



MACQUARIE
University
SYDNEY · AUSTRALIA

Modern Slavery Statement

JANUARY 2022 – DECEMBER 2022

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Acknowledgement of Country

We acknowledge the Traditional Custodians of the land upon which this University is situated, the Wallumattagal people of the Dharug Nation, whose cultures and customs have nurtured, and continue to nurture, this land since time immemorial. We pay our respects to the Dharug people and the Wallumattagal Clan. We also wish to acknowledge and pay our respects to the Elders of the Dharug Nation – past, present and future.

We further wish to honour and pay our respects to the ancestors and spirits of this land. We humbly ask that all members of the Macquarie University community are granted the capacity to wingaru – to think, to learn and to walk safely upon this ngurra (this land). The University continues to develop respectful and reciprocal relationships with all Indigenous people in Australia and with other Indigenous people throughout the world.

1. Introduction

Macquarie University has ongoing commitment to respect and protect the human rights of our staff, students and community members, and continues to look for ways to identify and prevent any instances of modern slavery in our operations and supply chains. The University's Modern Slavery Statement is made under Part 2 of Section 16 of the *Modern Slavery Act 2018 (Cth)* (the Act). The statement sets out the steps the University has taken during 2022 across our research, teaching and operational activities to identify and prevent modern slavery.

The University and its controlled entities recognise that in spite of significant global effort modern slavery risk still exists, including in Australia. The University opposes all forms of modern slavery and is committed to guard against modern slavery in all areas of our operations and supply chains.

The University recognises that our efforts extend well beyond compliance, and we must take the leading role in upholding and promoting human rights. We reaffirm our commitment to playing our part in contributing to the global efforts to address modern slavery.

In 2021 and 2022 the University has taken steps that allow us to identify and, most importantly, prevent instances of modern slavery. This statement describes initiatives we have undertaken to increase our understanding of modern slavery and the measures we have put in place since our first statement to combat it. We continue with the efforts to increase visibility of the risk areas and take meaningful and targeted actions to minimise modern slavery risks.

We review all our international relationships on a regular basis to ensure that neither our contractors nor our students are subjected to modern slavery practices and that the rates we pay our contractors in international markets are above the local benchmark.

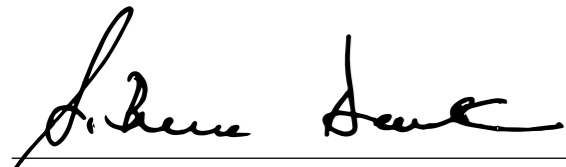
We recognise that due to the breadth of our procurement activities,

the University has complex supply chains, where modern slavery risks are more difficult to identify. Through our memberships with the Australian Universities Procurement Network (AUPN) and the University Procurement Hub (UPH), we continue our contribution to the improved sector reporting on and analysis of modern slavery.

The tools developed over the course of 2021–22 allow us to closely monitor the areas where the University may potentially cause, contribute to, or be directly linked to modern slavery through our operations and supply chains. We continue working diligently with our partners and suppliers, and refining our policies and processes to ensure that we have the ability to identify, prevent, mitigate and remediate instances of modern slavery to the best of our ability.

With this statement, the University once again reaffirms its commitment to:

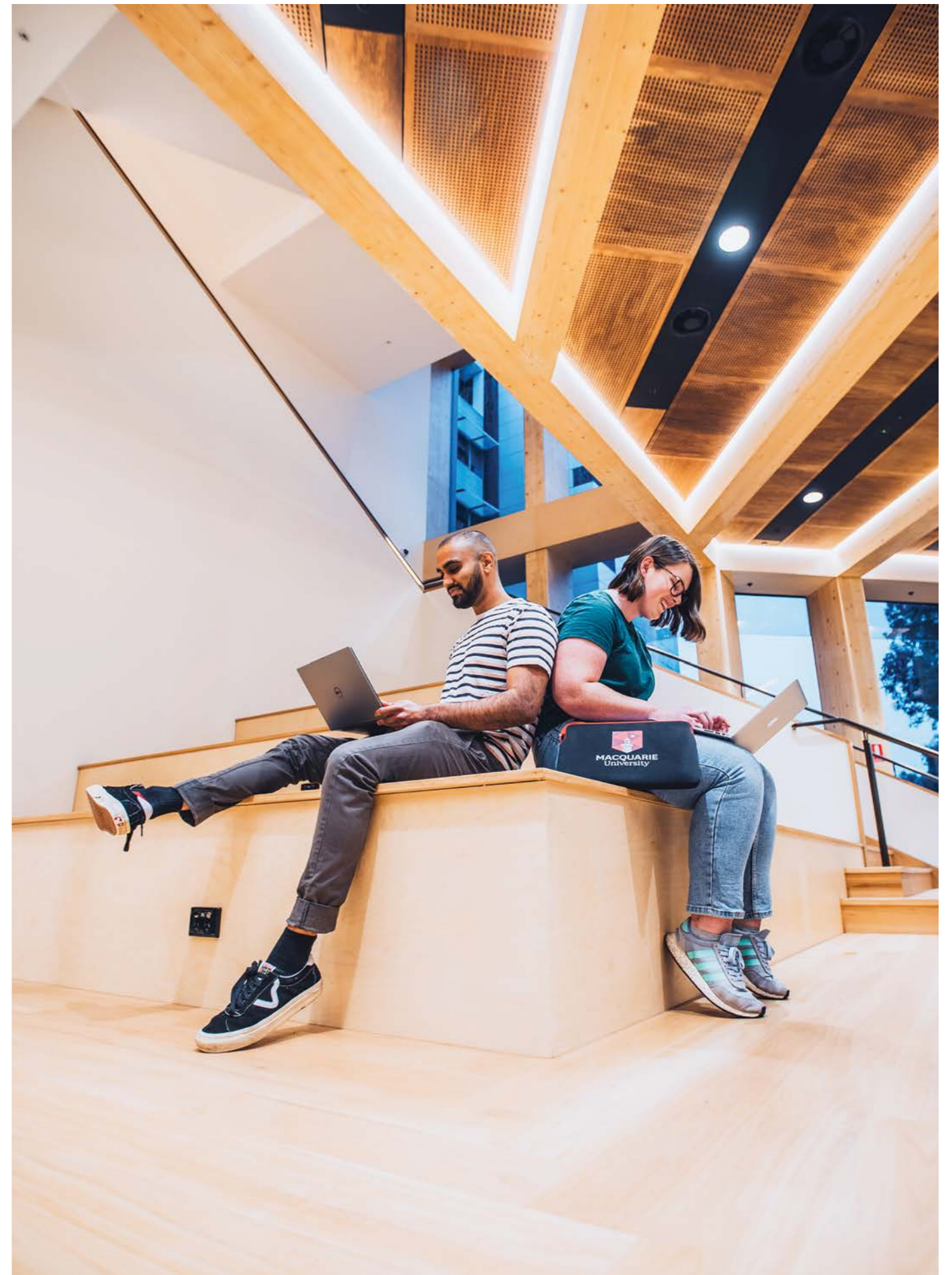
- ensuring that our employees, students, partners and suppliers have a full understanding of the modern slavery risks and have the tools and pathways to address these risks in accordance with the Act as well as internationally agreed standards
- identifying, preventing and eliminating any potential for modern slavery practices in our operations and supply chains
- developing and communicating to our stakeholders a plan to measure the effectiveness of our approach.



Professor S Bruce Dowton
VICE-CHANCELLOR AND PRESIDENT
MACQUARIE UNIVERSITY

23 June 2023

Date



2. Macquarie University Group

AT A GLANCE

Macquarie University was formally established in 1964 with the passage of the *Macquarie University Act 1964* by the New South Wales parliament. It is situated on a 126-hectare university-owned campus in the Connect Macquarie Park Innovation District. The University operates four faculties – Faculty of Arts; Faculty of Medicine, Health and Human Sciences; Faculty of Science and Engineering; and Macquarie Business School – that offer an extensive range of undergraduate, postgraduate and research programs. We also operate a private, not-for-profit teaching hospital on the University campus. The University also operates the following controlled entities that are covered by this statement (referred to together as the ‘Group’).

