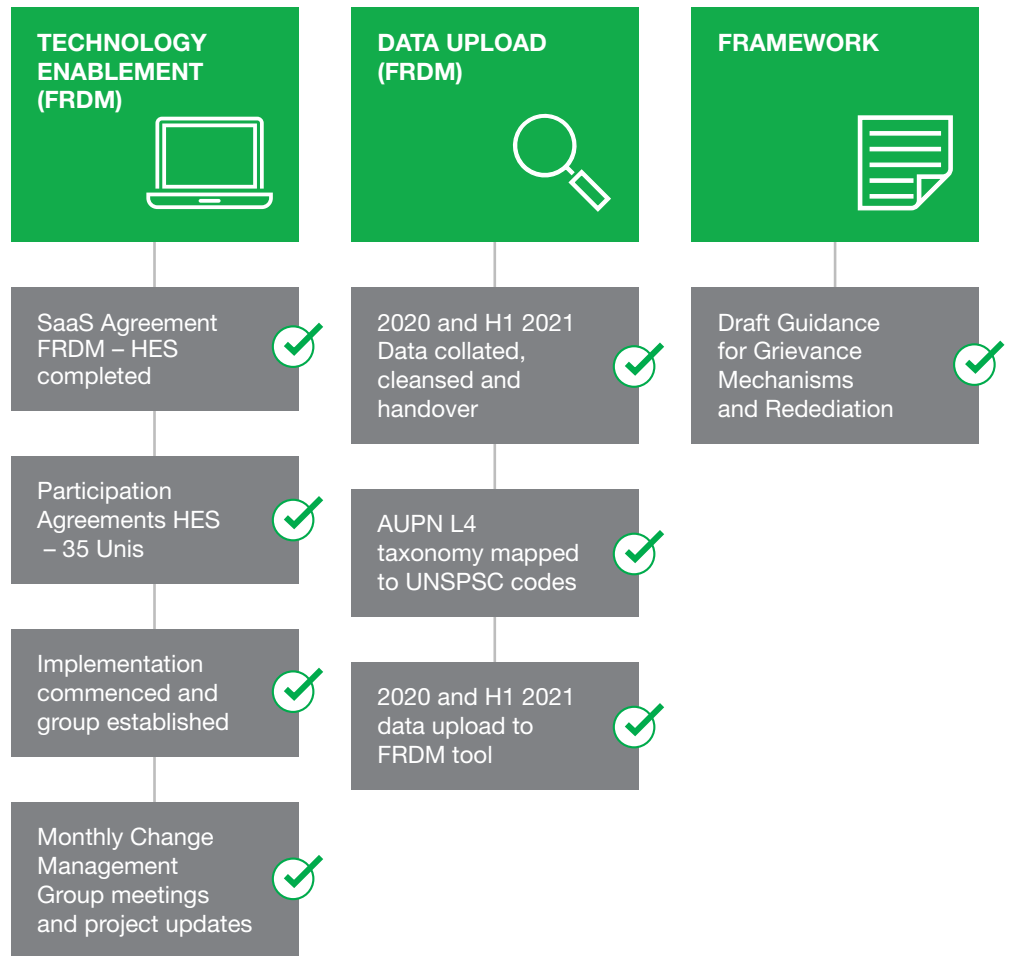
- Council of Australasian University Directors of Information Technology (CAUDIT) – 63 members uniting to transform how research and education leverages the latest digital technologies
- Council of Australian University Librarians (CAUL)
- Tertiary Education Facilities Management Association (TEFMA)
- Australian University Senior Finance Officer Group (AUSFOG)
- Group of Eight Universities
- Universities Australia

