



MACQUARIE
University
SYDNEY · AUSTRALIA

Modern Slavery Statement

JANUARY 2021 – DECEMBER 2021

Contents

| | |
|--|----|
| ACKNOWLEDGEMENT OF COUNTRY | 3 |
| INTRODUCTION | 4 |
| MACQUARIE UNIVERSITY GROUP | 6 |
| OUR GOVERNANCE STRUCTURE | 8 |
| ASSESSING MODERN SLAVERY RISKS AND PRACTICES | 10 |
| ACTIONS TAKEN TO ADDRESS IDENTIFIED RISKS | 16 |
| ASSESSING THE EFFECTIVENESS OF OUR ACTIONS | 24 |
| CONSULTATION PROCESS | 26 |
| OTHER RELEVANT INFORMATION | 28 |
| NEXT STEPS | 30 |



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 the Dreamtime. We pay our respects to the Dharug people and the Wallumattagal Clan.

We also wish to acknowledge the Elders of the Dharug Nation – past, present and future – and pay our respects to them. We further wish to honour and pay our respects to the ancestors and spirits of this land, and humbly ask that all members of the Macquarie University community are granted with the capacity to wingara – to think, to learn and to walk safely upon this pemul (land). The University continues to develop respectful and reciprocal relationships with First Nations peoples in Australia and with Indigenous people throughout the world.

1. Introduction

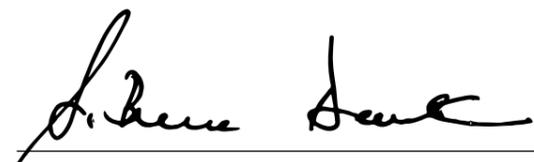
Macquarie University is committed to respecting and protecting the human rights of our staff and students, and community members. The University's Modern Slavery Statement is made under Part 2 of Section 16 of the *Modern Slavery Act 2018* (Cth) (the Act). The statement sets out the steps the University has taken during 2021 across our research, teaching and operational activities to identify and prevent modern slavery in our operations and supply chains.

The University and its controlled entities recognise that modern slavery is a real risk globally, including in countries such as Australia. The University supports the commitments introduced under the Act. The University opposes all forms of modern slavery and is committed to maintaining responsible and transparent operations and supply chains. Our approach and commitment to guard against modern slavery in this area is consistent with the University's **purpose, vision and values**.

Our role as an institution of higher education means we must go beyond adopting a compliance approach and take leadership in upholding and promoting human rights. The University commits to conduct human rights due diligence in line with the Act as well as international standards to identify, prevent, mitigate and remediate modern slavery linked to its operations. We are committed to playing our part in contributing to the global efforts to address modern slavery.

In 2021 the University has taken steps to set up processes that allow us to identify and, most importantly, prevent instances of modern slavery. This statement describes the 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 now have a much stronger visibility of the risk areas, which positions us well to take further meaningful and targeted actions.

The last two years, the global COVID-19 pandemic has heightened the vulnerabilities of modern slavery and has brought additional challenges to both the broader society and tertiary institutions, including Macquarie University. We continue to recruit students through international agents and to have relationships with overseas entities. We have reviewed all our international relationships 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.



Professor S Bruce Downton MD
VICE-CHANCELLOR AND PRESIDENT
MACQUARIE UNIVERSITY

30 June 2022

Date

We are closely monitoring the effect of the temporary relaxation of working hours for student visa holders to ensure that this important arrangement does not result in the exploitation of our students.

The University's risk of modern slavery continues to be most present in the University's procurement activities, specifically in the areas of subcontracting and complex supply chains. In 2021 the University worked closely with the Australian Universities Procurement Network (AUPN) to create a modern slavery risk dashboard, which provides universities with an indication of the scale of modern slavery risks in their supply chains and the broader sector.

With the new tools at our disposal and a committed task force, we are continually reviewing the areas where the University may potentially cause, contribute to, or be directly linked to modern slavery through our operations and supply chains. We will continue to work diligently with our partners and suppliers, and to refine 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 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.



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 a university campus, which is part of MQ Health. 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.



