



Bond University Modern Slavery Act Statement

2023

Bond University
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Australia

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Our commitment to Australian Aboriginal and Torres Strait Islander people

Bond University acknowledges the people of the Yugambeh language, upon whose ancestral lands our University now stands, and celebrates the contribution that Aboriginal and Torres Strait Islander people make to our institution.

Bond University has a long-standing and deeply embedded commitment to building strong relationships with the Aboriginal and Torres Strait Islander communities, with the primary goal of improving educational opportunities and providing culturally safe and supportive learning environments for our Indigenous students.



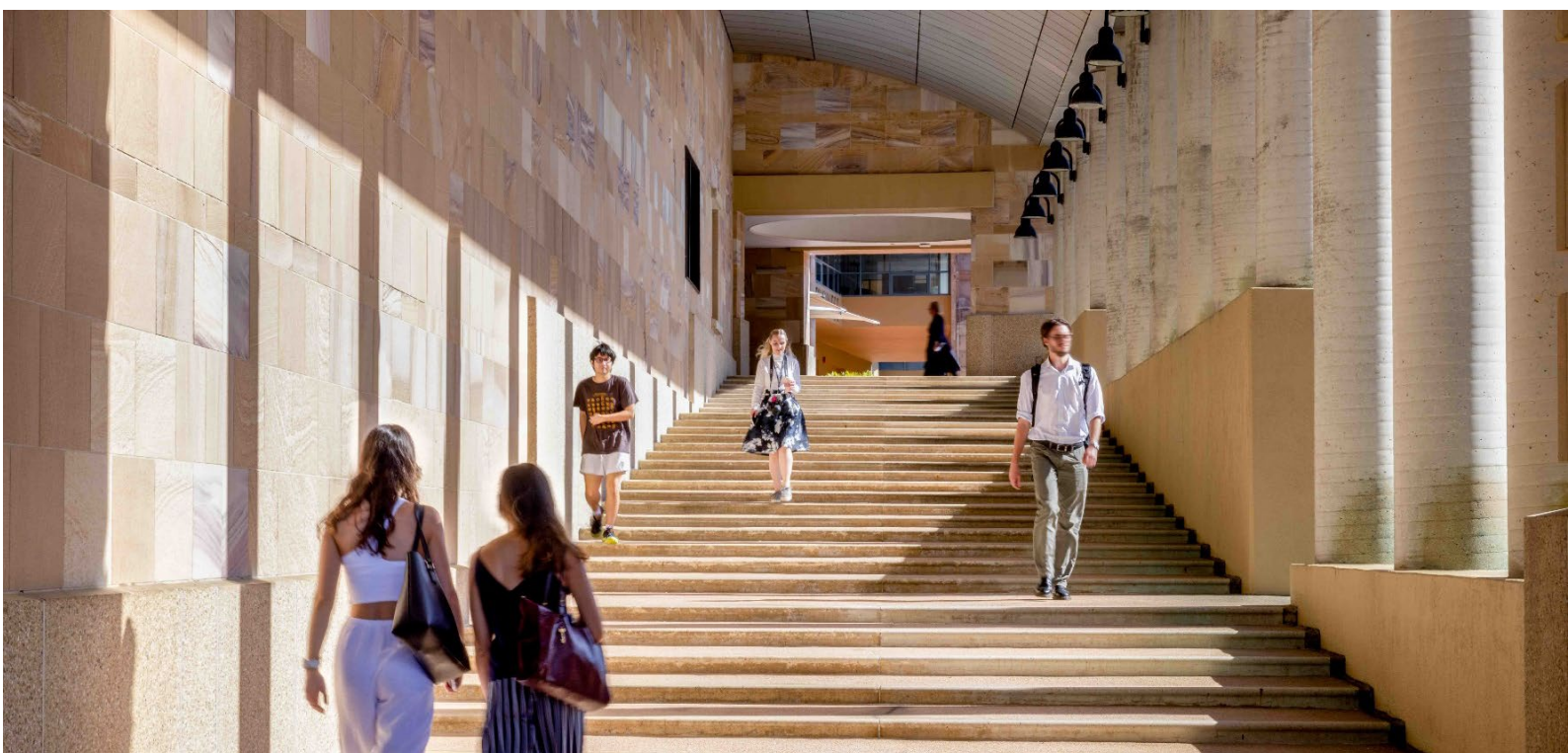
Introduction

Bond University is unwavering in its commitment to combatting modern slavery. We are dedicated to upholding the rights and wellbeing of all individuals within our sphere of influence, from our employees, collaborating with our University peers via the AUPN (Australian University Procurement Network), educating our students and those throughout our supply chains.

