

Modern Slavery Statement 2023



THE UNIVERSITY OF
SYDNEY



Support Services

This statement contains information about modern slavery that some people may find confronting and disturbing. Some words may cause sadness or distress, or trigger traumatic memories, particularly for people with lived experience of modern slavery.

For some people, these responses can be overwhelming. If you need to talk to someone, or if you, or someone you know, is in danger or is unsafe, please know that help is available.

In an emergency, you should always call Emergency Services by dialling triple zero (000).

24-hour, free phone counselling is available from the following community resources:

- Lifeline - 13 11 14.
- Mental Health Line NSW - 1800 011 511.

You can report a suspected incident of modern slavery linked to the University via our [Modern Slavery Incident Reporting Form](#) or you can contact the University's dedicated modern slavery team directly by emailing anti.slavery@sydney.edu.au. If you feel unsafe on campus or are concerned for someone else's safety on campus you can contact Protective Services on +61 2 9351 3333, 24 hours a day.

If you are a student at the University of Sydney, you can access:

- Student Wellbeing (+61 2 8627 8433; student.wellbeing@sydney.edu.au), who can support you if you are experiencing modern slavery, sexual misconduct, domestic and family violence, or bullying and harassment.
- The University's after-hours mental wellbeing support (1300 474 065; +61 488 884 429). The service provides free and confidential access to wellbeing support.

If you are experiencing coercion, threats, deception or violence at your workplace or home you may be experiencing modern slavery, which is illegal in Australia.

- For free and confidential legal and migration services, contact Anti-Slavery Australia (+61 2 9514 8115; asalegal@uts.edu.au).
- For free and confidential support for forced marriage, contact My Blue Sky (+61 2 9514 8115; +61 481 070 844; help@mybluesky.org.au).

You can also contact the Australian Federal Police (AFP) on 131 237 (131AFP) or go to the [AFP website](#) for help. The AFP can keep you safe, provide advice and refer you to other services that provide accommodation, financial support, counselling, and legal and immigration advice.

Free interpreter services are available to help any person to communicate with service providers in their own language. Call Translating and Interpreting Service on 131 450. All calls are free and confidential.

For more information about the University's Modern Slavery Unit, you can visit our [website](#). Staff can access the [University intranet](#) to learn more about the approach of identifying and addressing modern slavery and our students may access the [student website](#) for online training, contacts for support services and additional resources.

Acknowledgement of Country

The University of Sydney's Camperdown campus sits on the lands of the Gadigal people with campuses, teaching and research facilities on the lands of the Gamaraygal, Dharug, Wangal, Darkinyung, Burramadagal, Dharawal, Gandangara, Gamilaraay, Barkindji, Bundjalung, Wiradjuri, Ngunawal, Gureng Gureng and Gagadju peoples.

We recognise and pay respect to the Elders and communities of these lands, past, present and emerging, who for thousands of years have shared and exchanged knowledges across innumerable generations, for the benefit of all.

We recognise and acknowledge First Nations' people and their survival of policies and practices that today we call modern slavery, including forced labour, removals, segregation, servitude, sexual servitude, child labour and forced marriage. These wrongs remain unresolved and remain, shamefully, part of the Unfinished Business of the Land.

As the first Australian university, we acknowledge the history and legacies of racism and ongoing injustices experienced by the First Nations peoples of Australia, and the University's part in that history. We also recognise the University may have received funds from donors whose wealth was built on the exploitation of unfree labour or other forms of exploitation.

The University has established a 'truth-telling' project to facilitate a deeper understanding of the University's past and its accountability in relation to forms of modern slavery. It aims to deepen the understanding of and appreciation for the importance of the highest standards of ethical research and teaching practice. A working party of leading scholars has been established to support this project to investigate the history of the University's involvement in benefitting from and perpetuating forms of indigenous dispossession, unfree labour, racist ideology, practice and action.

Dale Harding, *Spine 3 (radiance)*, 2018.
Carlaw Building, Camperdown Campus.



Modern Slavery Statement

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About this statement:

The University of Sydney (ABN 15 211 513 464) is a statutory corporation established in New South Wales pursuant to the University of Sydney Act 1989 (NSW). Our principal address is the University of Sydney, NSW, 2006. We are registered with the Australian Charities and Not-For- Profits Commission. Our CRICOS (Commonwealth Register of Institutions and Courses for Overseas Students) number is 00026A.

This is the University of Sydney's Modern Slavery Statement 2023, pursuant to its obligations under section 13 of Australia's *Modern Slavery Act 2018 (Cth)*. This statement is made on behalf of the University of Sydney and its controlled entities for the calendar year ended 31 December 2023.

The statement has been approved by the Senate of the University at its meeting on 10 May 2024.

From the Chancellor and Vice-Chancellor

When our founders established Australia's first university, they recognised the transformative power education has in shaping society, a belief we continue to hold steadfastly today. As an institution committed to changing lives through education and research, we acknowledge our responsibility to contribute to the global mission of eliminating modern slavery.

The University of Sydney is unwavering in its commitment to respecting human rights. The persistence of modern slavery in various forms, even within Australia, represents a profound infringement on fundamental freedoms and human rights. We firmly believe that respect for human rights is intrinsic to the strength of our academic institution.

No sector, industry, or organisation is exempt from the pervasive influence of modern slavery. The higher education sector, including our institution, encounters distinctive and challenging risks related to modern slavery across our value chain. However, we also recognise that no sector is better positioned to develop tools, provide essential research and data, and contribute solutions to the global modern slavery challenge.

Our 2023 Modern Slavery statement exemplifies the University's enduring commitment to addressing one of the paramount global challenges of our time. This statement marks our fourth year of reporting under the *Modern Slavery Act 2018 (Cth)*. Today, we remain as resolute in our efforts to play our part in eradicating modern slavery as when we started on this journey.

Looking ahead to 2024, we will continue our efforts to have tangible and meaningful impact on the global challenge of modern slavery through research, education, knowledge sharing, and fostering multi-stakeholder collaborations. Together, we strive to build a future where the principles of human rights are upheld, and slavery practices are truly a remnant of the past.



A handwritten signature in black ink, appearing to read 'Belinda Hutchinson'.

Belinda Hutchinson AC
Chancellor



A handwritten signature in black ink, appearing to read 'Mark Scott'.

Professor Mark Scott AO
Vice-Chancellor and President

Snapshot of Our Progress in 2023

Our 2023 efforts focused on deepening our understanding of modern slavery risks and working to have meaningful impact on the global challenge of modern slavery through our world-class education, research, partnerships and due diligence.

Focus Areas	2023 Key Deliverables
<p>Embedding best practice due diligence across the University's supply chain and operations.</p>	<p>Improved our understanding of our impact on people through our supply chain</p> <ul style="list-style-type: none"> - Supply chain mapping to Tier 10 using the Open Analysis to Address Slavery in Supply Chains (OAASIS) project. - 122 new or renewed contracts updated with modern slavery clauses. - 55 tenders with modern slavery questions included in 2023. - Detailed due diligence on nine high-risk procurement projects (e.g. solar panels, cleaning, maintenance, waste management and visa services). - Participated in monitoring of factories linked to the University's ICT supply chain, through third party provider Electronics Watch. <p>Improved our understanding of our impact on people through our operations</p> <ul style="list-style-type: none"> - Launched The Know Your Partner and Project Tool – a new human rights due diligence process for identifying modern slavery risks in research partnerships and projects. - Conducted detailed due diligence on four high risk research projects, including three projects assessed using the Know Your Partner and Project Tool during the first month of piloting. - Established regular screening of all the University's equity assets for human rights risk. - 83% of University Investment Managers, prohibit or otherwise limit investments contributing to modern slavery or human rights abuses.
<p>Enhancing our culture of continuous learning and feedback.</p>	<p>Supported and enabled our staff to identify and address modern slavery risks</p> <ul style="list-style-type: none"> - 15,000+ staff, affiliates and casuals have completed our Anti-Slavery Awareness training module. - 48 research staff trained on modern slavery due diligence. - 30+ staff briefed on the evolving modern slavery and human rights regulatory landscape in Australia and abroad. - 20+ procurement staff received bespoke training on supply chain risks. - 15+ staff in student wellbeing services received bespoke training on modern slavery from Anti-Slavery Australia.
<p>Supporting students, especially those at heightened risk, have remained a key priority.</p>	<p>Supported our students to access information and tailored support</p> <ul style="list-style-type: none"> - 8,400+ students have voluntarily completed our Anti-Slavery Awareness training module. - Launched the Student Human Rights Network. - Collaborated with four student societies on educational events and resource sharing. - Updated university student support procedures, information booklets and intranet site to support staff with identifying students at risk.
<p>Contributing to the global effort to eradicate modern slavery through meaningful collaborations and partnerships.</p>	<p>Engaged in meaningful partnerships, forums and networks</p> <ul style="list-style-type: none"> - Became members of the Cleaning Accountability Framework. - Affiliated with ICT supply chain monitoring organisation, Electronics Watch. - Extended our multi-year partnership with Anti-Slavery Australia. - Joined and presented to the Australian Government's Human Trafficking and Modern Slavery Research Network. <p>Contributed to the public discourse on taking action on modern slavery</p> <ul style="list-style-type: none"> - Held three public events on modern slavery due diligence and legislative reform. - Participated and presented at seven conferences relating to modern slavery. - Participated with 16 universities and civil society groups in the International Student Working Group. - Engaged four universities to discuss common challenges and share resources across Europe and Australia. <p>Accelerated research, data and knowledge on addressing modern slavery</p> <ul style="list-style-type: none"> - Supported the ongoing work of the OAASIS Project, which was awarded the Anti-Slavery Australia Freedom Award. - Supported and facilitated collaboration between the Institute of Transport and Logistics and the NSW Anti-Slavery Commissioner's Office.