1500+
academic staff



1800+
professional staff



9072
international students from
more than 118 countries



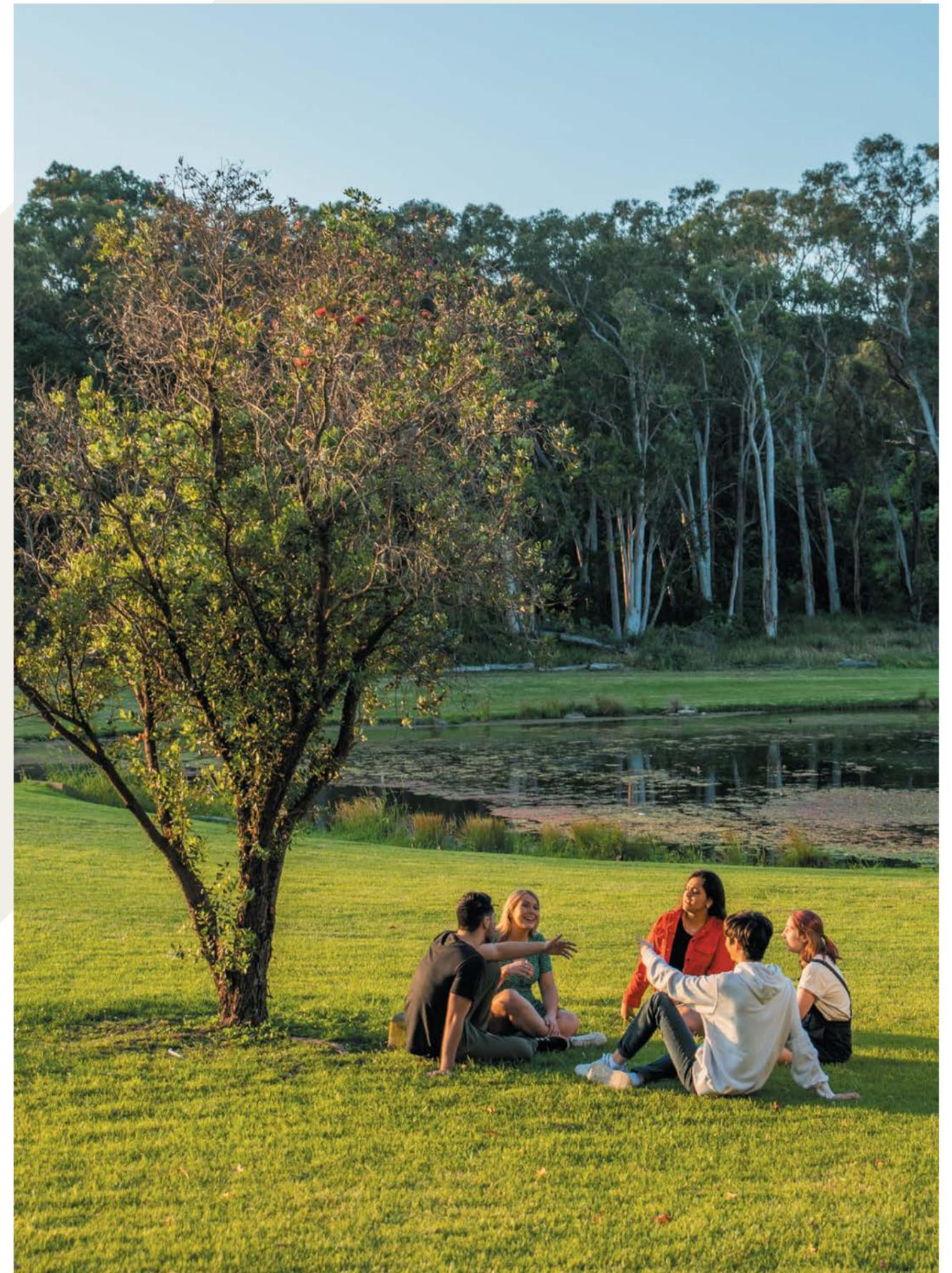
35,663
domestic students



More than 215,000
alumni in our international community
from more than 140 countries



\$1182 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 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, slavery, forced labour, child labour and other slavery-like practices. According to the *Global Slavery Index 2018*, there are about 40.3 million people enslaved globally, of which about 25 million people are in the Asia-Pacific region and 15,000 are in Australia.

Due to the existing legislative framework concerning education and employment in Australia, the risk that the University itself is engaged in modern slavery activities is relatively low. Most staff in the Macquarie University group are employed on a permanent or fixed-term contract. This significantly lowers our risk in the area of employment. Our operational risk assessment focuses on student recruitment, third-party labour suppliers and international research partnerships.

The risk is more pronounced in the area of 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). The University is wholly accountable for how we spend our funds. Suppliers play an important role in the success of our operations and in our ability to deliver on our vision of serving and engaging our students and staff through transformative learning and life experiences. We serve and engage the world through discovery, dissemination of knowledge and ideas, innovation and deep partnerships.

Who we choose to partner with and how is critical to our reputation. As custodians of the University, we believe that learning, enquiry and discovery improve lives. We conduct ourselves ethically, equitably and for mutual benefit, and we make our community a source of strength and creativity. The University has developed the **Supplier Code of Conduct** to ensure that our suppliers and partners are aligned with our vision and values, and comply with our sustainability and transparency principles. To ensure that our actions are meaningful and measurable, we work within three spheres: concern, influence and control. Understanding and working within these spheres informs our actions. The sphere of concern provides us with the global context in which we operate. Our spheres of influence and action are where we strive to undertake meaningful action. Following the initial assessment of our risks during 2021 in addition to conducting awareness training across both professional and academic staff, the University undertook a number of steps that continue to help us in our journey of understanding and addressing potential modern slavery risks across our supply chains.