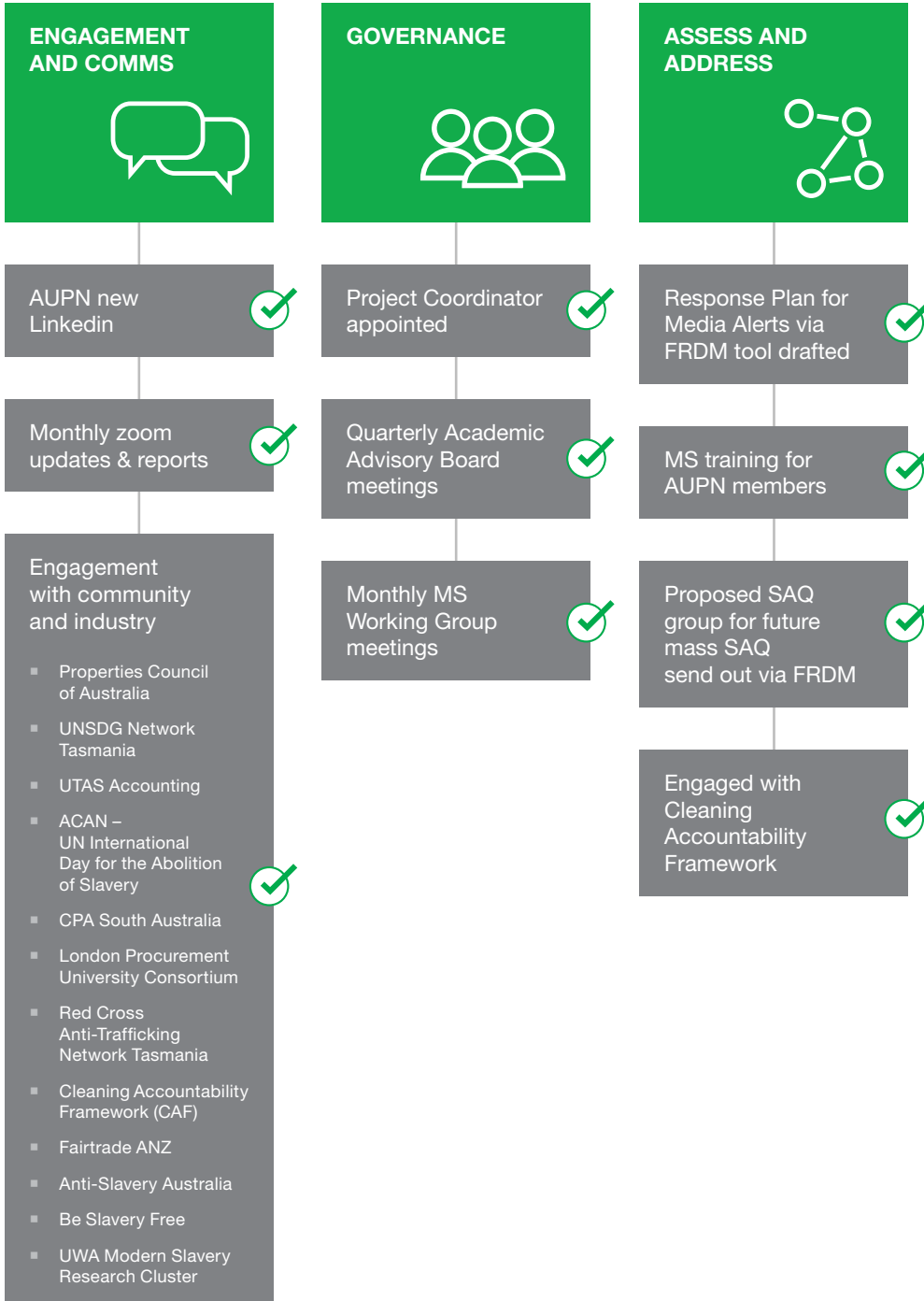
## ACKNOWLEDGEMENTS

Monash University academics contributed to this report:

- Monash Business School
  - » Dr. Ingrid Landau, Business Law and Taxation
  - » Professor Dayna Simpson, Operation and Supply Chain Management
- Faculty of Arts
  - » Associate Professor Marie Segrave, Criminology

## 2021 AUPN MODERN SLAVERY WORKING GROUP KEY ACHIEVEMENTS





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2022  
ACTION  
PLAN



Monash University has a five-year plan in place, approved by the University's senior executive group, to increase the scope of entities covered by each subsequent annual Modern Slavery Report, until all relevant Monash entities and operations are within scope of the report

The five-year plan is a dynamic initiative – it's expected to change and evolve as we and actors in our supply chains learn, and our approach matures.