Modern Slavery remains a pervasive global issue, encompassing various forms of exploitation, such as forced labour/marriage, servitude, debt bondage, and child labour. This reprehensible practice thrives on coercion, depriving individuals of their basic rights and dignity. Modern slavery is hidden in plain sight and intertwined within life in every corner of the world as we buy the products or use the services without realising the hidden human cost.

The Global Slavery Index 2023 produced by [Walk Free.org](https://www.walkfree.org/) estimates that on any given day in 2021 throughout the world there were 50 million people living in modern slavery. In Australia, despite ranking second globally for the strength of our government response to modern slavery, including legislative efforts like the Modern Slavery Act 2018 (Cth), it was estimated that 41,000 or 1.6 people per 1,000 are living in modern slavery.

Bond University is pleased to present this Modern Slavery Statement for the period January to December 2023. Aligned with our financial reporting year and in accordance with the Modern Slavery Act 2018 (Cth), this statement underscores our steadfast determination to address modern slavery and promote ethical practices within our operations and beyond.



Part A – Reporting entity (Criterion 1)

Bond University was founded in 1989 as Australia’s first private, not-for-profit university and, in 2023, was ranked within the top 50 in the world by the Times Higher Education (THE) Young University Rankings list. In 2023, the University, on average, enrolled 4,097 students each semester, employed 1,306 staff each month, and generated an annual turnover of circa \$230 million.

The Modern Slavery Act’s reporting requirement applies to large businesses and other entities in the Australian market with annual consolidated revenues of at least AUD \$100 million.

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Bond University,
QLD 4229



Part B – Structure, operations, and supply chains (Criterion 2)

Structure

Bond University Limited is incorporated as a company limited by guarantee. Pursuant to the constitution of the company, the Membership of Bond University Limited comprises 30 members, drawn from alumni, staff, students and the external community.

The University has three campuses located in Australia. The University's controlled entities are Campus Operations Pty Ltd (100% ownership) and Lashkar Pty Ltd (100% ownership). Campus Operations Pty Ltd operates student accommodation including food and beverage facilities. Lashkar Pty Ltd holds and manages properties for the University, including the Bond Institute of Health and Sport buildings located in Robina, Queensland. Risk assessment, reporting and data presented within this statement is for the consolidated group.

For the purposes of the Modern Slavery Act, the Bond University Council is the principle governing body operating as the Board of Bond University Limited. Comprising 10 councillors, the Bond University Council is accountable to university stakeholders and the wider community to ensure the University is managed prudently, efficiently, and in compliance with all relevant regulations. Council leads the University's community of students, staff and others to meet and advance the University's goals and objectives. Apart from the Vice Chancellor, all Councillors are non-executive and are elected based on the skills and experience they bring to the Council. Bond's Constitution provides for the rotation of Councillors, whereby no Councillor may serve for more than the maximum term allowed under the Constitution being eight years.

The University is organised into five academic groups being:

- Bond Business School
- Faculty of Health Science and Medicine
- Faculty of Society and Design
- Faculty of Law
- Transformation CoLab

A comprehensive array of professional administration services supports the University's students, staff and teaching, learning and research activities.

Operations

As Australia's first private not-for-profit university, Bond University seeks to be recognised internationally as a leading independent university, imbued with a spirit to innovate, a commitment to influence and a dedication to inspire tomorrow's professionals who share a personalised and transformational student experience. As a not-for-profit entity, the institution reinvests its surplus from operations back into the University.

In 2023 the University expanded its Medicine program, commenced new health and legal clinics that are open to the community and constructed a new state of the art Allied Health facility to support and innovative teaching and learning in the health environments.

In 2023 operations are summarised as below

- Revenue - \$229 million
 - \$205 million Student Tuition and Research income
 - \$8 million Accommodation/Food and Beverage
 - \$8 million Investment Income
 - \$4 million Donations/prizes
 - \$4 million Other
- Operational Expenditure \$208.0 million
 - \$146 million Employee Expenditure
 - \$62 million Other Operational Expenditure
- Property, Plant and Equipment (Excluding Land) - \$50 million

Teaching delivery occurs across three campus locations consisting of the main campus on the Gold Coast, an institute specialising in Allied Health within proximity of Robina Hospital, and a Brisbane site focused on postgraduate and executive education. Almost 100% of tuition revenue generated requires in face to face in-person delivery at these campus locations with online material being supplemental only. Bond University manages and owns all food and beverage outlets and accommodation facilities on campus.