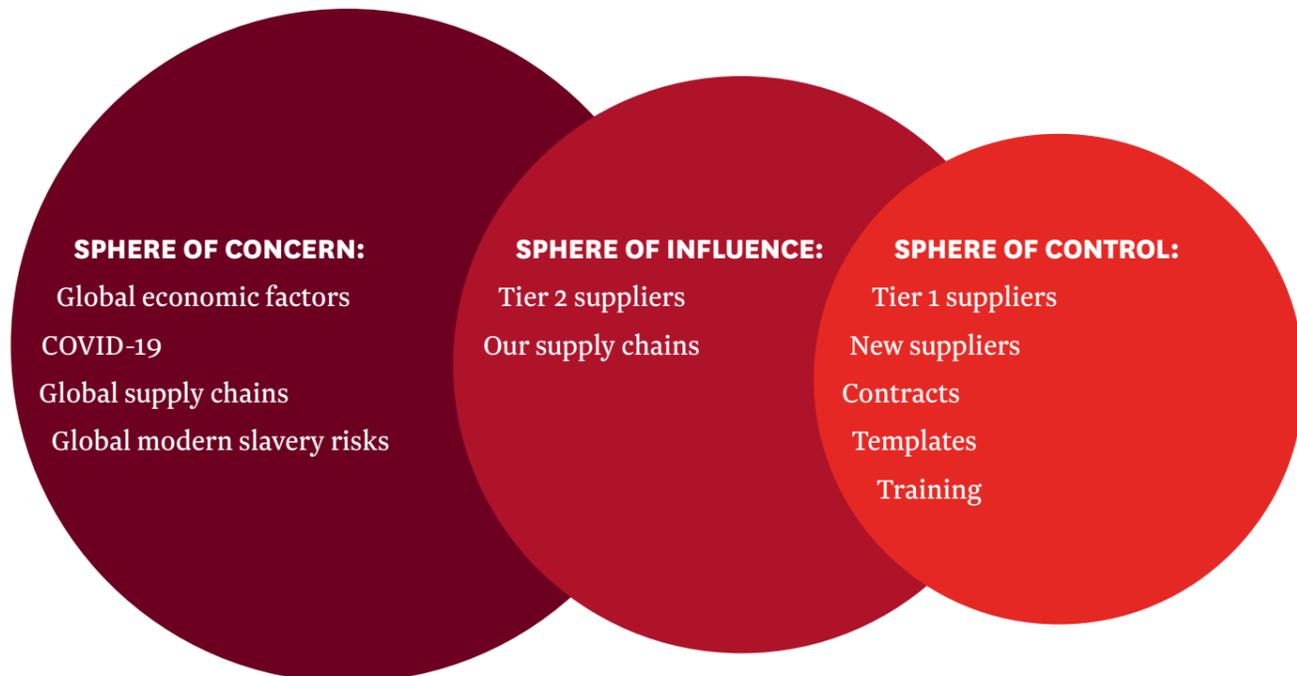
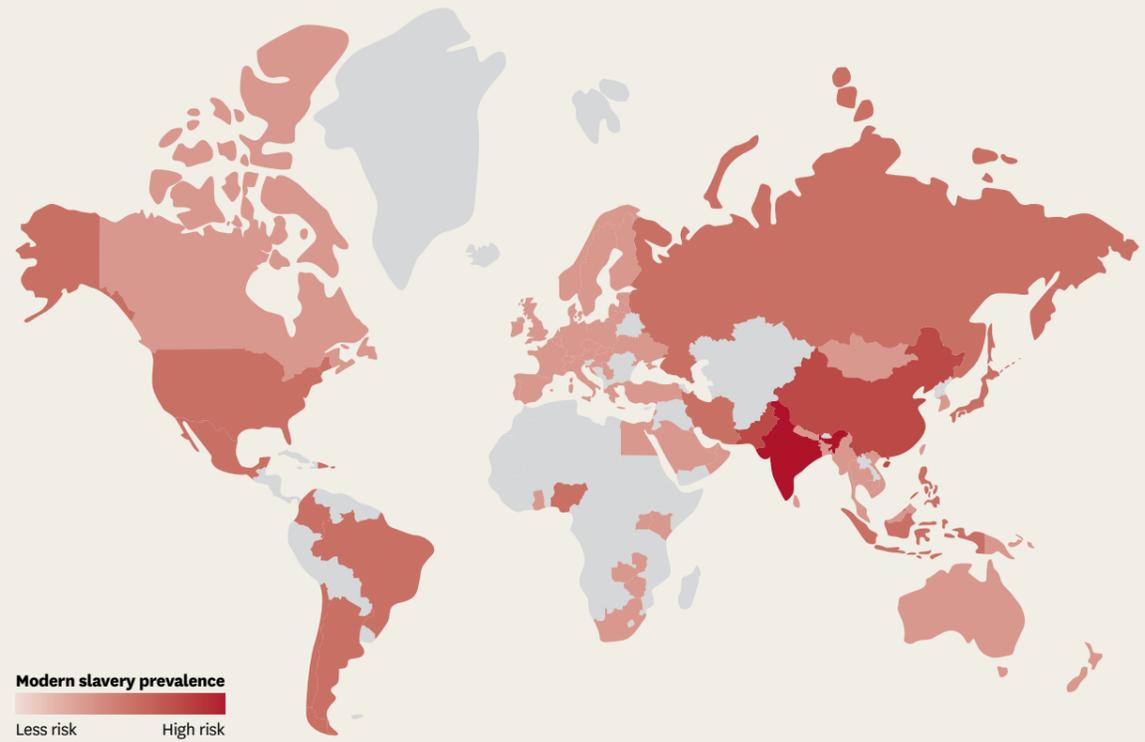