Who we are

We are a leading Australian research-intensive University. We educate students from around the world at teaching and research facilities primarily across Sydney and New South Wales.

Our largest campus is located at Camperdown/Darlington in Sydney, encompassing 72 hectares of teaching and research, facilities and social infrastructure. We are a statutory corporation pursuant to the University of Sydney Act 1989 (NSW) and were established by the Parliament of New South Wales in 1850.

*Data current as of 31 March 2023 unless otherwise indicated.

Our People

67,175
Students

36,749
Domestic Students

30,426
International students
from 124 countries.

15

Fellows of the Senate

The University's governing authority, chaired by the Chancellor.

9

Senior executive portfolios:

Vice Chancellor, Provost, Education, Indigenous Strategy and Services, Research, Advancement, External Engagement, Operations and Strategy.

27,527
Staff

12,774
Casual staff

5,702
Affiliates

Staff breakdown by diversity groups:
110 Staff identifying as Aboriginal and Torres Strait Islander
1,578 Staff identifying as culturally and/or linguistically diverse
146 Staff with disability.

Our Spaces and Operations

8

Teaching and research locations

7

Campuses registered with Government

Camperdown/Darlington, Camden, Mallet Street, Lidcombe (Cumberland), Sydney, Surry Hills, Westmead.

1

Research station

One Tree Island Research Station.

1

Offshore centre in China

403

Campus buildings

\$3,122.23 million

in Long-Term and Medium-Term Funds as at 31 December 2023.

7

Residential colleges and 58 student residences.

Our Education and Research

5

Faculties

Faculty of Arts and Social Sciences,
Faculty of Engineering,
Faculty of Medicine and Health,
Faculty of Science,
The University of Sydney
Business School.

3

Schools

Sydney Conservatorium of Music,
The University of Sydney Law School,
The University of Sydney School of
Architecture, Design and Planning.

860

Award courses (excludes
cross-institutional)

28

Fields of research

65

Research and teaching centres

\$344.297 million

Awarded in research grants
and fellowships*

*For period 01 April 2022 – 31 March 2023

Our Community

430,000

Alumni

260

Student organisations

400+

Exchange programs

250

Partners and universities
in 40+ countries

Our Supply Chain

\$942.12 million

Spend on Tier 1 suppliers

5,842

Tier 1 suppliers located across
60 countries

295

Product and service types

Our Controlled Entities

4

Controlled entities

Operating in Australia

- Westmead IVF Pty Ltd (Westmead Fertility Centre) – Australian company providing affordable access to fertility treatments, based at Westmead Hospital in Sydney's West.

In 2023, Westmead Fertility Centre:

- Provided 3,087 cycles of treatment with assisted reproductive technology.
- Employed 44 nurses, scientists, administration and trainee doctors.
- Spent \$3.6M in procurement spend of which \$1.3M relates to lab and clinical consumables.

Operating Overseas

- Suzhou Xi Su Business Consulting Co (Centre in China) – Operator of our multi-functional centre in China.
- A14 Holdings Pty Ltd – Holding company for the Centre in China, wholly owned and controlled by the University.

University of Sydney Vietnam Institute

- In late in 2023, the University of Sydney established the Sydney Vietnam Institute, as a Social Enterprise in Ho Chi Minh City, Vietnam. The Sydney Vietnam Institute will be officially launched in 2024 and will initially focus on health research and translation and clinical trials.



Our Approach to Addressing Modern Slavery

Our Theory of Change

Measuring Our Impact

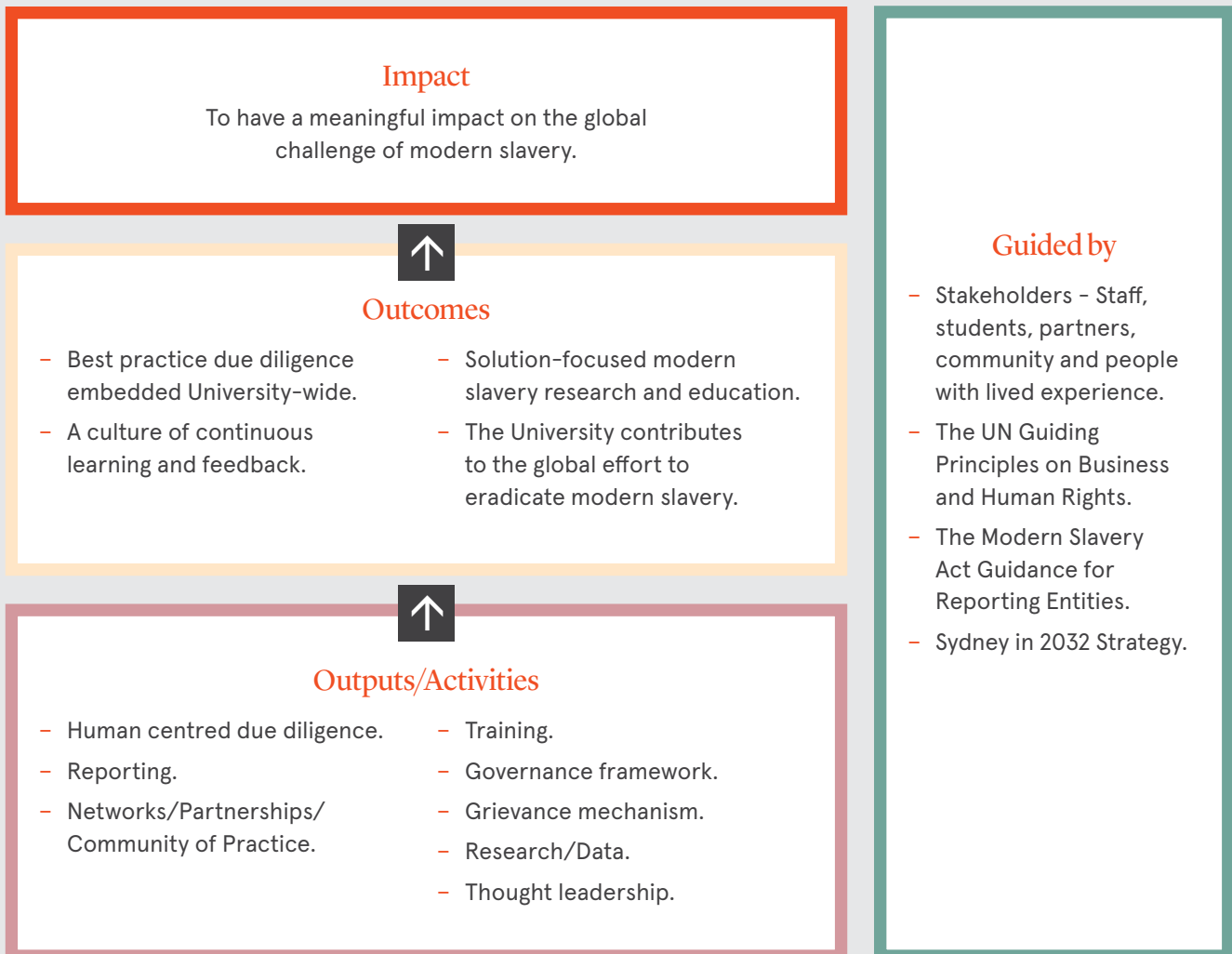
From the Director of
the Modern Slavery Unit

Modern Slavery Risk
Analysis Approach

Modern Slavery Risks in
the University's Value Chain

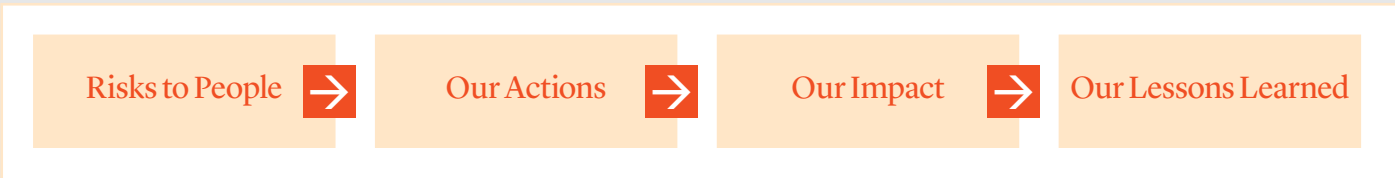
Our Theory of Change

Consistent with the United Nations Guiding Principles on Business and Human Rights, how we take action to address modern slavery is guided by our deep commitment to addressing the risk to people. Our theory of change provides the roadmap for delivering on this commitment, ensuring our actions have meaningful impact for those most affected by modern slavery.



Measuring Our Impact

Since our first modern slavery statement, the University has demonstrated a sustained commitment to continuous improvement. Today, we remain committed to continuous learning and transparent reporting on the effectiveness of our actions. Throughout 2023, we monitored our efforts with an emphasis on understanding our impact and targeting our actions on addressing the risk to people. Throughout the statement we report on key risks to people, our actions, our impact and the effectiveness of those actions through our lessons learned.



Our Approach to Identifying and Addressing Risks

From the Director of the Modern Slavery Unit

This statement marks our fourth year of reporting under the *Modern Slavery Act 2018 (Cth)*. Since we started on this journey in 2020, identifying and addressing modern slavery risks has always been more than a compliance exercise. We have from the outset understood and recognised the deep responsibility we have, as a higher education institution, to not only meet our reporting obligations, but to contribute to the solutions, research and data needed to take real and meaningful action.

Throughout 2023 we focused on efforts on identifying and deeply understanding the impact we may have on those most vulnerable to modern slavery. In practice this meant, moving beyond policy and process improvements, and taking a detailed view of the risks in our value chain. The diagram on the opposite page provides a high-level overview of our approach to identifying and addressing modern slavery risks.