**Lessons from the past year that have informed the remainder of our program include:**

- The use of third parties to help address identified risks may include the need to create complex multi-party solutions in areas that already have established and complex relationships. These engagements may take more time than was first considered.
- Internal stakeholders and suppliers may be reluctant to discuss identified risks for fear of negative publicity or punitive action. More education is needed to help all parties involved understand that any discovery – or even the assessing of a potential risk – is a positive outcome and, in general, not to be considered a failure in previous decision-making, nor result in any punitive action.
- A staged approach to onboarding offshore entities is required, and earlier engagement with these entities, including the request for working group/steering committee representative nomination well before onboarding commences, is preferable.

## 2022 ACTIONS

### Onshore and offshore training

- Extend modern slavery training module to relevant staff in both Monash University Australia, Monash College, Monash University Malaysia and other newly onboarded entities as deemed appropriate by senior leadership group in each entity.

### Advanced tracking system

- Operationalise FRDM across Monash University Australia and Monash College.
- Collate and analyse procurement data from Monash University Malaysia and other newly onboarded entities.

### Industry deep-dive

- Commence deep-dive with Electronics Watch for Monash University's ICT hardware procurements.
- Assess feasibility of participating in the higher education sector pilot managed by the Cleaning Accountability Framework, and explore alternative deep-dive mechanisms for cleaning and security services.
- Map out existing supply chains for our main apparel suppliers.

### Agreement and sourcing templates update

- Commence update of agreement and sourcing document templates across Monash University Australia and Monash College.

### Assessment of new risks

- Commence detailed risk assessment of security services, catering services, cotton-based lab coats and solar panel procurements, and develop action plans.

### Operational framework

- Develop an operational framework to coordinate and guide implementation of modern slavery actions across entities.

### Compliance monitoring

- Continue monitoring of supplier onboarding and completion of modern slavery training.

### Commence onboarding of wholly controlled offshore entities

- Continue onboarding of Monash University Malaysia.
- Commence onboarding of World Mosquito Program Ltd and Monash University Indonesia.

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# ADDENDUM





## **MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE**

### **Principal Governing Body Approval**

This modern slavery statement was approved by the *principal governing body* of

Monash University (ABN 12 377 614 012)

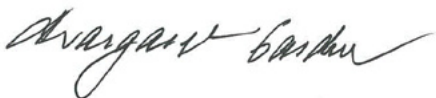
as defined by the *Modern Slavery Act 2018 (Cth)*<sup>1</sup> (“the Act”) on 15 June 2022

### **Signature of Responsible Member**

This modern slavery statement is signed by a *responsible member* of

Monash University Council

as defined by the Act<sup>2</sup>:



President and Vice-Chancellor Margaret Gardner AC is the responsible member.

### **Mandatory criteria**

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

| <b>Mandatory criteria</b>  | <b>Page number/s</b> |
|--|----------------------|
| a) Identify the reporting entity.  | 14                   |
| b) Describe the reporting entity’s structure, operations and supply chains.  | 13, 15–17            |
| c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.  | 23–40                |
| d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.   | 32–40                |
| e) Describe how the reporting entity assesses the effectiveness of these actions.  | 42–44                |
| f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).* | 46–47                |
| g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.**  | 49–53                |

\* If your entity does not own or control any other entities and you are not submitting a joint statement, please include the statement ‘Do not own or control any other entities’ instead of a page number.

\*\* You are not required to include information for this criterion if you consider your responses to the other six criteria are sufficient.

1. Section 4 of the Act defines a principal governing body as: (a) the body, or group of members of the entity, with primary responsibility for the governance of the entity; or (b) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed body within the entity, or a prescribed member or members of the entity.

2. Section 4 of the Act defines a responsible member as: (a) an individual member of the entity’s principal governing body who is authorised to sign modern slavery statements for the purposes of this Act; or (b) if the entity is a trust administered by a sole trustee—that trustee; or (c) if the entity is a corporation sole—the individual constituting the corporation; or (d) if the entity is under administration within the meaning of the Corporations Act 2001—the administrator; or (e) if the entity is of a kind prescribed by rules made for the purposes of this paragraph—a prescribed member of the entity.

## CONTACT DETAILS

Manager Procurement Strategy & Governance  
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