ACCESS MACQUARIE LIMITED (ACCESSMQ)

AccessMQ is a not-for-profit public company limited by guarantee and wholly owned by the University. Its principal business is to further the University’s mission by promoting and pursuing the practical application of the University’s research, scholarly and outreach activity to industry or the wider community, principally through commercialisation of research and teaching.

MQ HEALTH PTY LIMITED

MQ Health is a not-for-profit company limited by shares and wholly owned by the University. Its objectives are to provide clinical services that are patient-centred, high-quality, evidence-based and efficient. MQ Health provides clinical placements for medical and allied health students, as well as junior doctors undergoing their postgraduate clinical training. It supports medical research with Macquarie University and other high-quality affiliated medical and research institutions.

U@MQ LTD

U@MQ is a not-for-profit public company limited by guarantee and wholly owned by Macquarie University. Its objective is to provide facilities for the members of the University community, including staff and students, which complement and support the University’s academic activities. Services include sporting and recreational facilities; accommodation, food, beverage and retail services; and childcare provision.

MGSM LIMITED

MGSM is a not-for-profit public company limited by guarantee and wholly owned by the University. Its principal activity is to operate the hospitality facilities that support the mission of Macquarie University.

MACQUARIE UNIVERSITY HONG KONG FOUNDATION LIMITED

Macquarie University Hong Kong Foundation is a not-for-profit public company limited by guarantee and wholly owned by the University. Its principal activities are to advance, promote and develop higher education. It focuses on the advancement of education and exchange of knowledge between Macquarie University, Hong Kong and China – and provides mobility scholarships and support for students, researchers and academics.



1617+
academic staff



1834+
professional staff



8433
international students from
more than 118 countries



35,251
domestic students



225,000+
alumni in our international community
from more than 155 countries



\$1146 million income
from continuing operations,
including controlled entities



3. Our governance structure

AS IT RELATES TO MODERN SLAVERY OBLIGATIONS

The University operates under the *Macquarie University Act 1989* (NSW) (the Act). The Act, under Part 2 of Section 6(1), states: “The object of the University is the promotion, within the limits of the University’s resources, of scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence.”

The University Council is the governing body of the University. Under Part 4 of the Act, the Council “may act in all matters concerning the University in such manner as appears to the Council to be best calculated to promote the object and interests of the University.” It is also empowered to make by-laws and rules relating to how the University is managed.

The Act also establishes the Academic Senate, which is the principal academic body of the University, and the Vice-Chancellor as the principal executive officer of the University. The Office of the General Counsel (OGC) oversees the **Compliance Management Framework** for the Group and is responsible for providing legal services to the University. The OGC maintains a library of standard agreements and templates for use in a range of common transactions. It reviews and provides advice on deviations from the standard agreements. The OGC also provides advice to University staff on non-standard contracts, instruments and dealings.

The University’s Governance Services manages **Policy Central**, the sole authoritative source for all Macquarie University rules, policies, procedures, guidelines and related documents. Compliance is a shared responsibility across the Group to ensure that operational activities are undertaken in a manner consistent with relevant laws and regulations.

Targeted consultation is undertaken to determine policy relevance across the University, its entities and various portfolios.

To govern our approach to modern slavery, a working group has been established to oversee the modern slavery risks across the Group to gain insights for the framework’s development.

The Modern Slavery Working Group aims to expand consultation processes to both students and external stakeholders.

Unless otherwise stated, the data in this report covers the University’s operations only. Figure 1 shows the governance arrangements established to identify and address modern slavery risks, and maintain responsible and transparent supply chains across the Group.

Figure 1: Macquarie’s governance arrangements to identify and address modern slavery risks



4. Assessing modern slavery risks and practices

IN OUR OPERATIONS AND SUPPLY CHAINS

Under the *Modern Slavery Act 2018*, the term ‘modern slavery’ broadly includes exploitative practices including human trafficking, forced labour, child labour and other slavery-like practices. According to the 2022 data available via Global Slavery Index from Walk Free 49.6 million people around the world live in modern slavery – in forced labour or forced marriage. Approximately a quarter of all modern slavery victims are children. It is estimated that up to 15000 people are living in the conditions of modern slavery in Australia.

Our approach to minimising and managing modern slavery and human rights violation risks is informed by Principle 14 of the United Nations Guiding Principles on Business and Human Rights, which states: “The responsibility of business enterprises to respect human rights applies to all enterprises regardless of their size, sector, operational context, ownership and structure. Nevertheless, the scale and complexity of the means through which enterprises meet that responsibility may vary according to these factors and with the severity of the enterprise’s adverse human rights impacts.”

To support this approach, the following is in place:

- compulsory training for all new employees at induction
- targeted training for Modern Slavery Working Group
- robust due diligence processes via the application of our award-winning procurement framework, ProcureRight
- comprehensive policy framework to support safe studying and working environment for our students and staff
- comprehensive policies and processes concerning the appointment of staff, both domestic and overseas, and international student recruitment
- clear governance structures, including the cross-functional Modern Slavery Working Group that coordinates all actions to manage modern slavery and human rights violations in our operations and supply chains.

Our risk in the area of both academic and professional employment is relatively low. We continue to ensure that most staff at the University are employed on a permanent basis or on fixed-term contracts. Casual and temporary staff are appointed through reputable recruiters and considered for permanent employment or for fixed-term contracts, where appropriate. Our operational risk assessment continues to focus on international student recruitment, third-party labour suppliers and international research partnerships.

The risk continues to be more pronounced in procurement, specifically in the areas of subcontracting and supply chains (see figures 2–5 for the breakdown of the University and its controlled entities supplier portfolio by spend, country of origin and the region of origin). While suppliers and their subcontractors play an important role in our operations, the University takes full accountability on how and, more importantly, where and with whom we spend our funds. We are committed to building partnerships with our suppliers, both locally and globally, via the application of strong procurement and contract governance processes.

These partnerships are critical to our reputation. The University ensures that all our suppliers are aligned with our vision and values, and comply with our sustainability, fairness and transparency principles. To ensure that our actions are meaningful and measurable, we continue working within three spheres: concern, influence and control. Working within these spheres informs our actions. The sphere of concern reflects the global context in which we operate. The spheres of influence and control are where we strive to undertake meaningful action.

SPHERE OF CONCERN

- Global economic factors (eg COVID-19)
- Global supply chains
- Global modern slavery risks