In line with the United Nations Guiding Principles on Business and Human Rights, our approach to identifying and addressing risks involves:

- Identifying where we may be at risk of causing, contributing to or being directly linked to modern slavery.
- Assessing the saliency of those risks.
- Prioritising our actions (based on the degree of leverage we have to effect change) and ensuring our due diligence reflects good practice.
- Evaluating our effectiveness and tracking our impact on the ground.

To learn more about our approach to modern slavery risk analysis and due diligence visit our [Modern Slavery webpage](#).



Esty Marcu

Esty Marcu
Director Modern Slavery Unit

Modern Slavery Risk Analysis Approach

1

Identify

Is there a risk of modern slavery?

Considering four key risk indicators:

- Geographic
- Sector and Industry
- Product and Service
- Entity.



2

Assess

Is the risk salient?

When assessing the saliency of the modern slavery risk, we consider the severity of risks to people and the likelihood of the risk occurring. We also assess if we are at risk of causing, contributing or being directly linked to modern slavery.



3

Prioritise

What leverage do we have to take action?

Risks are prioritised based on the severity of the risk, and the actions and leverage available to us in our circle of control and sphere of influence.



4

Act

What is the appropriate due diligence?

Due diligence reflects good practice and is in line with our principles for taking action:

- Risk-based
- Balanced
- Fit for purpose
- Embedded into business as usual.



5

Evaluate

Feedback loops and active monitoring

We track our impact and evaluate our actions through built-in feedback loops and on the ground monitoring by third parties.

Modern Slavery Risks in the University's Value Chain



Like all large and complex organisations, universities are linked to modern slavery risks through their operations and supply chain. However, universities are also exposed to unique modern slavery risks along their value chains.

Examples of Modern Slavery Risks across the University's Value Chain



Westmead Fertility Centre

A report by KPMG and the Australian Human Rights Commission found that the health services sector is an interwoven connection of private, public and not-for-profit entities. This creates difficulties in navigating supply chains and operational activities which may all be linked to forced labour, deceptive recruitment, debt bondage and child labour. There may also be patients at risk of modern slavery who are accessing treatment. As a controlled entity, we may be linked to modern slavery from sourcing high risk products such as rubber gloves or other PPE, outsourcing cleaning and security which rely on migrant and base-skill workers who are a high-risk group and patients accessing IVF treatment may be experiencing exploitative practices.



Student Working Conditions

Cost of living and housing stress have left young people vulnerable to exploitative working conditions, with 2023 research by the Grattan Institute finding young workers (20 – 30 year olds) were six times more likely than older workers to be underpaid. In 2023, the Australian Government reinstated the fortnightly work hours cap for international students after a suspension during the pandemic. Students who work more than the allowed hours, due to pressure from their employer or to mitigate underpayment of wages, are unlikely to report exploitation due to fear of deportation.



Centre In China

The Centre in China is a multifunction research and education hub based in Suzhou, China. The Centre is designed to facilitate and strengthen intellectual and creative exchanges between Australian and Chinese researchers, academics, and students. The Global Slavery Index 2023 Country Study of China identified State-sponsored forced labour and forced labour by private actors, affecting global and local supply chains. Products imported into China are also at risk of being made with modern slavery.



IT Hardware

The Global Slavery Index, released in 2023, estimates that electronics account for the highest value import into Australia at risk of being made using modern slavery. Through our affiliation with Electronics Watch, we have identified potential links to factories where workers have reported indicators of forced labour and hazardous working conditions.



Lab and Teaching Consumable

Workers producing lab and teaching consumables, including those involved in the extraction of raw materials and the manufacture of components, may have experienced child labour, forced labour, excessive work hours, deceptive recruitment practices and exposure to hazardous chemicals and machinery. Research has shown that the COVID-19 pandemic amplified labour issues connected to forced labour and unethical practices, for example in Malaysia's medical gloves sector which supplies the majority of the world's medical examination gloves.



Dual Purpose Research

Research with a dual academic and commercial purpose may be misapplied by research partners or a third-party and result in human rights violations. For example, universities in Australia and abroad have been linked to the surveillance of ethnic minorities in the Xinjiang Region, China, through research partnerships to develop AI technologies. In 2023, the U.S. sanctioned several research organisations for biometric data collection that had potentially facilitated human rights abuses.



Identifying and Addressing our Modern Slavery Risks

Our Supply Chain

Our Research Activities

Our Support to Students

Our Investments

Our Controlled Entities

Grievance Mechanism
and Remediation

Collaboration and Engagement

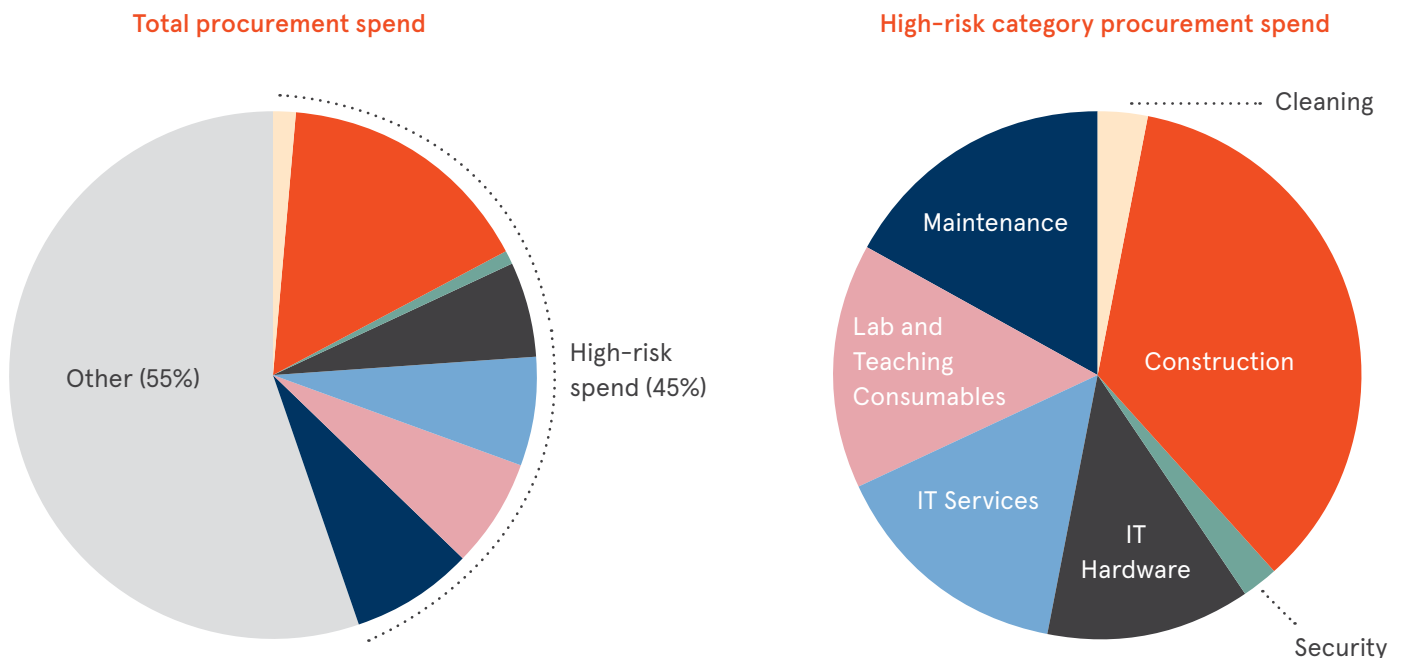
Identifying and Addressing our Modern Slavery Risks

Our Supply Chain

With over 5,800 Tier 1 suppliers and more than 290 product and service types – from office supplies to human tissue – the University’s supply chain is complex and diverse.

The University has identified seven procurement categories at high risk of modern slavery: lab and teaching consumables, IT services, IT hardware, construction, cleaning, maintenance and security. These high-risk categories of spend contributed to 45% of the University’s total procurement spend and 39% of the University’s total number of suppliers.