Figure 2: Breakdown of the University and its controlled entities' procurement spend by country of origin



Our procurement spend by country (top 10)

| | | | | |
|--|---|--|--|--|
|  Australia 92% SPEND 3473 SUPPLIERS |  United States 2.1% SPEND 330 SUPPLIERS |  Ireland 1% SPEND 14 SUPPLIERS |  China 0.9% SPEND 125 SUPPLIERS |  United Kingdom 0.8% SPEND 201 SUPPLIERS |
|  Netherlands 0.8% SPEND 19 SUPPLIERS |  Germany 0.7% SPEND 76 SUPPLIERS |  India 0.3% SPEND 57 SUPPLIERS |  Singapore 0.2% SPEND 34 SUPPLIERS |  Canada 0.1% SPEND 57 SUPPLIERS |

NOTES:
 • Countries in shades of red indicate procurement spending with suppliers in that country
 • 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 Global Slavery Index [globalslaveryindex.org](https://www.globallslaveryindex.org)



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

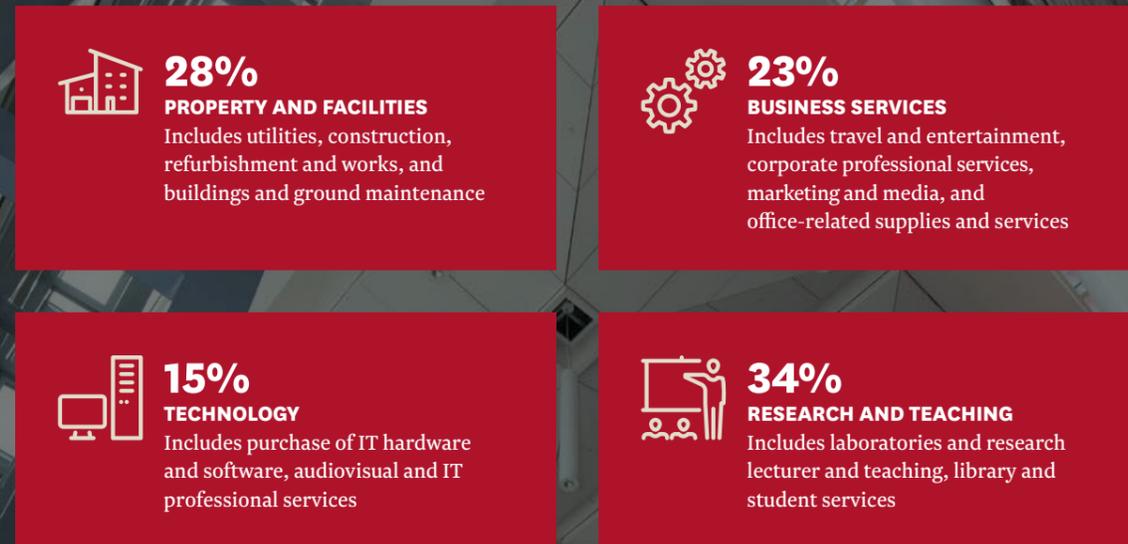


Figure 4: The University and its controlled entities' supplier portfolio, nationally and internationally



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 has representation from each of the faculties, portfolios and controlled entities. The group provides ongoing input into developing a modern slavery framework. 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.

OUR ONGOING ACTIONS

- Mapping our supply chains
- Identifying areas of vulnerability in subcontracting and supply chains
- Achieving greater visibility in the tiers of subcontracting and supply chains by including requests for information in standard procurement documentation and by conducting appropriate due diligence before contract execution
- Seeking opportunities to extend our impact by collaborating and partnering internally and externally
- Growing awareness and supporting ambassadorship and leadership across the University community through training and communication programs
- Embedding the University's Modern Slavery Program using existing channels, processes and frameworks (eg ProcureRight framework) wherever possible, supported by specific tools and systems, as required
- Reviewing and updating contractual templates

ACTIONS UNDER CONSIDERATION OR DEVELOPMENT

- Further develop resources and guiding principles for staff and students
- Deliver targeted training for staff and students
- Develop ContractRight, a contract and supplier governance framework
- 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
- Initiate focus group discussions with international students to better understand their experiences of modern slavery
- Develop a human rights policy in line with international standards, such as the United Nations Guiding Principles on Business and Human Rights