SPHERE OF INFLUENCE

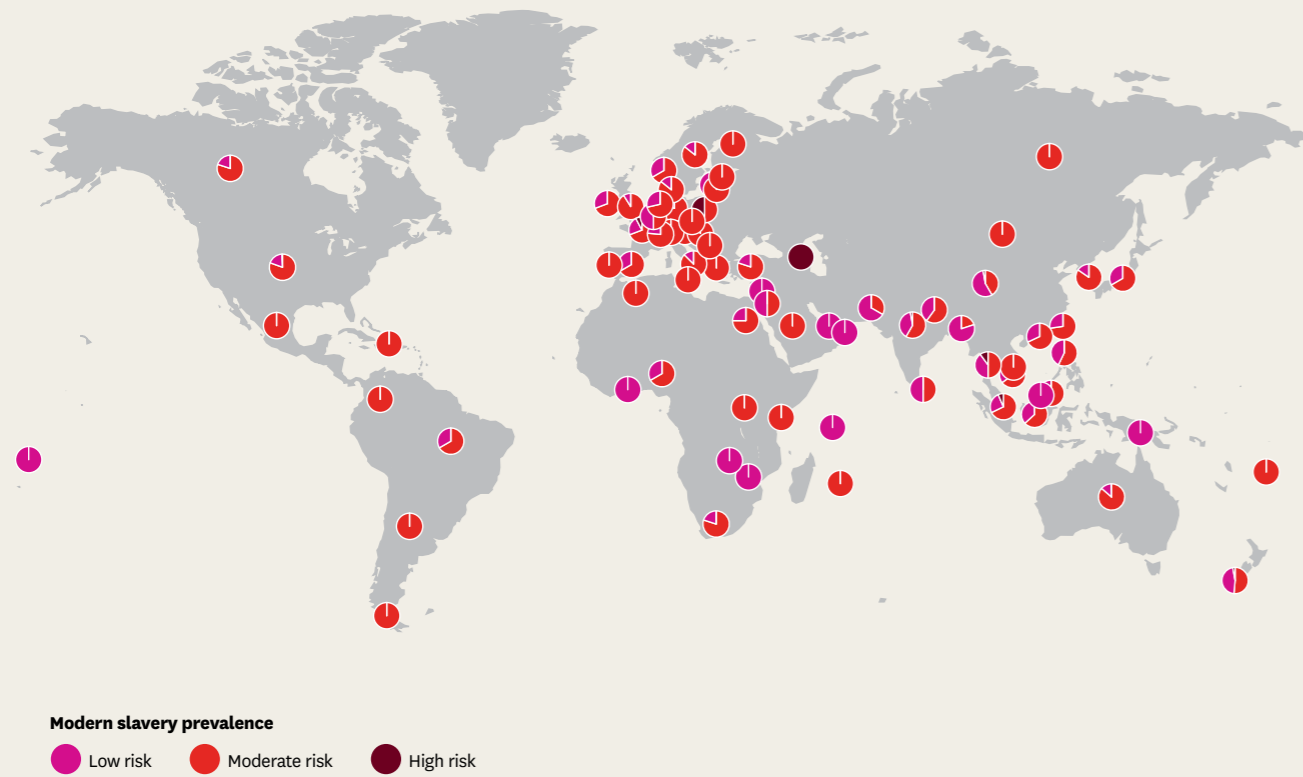
- Tier 2 suppliers
- Supply chains

SPHERE OF CONTROL











- Tier 1 suppliers
- New suppliers
- Contracts
- Templates
- Training



Figure 2: Breakdown of the University and its controlled entities' procurement spend by country of origin (2022)



Our procurement spend in 2022 by country (top 10)

 Australia 89.6% SPEND 5798 SUPPLIERS	 United States 2.9% SPEND 354 SUPPLIERS	 India 1.5% SPEND 261 SUPPLIERS	 United Kingdom 0.9% SPEND 240 SUPPLIERS	 China 0.7% SPEND 158 SUPPLIERS
 Ireland 0.6% SPEND 13 SUPPLIERS	 Germany 0.5% SPEND 61 SUPPLIERS	 Canada 0.4% SPEND 77 SUPPLIERS	 Singapore 0.4% SPEND 42 SUPPLIERS	 Netherlands 0.2% SPEND 18 SUPPLIERS

NOTES

- The colour (from light red to dark red) indicates the current prevalence of modern slavery in that country. (Light red = low risk, dark red = high risk)
- All risk ratings have been taken from the **FRDM Tool**

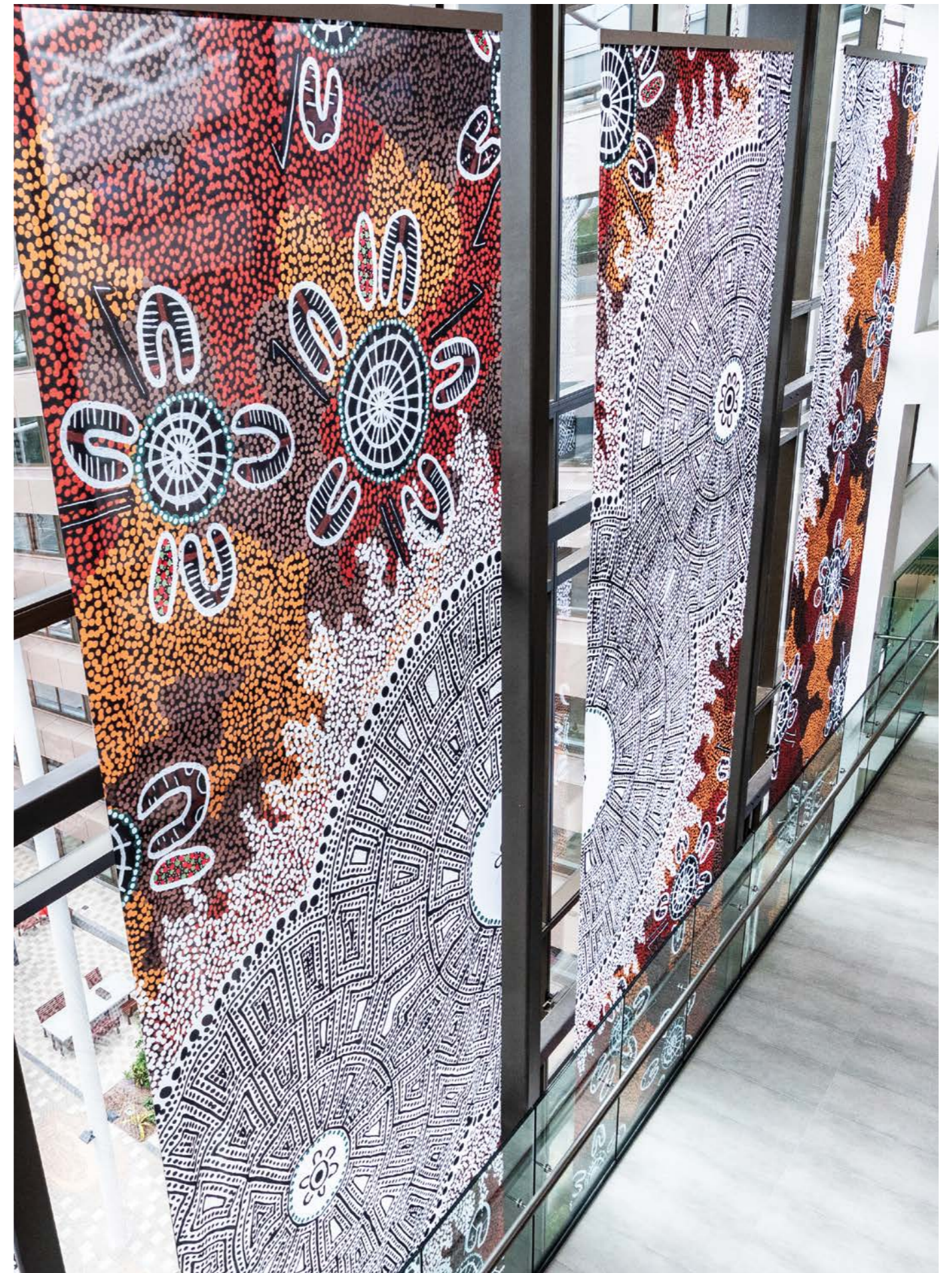


Figure 3: Breakdown of the University and its controlled entities' procurement spend by the AUPN categories