Supply Chains

Supporting the operations of the University requires purchasing of a diverse range of goods and services from a wide range of suppliers across many categories including staffing. The University is committed to purchasing in a responsible manner, proactively supporting local and indigenous first nations suppliers where possible to leverage our supply chain for positive social change within our sphere of influence.

Procurement Supply chains (excluding salaried staff)

The University has made a considerable investment in collaborating with the Australian Universities Procurement Network (AUPN) to ensure its spend categories align with their uniform reporting taxonomy. Through sharing data, the AUPN facilitates aggregated spend analysis, bench marking, reporting and transparency across the Higher Education sector, including through the implementation of a supplier risk portal.

At the highest level there are four categories. These four categories have been built up from a granular level consisting of a mapping exercise of 300+ base level categories.

1. ***Property and Facilities*** - Maintenance and construction of buildings and facilities - All university facilities and buildings are located on the Gold Coast and Brisbane.
2. ***Research and Teaching*** - Procurement to support delivery of innovative and agile teaching and learning including student placements, library/laboratory services and direct teaching expenses.
3. ***Business Services*** - Professional services such audit and insurance, marketing and media, travel, office related supplies, storage and logistics
4. ***Technology*** - Environments with the increasing use of technology and online platforms including expenditure on IT hardware, audio visual, software and telecommunications.

The Australian university sector spend in 2023 was approximately \$12.6 billion across 90,000 unique suppliers. Bond University procurement spend (operational expenditure and asset purchases excluding land purchases and financing costs) was \$106.8 million across 1,666 unique suppliers.



Part C – Risks of modern slavery practices in operations and supply chains of the University and subsidiaries (Criterion 3)

Risks in Operations

Bond’s primary source of revenue is generated from tuition revenue and the main input to deliver this operation is salaries. Comprising 70% of operational expenditure and engaging approximately 1,300 staff each month, predominantly domiciled in Australia, salaries are Bond’s single largest expenditure item. The Bond University Act 1987 makes provision for two staff associations. Professional staff are engaged under a Collective Agreement in the Federal jurisdiction and a negotiated agreement (MOU) between the University and Staff Association. Academic staff are covered by a Federal Award and a negotiated MOU.

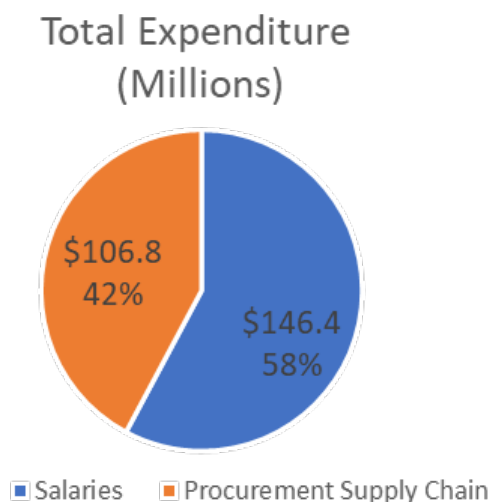
Location of employees in 2023

NSW	QLD	SA	WA	OVERSEAS	TOTAL
2	1,300	1	1	2	1,306

With a large portion of staff highly educated, based primarily in Australia, administered by a professional central HR team and engaged under applicable Awards, Collective Agreements and MOUs the University assesses the risk to be low.

Risks in Subsidiaries

The University’s subsidiary entities, Campus Operations Pty Ltd and Lashkar Pty Ltd, are 100% owned and managed by Bond University Ltd. This statement is for the consolidated group.



Risks in our Supply Chain



~\$106.8 million



1,600+ Suppliers



40 Countries

There are greater risks within the University's supply chain compared to operations given the diverse range of products and services procured. Bond University's Modern Slavery Framework identifies three primary risk factors (Country, Category and Spend) that have and will continue to apply to our risk methodology and our overall supplier risk rating. This framework assists in developing a more targeted and impactful strategy to combat human rights violations.

Country Risk - Level of risk or vulnerability that a country exhibits concerning the prevalence and enforcement of laws related to modern slavery. The Global Slavery Index (GSI) ([Walkfree Org](https://www.walkfree.org/)) is a tool that assesses and ranks countries based on their efforts to address modern slavery and the prevalence of modern slavery within their borders. Total Vulnerability rating is weighted at: Low 0-25, Medium 25-50, High 50-75, Very High 75-100.