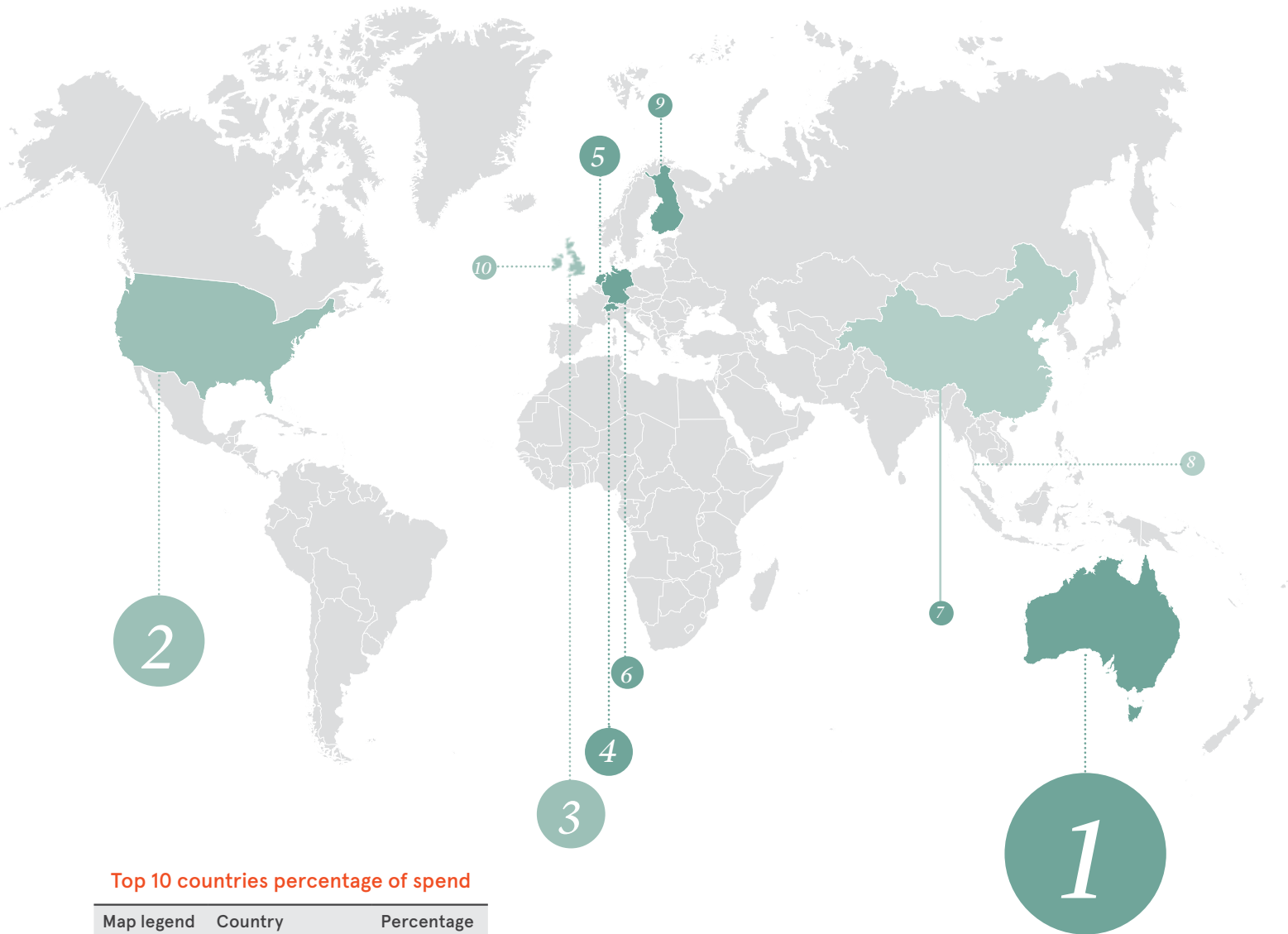
Breakdown of 2023 procurement spend



<p>Cleaning</p> <p>1.45% of total procurement spend 3.22% of the the high-risk categories</p>	<p>IT Hardware</p> <p>5.65% of total procurement spend 12.56% of the the high-risk categories</p>	<p>Lab and Teaching Consumables</p> <p>6.71% of total procurement spend 14.91% of the the high-risk categories</p>
<p>Construction</p> <p>15.82% of total procurement spend 35.16% of the the high-risk categories</p>	<p>IT Services</p> <p>6.77% of total procurement spend 15.04% of the the high-risk categories</p>	<p>Maintenance</p> <p>7.6% of total procurement spend 16.91% of the the high-risk categories</p>
<p>Security</p> <p>0.99% of total procurement spend 2.20% of the the high-risk categories</p>		

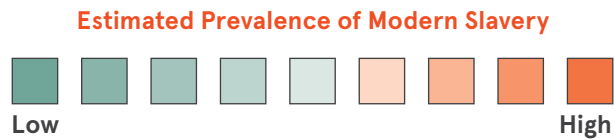
In 2023, the University of Sydney spent over \$942 million procuring goods and services from 60 countries. Over 98% of the University’s total procurement spend was made in 10 countries, with 90% made in Australia. The University takes a risk-based approach to managing modern slavery risks in our supply chain, focusing our modern slavery due diligence on procurement of high-risk categories, e.g. cleaning and construction, regardless of where these goods and services are procured from.

Top 10 countries of the University’s total procurement spend, overlaid with the prevalence of modern slavery by country (colour of the country)*



Top 10 countries percentage of spend

Map legend	Country	Percentage
1	Australia	90.09%
2	United States	3.32%
3	United Kingdom	1.41%
4	Switzerland	1.30%
5	Netherlands	0.82%
6	Germany	0.46%
7	China	0.42%
8	Singapore	0.39%
9	Finland	0.29%
10	Ireland	0.26%



*Source: [Global Slavery Index 2023, Walk Free](#)

Identifying and Addressing our Modern Slavery Risks

Our Supply Chain Activities

In 2023, we initiated a review of the impact of our modern slavery due diligence and identified opportunities to better address risks to people, through supply chain transparency, targeted risk mitigation and participation in expert, multi-stakeholder initiatives.

We prioritised	We delivered	Impact measurement
Continuous improvement to our supply chain due diligence practices.	<ul style="list-style-type: none"> - A review of modern slavery due diligence across the procurement lifecycle, including a maturity assessment by Accenture, which identified opportunities for improvement of our supplier evaluation processes. - Initiated a review of our supplier assessment process with a focus on identifying and tracking impact, through supplier engagement, on the ground monitoring, and worker voice. 	<ul style="list-style-type: none"> - 122 new or renewed contracts updated with modern slavery clauses in 2023. - 55 tenders with modern slavery questions included in 2023. - 30% increase in the number of visits to the University of Sydney's Supplier webpage in 2023 when compared to numbers from 2022. This page contains information on modern slavery.
Equipping our staff to identify risks and embed good practice due diligence into their procurement processes.	<ul style="list-style-type: none"> - In depth risk assessments and tailored due diligence plans for high-risk procurement projects. - A briefing to Procurement staff on the Modern Slavery Act Review and their role in responding to emerging human rights legislative developments. - Became a member of the Cleaning Accountability Framework (CAF), a multi-stakeholder initiative to improve labour practices in the cleaning industry. We referred to CAF's expert guidance to mitigate modern slavery risks in a cleaning services tender. 	<ul style="list-style-type: none"> - Nine procurement projects integrated detailed due diligence guidance on modern slavery risks: Cleaning; Solar; Infrastructure; LED lights; Commercial print services; Security services; Maintenance services; Visa and immigration support services and strategic communication consultancy services in China. - 33 staff briefed on modern slavery and human rights regulatory developments. Staff indicated improved awareness of the Modern Slavery Act and how it applies to their role post-briefing, with an additional three referrals to the Modern Slavery Unit for advice, following the briefing.
Identifying risks deep in our supply chain, through mapping suppliers beyond Tier 1.	<ul style="list-style-type: none"> - Worked with the School of Physics to map our supply chain up to Tier 10 of our supply chain, using a world-leading methodology adapted from carbon footprinting (see Appendix 1). - Established initial monitoring of high-risk ICT factories in our supply chain, through our affiliation with Electronics Watch, an independent worker-driven monitoring organisation. 	<ul style="list-style-type: none"> - Four ICT factories potentially linked to the University's top ICT products underwent initial monitoring by Electronics Watch. - Five high-risk, high value ICT suppliers engaged to provide disclosures of their Tier 1 and Tier 2 suppliers for worker-driven monitoring.

Impact Case Study

Worker-driven monitoring of our electronics supply chain

Integrating worker voice into our due diligence processes and supporting our commitment to increase visibility beyond our Tier 1 suppliers has been a key priority for 2023.

The University is affiliated with [Electronics Watch \(EW\)](#), an industry-independent organisation that brings together over 1,500 public buyers in Australia and internationally to protect the rights of workers in the electronics industry. EW carries out worker-driven factory monitoring, engagement and remediation through their extensive network of civil society and trade union partners.

Key risks to people

The University may be directly linked to modern slavery, through our sourcing of information and communication technology (ICT) hardware.

Through our affiliation with Electronics Watch, we identified potential links to factories where workers reported:

- Forced labour.
- Poor working conditions, including mandatory overtime.
- Handling toxic chemicals without proper protection.
- High levels of surveillance.
- Lack of transparency about their working and accommodation conditions when recruited.

Our actions

Worked with our ICT portfolio and Procurement Services to develop a 2023-24 due diligence plan, based on Electronics Watch good practice guidance, including:

- Provided Electronics Watch with our top 10 ICT product models by spend to identify electronics factories linked to our suppliers.
- Working with five of our major suppliers to disclose their final assembly and component production factories.
- Held an information session for eight vendor managers, who manage ICT supplier contracts and provided targeted training on engaging high-risk suppliers.

Our impact

- Increased our transparency of factories beyond Tier 1 in our electronics supply chain. Electronics Watch identified potential links between our major ICT procurement and several factories – see the table below. In 2024, we will integrate the Electronics Watch model contract clauses into revised contracts and continue to work with our suppliers to verify these links and increase visibility of our extended supply chain.

The University’s potential links to electronics factories, identified by Electronics Watch

Electronics factory	Potential link to the University	Electronics Watch 2023 monitoring
Hungary – final assembly and testing	Desktop PCs	<ul style="list-style-type: none"> - Worker surveys and interviews. - Dormitory visits. - Remote social media monitoring.
Malaysia – assembly, packaging and final testing	Laptops, mobiles phones, mouse and keyboards	<ul style="list-style-type: none"> - Field investigations. - Training session on labour rights for 20 migrant workers. - Interviews with migrant workers on recruitment-related issues.
India – final assembly	Mobile phones	<ul style="list-style-type: none"> - Engagement with factory and major buyer on several labour rights breaches, including infringements on freedom of association and high levels of surveillance.
China – final assembly	Servers and monitors	<ul style="list-style-type: none"> - Industry dialogue, based on labour rights breaches identified through extensive worker interviews in 2020 and 2021.

Impact Case Study

Just transition: Addressing forced labour risks in the solar supply chain

In 2023, as part of our Sustainability Strategy to have three megawatts on-site renewable electricity by 2025, the University tendered to install solar panels across 14 campus buildings. The Modern Slavery Unit worked with the Central Operations Services and Sustainability teams to ensure our decarbonisation targets also reflected our commitment to respecting human rights.

Key risks to people

Our risk assessment identified that the University may be directly linked to modern slavery, such as forced labour, through the sourcing of solar panels manufactured in Xinjiang, China.

