

Modern Slavery Statement 2021

(for the 2020 calendar year reporting period)

Western Sydney University (ABN 53 014 069 881) and its controlled entities.

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1. Introduction

The purpose of this Modern Slavery Statement (**Statement**) is to outline the approach Western Sydney University (ABN 53 014 069 881) and its controlled entities (together, **the University**) have taken to identify and minimise the risk of modern slavery in its business operations and supply chains.

Western Sydney University is one of Australia's leading institutions and has an on-going reputation for academic excellence, integrity, and pursuit in the higher education sector. The University is also recognised for its commitment to research and development.

The University is committed to conduct of business and delivery of higher education and research in a fair, transparent, accountable, and impartial manner.

Another ongoing commitment of the University is to advance gender equality by encouraging gender equality across the supply chain. Western Sydney University has received the Employer of Choice citation for the past 17 years, and continues to report its compliance to the *Workplace Gender Equality Act 2012* (Cth). The University continues to monitor how the outputs and activities it undertakes contributes to greater gender equality, and achieves the objectives of its [Gender Equality Policy](#).

2. The University's business

The University is an Australian multi-campus university in the Greater Region of Sydney, and is a provider of undergraduate, postgraduate, and high research degrees to domestic and international students, and researchers.

In the 2020 calendar year (**Relevant Reporting Period**), the University's [global rankings](#) were:

Top 251-300 of [Times Higher Education \(THE\) World University ranking](#), including:

#36 of THE 100 under 50 universities; and

Top 10 of THE Impact Ranking.

Top 451-500 of [QS World University ranking](#), including:

Top 61-70 Top 50 under 50 and next 50; and

9 subjects ranked in the top 200.

Top 301-400 of [Academic Ranking of World Universities](#).

The University has approximately 3,000 full-time equivalent staff members across its multiple campuses in Australia, and approximately 36,000 students as well as international student recruitment presence, international partnerships, and formal agreements with more than 320 international institutions and organisations across 53 countries.

3. Organisational structure

Sections 16(1)(a) and (b) of the *Modern Slavery Act 2018* (Cth)

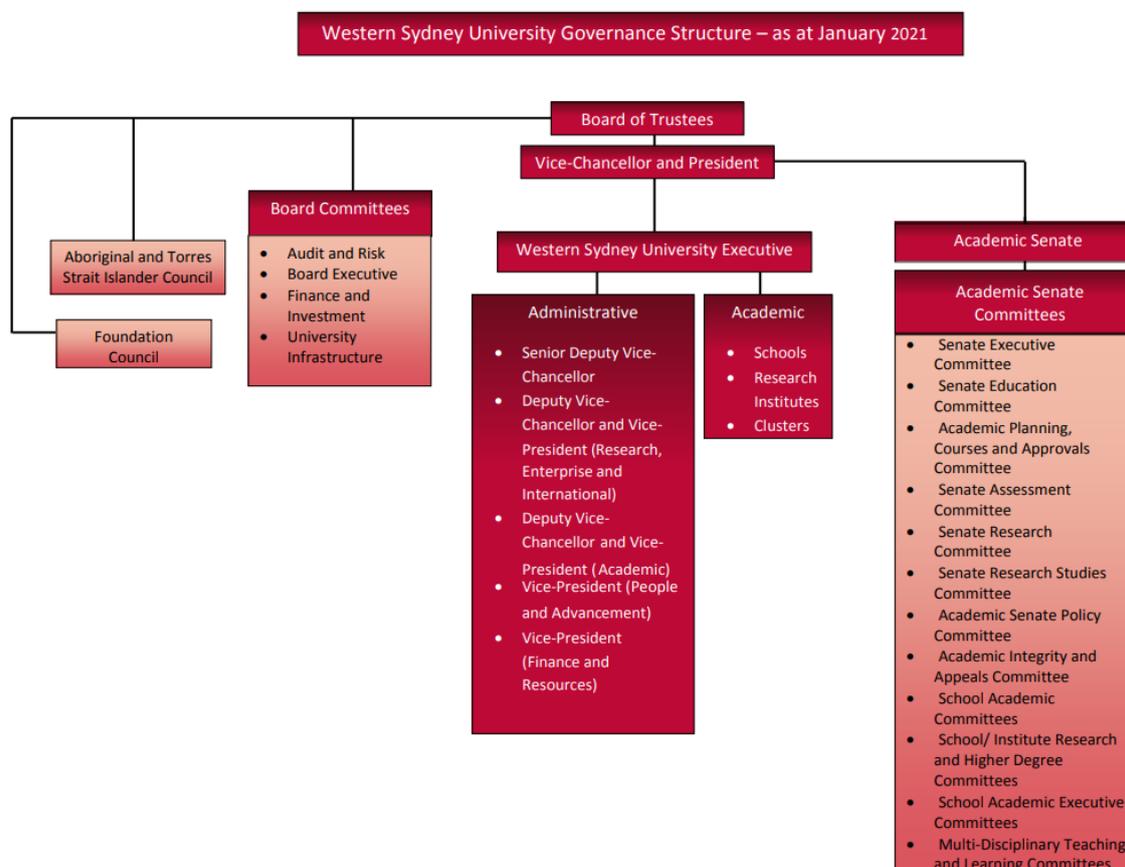
For the purpose of this Statement, the key operational activities of each entity and the key supply chains are outlined as follows:

Entity/Type/ABN	Key operational activities	Key supply chains
Western Sydney University (Other Incorporated Entity) ABN 53 014 069 881	Delivering higher education services, including research and development services. Key operational functions include: <ul style="list-style-type: none"> - Student placements; - Partnerships in research, collaboration, and joint ventures; - Finance, property, and procurement; - Information technology and digital services; - Human resources; - Governance including legal, compliance, and risk. 	<ul style="list-style-type: none"> - Office consumables, machineries, laboratory materials, teaching materials etc; - Technology (hardware, software, cloud services); - Service professionals who provide services directly to the University; - Contractors (individuals or companies).
Whitlam Institute within Western Sydney University (Australian Company Limited by Guarantee) ABN 50 100 342 309	Delivery of policy research and programs to promote inclusive national identity and civic engagement for Australians.	As above.
Western Sydney University Enterprises Pty Ltd trading as Western Sydney University – The College (Australian Private Company) ABN 44 003 474 468	Same as for Western Sydney University with a focus on pathways programs to University study.	As above.
Western Sydney University Early Learning Ltd (Australian Public Company) ABN 39 155 993 445	Child care services.	<ul style="list-style-type: none"> - Office consumables, teaching materials etc; - Technology (hardware, software, cloud services); - Contractors (individuals or companies).

4. The University's governance framework

The University is committed to operate responsibly, including having a zero tolerance for inaction on any forms of slavery, and work towards eradicating all forms of modern slavery.

Governance structure



The University's approach

The Compliance Program Unit (**CPU**) liaises with cross-functional units, i.e. the Office of Audit and Risk Assessment, and the Complaints Resolution Unit (all of which sit within the Office of the University Secretary and General Counsel), as well as other stakeholders throughout the University, for the purpose of identifying and improving compliance processes in relation to modern slavery.

The University's Board of Trustees is made aware of any significant compliance breaches (including those of modern slavery) through compliance reports to the Audit and Risk Committee.

5. The University's values, principles, Code of Conduct, and policy framework

Section 16(1)(f) of the *Modern Slavery Act 2018* (Cth)

Refer to Western Sydney University's Strategic Plan, [Sustaining Success 2021-2026](#)

Values

- Boldness in thinking and actions
- Fairness in University policies and practices

- Integrity
- Excellence

Principles

- Sustainability
- Equity
- Transformation
- Connectedness

Code of Conduct and policy framework

The University expects staff and affiliates to conduct themselves in accordance with the principles in its [Code of Conduct](#), underpinned by its values and beliefs. The University also expects its staff and affiliates to be aware of the University's responsibilities in its social, physical, and natural environments, and continues to do so through responsible planning and management of resources. The University also encourages all external individuals or organisations with whom the University has a commercial or other (including educational partnerships) relationship involving the supply of goods or services to the University to do the same.