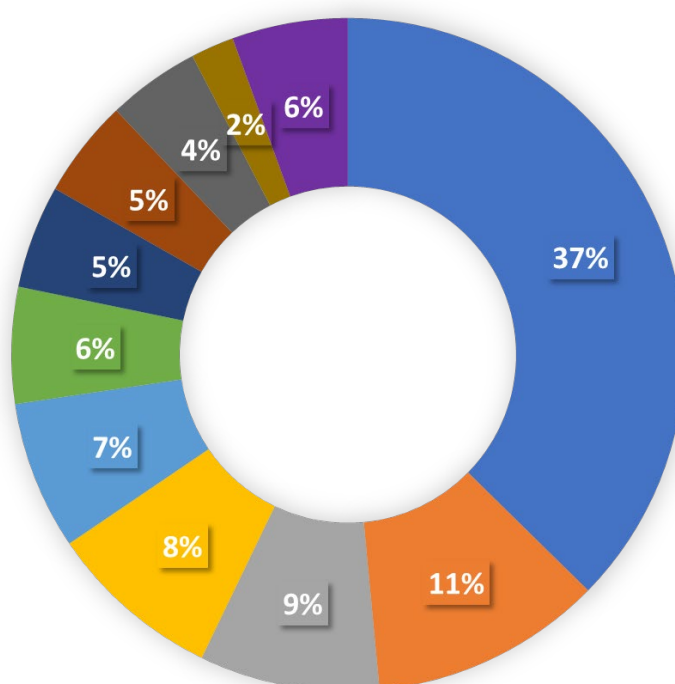
Over 97% of Bond's expenditure is directed to low-risk countries. The table below summarises our supply chain expenditure based on the head office location of the supplier.

Country	2023 Global Slavery Index rating*	Expenditure	%
Australia	Low	99,208,938	93%
United States of America	Low	2,004,896	2%
Netherlands Antilles	Medium	1,085,017	1%
United Kingdom	Low	918,322	1%
Ireland	Low	802,962	1%
Canada	Low	763,857	1%
India	High	307,287	0%
China	Medium	294,978	0%
Germany	Low	287,433	0%
Denmark	Low	189,898	0%
Other (30 Countries)		967,010	1%
Total		106,830,599	100%

Category Risk - Level of risk associated with specific categories or sectors where modern slavery is prevalent or has a higher likelihood of occurrence. Each of the 300+ base level expenditure categories have been assigned a low, medium, or high rating. Risk ratings have been developed in conjunction with the AUPN using sources including the Global Slavery Index, The Responsible and Ethical Private Sector Coalition against Trafficking ([RESPECT](#)) and the NSW Anti-Slavery Commissioner [GRS Inherent Risk Identification Tool](#) and industry consulting specialist ArcBlue.

The Universities spend breakdown per category in 2023 was as follows.

Category	Low	Medium	High	Total	% of total procurement spend
Construction, Refurbishment & Works	65,873		39,834,576	39,900,450	37%
Marketing & Media	35,474	7,080,123	4,795,162	11,910,759	11%
Corporate Professional Services	5,868,740	222,655	3,159,274	9,250,668	9%
Buildings & Grounds	255,407	2,744,645	5,932,745	8,932,798	8%
IT Software			7,618,689	7,618,689	7%
Student Services	498,556	5,475,085		5,973,641	6%
Plant & Equipment		5,299,501		5,299,501	5%
IT Hardware	262,851		4,778,339	5,041,190	5%
Library Services	27,723	4,709,948		4,737,671	4%
Utilities & Renewables		2,222,047		2,222,047	2%
Other	1,886,545	2,249,541	1,807,100	5,943,186	6%



Spend Risk - Level of risk weighted per supplier at Low for \$0-10,000, Medium \$10,000-50,000, High \$50,000-100,000, Very High >\$100,000.

Overall Procurement Supply Chain Risk Rating - The risk ratings for country, category, and spend are consolidated into overall risk rating with category having a significant higher weighting. Overall Risk Rating = (Category*5) x Country Risk x Spend Risk.

In 2023, the overall risk profile showed 64% of the Universities procurement spend was rated as high risk. This risk profile is skewed higher by virtue of the unusually large proportion of expenditure in the heavily weighted category risk associated with construction, refurbishment and works category, reflecting our record capital works investment during the year, which was the largest in the University's history. However, as discussed below, the overwhelming majority of that capital works spend was directed to Australian entities that are, like Bond, committed to combatting modern slavery.

Overall Procurement Supply Chain Risk Rating

Risk Rating	Expenditure	%
Very High	750,530	1%
High	68,133,074	64%
Medium	346,568	0%
Low	37,600,426	35%
Total	106,830,599	100%



Part D – Actions taken to assess and address risks (Criterion 4)

Bond University undertakes the following actions to assess and address modern slavery risks in our operations and supply chain.