The solar industry relies on the Xinjiang Region in China for raw materials and module manufacturing, where there have been well documented reports, including by the U.S. Government and the United Nations, of human rights violations, including arbitrary detention, political re-education and high levels of surveillance of Uyghur and other ethnic minorities. Xinjiang-based suppliers account for approximately 45% of the world's supply of polysilicon, a key component in solar panels. Credible reports have indicated all Xinjiang polysilicon suppliers have been involved in labour transfers of ethnic minorities, widely reported to be a form of forced labour.

Several of the solar panel providers proposed by the suppliers who tendered for the project were reportedly linked to forced labour in Xinjiang by publicly available and reputable sources.

Our actions

- Provided an in-depth risk assessment and mitigating actions for the two shortlisted suppliers to Procurement Services and the University's Tender Board.
- Worked with the preferred supplier to source panels that were not manufactured, or had components sourced, from the Xinjiang Region. We required the supplier to demonstrate traceability of the panels through providing a complete list of suppliers down to raw materials.
- Included bespoke modern slavery clauses into the supplier's contract, tailored to solar-specific risks.

Our impact

- Mitigated the project's risks to people through a tailored approach.
- Given the region-wide, state-sponsored nature of forced labour in Xinjiang, working with suppliers to remediate modern slavery is not possible. Recognising the challenges of standard human rights due diligence, we focused on actions within our circle of control (i.e. where we had the greatest leverage to influence change) and followed good practice guidance by Sheffield Hallam University Forced Labour Lab.
- Increased staff awareness of risks in the solar supply chain, demonstrated by a request to provide support on an additional campus construction project sourcing solar panels and plans to integrate human rights considerations into solar procurement in 2024.

Identifying and Addressing our Modern Slavery Risks

Supply chain lessons learned

- Tailored due diligence is needed to effectively address complex, sector-specific risks. For example, learning from Electronics Watch’s network of affiliates, monitoring partners and workers has given us a deeper understanding of risks specific to our ICT procurement and the targeted actions needed to have a tangible and positive impact.
- Transparency is just the first step in addressing modern slavery risks across our electronics supply chain. In 2024, we will integrate Electronics Watch’s quarterly monitoring reports into our contract management processes and draw on the collective leverage of Electronics Watch’s affiliates to drive change with our ICT suppliers.
- Integrating human rights early in the procurement lifecycle is critical to identifying potential risks and attracting suppliers aligned with our values. In 2024, we will provide training to all staff working on upcoming high risks projects (e.g. solar projects) and will include modern slavery due diligence as a key consideration in the tender evaluation criteria.
- Ensuring a just transition to renewable energy requires a multi-stakeholder collaborative approach. In 2024, we will engage with the NSW Anti-slavery Commissioner’s consultation process on developing A Code of Practice on Managing Modern Slavery Risks in Renewable Energy Value-Chains.

“Through active collaboration, Modern Slavery Unit, Sustainability and Central Operations Services joined forces to ensure our desired targets were met, exemplifying the University’s commitment to sustainability, human rights and good governance.”

Elaine Koh
Senior Project Manager,
Central Operations Services

“As we reflect on the past year, the lessons we have learnt in our efforts to eradicate modern slavery reinforce the critical importance of collaboration, both with suppliers, and with our internal stakeholders. This year, we focused on raising awareness and achieved significant improvements in our supply chain visibility. In 2024, we will prioritise category specific corrective actions, and use the combined power of our purchasing for impactful outcomes. In this way, we create a unified front against modern slavery and help to build a slavery free supply chain.”

Tabassum Humza
Associate Director Procurement – Quality, Governance
and Performance, Procurement Services



Identifying and Addressing our Modern Slavery Risks

Our Research Activities

As a research-intensive institution, our academic expertise extends across 23 fields of research, spanning from astronomical instrumentation, agricultural biotechnology diagnostics (including bio sensors), virology, bio fabrication and electrical energy transmission to networks and systems. In 2023, we established new contracts with over 129 research partners across government and industry.

We prioritised	We delivered	Impact measurement
Streamlined identification of modern slavery and intersecting risks in research.	<ul style="list-style-type: none"> - The Know Your Partner and Project Tool (currently being piloted), which provides a check of prospective partners and activities for potential risks, including human rights violations. 	<ul style="list-style-type: none"> - Three projects assessed using the Know Your Partner and Project Tool during the first month of piloting.
Embedding human rights due diligence across the research pipeline, through a consultative, co-design process.	<ul style="list-style-type: none"> - Improved due diligence processes to identify modern slavery and intersecting risks across the research pipeline, co-designed with the Research portfolio, Office of General Counsel and Risk teams. - Referral pathways to the Modern Slavery Unit and other specialist risk teams for research projects flagged for sanctions, defence export controls, foreign interference and human rights violations. - Embedded human rights indicators into new due diligence checks for our Faculty and School-based Business Development Managers, responsible for industry partnerships, and our contract negotiation team. 	<ul style="list-style-type: none"> - 15 staff across eight teams involved in co-design of new human rights due diligence processes for research partnerships and projects. - Zero referrals to specialist risk teams in the first month of piloting the revised due diligence processes.
Capacity building of our research staff and partners to support them to effectively identify and address modern slavery risks.	<ul style="list-style-type: none"> - Modern slavery due diligence training for Business Development Managers and the contract negotiation team. - Tailored training for a research partner on forced labour risks in the solar supply chain and resources on human rights due diligence. - Input into our new Risk Appetite Playbook, including a human rights case study involving a research partner to help staff identify risks and opportunities and inform decision-making. 	<ul style="list-style-type: none"> - 48 research staff participated in the modern slavery due diligence training. - 59% of those who participated indicated their awareness of modern slavery risks increased post-training. - 61% of those who participated in the modern slavery due diligence training indicated their understanding of the University's obligations under the Modern Slavery Act and how they apply to their role increased post-training.

Impact Case Study

Know Your Partner and Project: Identifying human rights risks in our research activities

Our funded research project partners come from more than 28 countries. In 2023, we signed contracts with over 440 entities, from industry partnerships to grants, presenting unique and complex risks to people. In 2023, we established a working group with our Research portfolio, Risk, Global Engagement, Office of General Counsel and Centre in China to co-design a tailored approach to addressing human rights impacts in our research activities.

Key risks to people

The University may potentially contribute to, or be directly linked to, human rights concerns such as modern slavery, through its research activities, which can be hard to identify due to their interconnectedness with other complex risks such as export controls, sanctions and national security.

Clinical trials with vulnerable populations, AI technologies, DNA harvesting, and clean energy generation and storage technologies have been linked to human rights concerns, including forced labour, discriminatory surveillance and lack of informed consent. These research categories are particularly of concern when they are carried out with external partners with poor human rights track records.

Our actions

- Consulted staff responsible for research grant applications, scoping prospective partners and negotiating research contracts to identify opportunities for streamlining risk identification and assessment processes.
- Developed the Know Your Partner and Project Tool (KYPPT) to enable staff to quickly check a new project for potential risks, based on publicly available, reputable sources. This will enable teams to automatically refer high risk projects to specialist risk teams for detailed assessments and guidance.
- Piloted the Know Your Partner and Project Tool with Business Development Managers responsible for industry partnerships in high-risk research categories and staff who manage and support research contract negotiations in 2023. We will carry out further testing in 2024 with the Office of General Counsel, Centre in China and Faculties and Schools.

Our impact

- Initial effective identification of counterparty risks in research activities, through a pilot of the Know Your Partner and Project Tool. In the first month of the pilot, 22 partners and three projects were screened using the Know Your Partner and Project Tool.
- Widespread support and adoption of the new due diligence processes. Initial feedback from staff indicates the co-design approach to due diligence development has resulted in processes tailored to their needs and a shared sense of accountability for ensuring effective implementation.

Our lessons learned

- Modern slavery risks in research need to be addressed alongside other counterparty risks, recognising human rights violations can coincide with foreign interference, military links and cybersecurity concerns, often symptomatic of a partner's poor governance and limited transparency.
- Early identification of risks is critical to transparent discussions with partners and mitigating potential concerns before the project is established. In 2024, we will engage with Faculties and Schools to roll out the Know Your Partner and Project Tool to researchers and research support staff.



Identifying and Addressing our Modern Slavery Risks

Our Support to Students

Students have a heightened risk of experiencing modern slavery. International students and students from culturally diverse backgrounds are particularly vulnerable to experiencing forced labour, debt bondage, deceptive recruitment and forced marriage. Throughout 2023, we focused on building students’ awareness of risk indicators of exploitative labour, how to seek support and further information and equipped staff to identify and respond to modern slavery.

We prioritised	We delivered	Impact measurement
Providing students with information and training on modern slavery risks and support services.	<ul style="list-style-type: none"> - Targeted online student education initiatives through online training, newsletters and resources. - Face-to-face engagement with students at Welcome Fest through the “Human Rights at Sydney” tent and International Student Welcome event. 	<ul style="list-style-type: none"> - 8,400 students have voluntarily completed the Anti-Slavery Awareness training module. - Three student news articles on modern slavery published, reaching over 25,000 student readers. - Three international student news articles on modern slavery, reaching over 14,000 international student subscribers. - 3,245 visits to our student-focused modern slavery webpages in 2023. - Resources and information shared with 150+ students during Welcome Fest.
Providing students with opportunities to take an active role in engaging in human rights issues.	<ul style="list-style-type: none"> - Launched the Student Human Rights Network at Welcome Fest 2023, to directly engage with students in participating in the University’s Anti-slavery efforts. - Facilitated opportunities for students to work directly with the Modern Slavery Unit, including through internships and event collaborations. 	<ul style="list-style-type: none"> - Five Student Human Rights Network newsletter updates sent to 151 student members. - One collaboration with USYD Fashion Revolution, a student society, on a fashion swap and ethical fashion panel event. - Four student societies engaged with the Modern Slavery Unit for information and resource sharing: Sydney University Law Society Social Justice Committee, Sydney University United Nations Society, USYD Fashion Revolution and USYD International Justice Mission. - Three intern positions with the Modern Slavery Unit offered to students for academic credit.
Equipping our staff to identify modern slavery risks and refer students to appropriate support.	<ul style="list-style-type: none"> - Bespoke training and engagement with our student-facing teams. - Embedded modern slavery into student wellbeing assessments and processes. - Service information session with The Salvation Army and Redfern Legal Centre on referral options. - Staff training on Anti-Slavery Awareness. 	<ul style="list-style-type: none"> - 15 staff attended the Modern Slavery Unit workshop delivered to Student Wellbeing teams. - 15 student support staff attended the service information session. - 15,000+ staff completed the training on Anti-Slavery Awareness.
Deepening our understanding of modern slavery risks facing students.	<ul style="list-style-type: none"> - Engaged in the International Student Working Group, that is part of the Australian Universities Procurement Network. 	<ul style="list-style-type: none"> - Participated with 16 universities and civil society groups in the International Student Working Group.