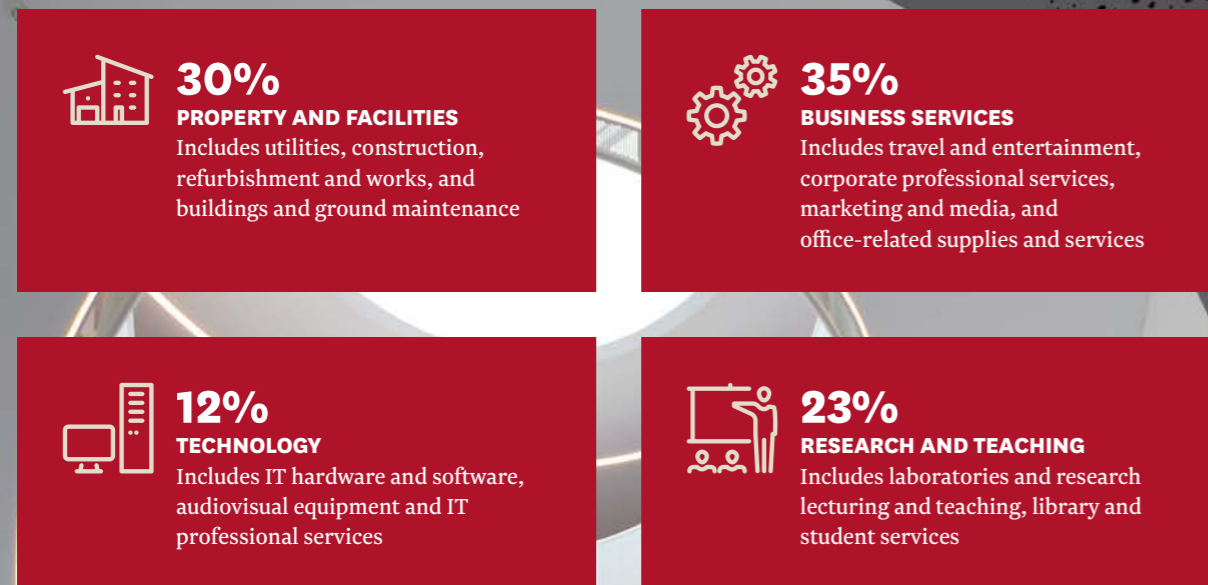


Figure 4: The University and its controlled entities' supplier portfolio, nationally and internationally



Figure 5: The University and its controlled entities' supplier portfolio spend breakdown by region of origin



5. Actions taken to address identified risks

The Modern Slavery Working Group was established in 2020. To ensure that our activities are coordinated and our response to modern slavery and human rights risks is inclusive and comprehensive, the working group includes a representative from each of the faculties, portfolios and controlled entities. The working group’s ongoing input into our modern slavery framework not only ensures its relevance and focus but also enhances its effectiveness. Strategic Procurement, Group Risk and the Office of the General Counsel – with oversight from the Modern Slavery Working Group – partner in their ongoing efforts to identify, prevent, mitigate and remediate modern slavery risks in our operations and supply chains. The working group reports to the Executive Group and is chaired by the Chief Procurement Officer.

In 2022 our continued focus centred on the following eleven areas:

- international student recruitment
- agent recruitment and review
- consultants and contractors
- international mobility and Professional and Community Engagement (PACE)
- professional staff and academic staff recruitment
- student employment
- property and facilities management
- international research collaboration
- fundraising
- investments
- procurement and supply chains.

During the year we delivered several important steps towards achieving our stated goals. We conducted a comprehensive review of our procurement and contract management practices and embedded modern slavery considerations into every step of procurement process. Modern Slavery Awareness training has been developed and rolled out; this training is compulsory at induction for all new employees; targeted training was also delivered across many areas of the University. We developed and published Modern Slavery Policy and Supplier Code of Conduct and undertook supply chain mapping using the tools developed in collaborations with Australian Universities Procurement Hub.

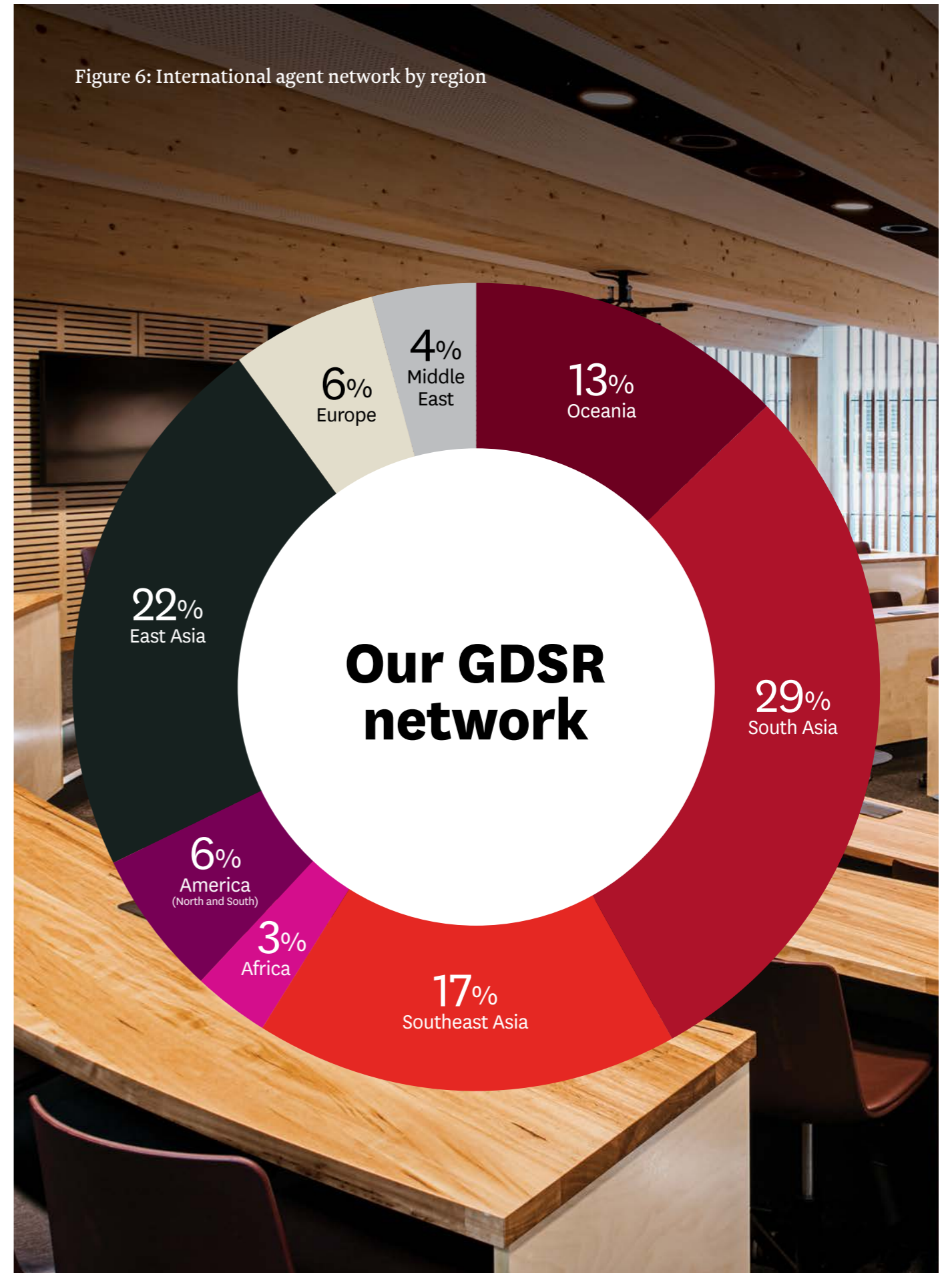
INTERNATIONAL STUDENT RECRUITMENT

Global and Domestic Student Recruitment (GDSR) has a robust and effective operation to recruit international students. Although some regions have been identified as potential risks in terms of modern slavery activities, the University has assessed the overall risk as low due to our appointment procedures, active management and review processes, and local expertise that mitigate potential issues.

In 2021 the **International Education Agent Policy**, the **International Education Agent Management Procedure** and the **Admission of Students under 18 Procedure** were introduced. In 2022 the GDSR further strengthened their agent management and relationship engagement efforts by creating two new roles: the International Agent Manager and the International Agent Administrator. Despite a low risk in these types of arrangements, we have included a modern slavery clause in all international agreements to ensure foreign parties are aware of our commitment to combating exploitation and understand how to report any suspected or alleged exploitative conduct.

Where modern slavery risks arise outside the University’s direct control, we will aim to engage collaboratively with suppliers and partners to identify and implement measures that contribute to preventing, mitigating and remediating those risks. Figure 6 demonstrates the breadth of our international agent network by region.