INTERNATIONAL STUDENT RECRUITMENT

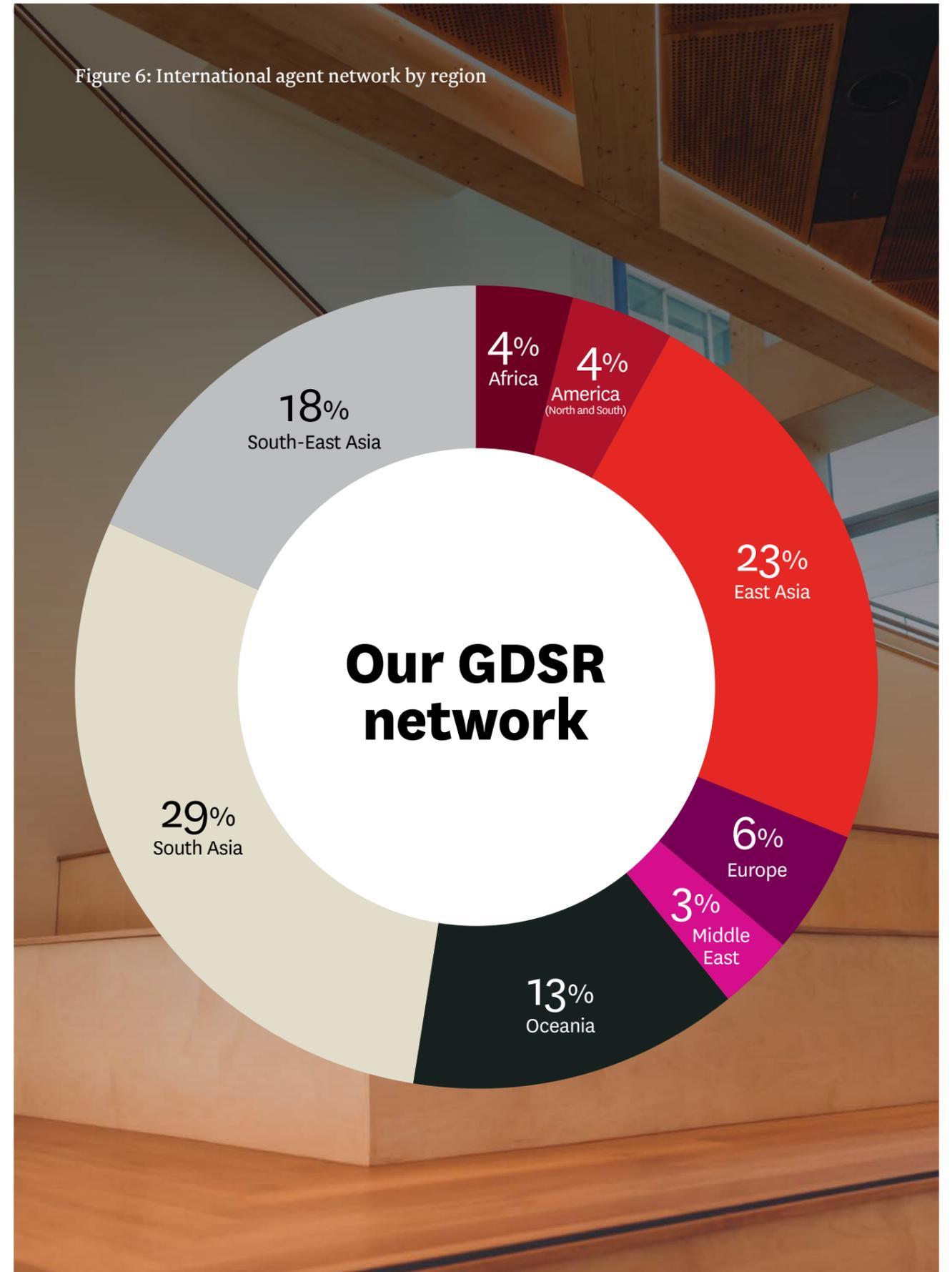
Global and Domestic Student Recruitment (GDSR) has a robust and effective operation to recruit international students and to manage mobility opportunities for students. Although some regions have been identified as potential risks in terms of modern slavery activities, the University has assessed the overall risk as very low due to our appointment procedures, active management and review processes, and local expertise that mitigate potential issues. During 2021, a number of policies that demonstrate the University's approach in this area were approved – notably the **International Education Agent Policy**, the **International Education Agent Management Procedure** and the **Admission of Students under 18 Procedure**.

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.

Our completed actions

- Comprehensive review of procurement practice, including embedding modern slavery considerations into every step of the procurement process
- Development and roll-out of Modern Slavery awareness training
- Supply chain mapping
- Development of Modern Slavery Policy and Supplier Code of Conduct

Figure 6: International agent network by region





AGENT RECRUITMENT AND REVIEW

- The **International Education Agent Policy** and the **International Education Agent Management Procedure** were introduced in 2021 to ensure the University complies with all relevant legislation when appointing, managing and reviewing suitable international education agents to represent the University locally and internationally.
- All appointed education recruitment agents have their backgrounds checked with industry peers and are required to 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 by GDSR. 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 individually by GDSR's experienced staff members in the Global Engagement and Reputation team. A robust annual 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 approval.
- Termination requirements for any agency are clearly outlined in the agreement to regulate any potential wrongdoings.

CONSULTANTS AND CONTRACTORS

- GDSR 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 GDSR's senior continuing staff members.
- Contracts with local consultants and contractors are generally governed by New South Wales law.

INTERNATIONAL MOBILITY AND PACE (PROFESSIONAL AND COMMUNITY ENGAGEMENT)

The University recognises that students, particularly cohorts such as international students and those with a disability, may be more vulnerable to risk and exploitation. This can be related to the practices that constitute modern slavery or more broadly about equitable participation in the labour market. Students have opportunities to be informed about and seek support for issues relating to workforce participation and their 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 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.

The University's Student Care and Reporting framework 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 60 per cent of our staff are employed on a permanent 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.