Identifying and Addressing our Modern Slavery Risks

Our Investments

The University manages endowment funds to meet its long-term academic and research goals. These funds consist mainly of bequests and donations that have been gifted to the University. Our portfolio is made up of diverse assets, including Australian and international equity, private equity, debt and property. In 2023, we focused on strengthening our processes to identify and respond to modern slavery risks across our portfolio.

We prioritised	We delivered	Impact measurement
Embedding human rights due diligence into our investment policies and procedures.	<ul style="list-style-type: none"> - A 2023-24 due diligence plan, aligned with the UN Guiding Principles on Business and Human Rights. The plan prioritises due diligence with holdings where the risk to people is the most severe and the University has the greatest leverage to influence investment manager practices, based on high-risk industries, value of holdings and maturity of managers to address risks. 	<ul style="list-style-type: none"> - 100% of direct agreements between the University and investment managers require managers to regard the University's Investment Policy and Procedures, which reflect the University's commitment to respect human rights.
Developing and implementing streamlined systems to identify modern slavery risks across our listed and private equity portfolios.	<ul style="list-style-type: none"> - Baseline screening of our publicly listed and private equity portfolios for links to human rights violations, based on Australian and U.S. sanctions and reputable non-government reports. - A review of our investment managers' approach to modern slavery risks, through our annual ESG survey. Responses in 2023 suggest that modern slavery risks are increasingly becoming a normalised consideration for fund managers, particularly in jurisdictions with legislation. 	<ul style="list-style-type: none"> - All the University's equity assets under management screened for human rights risks. - 74% of the University's investment managers have a policy to manage the risk of modern slavery, compared to 67% in 2022. - 83% of the University's investment managers prohibit or otherwise limit investments contributing to modern slavery or human rights abuses, compared to 72% in 2022. - 26 engagements by investment managers with companies on human rights, compared to 14 engagements in 2022.

“The investment team was pleased in 2023 to implement the Modern Slavery Unit’s portfolio tracker to uncover any exposure to the most egregious modern slavery and human rights risks. That assessment exposed two companies in the depths of funds with a total value of \$95,000, or 0.003% of the Long-Term Fund. These investigations establish a baseline for the portfolio, after which we will be focusing on reviewing those sector exposures representing the highest risk of exposure to unacceptable activities.”

Miles Collins

Chief Investment Officer, Investment and Capital Management

Impact Case Study

Engaging investment managers to address human rights violations in the Xinjiang Region, China

In 2023, we strengthened our approach to identifying modern slavery and human rights risks in our investments. We completed a baseline screening of our portfolio for links to human rights violations. Taking a staggered approach, we prioritised our listed and private equity portfolios. We focused on the equity held in companies, which make up the majority of our assets under management (AUM).

Key risks to people

Our screening identified the University may potentially be directly linked to modern slavery risks, through investments in two companies with reported involvement in human rights violations in the Xinjiang Region, China.

One company reportedly supplied surveillance technology to Xinjiang authorities, which enabled human rights violations in the region.

The other company is reportedly involved in labour transfers of Uyghur and other ethnic minorities to its factories across China, considered to be a form of forced labour.

Our actions

- We provided our investment managers with detailed risk assessments for both companies, and engaged with them to understand the steps they are taking to address the risks.
- In both cases the University's relationship was with a fund of funds manager, who in turn needed to engage with one of their chosen underlying managers to address the issue.
- Our holding in one of the companies has been sold. Steps to end the relationship with the other company have also been initiated, with a sale expected in 2024.
- In line with the OECD Guidelines for Responsible Business Conduct for Institutional Investors, divestment is considered where the risks to people are severe and there is limited leverage to influence change.
- In the Xinjiang Region lack of access to independent information and fear of reprisal for speaking up makes standard due diligence challenging. Our leverage was limited by our links to the companies held, given that our managers were two steps removed from the holding through the fund of fund arrangements.

Our impact

- Effective identification of portfolio exposure to human rights risks. Given most diverse portfolios are likely to be linked to modern slavery, identifying incidents in our holdings indicates our due diligence processes are working, particularly for complex and multi-layered investment arrangements.
- Increased managers' awareness of human rights risks. One manager shared they have made improvements to their processes to better identify incidents and further engaged with the underlying manager on the flagged company.

Our lessons learned

- Engagement with managers is particularly important for indirect investment arrangements, where we have limited leverage to affect change. Our engagement with our managers on the investments flagged for reported human rights violations prompted further engagement with underlying managers.
- Portfolio screening for reported human rights incidents is an important first step but further due diligence is required. In 2024, we will prioritise due diligence of investments in high-risk industries, through tailored engagement with managers.

Our Controlled Entities

The University's controlled entities were consulted in preparation of this statement and share our commitment to addressing modern slavery risks. All controlled entities are subject to the University's Modern Slavery Policy and the Modern Slavery Unit works with their senior executive teams to implement the policy, identify risks and train staff.

Westmead Fertility Centre

We prioritised	We delivered	Impact measurement
Best-practice due diligence embedded University-wide, including in the University's Controlled Entities.	<ul style="list-style-type: none"> Updated Westmead Fertility Centre's website to provide a link to the University's modern slavery webpage and statement to publicly demonstrate commitment to address modern slavery. Provided patients with updates on Westmead Fertility Centre's commitment to addressing modern slavery via the Patient portal. 	<ul style="list-style-type: none"> 11 visits to the University's modern slavery webpage from the Westmead Fertility Centre website. Increased patients' awareness of Westmead Fertility Centre's commitment to address modern slavery risks.
A culture of continuous learning and feedback.	<ul style="list-style-type: none"> Westmead Fertility Centre completed a risk identification activity with nurses, counsellors and scientific, research and administrative staff to identify where modern slavery risks may present in the clinic and enhance staff's awareness of risks. 	<ul style="list-style-type: none"> 45 staff members participated in the risk identification activity. Increased awareness among staff of modern slavery risks unique to Westmead Fertility Centre. Bespoke training requests from staff around addressing modern slavery.

A14 Holding (Centre in China)

We prioritised	We delivered	Impact measurement
Best-practice due diligence embedded University-wide, including in the University's Controlled Entities.	<ul style="list-style-type: none"> Modern slavery saliency risk assessment undertaken identifying key modern slavery risks linked to the operations of the Centre in China. Co-designed a multi-year, risk based due diligence plan with an annual risk review built in. Reviewed and updated the Centre in China Risk Register and ensure appropriate oversight and governance of the register. 	<ul style="list-style-type: none"> Increase awareness and understanding among staff of modern slavery risks unique to the Centre in China. Uplifted modern slavery risk control measures for the Centre in China.
A culture of continuous learning and feedback.	<ul style="list-style-type: none"> A14 Holding Board provided with detailed briefing on emerging modern slavery risks and other related risks associated with meeting legislative requirements while operating in China. 	<ul style="list-style-type: none"> Increase awareness and understanding of the Board of modern slavery risks unique to the Centre in China.





Grievance Mechanism and Remediation

Our Modern Slavery Incident Reporting Form is open to staff, students, suppliers, partners and the general public to anonymously report suspected modern slavery incidents linked to the University. The Modern Slavery Unit assesses and triages reports, refers to specialised support services and, where appropriate, facilitates remedy for the incident. In 2023 we received a total of seven reports of potential modern slavery incidents through various channels.

Reports made directly to the Modern Slavery Unit in 2023

- Three reports, one reported directly through the online form and two reported via email – none of which constituted modern slavery.
- Two reports raised concerns of poor working conditions outside of the University. These were made by a student of the University and a member of the public.
- One report concerned an incident unrelated to the University made by a member of the public.
- All reports were resolved, through either direct referral to specialist services, with the reporter’s consent, or through providing resources on rights and options for support.

Reports made directly to Safer Communities Office (SCO)

- Two reports of forced marriage, one as a self-referral and one referred by the Student Counselling Service.
- One report of forced marriage from 2022 with ongoing case management support until June 2023.
- One report of suspected forced labour, a student enquiring due to concerns for a friend who may be in exploitative labour.
- All reports were resolved, either through case management including academic adjustments or sharing information about My Blue Sky and key contacts for support.

While a total number of reports (seven) has slightly increased in 2023 since our last report (five), usage of our grievance mechanism remains low, with one report of modern slavery made in 2023 through the form. Lack of awareness of the form, language barriers and concerns about the outcome of making a report, such as the potential involvement of police, are likely barriers to reporting. We recognise that identifying incidents of modern slavery is critical in reducing prevalence and providing remedy.

In 2024, we will review our grievance mechanism, and incorporating input from our staff, students and civil society partners.