Figure 6: International agent network by region





AGENT RECRUITMENT AND REVIEW

- The **International Education Agent Policy** and the **International Education Agent Management Procedure** that have been in place since 2021 ensure the University complies with all relevant legislation when appointing, managing and reviewing suitable international education agents to represent the University locally and internationally.
- The newly established roles of International Agent Manager and International Agent Administrator are responsible for developing the University's international agent management strategy and oversee the relationships with existing and new international education agencies, ensuring compliance with the University's agent policy framework and relevant legislation.
- We conduct background checks on all appointed education recruitment agents and require that they undertake professional training by industry associations – such as Professional International Education Resources, International Consultants for Education and Fairs, and Qualified Education Agent Counsellor – prior to being appointed. The training includes relevant legislation, international standards and a code of ethics. Irrespective of the region the agents are operating within, the governing laws are those of New South Wales and the compliance is within the *Education Services for Overseas Students Act 2000* (Cth), the *Education Services for Overseas Students Regulations 2019* (Cth), and the *National Code of Practice for Providers of Education and Training to Overseas Students 2018*.
- The agency agreements are managed by GDSR's agent management team. A robust agent performance and compliance review is conducted every year or at the University's discretion.
- An agency is not permitted to appoint subagents without the University's explicit written approval.
- Termination requirements for any agency are clearly outlined in the agreement to regulate any potential wrongdoings.

CONSULTANTS AND CONTRACTORS

- The University has consultants and contractors located overseas to assist with Macquarie's international recruitment activities.
- All appointees are subject to background checks and are managed directly by the GDSR's senior staff members.
- Contracts with local consultants and contractors are governed by New South Wales law.

INTERNATIONAL MOBILITY AND PACE (PROFESSIONAL AND COMMUNITY ENGAGEMENT)

The University recognises that students, particularly international students and those with a disability, may be more vulnerable to risk and exploitation. This can relate either to the practices that constitute modern slavery or, more broadly, to equitable participation in the labour market. We ensure that students have access to information and support regarding their workforce participation and legislative rights in Australia.

For work-integrated learning (WIL), career and employability-related activities, the University follows policies and processes to:

- approve and manage quality WIL experiences for students, in line with academic outcomes
- only advertise opportunities that can be linked to academic outcomes and/or are compliant with the provisions of the *Fair Work Act 2009* (Cth)
- approve, review and quality assure industry and employer partners for all these activities.

Partners for exchange and mobility programs are chosen carefully with the input from in-country representatives, and background checks, risk assessments and business cases are undertaken.

Policies and processes have also been established to meet obligations under the Department of Foreign Affairs and Trade's Preventing Sexual Exploitation, Abuse and Harassment Policy and child protection requirements. Partners involved in government-funded projects (notably, the New Colombo Plan) are also informed.

Students participating in the New Colombo Plan-funded program also undergo mandatory pre-departure training to address the above policies and reporting processes.

The University's **Student Care and Reporting Network** allows all students, staff, partners and members of the public to report issues and seek assistance, including any concerns relating to modern slavery and/or student exploitation.

PROFESSIONAL STAFF AND ACADEMIC RECRUITMENT

Over 53 per cent of our staff are employed on a permanent basis or a fixed-term contract. Most employees are covered by either the Macquarie University Academic Staff Enterprise Agreement 2018 or the Macquarie University Professional Staff Enterprise Agreement 2018. These enterprise agreements prescribe minimum terms and conditions of employment and regulate the relationship between the University and its employees. The employment of casual staff is managed by Human Resources under a standard employment contract that regulates casual employment. This high level of regulation significantly mitigates against the risk that the University is engaged in modern slavery practices. We conduct all the necessary searches to ensure that prospective personnel are legally entitled to work in Australia and ensure that all candidates are capable of interpreting the terms of employment.

MQ Health, U@MQ and MGSM refer to modern awards and the National Employment Standards for those who are not covered under a modern award. We ensure that all our contingent labour is remunerated fairly and all casual recruitment is done either directly or through licenced and accredited recruitment agents.

The University's ProcureRight framework provides clear guidance on the differences between a contractor/consultant and an employee to ensure that we engage with each and every individual using the appropriate arrangements and that all employee entitlements and the University's tax liabilities are applied correctly.

All new staff receive modern slavery awareness training as part of the induction training.

STUDENT AND GRADUATE EMPLOYMENT

Macquarie University Student Employment helps students become job-ready by coaching them through the recruitment process. It facilitates paid employment opportunities on and off campus. Paid employment while studying helps students enhance their employability and develop a range of skills while easing the cost of university study. While rates of pay will vary according to the role, hourly rates offered must comply with the national minimum wage standards. Each new student employed by the University is provided with a Fair Work Information Statement that contains a summary of the minimum employment standards in Australia. All interns are paid on award rates and no unpaid work experience is permitted, unless it is part of specified coursework. In 2022 Financial Services and Strategic Procurement developed and launched graduate programs for Macquarie students that provide students with fully paid employment opportunities and a pathway for career growth both within and outside the University.

PROPERTY AND FACILITIES MANAGEMENT

The University undertakes many and varied property development and facilities management projects and activities, ranging from major construction and office fit-outs to general maintenance of a complex campus. We also manage on-campus student accommodation.

Due to the high rates and complex layers of subcontracting within the industry, the University acknowledges that it may have exposure to modern slavery risks and human rights violations. Some workers, often migrants, may be from countries where work opportunities are scarce and where wages are low, or from low socioeconomic regions in Australia.

To mitigate these risks, the University requires that suppliers, including contractors and consultants, understand their own legal obligations in relation to the *Modern Slavery Act 2018* and how it specifically relates to their business. Through the ProcureRight framework, suppliers are asked to provide evidence of compliance with anti-slavery laws relating to:

- child/forced labour
- minimum wage
- living wages
- working conditions and hours
- freedom of association.

Our modern slavery risk assessment processes are also informed by the activities of the Property Council of Australia (PCA). Through the PCA, we work collaboratively with industry peers to engage suppliers. Due to the number of shared suppliers across the property sector, this collaborative approach to risk assessment helps us maximise our impact and facilitates a consistent approach across the sector to supplier risk assessments.

The University developed a modern slavery questionnaire that incorporates data from the PCA to evaluate suppliers, particularly those operating in high-risk areas. The questionnaire assesses several criteria, and failure to comply with these criteria will result in the University not engaging with the supplier. Specifically, our modern slavery questionnaire assesses the following:

- general understanding of the concept and risks of modern slavery and human rights and, if applicable, compliance with the Modern Slavery Act or similar legislation
- approach to supply chain management
- use of subcontracting and foreign labour in supply chains
- recruitment practices
- policies and procedures
- supply chain visibility
- effectiveness and reporting remediation practices.

The questionnaire forms part of our tendering process. To ensure that our suppliers have robust ongoing management and remediation processes, an annual review is also conducted with our key suppliers with complex supply chains.

No high-risk areas were contracted to new suppliers (eg cleaning or security providers) during the reporting period. Although our supply chain in the property and facilities management portfolio remains relatively stable, we acknowledge that our risk profile will continue to evolve and are committed to monitoring new and emerging issues.

CLEANING AND SECURITY SERVICES

Macquarie is a significant procurer of cleaning and security services. The University acknowledges that these sectors are found to have a higher risk of modern slavery through the indirect potential use of unskilled migrant workers, where private contractors may exploit their migrant status and underpay them. The University mitigates these risks through the ProcureRight framework by requesting evidence of compliance from suppliers and ensuring contracts and tender documents are also compliant with legislation and labour standards.

The University demonstrated its commitment to responsible business practices, a safe working environment and fair wages through the cleaning and security contracts by requiring the contracted company to employ staff directly.