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.

PROPERTY

Macquarie University undertakes numerous property development projects ranging from construction builds to office fit-outs. Due to the high rates of subcontracting within the industry, the University may be exposed to modern slavery risks due to the layers of subcontracting. 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 (contractors, consultants and suppliers) 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.

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.

In 2021, as part of the AUPN, Macquarie partnered with the **Cleaning Accountability Framework** (CAF) on a pilot project to test a certification framework at university campuses. The project is a result of a Fair Work Ombudsman grant to ultimately lift labour standards across property services and to improve the conditions of cleaners and security guards who keep our workplaces, lecture theatres and facilities clean and safe.

CAF works with cleaners, tenants, contractors, property owners, facility managers and investors across the cleaning supply chain to ensure ethical labour practices. Ultimately this project is to result in the development of a compliance framework to cover contract cleaning and security at university campuses.

Partnering with CAF demonstrates our commitment to responsible business practices and fair wages and working conditions for cleaners. Our leadership and actions not only impact the lives of cleaners within the University's supply chain but also contribute to ending exploitation in the industry.

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 all 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 preventing and reporting corruption. The University also conducts due diligence on each entity being proposed for a formal research collaboration.

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 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, the Philanthropy Office 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 associated with new and existing donors and or supporters and in our own operations. We understand the importance of being vigilant so that we can quickly identify and address any issues related to our activities associated with slavery and human trafficking. The Philanthropy office 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 and social 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, corporate governance and ethical 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. As the next step in the area of investments, the University is intending to review our investment portfolio, inclusive of super investments, to further consider the impact of investments.





STRATEGIC PROCUREMENT AND SUPPLY CHAINS

The University recognises the extensive and varied modern slavery risks associated with procurement. As a public institution we are bound by the Commonwealth Procurement Rules (CPRs), including upholding the principles of integrity, fairness, accountability, value for money, sustainability, corporate and social responsibility, and open and effective competition. Our commitment to these principles and our desire to affect a positive change continue to be fundamental to how we shape our procurement function and principles.

Since our inaugural statement in 2020, 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. The due diligence that is embedded into the ProcureRight framework and operations is based on the level of potential risk associated with high-risk modern slavery geographies or sectors, or when engaging the services of what is classified as a vulnerable population. In association with AUPN we map our supply chains across the four risk criteria: geography, product, sector/industry and specific entity. The potential risks relating to specific services or goods are identified by using the tool developed by FRDM (pronounced FREE-DOM) in conjunction with AUPN, reviewing published reports and datasets and, where appropriate, undertaking external corporate viability assessment. The risks are assessed through detailed supply chain analytics to ensure that we see beyond our direct suppliers into the entire supply chain to assess any potential risk in our sphere of control, influence or concern.

The ProcureRight framework – Smarter procurement with (YOU)^{us} – is based on three fundamental principles: trust, empowerment accountability. ProcureRight includes step-by-step instructions and provides interactive guidance through the end-to-end procurement processes. The framework ensures that we comply with applicable laws and that all our activities are underpinned by the principles of business ethics, human rights and environmental protection.

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

The University is in the process of establishing an operational procurement capability, ProcureRight Desk, to support triage and execution of the University's procurement activities. The ProcureRight Desk will assist in identifying appropriate channels to establishing grievances 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 will ensure that modern slavery risks are identified and appropriately mitigated at an enterprise level.

Procurement planning completed

- Included a chapter in the ProcureRight framework on how to interpret the Act and what it means for the procurement process
- Included a reference to the Act in the Pre-Procurement Risk Assessment Checklist
- Allocated the management of high-risk and high-value tenders to Strategic Procurement
- Developed a questionnaire to be included in tender templates to address modern slavery risks
- Revised relevant contract templates to include modern slavery-specific provisions

Evaluating

- Pre-established evaluation criteria 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 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

- Sophisticated contract and vendor governance framework: ContractRight – under development.
- Ongoing supplier risk, performance and KPI monitoring