We prioritised	We delivered	Impact measurement
Refreshing our grievance mechanism to ensure it is transparent and needs based.	<ul style="list-style-type: none"> - New public grievance mechanism page, accessible to staff, students, suppliers, partners and the general public. The page includes guidance on how reports are handled, support services and a ‘Quick exit’ button to navigate quickly off the page if there are concerns of being watched. - Updated communications to reporters, including clearer emails on timeframes for responding to grievances. - Incorporated a short feedback survey into our case closure email on the reporter’s experience of using the form. We plan to report on this feedback (de-identified) in future statements. 	<ul style="list-style-type: none"> - 226 visits to the ‘Make a report of modern slavery’ webpage.
Equipping our students, staff and community to report and respond to modern slavery incidents.	<ul style="list-style-type: none"> - Tailored training and communications to staff and students that included guidance on the grievance mechanism, and how to report a modern slavery incident and refer to external support services for students. - Strengthened referral pathways for staff supporting students experiencing modern slavery, through the development of a streamlined process for reporting to the Student Wellbeing team. 	<ul style="list-style-type: none"> - Nine student and staff news articles on modern slavery via staff news, student news, international student newsletter, and email mailing list. This included information on how to report suspected modern slavery incidents.

Collaboration and Engagement

Collaboration for collective impact is fundamental to our approach to identifying and addressing modern slavery risks. In 2023, we engaged widely and frequently with like-minded organisations across the globe who share our commitment to making a meaningful impact.

We prioritised	We delivered	Impact measurement
Partnerships to accelerate evidence-based solutions to addressing modern slavery.	<ul style="list-style-type: none"> - Support to develop a world-leading, publicly available Modern Slavery Footprint tool with the School of Physics' Open Analysis to Address Slavery in Supply Chains (OASIS). The multi-disciplinary, collaborative project, which includes the Australian anti-slavery coalition Be Slavery Free and the Australian Retailers Association, identifies modern slavery risks up to Tier 10 of the supply chain. - A partnership between the Business School's Institute of Transport and Logistics Studies and the NSW Anti-slavery Commissioner to develop a tool to identify modern slavery risks in NSW government procurement. 	<ul style="list-style-type: none"> - OASIS awarded an Anti-Slavery Australia Freedom Award for their innovative proof-of-concept. - Six presentations to seek funding, collaborators and feedback on the OASIS tool.
Opportunities for collaboration and collective learning with business, government and civil society.	<ul style="list-style-type: none"> - Participation in the Australian Universities Procurement Network, along with 40 other universities, including co-presenting with Anti-Slavery Australia on our lessons learned in supporting students at risk of modern slavery. - Participation in the Australian Government's Human Trafficking and Modern Slavery Research Network, including presenting on the OASIS tool. - Appointment of the Modern Slavery Unit Director, Esty Marcu and Sydney researchers, Associate Professor Anna Boucher and Scarlet Franks, to the NSW Anti-slavery Commissioner Advisory Panel, to provide expert guidance to the Commissioner. - Appointment of the Modern Slavery Unit Director to the Electronics Watch's Board of Trustees. 	<ul style="list-style-type: none"> - Gained increased awareness of best practice and new approaches to modern slavery risk management and uplifted our process where appropriate, for example the review and uplift of our modern slavery procurement due diligence process, which will continue in 2024.
Demonstrating leadership for good, through sharing our academic expertise, due diligence practice and lessons learned.	<ul style="list-style-type: none"> - Events to engage our community to better understand and act on modern slavery, including on: <ul style="list-style-type: none"> - The Modern Slavery Act Review with the Sydney Law School, featuring the Australian Ambassador to Counter Modern Slavery, People Smuggling and Human Trafficking, Lynn Bell, and Professor John McMillan, author of the Review. - Ethical fashion, with the University of Sydney Business School's MBA Dimensions Program and speakers from across academic, advocacy and civil society. - Presentations to the university sector to share our Modern Slavery Due Diligence Framework, including the UNICA, a network of 57 universities across Europe, and Macquarie University's Modern Slavery Working Group. - Briefings to the University's senior leadership on the University's compliance with the Modern Slavery Act. - Practical resources for our staff to identify and address modern slavery risks through our Staff Intranet page. 	<ul style="list-style-type: none"> - 170 attendees across three University of Sydney public events, along with participation and presentations at seven conferences. Attendees after our ethical fashion event reported that they intended to check the origin of their clothing and use ethical fashion resources to inform their purchases. - Four universities in Australia and internationally engaged through informal partnerships to discuss common challenges and share resources. - Two presentations and briefs to the University Executive and Senate. - 286 visits to the modern slavery webpages on the Staff Intranet. - 3,126 visits to our Modern Slavery webpages.

“By providing a free and open-source tool for everyone to use, the tool will level the playing field and provide all reporting entities, businesses and organisations with equal access to modern slavery supply chain risk information that is both accessible and company specific. The OAASIS project’s commitment to making this tool publicly and freely available is truly remarkable and commendable.”

Professor Jennifer Burn
Director
Anti-Slavery Australia on the OAASIS project



Looking Ahead

Our Plan for 2024

Appendix 1 - The University of Sydney
OASIS footprint



Our Plan for 2024

We remain committed to tackling modern slavery, through our due diligence practice, creating a culture of continuous learning and feedback, through our research and expertise, and by contributing to the global effort to eradicate modern slavery. Our 2024 priorities include:



Embedding best practice due diligence.

- Review and uplift our governance and policy framework.
- Review the supplier assessment platform.
- Develop and implement effective methodology, tools, and guidance.
- Continue to identify and address risks beyond Tier 1 of our supply chain.
- Update our model modern slavery contract clauses to reflect best practice.



Enhancing our culture of continuous learning and feedback.

- Update our staff Anti-Slavery Awareness Module.
- Deepen engagement and support for students by working with Student Wellbeing teams, student clubs and societies.
- Build on our Student Human Rights Network.
- Increase engagement with civil society and people with lived experiences.



Designing solution-focused modern slavery research and education.

- Facilitate opportunities of collaboration for academics with government, industry and civil society.
- Build the University of Sydney's Modern Slavery Academic Network.
- Participate in the Australian Government Modern Slavery and Human Trafficking Research Network.



Contributing to the global effort to eradicate modern slavery.

- Support progress on the award-winning OASIS Project.
- Develop a university sector modern slavery network/community of practice.
- Build on the University's research, practice, and thought leadership.

Appendix 1

The University of Sydney OAASIS footprint

In 2023, the University of Sydney undertook an analysis of its operational spend for a 12-month period using the Open Analysis to Address Slavery in Supply Chains (OAASIS) project.

Methodology

- Sourced data for the Financial Year 2022 to 2023, mapping over 188,000 coded expense items covering \$805 million in operational spend of the University's operational spend.
- Inputted the data into the OAASIS project and ran an analysis against multiple satellite data sources of 'supply chain labour risk indicators' to map the global supply chain of the University's operational spend.
- Created footprints of the University of Sydney's 12-month operational spend by industry, sector and geography.

What we learned

- The mapping provided the University with increased visibility of our supply chain, down to the commodity level, and our understanding of the inherent modern slavery risks associated with our supply chain.
- The table below shows the top 15 'high-risk' commodities at the full GLORIA 120 sector classification. A risk ranking of 1 indicates the highest risk and note that the ranking uses the combined score for all indicators.

Top 15 high-risk commodities purchased by the University

Commodity	Employment skill low (GLORIA)	Modern-slavery (GSI-GEMS)	Forced-labour (Shilling et al.)	Rank*
Computers; electronic products; optical and precision instruments	279.16	4.73	1.46	1
Building construction	137.22	2.24	1.27	2
Administrative services	108.26	0.91	0.34	3
Information services	75.23	0.71	0.25	4
Electrical equipment	42.23	0.98	0.18	5
Furniture and other manufacturing n.e.c	35.86	0.56	0.19	6
Repair and installation of machinery and equipment	29.32	0.79	0.17	7
Professional, scientific and technical services	32.5	0.45	0.1	8
Hospitality	25.22	0.23	0.11	9
Other services	29.56	4.6	0.04	10
Electric power generation, transmission and distribution	24.88	0.17	0.08	11
Publishing	16.86	0.19	0.07	12
Telecommunications	13.34	0.2	0.06	13
Pharmaceuticals and medicinal products	11.67	0.15	0.08	14
Fabricated metal products	12.42	0.2	0.04	15

* The rank combines the individual satellite indicator rankings for the three data sets (GLORIA, GSI-GEMS and Shilling) and may be misleading.

High Risk Commodities

- It can be seen that all indicators rank computers, electronics and instruments as the highest impact, followed by building construction and administrative services.

Electronics

- Computers, electronics and instruments are the largest single risk across all measures.
- In FY23, the University spent \$111 Million on 2,744 suppliers of products in the category of computers, electronics and instruments representing 14% of total expenses.
- The combination of relatively high spend and high intensity of labour risk footprint, rates this sector as having a high risk of supply-chain labour risk, and the most significant risk to the University. This is not surprising, given electronics is also the highest value at-risk import for Australia (US\$8.5 billion).

Construction

- In FY23, the University spent \$85 Million on 119 suppliers in the category of building construction, representing 11% of total spend. Building construction ranks second as a contributor to the 20 University's supply-chain labour risk, though has a higher intensity (risk per dollar) compared to computers, electronics and instruments.

High Risk Regions

- The table below depicts the regions impacted by the University's consumption. These impact regions are uncovered by tracing the University's supply chains upstream to where the impacts occur.
- Whilst low-income countries represent a large component of total risk, the risks in higher income countries are also significant, as evidenced by the relatively high risks in Australia, USA and Europe.