INTERNATIONAL RESEARCH COLLABORATION

The University has international research partnerships and other international student programs with non-government organisations and other universities. The University takes its responsibilities in the conduct of research seriously. We have updated, where relevant, our research agreement templates to reflect our obligations under the Act and our approach to mitigating modern slavery risks and other related commitments, including those related to anti-bribery and corruption. The University also conducts due diligence on each entity being proposed for a formal research collaboration. The **Research Risk Review Procedure** includes processes to evaluate whether a research activity could lead to human rights violations, including instances of modern slavery.

FUNDRAISING

The University accepts philanthropic donations and research funding from a wide range of sources. It is acknowledged that there is a risk that sources of potential funding could be linked to unethical or illegal activity, including exploitation (either directly to the prospective donor or as an underlying source of funding for the donation). The Philanthropy Office has a robust due diligence process in place. This ensures that all streams of funding with a source that raises potential concerns in relation to a range of ethical issues, including modern slavery, are subject to enhanced scrutiny. The University screens all potential donations of more than \$100,000 for a number of factors, including any potential connection to modern slavery. Another component of the due diligence process is that the Executive Director, Philanthropy, reviews potential donations. Where due diligence checks indicate a significant issue or concern, the case is referred to the Vice-Chancellor.

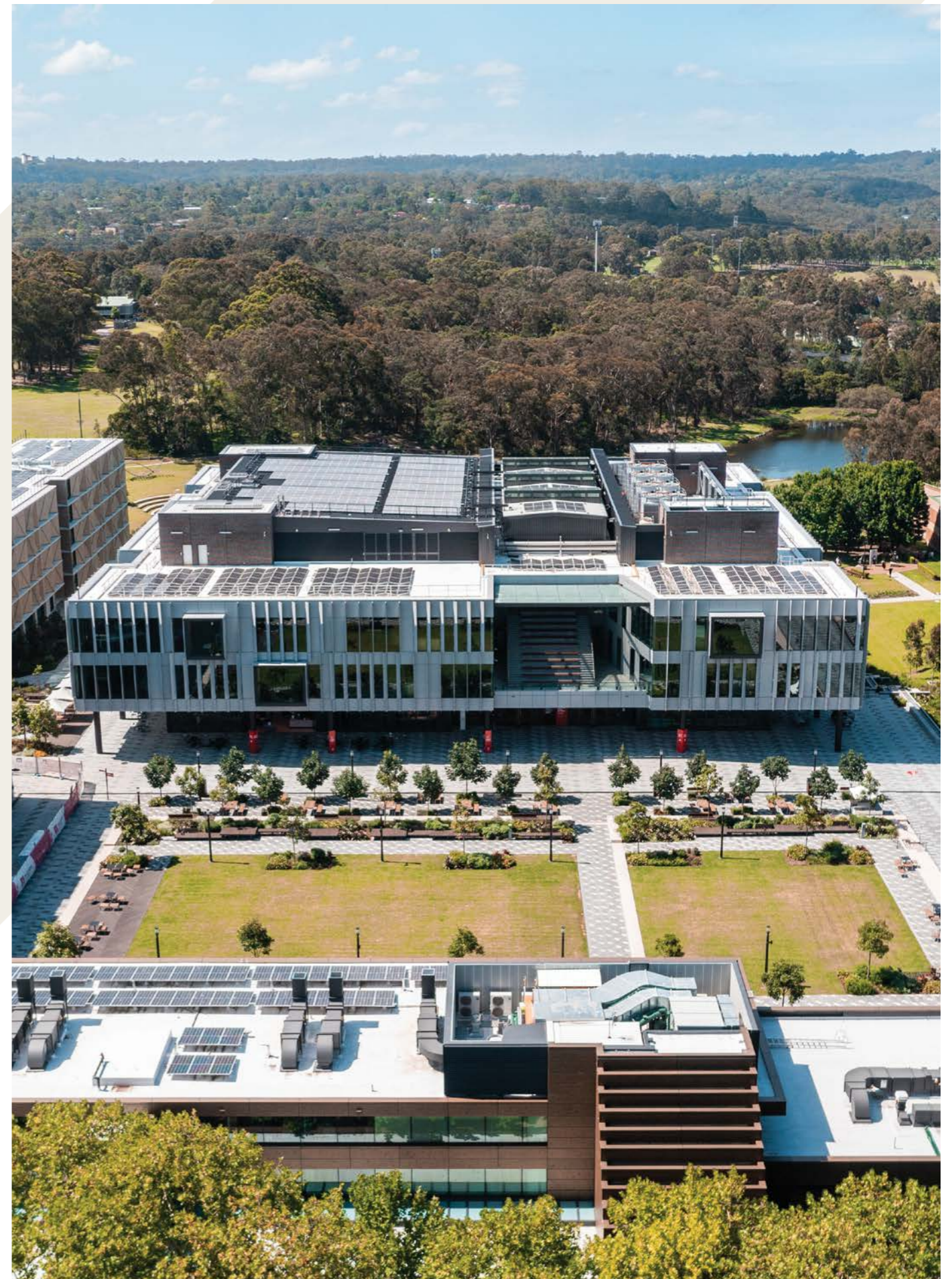
During the year, Philanthropy continued to give advice and guidance to the teams who have direct responsibility for fundraising and to build awareness of potential modern slavery risks. We will further enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in our own operations and with new and existing donors or supporters. We understand the importance of remaining vigilant to promptly identify and resolve any issues relating to slavery and human trafficking in our activities.

Philanthropy remains committed to continually developing and improving the protections, approaches and policies we have in place.

INVESTMENTS

As a responsible investor, the University gives serious and due consideration to environmental, social, corporate governance and ethical issues in the process of selecting and monitoring investments.

In light of this, the University positions itself as a responsible investor, believing companies and assets will not thrive over the long term if they ignore environmental, social, ethical and corporate governance issues. The University's **Investment and Treasury Risk Management Policy** requires that financial decisions are made with a strong focus on integrity and ethics, and with an understanding of the paramount importance of wise stewardship to ensure the long-term success of the University. Financial probity underpins the University's approach to all investment decisions.





STRATEGIC PROCUREMENT AND SUPPLY CHAINS

In 2020–21 the University undertook many activities aimed at comprehending and mitigating risks in its supply chains. In 2022, in collaboration with our industry peers, we refined our reporting capabilities and strengthened our evaluation criteria. Our commitment to the principles of integrity, fairness, sustainability, and social and corporate responsibility, and our desire to effect positive change continue to be fundamental to how we shape our procurement and contract governance functions.

Since our inaugural statement in 2020 and the subsequent statement in 2021, the University continues to invest both time and resources to ensure that our practices and frameworks apply fit-for-purpose due diligence to all our procurement and purchasing activities. Our award-winning ProcureRight framework's fundamental principles of trust, empowerment and accountability have been fully embedded into the University's operations. In association with the AUPN, we continue to map our supply chains across four risk criteria: geography, product, sector/industry and specific entity. The risks are assessed through detailed supply chain analytics to ensure that we see beyond our direct suppliers to the entire supply chain to assess any potential risk in our spheres of control, influence and concern.

Our procurement policies and procedures include modern slavery provisions, affirm our commitment to addressing modern slavery and human rights, and state our expectation that our suppliers do the same.

The University has now established an operational procurement capability, ProcureRight Desk, to support triage and the execution of the University's procurement activities. The ProcureRight Desk identifies appropriate channels to establishing grievance mechanisms for our suppliers – such as support directories, a hotline and an inbox for confidential reporting, and a committee to deal with formal complaints. Through the ProcureRight Desk, the University ensures that modern slavery risks are identified and appropriately mitigated at an enterprise level and that every procurement activity considers the potential of modern slavery risk.

Importantly, our supply chain profile has remained relatively stable over the last three years with the majority of our spend remaining in Australia. Both local and overseas suppliers undergo rigorous checks prior to being engaged.