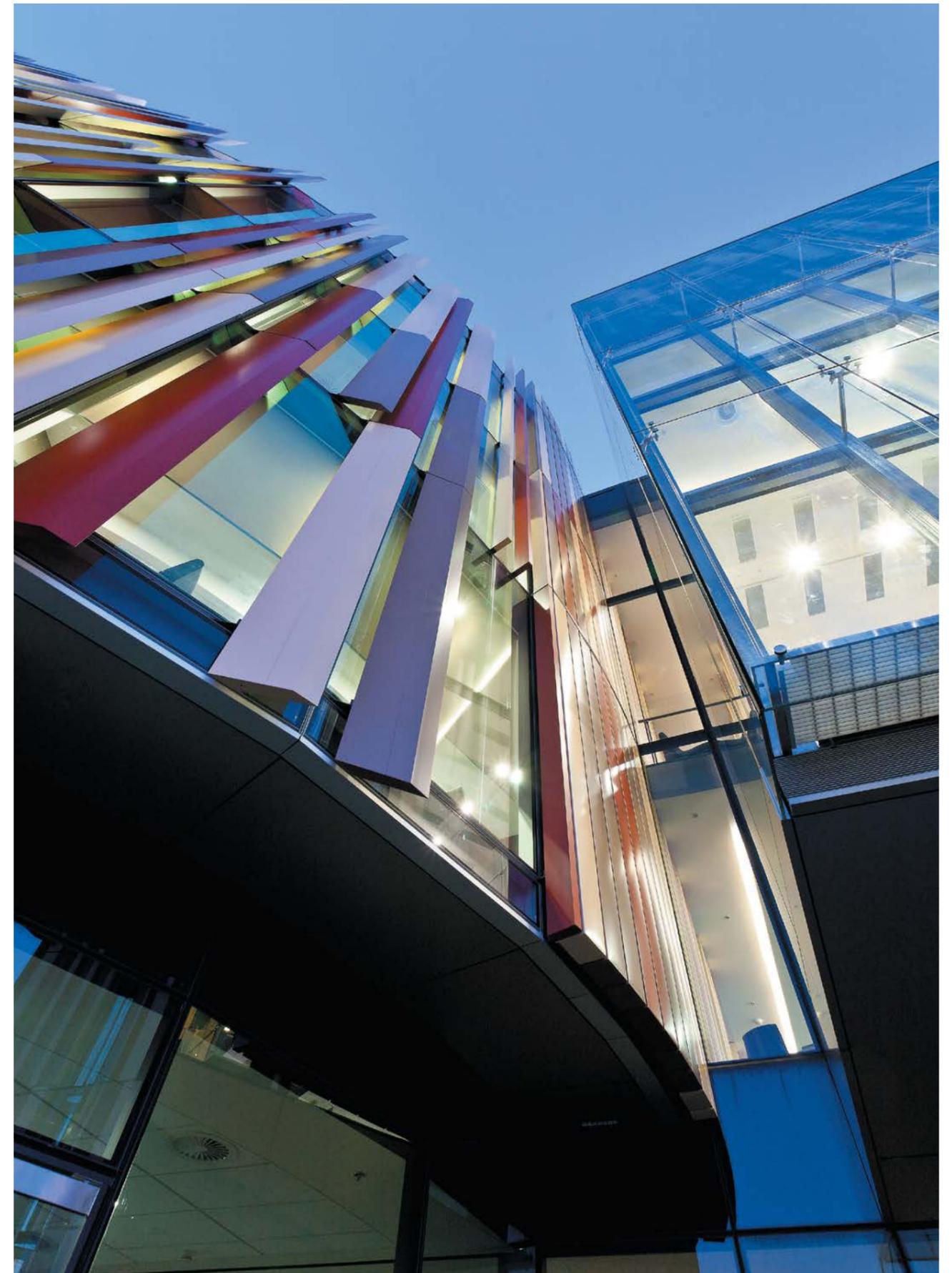
6. Assessing the effectiveness of our actions

As we gain better insights into our data and develop new investigative and monitoring tools, we will continue to evolve our programs and practices that support detection and elimination of modern slavery in our operations and supply chains. The Modern Slavery Working Group is working on devising appropriate mechanisms and key performance indicators to measure the effectiveness and impact of the many initiatives described in this statement.

| Activity | Performance measures and indicators | In place | Under development |
|--|---|----------|-------------------|
| GOVERNANCE | | | |
| Awareness Training | % of staff trained | ✓ | |
| Targeted Training | Ongoing Design, Development and Targeted Modules | | ✓ |
| Develop the Modern Slavery Policy, and review other policy-related documents | Modern Slavery Policy developed, and other relevant policies reviewed | ✓ | |
| Develop contractual provisions | Incorporating specific modern slavery clauses into all contractual templates | ✓ | |
| 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 | Rollout of modern slavery supplier questionnaire | ✓ | |
| Participate in external benchmarking | Active involvement in the AUPN Modern Slavery Program | ✓ | |
| Develop the category management and supplier governance framework | Category analysis undertaken Reporting dashboards rolled out Engagement with the industry | | ✓ |
| Develop the Supplier Code of Conduct | The Supplier Code of Conduct developed, and a communication strategy prepared to promote the importance of the code to suppliers | ✓ | |
| RISK ASSESSMENT | | | |
| Report regularly on supplier segmentation | Regular reporting on supplier segmentations by geography and sector is established | ✓ | |
| Undertake an annual risk assessment | % of risk assessments undertaken by country and sector | | ✓ |
| MONITORING | | | |
| Supplier assessment questionnaire | 34% of questionnaires returned, 64% awaiting response, 2% declined to complete and any potential concerns investigated by category managers | ✓ | |
| Developed the AUPN Modern Slavery dashboard | Active participation in developing the AUPN Modern Slavery dashboard | ✓ | |
| GRIEVANCE MANAGEMENT | | | |
| Review communication mechanisms to ensure relevance and ease of use | Safe channels for reporting non-compliances are developed for all constituents | | ✓ |
| Redress mechanisms | Established redress mechanisms including support directories, a hotline and an inbox for confidential reporting, and a committee | | ✓ |

UNDER CONSIDERATION FOR DEVELOPMENT

- Active consideration of vetted supplier panels with a number already in place
- Review of due diligence on supply chain risks for existing suppliers in the high-risk categories
- Consider options (potentially automated) that will allow us to have a subcontractor/supplier chain check as part of our tendering due diligence



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 THE PREVENTION AND MITIGATION OF MODERN SLAVERY

MODERN SLAVERY POLICY

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

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

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 in 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.