Policies and guidelines relevant to and in proportion to modern slavery are applied consistently across the University such as the:

- Modern Slavery Policy (currently being drafted);
- Contract Management Framework;
- Code of Conduct;
- Conflicts of Interest Policy;
- Gender Equity Policy;
- Procurement Policy;
- Whistleblowing (Reporting Corruption and Other Wrongdoing) Policy and Procedures;
- Work Health and Safety Policy.

The University is currently in the process of drafting a new Modern Slavery Policy in accordance with its usual processes which includes extensive consultation with stakeholders before submission and final approval by the University's governing body.

6. The Australian University's Procurement Network - Modern Slavery sector approach

Sector Consultation and Collaboration

The Australian University Procurement Network (**AUPN**), of which the University is a member, is leading a sector collaboration to support all member universities to meet the challenge of human rights transparency and risk management in their supply chains, and contribute to the fulfilment of members reporting requirement to the *Modern Slavery Act 2018* (Cth).

As a member of the AUPN, the University is able to leverage best practices and achieve economies of scale when managing common challenges, and to achieve successful procurement outcomes through sector collaboration.

A Modern Slavery Working Group (**MSWG**) was established in 2019, which underwent a Discovery Phase and developed the following sector-wide Modern Slavery (**MS**) Program. The majority of activity was conducted in the Relevant Reporting Period.

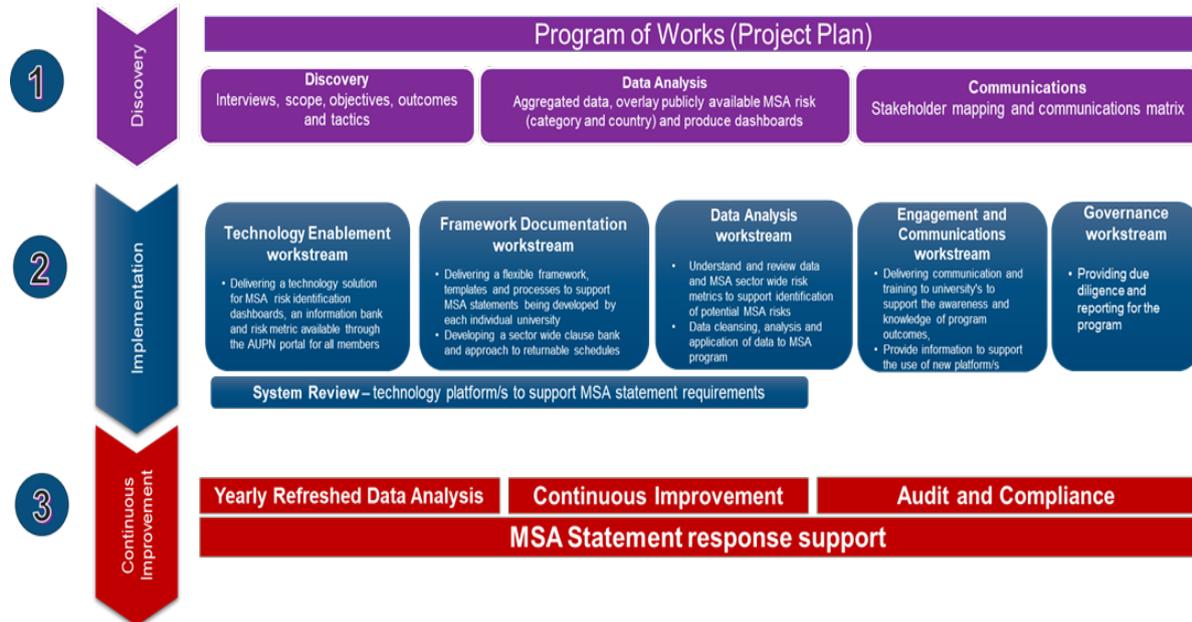


Image 1. AUPN MS Program – Developed by MSWG with support from ArcBlue Consulting.