Procurement

- The Procurement Policy will be updated in late 2023 to include compulsory triaging of all new procurement activities via the newly established ProcureRight Desk.
- A sustainability schedule that includes modern slavery consideration is mandatory for all procurements of more than \$250,000.
- All relevant contract templates now include modern slavery-specific provisions.
- When a procurement of low value is undertaken with a supplier from a high-risk industry or geography, a Corporate Social Responsibility (CSR) and modern slavery questionnaire is required to form part of their response.

Evaluating – ongoing

- The pre-established evaluation criteria are linked to risk; tenderers' economic, social and environmental impacts and policies form part of the evaluation; and corporate viability assessment and reference checks form part of the evaluation and include relevant searches and questions.
- Detailed price models are used to view the layered make up of price submissions.
- Compulsory rate benchmarking for suppliers in vulnerable markets, and rates appearing low in relation to industry awards are investigated and scrutinised.

Supplier governance – ongoing

- The sophisticated contract and vendor governance framework ContractRight has been developed and is expected to be launched in 2023.
- All strategic and key operational suppliers have been assessed and given a risk rating using the newly developed vendor governance framework.
- Supplier risk, performance and KPI monitoring are ongoing.

6. Assessing the effectiveness of our actions

We continue to work collaboratively with the sector and the government to ensure that we improve our tools that allow us to gain better insights into our data to inform our practices and programs that enhance our ability to detect, investigate and eliminate instances of modern slavery in our operations and supply chain.

Activity	Detailed description	In place	Ongoing	Under development
GOVERNANCE				
Deliver modern slavery awareness training	The Ethical Employee Training session has been included in the new starters induction and will be rolled out to all staff in 2023. Thirty-two per cent of new staff have completed the course.	✓	✓	
Develop the Modern Slavery Policy, and review other policy-related documents (ie the Supplier Code of Conduct)	The Modern Slavery Policy has been developed, and other relevant policies have been reviewed.	✓		
Develop contractual provisions to include modern slavery-specific provisions	Specific modern slavery clauses are incorporated into all contractual templates where there is an identifiable risk based on the subject matter of the agreement.	✓		
Embed modern slavery provisions into every step of the procurement process	All relevant provisions of the <i>Modern Slavery Act 2018</i> are incorporated throughout the ProcureRight framework.	✓		
Encourage transparency through supply chain data disclosure	The modern slavery supplier questionnaire is included in our tendering process. An annual follow up is conducted with all key suppliers.	✓	✓	
Participate in external benchmarking	We are actively involved in the AUPN and the UPH modern slavery programs.	✓	✓	
Develop the category management and supplier governance framework	The Supplier Governance framework, which includes addressing modern slavery and human rights violation risks, will be rolled out in 2023.			✓
Develop the Supplier Code of Conduct	The Supplier Code of Conduct has been developed and is distributed to all suppliers during the procurement process.	✓	✓	
RISK ASSESSMENT				
Report regularly on supplier segmentation	Regular reporting on supplier segmentations by geography and sector is established.	✓	✓	
Comprehensive review of procurement practice, including embedding modern slavery considerations into every step of the procurement process	The ProcureRight framework is in place to ensure that both staff and suppliers comply with the appropriate legislation throughout all procurement activities.	✓	✓	
Include a chapter in the ProcureRight framework on how to interpret the Act and what it means for the procurement process	The ProcureRight framework (including all templates) is regularly reviewed and updated to ensure that relevant legislation is applied to every step of the procurement process, as required.	✓	✓	
Conduct pre-procurement risk mitigation	A reference to the Act has been included in the Pre-Procurement Risk Assessment Checklist.	✓	✓	
Manage high-risk and high-value tenders via Strategic Procurement	The ProcureRight Desk has been established in 2022; in 2023 the triage of all procurement activities via the ProcureRight Desk will become policy.			✓

Activity	Detailed description	In place	Ongoing	Under development
RISK ASSESSMENT (continued)				
Develop a questionnaire to be included in tender templates to address modern slavery risks	A supplier modern slavery questionnaire has been developed.	✓	✓	
Rate and wage benchmarking in vulnerable markets	Compulsory rate benchmarking for suppliers in vulnerable markets, and rates appearing low in relation to industry awards are investigated and scrutinised.		✓	
Improve transparency within the University's supply chains by working with our contracted suppliers to understand their business practices	The FRDM tool , supply chain management software developed in conjunction with Australian Universities Procurement Network, provides a transparency score, which is a measurement that shows the ability for the University to assess risk in our supply chains.		✓	
LEADERSHIP AND MONITORING				
Map our supply chains and identify areas of vulnerability	We conduct comprehensive supplier mapping and risk modelling using the FRDM software.		✓	
Seek opportunities to extend our impact by collaborating and partnering internally and externally	We are building partnerships with international business councils, societies and consulates to share our commitment to combating modern slavery.		✓	
Further develop resources and guiding principles for staff and students	Review and update the University's modern slavery webpage.		✓	
Deliver targeted training for staff and students	The Ethical Employee Training session has been further updated to include material for targeted groups (ie students, academics and professional staff). A paid student advisory role is being defined to ensure that our activities are relevant to our student cohort.			✓
GRIEVANCE MANAGEMENT				
Review communication mechanisms to ensure relevance and ease of use	Ensure that safe channels for reporting non-compliances are developed for all constituents.		✓	
Redress and reporting mechanisms	Reporting mechanisms are in place via different channels across the university. We will ensure that redress mechanisms, including support directories, a hotline and an inbox for confidential reporting remain accessible and relevant.		✓	✓
In addition to existing, identify appropriate channels to raise grievances in confidence, and seek remediation such as support directories, a hotline and an inbox for confidential reporting	Continually review and update channels to raise grievances and to add all available channels on the modern slavery webpage to increase awareness.		✓	

7. Consultation process

This statement has been prepared in consultation with each controlled entity covered by this statement.

As is the case with a whole-of-university policy or compliance framework, broad consultation on the modern slavery requirements has already taken place to govern our overall approach.

An internal Modern Slavery Working Group has been established to enhance consultation and share knowledge across the University and controlled entities. This will be an ongoing process as our modern slavery framework matures.

Given that compliance is a shared responsibility across the University and controlled entities, it has been important to ensure that all our operational activities are undertaken in a consistent manner for procurement, employment, training and engagement. The University and controlled entities have a consistent approach to compliance, and the controlled entities are subject to key University policies that relate to them.



8. Other relevant information

POLICIES AND PRACTICES FOR PREVENTING AND MITIGATING MODERN SLAVERY

MODERN SLAVERY POLICY

The **Modern Slavery Policy** sets out the University's commitment to:

- identify, assess and minimise the risks of modern slavery in its operations and supply chains
- maintain responsible and transparent operations and supply chains.

POLICY FRAMEWORK – HUMAN RESOURCES

Our human resources policies and practices set out workplace rights and responsibilities at the University and include:

The **Staff Code of Conduct** confirms a commitment that staff are ethical, enquiring, creative, inclusive, agile and excellent. All staff are expected to perform their duties and conduct the academic and business activities of the University with efficiency, fairness, impartiality, integrity, honesty and compassion.

The **Discrimination, Bullying and Harassment Prevention Policy** outlines the rights and responsibilities of the University community for the achievement of a diverse, equitable, inclusive and safe campus environment, free from unlawful discrimination, bullying and harassment. Members of the University community are required to read and acknowledge the policy as well as undertake classroom training on the topic.

The **Reporting Wrongdoing – Public Interest Disclosures Policy** is designed to establish an internal system for receiving, assessing and dealing with internal reports of suspected wrongdoing.

The University's complaint management process and procedures recognise that while the University aims to provide a high-quality teaching, research and learning environment that promotes respect and safety, and embraces diversity, there will be occasions when problems, misunderstandings or complaints arise that need to be managed in a fair, transparent and timely manner. Through Macquarie's **complaints and misconduct reporting portal**, there are pathways for staff, students and members of the public to report complaints, including for threatening behaviour. The University also has a dedicated, online **Risk Online Active Reporting (ROAR)** system that allows staff, students or members of the public to contact the Workplace Health and Safety, and Risk teams directly about anything that they may consider risky, hazardous or threatening.