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.

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 2018.

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

SUSTAINABILITY

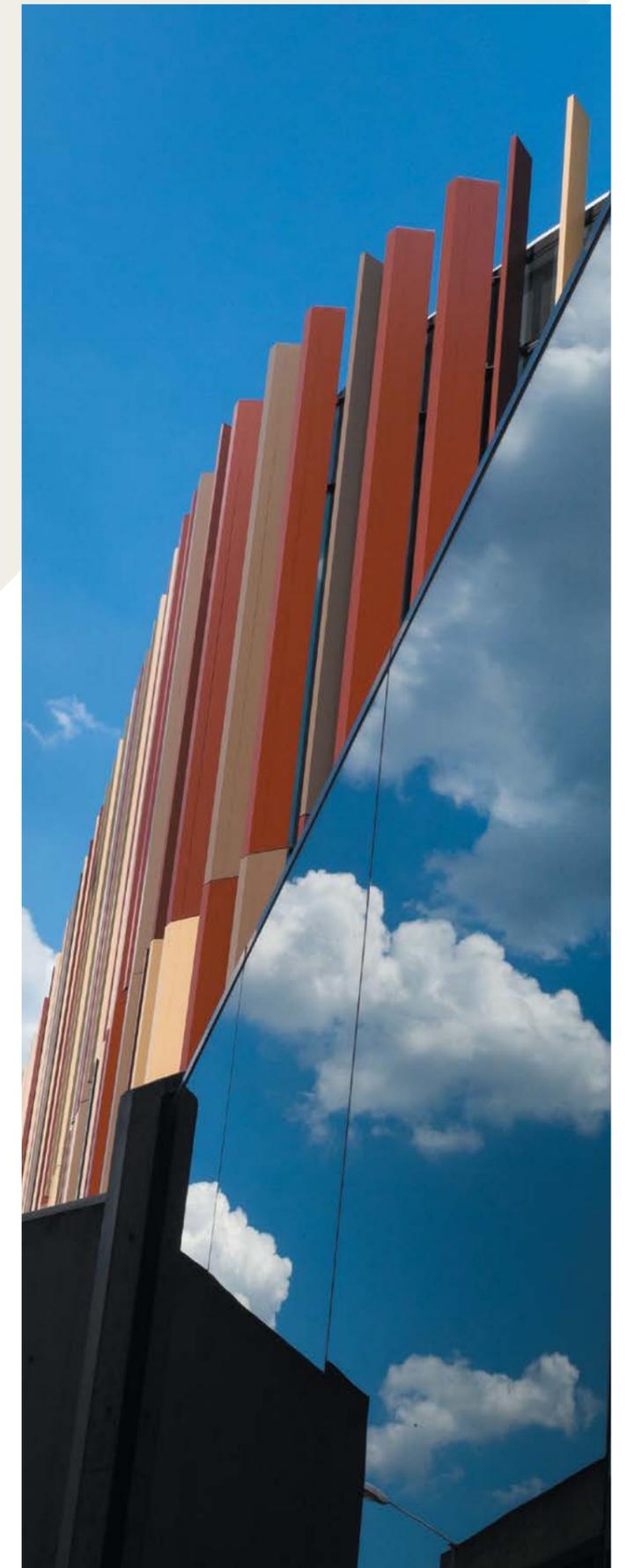
The University aligns its operational activities with the United Nations Sustainable Development Goals (SDGs). Macquarie University participates in the *Times Higher Education* Impact Rankings where we provide evidence of the University's contribution to the SDGs through learning, teaching, research and operations.

STUDENT WELLBEING AND CODE OF CONDUCT

All University students have access to wellbeing assistance via wellbeing@mq.edu.au and can easily 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 international 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

- Continue to build on the changes we have introduced to identify, prevent, mitigate and remediate modern slavery risks.
- Collaborate with our suppliers and research partners to improve everyone's understanding of the risks of modern slavery and human trafficking.
- Invite modern slavery subject matter experts to present to the University's target groups.
- Improve transparency within the University supply chains by working with our contracted suppliers to understand their business practices.
- Increase awareness of modern slavery risks across the University population.
- Demonstrate sector leadership through sharing our responsible procurement approach and promoting a zero-tolerance approach to modern slavery in supply chains and in general.
- Expand our consultation process to both students and external stakeholders.
- Develop the University's approach to become a proactive leader in promoting respect for human rights in line with international standards.

In 2022, the University will be exploring the idea of expanding internal consultation with students through student-led organisations and targeted groups such as working international students.

We will also be exploring opportunities to work collaboratively with external stakeholders – such as suppliers, non-government organisations and the Australian Human Rights Commission – to strengthen our awareness and responsiveness to modern slavery through wider community discussions.





MACQUARIE
University
SYDNEY · AUSTRALIA

Macquarie University
North Ryde NSW 2109
T: (02) 9850 7111
mq.edu.au

PHOTOS: Chris Stacey, Jesse Taylor, Joanne Stephan,
Matt Chang, Morris McLennan, Paul Wright

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