This Program aims to deliver:

- a collection and aggregation of sector procurement data;
- a solution that allows members to identify risk, focus resources, and inform action – supported by a third-party technology enablement solution;
- a sector approach/action plan for addressing, mitigating, and/ or remediating identified risks;
- flexible templates and guidance; and
- continuous improvement.

Technology Data Gathering

A Modern Slavery Risk Dashboard was developed. As at the Relevant Reporting Period, up to 27 Australian universities have submitted 2018 - 2020 spend data into the dashboard and MS Program.

The dashboard provides an indication of the University's risk across two different lenses:

1. Potential risks of modern slavery applied against spend categories using the AUPN taxonomy; and
2. Potential risks of modern slavery applied against country locations using supplier head office location.

These risks have been determined through publicly available modern slavery risk (eg. Global Slavery Index), and prevalence information together with some reasonable assumptions.

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

Communications (Universities and Stakeholders)

The University engages with the MSWG progress updates on the MS program via email correspondence and regular project status uploads into the AUPN portal, and monthly virtual sessions. The communication provides an opportunity for feedback, discussion, and education to the wider AUPN community.

Support from Consultants

In the beginning of 2019, ArcBlue Consulting were engaged to facilitate the discovery phase and supported development of the AUPN MS Program and the Modern Slavery Risk Dashboard. ArcBlue continues to support the AUPN with managing the online AUPN portal, including maintaining the Risk Dashboard and shared modern slavery documentation.

Modern slavery specialist, Pillar Two, were engaged in May 2020 following a tender process to provide modern slavery subject matter expertise (SME) and support of the MS Program.

Academic Advisory Board

An Academic Advisory Board was established in July 2020 consisting of 12 academics from 9 universities with experience and expertise in modern slavery. The board aims to enrich the sector approach. Meetings were held monthly in 2020 and were structured to review and refine AUPN-developed artefacts and initiatives. The Academic Advisory Board held a panel discussion with the AUPN members to provide academic insight into modern slavery risks and action.

High Risk Identified Industries

Using the Risk Dashboard and aggregated sector data, a list of suppliers with potentially high-risk of modern slavery presence in their supply chain and high spend with multiple universities was considered for further engagement by the AUPN MSWG.

The session was held to:

- provide an overview of the AUPN and the MS Program;
- discuss and confirm suppliers' willingness to engage with the AUPN's sector collaboration on modern slavery;
- request completion of the AUPN developed supplier self-assessment; and
- request feedback on the AUPN's approach and contract clauses.

Overall positive feedback was received from suppliers showing understanding of the benefits in engaging at a sector level.

7. Supply governance framework

The University's [Procurement Policy](#) sets out the principles under which procurement occurs in the University. This policy has been developed to conform to the NSW Government Guidelines on Procurement and to comply with the *Government Information (Public Access) Act 2009* (NSW) and the *NSW Public Finance and Audit Act 1983*.

In order to make the best possible informed decisions for procurement activities, the University considers factors such as fitness for purpose, fair market price, return on investment, whole-of-life costs, timely delivery, post-delivery support, environmental sustainability, social responsibility,

evidence of previous performance or experience, effective warranty, and conformity of law in its procurement decisions.

8. Supply chain

Section 16(1)(c) of the *Modern Slavery Act 2018* (Cth).

According to AUPN's analysis at a sector level to date, and the [Global Slavery Index](#), the top 5 high modern slavery risk countries are: i) North Korea; ii) Libya; iii) Eritrea; iv) Central African Republic; and v) Iran.