POLICY FRAMEWORK – PROCUREMENT AND SUPPLY CHAINS

The University is committed to acting with integrity in all its dealings, relationships and supply chains. It expects the same standards from all its suppliers, contractors and others with whom we do business. In September 2019 the University launched the **ProcureRight framework** that governs all our procurement activities. The ProcureRight Instructions provide tools to enable a positive procurement experience while ensuring that all our activities are underpinned by the principles of business ethics, human rights and environmental protection. The ProcureRight Instructions incorporate the **Procurement Policy**, probity principles, relevant legislation and risk management. Strict approval processes embedded into the ProcureRight Instructions ensure that accountability for decisions resides with the authorised officers of the University.

POLICY FRAMEWORK – OTHER RELATED POLICIES AND PRACTICES

The University, through **Our University: A Framing of Futures**, has made a commitment to adhering to the principles of sustainability in all it does, which is also reflected in the **Investment and Treasury Risk Management Policy** and the **Donations and Fundraising Policy**.

The **Code for the Responsible Conduct of Research** is central to the University's commitment to the highest standards of research integrity. We expect researchers to manage and conduct their research with the utmost professionalism and with respect and regard for humans, animals and the environment – irrespective of their funding situation, research area, experience or working arrangement. Our code is aligned with the standards set out in the *Australian Code for the Responsible Conduct of Research*.

In addition, the **Research Risk Review Procedure** enables the University to consider, control and mitigate the risk that outcomes of a research project or collaboration may be used by third parties to infringe human rights, and this includes considerations of modern slavery.

The **Controlled Entities Policy** establishes the University's governance framework for controlled entities.

SUSTAINABILITY

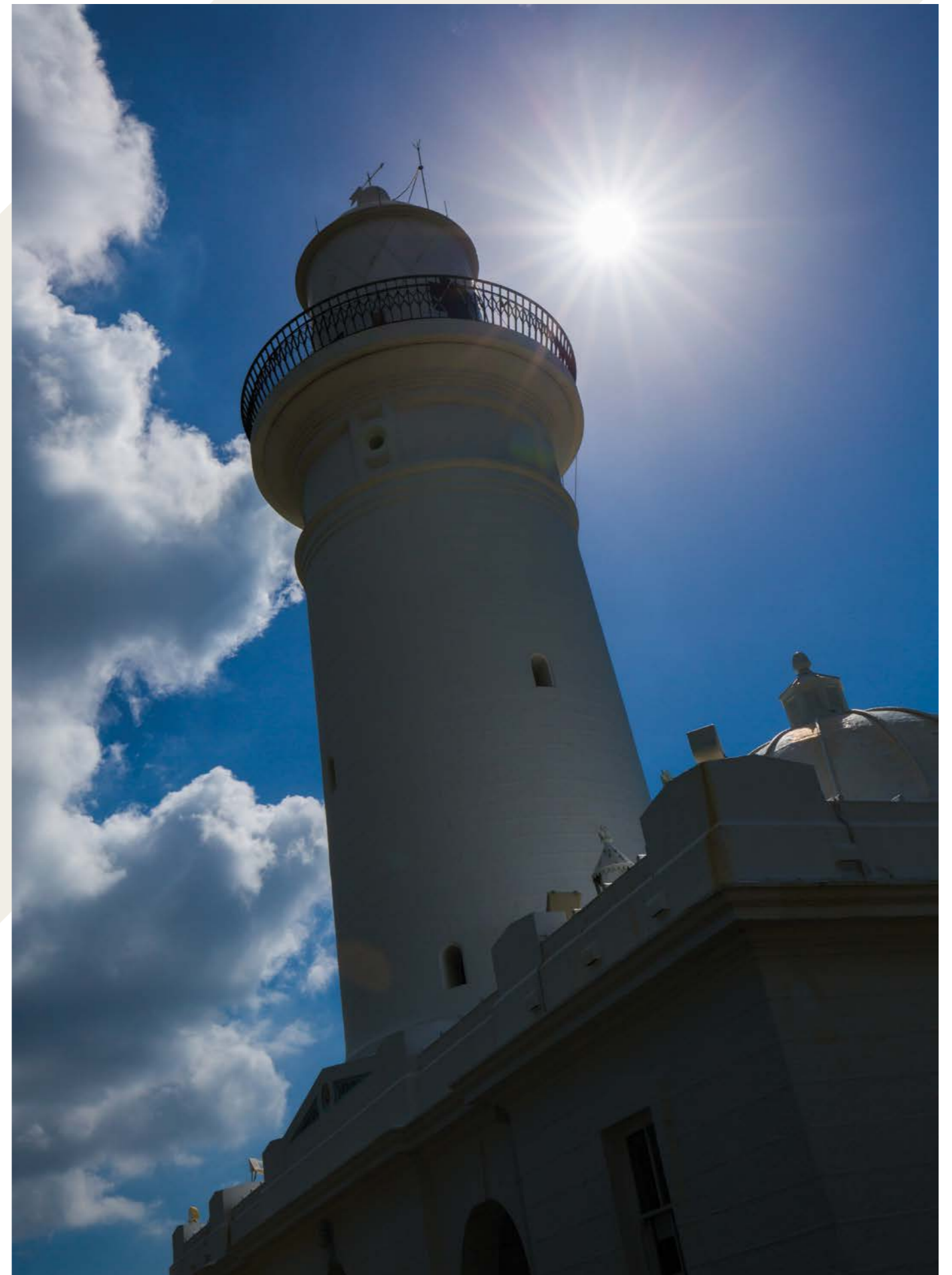
The University aligns its operational activities with the United Nations Sustainable Development Goals (SDGs) and is in the process of developing its next sustainability strategy. Macquarie participates in the *Times Higher Education* Impact Rankings, where we provide evidence of the University's contribution to the SDGs through learning, teaching, research and operations. In 2022 Macquarie University ranked 79th in the world in the THE Impact Rankings.

STUDENT WELLBEING AND CODE OF CONDUCT

All University students have access to wellbeing assistance via **Student Wellbeing** at wellbeing@mq.edu.au and +61 (2) 9850 7497, and can report concerns about wellbeing and safety via the **Student Care and Reporting Network**. The online portal has been brought into alignment with the Department of Foreign Affairs and Trade's Preventing Sexual Exploitation, Abuse and Harassment Policy to help identify students who may be experiencing sexual exploitation that may be part of modern slavery. Where the University does not have capacity or specialist skills to support complex wellbeing matters, external support and advice is sought.

All current Macquarie students have free access to the **My Legal Mate app**. The information in the app focuses on the issues most likely to affect students, such as employment, accommodation and housing, as well as serious issues such as sexual assault.

The **Student Code of Conduct** gives students notice of general conduct, which is prohibited. It is binding on all students, and any misconduct may be subject to disciplinary action.



9. Next steps

We continue to structure all our actions and activities under four broad areas: Governance, Risk Assessment, Monitoring and Grievance Management. Our commitment to combating modern slavery risks grows with our increased understanding of human rights issues.

In 2023 the University will continue its commitment to strengthening collaboration across all areas, including students, and to developing resources and tools to help us make informed decisions in addressing modern slavery and human rights violation risks.

We will continue to explore opportunities to expand internal and external consultation, and will work with subject matter experts to strengthen awareness and commit to modern slavery activities that are meaningful and sustainable.

We will continue our collaboration with the Australian Universities Procurement Network (AUPN) and implement the AUPN Data Hub when it becomes available to further improve data availability to enable meaningful actions.

We will continue to improve and update resources and guiding principles that are accessible to both staff and students.

We will continue working with our suppliers to ensure the integrity of our supply chains.

We will look for opportunities to partner with industry peers, participate in various groups and attend forums to ensure that we keep up to date with any new findings and research on the subject.





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