Top 15 regions impacted by the University's supply chains

Region	Employment skill low (GLORIA)	Modern-slavery (GSI-GEMS)	Forced-labour (Shilling et al.)	Rank*
Australia	379.2	9.92	1.4	1
China	202.05	1.26	0.67	2
India	75.53	2.03	0.65	3
Indonesia	37.25	0.53	0.44	4
Thailand	17.76	0.2	0.16	5
Philippines	9.61	0.25	0.2	6
Malaysia	8.43	0.16	0.35	7
United States of America	7.38	0.33	0.07	8
Nigeria	9.76	0.13	0.07	9
Zambia	12.55	0.15	0.03	10
Viet Nam	18.26	0.12	0.03	11
Pakistan	5.27	0.08	0.05	12
Mexico	3.74	0.1	0.03	13
Turkey	2.5	0.21	0.03	14
Brazil	3.57	0.11	0.02	15

* The rank combines the individual satellite indicator rankings for the three data sets (GLORIA, GSI-GEMS and Shilling) and may be misleading.

Glossary

Affiliate

Has the meaning given in the *Modern Slavery Policy 2020*. At the date of this policy, this is: clinical title holders; adjunct, conjoint and honorary appointees; consultants and contractors to the University; holders of offices in University entities, members of Boards of University Foundations, members of University Committees; and any other persons appointed or engaged by the University to perform duties or functions on its behalf.

Assets under management

The total market value of the investments managed by the University and its specialist external portfolio managers.

Child labour

Has the meaning given in the *Modern Slavery Policy 2020* referring to the worst forms of child labour, where children are:

- Exploited through slavery or similar practices, including for sexual exploitation;
- Engaged in hazardous work which may harm their health or safety; or
- Used to produce or traffic drugs.

Controlled entity

Has the meaning given in the *Modern Slavery Policy 2020*. At the date of this policy, this is: a person, group of persons or body over which the University has control.

Debt bondage

Has the meaning given in the *Modern Slavery Policy 2020*, consistent with the *Modern Slavery Act 2018 (Cth)* and divisions 270 and 271 of the *Criminal Code 1995 (Cth)*, referring to situations where the victim's services are pledged as security for a debt (owed by the victim or by another person) and:

- The debt is manifestly excessive;
- The victim's services are not applied to liquidate the debt; or
- The length and nature of the services are not limited and defined.

Deceptive recruiting for labour and services

Has the meaning given in the *Modern Slavery Policy 2020*, consistent with the *Modern Slavery Act 2018 (Cth)* and divisions 270 and 271 of the *Criminal Code 1995 (Cth)*, referring to situations where the victim is deceived about whether they will be exploited through a type of modern slavery.

ESG

Environmental, social and governance.

Forced labour

Has the meaning given in the *Modern Slavery Policy 2020*, consistent with the *Modern Slavery Act 2018 (Cth)* and divisions 270 and 271 of the *Criminal Code 1995 (Cth)*, referring to situations where the victim is either not free to stop working or not free to leave their place of work.

Forced marriage

Has the meaning given in the *Modern Slavery Policy 2020*, consistent with the *Modern Slavery Act 2018 (Cth)* and divisions 270 and 271 of the *Criminal Code 1995 (Cth)*, referring to situations where:

- Coercion, threats or deception are used to make a victim marry; or
- The victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.

Grievance mechanism/modern slavery incident reporting form

A confidential [online form](#) which is intended for use by University of Sydney staff and students and external parties to report cases of modern slavery that may be linked to any part of the University's activities, including:

- Suspected incidents of modern slavery, labour exploitation, debt bondage, trafficking, forced marriage or other types of modern slavery, or if the reporter is worried about someone who might be in this type of situation; or
- Concerns regarding modern slavery occurring, both on or off campus, or in the University's supply chain through the procurement of goods and services.

Human rights due diligence/due diligence

According to the United Nations Guiding Principles on Business and Human Rights, assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed. Human rights due diligence:

- Should cover adverse human rights impacts that the business enterprise may cause or contribute to through its own activities, or which may be directly linked to its operations, products or services by its business relationships;
- Will vary in complexity with the size of the business enterprise, the risk of severe human rights impacts, and the nature and context of its operations; and
- Should be ongoing, recognizing that the human rights risks may change over time as the business enterprise's operations and operating context evolve.

MBA

Masters of Business Administration.

Modern slavery

Has the meaning given in the *Modern Slavery Policy 2020*, consistent with the *Modern Slavery Act 2018 (Cth)* and divisions 270 and 271 of the *Criminal Code 1995 (Cth)*, referring to situations where coercion, threats or deception are used to exploit people and undermine or deprive them of their freedom. This includes:

- Trafficking in persons;
- Slavery;
- Servitude;
- Forced labour;
- Forced marriage;
- Debt bondage;
- Deceptive recruiting for labour or services; and
- The worst forms of child labour.

The term 'modern slavery' is only used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal and harmful and may be present in some situations of modern slavery. These practices may escalate into modern slavery if not addressed.

Modern Slavery Act

Means the *Modern Slavery Act 2018 (Cth)*.

Partner

Has the meaning given in the *Modern Slavery Policy 2020*. At the date of this policy, this is: any organisation or person who is collaborating with the University; or participating in a joint venture or research initiative with, or on behalf of, the University.

PPE

Personal Protective Equipment.

Principal Officer

Has the meaning given in the *Modern Slavery Policy 2020*. At the date of this policy, this is: any of Vice-Chancellor and Principal; Senior Deputy Vice-Chancellor; Deputy Vice-Chancellor; Vice-Principal; General Counsel.

Servitude

Has the meaning given in the *Modern Slavery Policy 2020*. At the date of this policy, this is: an organisation or person who supplies the University with goods or services, and includes their officers, directors, subcontractors, agents, related entities and consultants.

Slavery

Has the meaning given in the *Modern Slavery Policy 2020*, consistent with the *Modern Slavery Act 2018 (Cth)* and divisions 270 and 271 of the *Criminal Code 1995 (Cth)*, referring to situations where the offender exercises powers of ownership over the victim including:

- The power to make the person an object of purchase; and
- The power to use their labour in an unrestricted way.

Supplier

Has the meaning given in the *Modern Slavery Policy 2020*. At the date of this policy, this is: an organisation or person who supplies the University with goods or services, and includes their officers, directors, subcontractors, agents, related entities and consultants.

Trafficking in persons/human trafficking

Has the meaning given in the *Modern Slavery Policy 2020*, consistent with the *Modern Slavery Act 2018 (Cth)* and divisions 270 and 271 of the *Criminal Code 1995 (Cth)*, referring to situations the recruitment, harbouring and movement of a person by means of coercion, threat, deception, fraud, and abduction for the purposes of exploitation through modern slavery. Exploitation includes:

- The prostitution of others without their consent or other forms of sexual exploitation;
- Forced labour or services;
- Slavery or practices similar to slavery;
- Servitude; or
- The removal of organs.

UNGPs

United Nations Guiding Principles on Business and Human Rights.

Index

The following list outlines where information related to each mandatory reporting criteria in the Modern Slavery Act can be located within our statement.

Identify the reporting entity

- About this statement (p. 3)

Describe the reporting entity's structure, operations and supply chain

- Who we are (p. 6)
- Modern Slavery Risks in the University's Value Chain (p. 14)
- Identifying and Addressing our Modern Slavery Risks: Our Supply Chain (p. 18)
- Identifying and Addressing our Modern Slavery Risks: Our Investments (p. 28)
- Our Controlled Entities (p. 30)

Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities it owns or controls

- Our Theory of Change (p. 10)
- Measuring our Impact (p. 11)
- Our Approach to Addressing Modern Slavery: From the Director of the Modern Slavery Unit (p. 12)
- Modern Slavery Risk Analysis Approach (p. 13)
- Modern Slavery Risks in the University's Value Chain (p. 14)

Describe the actions taken by the reporting entity and the entities it owns or controls to assess and address these risks, including due diligence and remediation processes

- Our Theory of Change (p. 10)
- Identifying and Addressing our Modern Slavery Risks: Our Supply Chain (p. 18)
- Impact Case Study: Worker-driven monitoring of our electronics supply chain (p. 21)
- Impact Case Study: Just transition: Addressing forced labour risks in the solar supply chain (p. 22)
- Identifying and Addressing our Modern Slavery Risks: Our Research Activities (p. 24)
- Impact Case Study: Know Your Partner and Project: Identifying human rights risks in our research activities (p. 25)
- Identifying and Addressing our Modern Slavery Risks: Our Support to Students (p. 27)
- Identifying and Addressing our Modern Slavery Risks: Our Investments (p. 28)
- Impact Case Study: Engaging investment managers to address human rights violations in the Xinjiang Region, China (p. 29)
- Our Controlled Entities (p. 30)
- Grievance Mechanism and Remediation (p. 32)
- Collaboration and Engagement (p. 34)

Describe how the reporting entity assesses the effectiveness of these actions

- Identifying and Addressing our Modern Slavery Risks: Our Supply Chain (p. 18)
- Identifying and Addressing our Modern Slavery Risks: Our Research Activities (p. 24)
- Identifying and Addressing our Modern Slavery Risks: Support to Students (p. 27)
- Identifying and Addressing our Modern Slavery Risks: Our Investments (p. 28)
- Our Controlled Entities (p. 30)
- Grievance Mechanism and Remediation (p. 33)
- Collaboration and Engagement (p. 34)

Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)

- Who we are (p. 6)
- Our Controlled Entities (p. 30)

Provide any relevant information

- Acknowledgment of Country (p. 1)
- From the Chancellor and Vice-Chancellor (p. 4)
- Our Theory of Change (p. 10)
- Our Approach to Addressing Modern Slavery: From the Director of the Modern Slavery Unit (p. 12)
- Modern Slavery Risk Analysis Approach (p. 13)
- Modern slavery risks in the University's Value Chain (p. 14)
- Appendix 1: The University of Sydney OASIS footprint (p. 40)