Geographical factor is not the sole factor that the University takes into account when assessing potential modern slavery risks in respect of a particular supplier. The University also considers the suppliers line of work, potential for sub-consultants engaged, and the amount of spend.

In the Relevant Reporting Period and overall, the goods and services the University procures are mainly manufactured in Australia, the USA and the Netherlands.

Also in the Relevant Reporting Period, the University engaged with 3,275 suppliers from 66 countries. The largest category of spend was on property & facilities at 46.06%.

9. Risk management and due diligence

Section 16(1)(d) of the *Modern Slavery Act 2018* (Cth)

Supply risk categories

As the Relevant Reporting Period, the University has identified the below as potential risks of modern slavery practices in its supply chains:

Real Estate

Desktop Hardware

Cleaning

The University's workforce

The University also considers potential modern slavery risks in its workforce.

The University's workforce consists generally of full time, part time, and casual staff. The number of staff appointments, in particular casual staff, fluctuates depending on academic sessions and other operations taking place throughout the year. The University also includes adjunct, emeritus, conjoint, and visiting staff in its higher

education tapestry. Except for senior staff, all University staff are employed on conditions set out in the relevant Academic and Professional Staff Agreements which are negotiated with the relevant unions and approved by the Fair Work Commission under the *Fair Work Act 2009* (Cth).

Staff recruitment practices are merits-based (and not based on factors such as whether a staff member is willing to work unnecessary longer hours). Staff are supported by having access to a wide range of training courses and other career opportunities that look after the University's value of having a diverse and balanced workplace. The University acknowledges that for its staff to be productive and thrive in a culture of civility and respect, staff need to take care of themselves and others as part of a reasonable work life balance.

In the Relevant Reporting Period, the risk of modern slavery within the University's learning, teaching, and research services to external parties is deemed very low, as these category of staff are academic professionals and remunerated in accordance with the Enterprise Bargaining Agreements. The University also meets its compliance obligations under the Fair Work Act 2009 (Cth). The University's senior management also ensures the University does not engage in practices that would be deemed a breach or a potential breach of the Modern Slavery Act.

The University confirms that it has not identified any modern slavery risks in the health, safety, and wellbeing of its staff in the Relevant Reporting Period. This is supported by the fact that the University is ranked in the Top 10 of the 2020 global Times Higher Education (THE) Impact Rankings, which charts universities' social and economic impact against the United Nation's Sustainable Development Goals including impact on gender equality, good health and wellbeing. As mentioned in the Introduction, the University is an Employer of Choice.

Covid-19

Section 16(g) of the *Modern Slavery Act 2018* (Cth)

The Covid-19 global pandemic has had a significant impact on the University as with other organisations. Travel restrictions resulted in a decline in the number of international students enrolled with the University, which in turn has had a significant impact on the University's budget and income. As part of its response, the University has had to implement significant cost savings measures, including suspending some external contract work in order to remain competitive and operational.

The University acknowledges that variations or terminations of contracts may increase modern slavery risks for workers in the supply chain as outlined in the Australian Border Force's [Modern Slavery Act Information Sheet: Coronavirus](#). For example, suppliers may engage in measures to cut costs to meet cash flow pressures, or if there has been a significant increase in the demand for certain goods, resulting in workers being forced to work in modern slavery conditions. In this regard, the University maintains open dialogue with its suppliers to ensure that contracts are not unreasonably varied or terminated, which may give rise to increased modern slavery risks.

International activities and students

Given the global reach of Western Sydney University, it recognises that there is potential risk of modern slavery related to international activities including those involving students, especially activities conducted in, and with institutions located in, high-risk countries. This will be the focus of future Statements for the next Reporting Periods.

10. Grievance mechanisms

Section 16(1)(d) of the *Modern Slavery Act 2018* (Cth)

The University's Modern Slavery Policy is currently being drafted. It is proposed that University staff and suppliers will be able to raise modern slavery concerns confidentially under the current process available under the University's [Whistleblowing \(Reporting Corruption and Other Wrongdoing\) Policy](#) and [Procedures](#) which are available online.

Due to the symmetry and potential overlap between modern slavery concerns and other types of whistleblowing complaints, this approach will ensure consistency and accountability, particularly in circumstances where there is a legal requirement to report a complaint to an external body, such as the NSW Independent Commission Against Corruption. Concerns raised by students are also treated in the same manner. More details of the procedures can be found [here](#). The University's Whistleblowing (and Public Interest Disclosure) Coordinator is the University Secretary and General Counsel.

The University's Compliance Representative and Compliance Contact for the *Modern Slavery Act 2018* (Cth) are listed on its staff [Compliance Directory](#), which is also accessible by the public. Anyone who has concerns may contact the CPU, and/or the Compliance Representative and Compliance Contact at any time. This provides another avenue for individuals, including staff, to raise any legislative non-compliance in relation to modern slavery.

The University did not identify any modern slavery incidents directly or indirectly within its operation and supply chains, based on its risk assessments for the Relevant Reporting Period.

11. Training

Section 16(1)(d) of the *Modern Slavery Act 2018* (Cth)

Training is an integral part of the University's compliance framework to ensure staff are aware of their legal, regulatory and compliance responsibilities.

The following online training modules relevant to modern slavery are available to staff:

i) Fraud and corruption risks; ii) Work, health and safety; iii) Whistleblowing and corrupt practices and how to report.

As part of its implementation of the Modern Slavery Policy and strategy on Modern Slavery more generally, the University will develop and circulate factsheets and training to staff on how to recognise, combat and report modern slavery.

These will stipulate the behaviour the University expects of its Board of Trustees, senior executives, staff, and suppliers, and how to engage with the reporting mechanisms to report any risks or actual incidents of modern slavery.

12. Review of policies and other relevant documents

Section 16(1)(d) of the *Modern Slavery Act 2018* (Cth)

The University also reviewed other policies, guidelines and commercial templates that are highly relevant in the context of modern slavery, to ensure that these complement the Modern Slavery Policy, such as the Procurement Guidelines, Contract Management Framework / Guidelines. The University will undertake a review of other policies and guidelines as part of its continuous improvement process.

13. Key performance indicators

Sections 16(1)(e) of the *Modern Slavery Act 2018* (Cth)

The University will assess the effectiveness of its actions in the monitoring, managing and reporting processes to ensure that modern slavery and human trafficking is not taking place within its operational and supply chains by a variety of measures as follows:

- the number of reported cases in relation to modern slavery concerns that were opened, closed and remain active either via the whistleblowing process or by other avenues (e.g. Work Health Safety Register), for each reporting period;
- the number of suppliers that did not adhere to the Supplier Code of Conduct alerted to the University;
- the number of completion rates of employees and suppliers in completing training modules as outlined under 'Training'.

14. Future commitments

The University and its controlled entities will focus on continuous monitoring of the effectiveness of its responsibilities and actions to combat modern slavery, in particular:

- (i) assessing practices to identify any gaps in assurance processes, including any issues that may limit the University's ability to take action;
- (ii) further identifying areas of potential risks of modern slavery and further expand due diligence processes to the newly identified areas;
- (iii) continuously reviewing and updating policies and control measures against the requirements of the *Modern Slavery Act 2018* (Cth);
- (iv) implementing a Supplier Code of Conduct; and
- (v) embedding a Risk Questionnaire within the Procurement Supplier Due Diligence process.

15. Certification and signature

This Statement is made in accordance to the *Modern Slavery Act 2018* (Cth) and constitutes the first annual modern slavery statement of Western Sydney University for the reporting calendar year ended 31 December 2020.

This statement has been approved by the Board of Trustees.

Dated: 22 June 2021



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 Professor Barney Glover
 Vice-Chancellor and President
 Western Sydney University