Supplier Media Monitoring and Collaboration with AUPN

Bond University proactively manages its supply chain, dealing primarily with known, regular suppliers and in 2023 of the 1,362 suppliers with ABN's engaged throughout the year only 16 (1.2%) were new suppliers compared to the prior year. A supplier media monitoring process has been implemented. Bond University is a member of the Australian Universities Procurement Network (AUPN), a collaborative group comprising 38 Universities, and the Modern Slavery Working Group (MSWG). All AUPN member universities actively contribute resources and data in relation to Modern Slavery. This collaborative approach engaged industry expert [FRDM](#) (pronounced Freedom) who are a specialist in supply chain risk management software. This software monitors and provides notification services of modern slavery reported within the media throughout the world. No suppliers of goods or services to Bond University in 2023 were identified.

High Risk Rating Reviews

Bond is conscious of the inherent increased risks within the construction industry because of the wide gamut of materials and inputs procured within the industry. In 2023 Bond University undertook its largest single capital construction project since its inception delivering a new major building to support our expanding allied health programs. By virtue of the large relative amount to overall spend that capital works undertaken in 2023 represented there is a corresponding increase in our assessment of the underlying overall risk rating compared to prior periods. Mitigating this as previously noted is the factor that the University primarily procures goods and services in Australia through a very stable known supplier base. In particular for large capital works the University engaged ADCO Construction, who it has partnered with previously to manage and oversee the project. ADCO are a nationally well-respected construction firm with a proven track record of strong governance practices, demonstrated transparency, ethical leadership, and are committed to meeting modern slavery obligations.

Reviews of other high risk rated expenditure areas were undertaken. The vast majority of these are existing suppliers and expenditure has not materially changed compared to prior reporting periods, hence prior period supplier surveys and supply chain mapping remain active. The University is also transitioning to issuing Modern Supplier Assessment questionnaires (SAQ) through the FRDM platform and AUPN to have a more collaborative approach and decrease the administrative burden on its suppliers. Contract renewals incorporate updated contracts specifically referencing Modern Slavery commitments. Although suppliers may be classified as high risk in our internal risk rating due to the inherent category risk, Bond University is comfortable that the organisations, we have engaged with have strong governance structures, high ethical standards and are endeavouring to identify and eradicate Modern Slavery within their supply chains.

Training and Education

Bond University has further developed custom in-house training material in 2023 and targeted staff outside key procurement staff who have already undertaken training in prior reporting periods. During 2023 there were 39 staff members who undertook this program.

Key procurement staff continue to be supported with continued professional development to ensure knowledge and skills are maintained and improved.

Guiding Policies and Procedures

Bond University has developed and maintains the policies listed below, which assist in addressing overarching risks of modern slavery within our operations and supply chains. Procurement guides for tendering incorporate specific assessment of modern slavery.

- Ethical Conduct
- Code of Conduct
- Conduct for Working with Children and Young Persons
- Public Interest Disclosure
- Sexual Exploitation, Abuse, Assault and Harassment
- Human Research Ethics
- Bullying and Harassment
- Workplace Health and Safety
- Procurement
- Student Regulation and Code of Conduct

Part E – Assessment of the effectiveness of actions (Criterion 5)

Bond University is committed to enhancing our processes to tackle the challenging and complex issue of modern slavery. Monitoring and reviewing the progress of our initiatives to eradicate modern slavery from our operations and supply chains is crucial for enhancing our approach over time and addressing emerging issues. In pursuit of this goal, evaluation of our approach throughout 2023 against our Action Pillars are summarised below.

Action Pillar	Effectiveness
Understand the Legislation	No legislation changes have occurred in 2023. Bond University understands the intent of the legislation and takes action to continue to comply and support making a genuine impact on modern slavery.
Engage with Industry Experts	Continuing engagement throughout 2023 with AUPN, ArcBlue, FRDM and the UPH (University Procurement Hub) provides the University with access to specialist advisors, synergies to seek in depth supply chain data and the ability to influence suppliers to ensure modern slavery is eliminated.
Procurement Process & Policies	Our procurement and tender guidelines incorporate specific assessment when conducting new tenders to ensure compliance with the Act. In 2023 training and education extended to users outside key procurement staff.
Ongoing Supplier Analysis	Progress in 2023 incorporated media monitoring given our relatively stable supplier base. This will be an area of continuous improvement as this cannot be a static assessment.

Part F – Consultation (Criterion 6)

The University's subsidiary entities, Campus Operations Pty Ltd and Lashkar Pty Ltd, are 100% owned by Bond University Limited and management across the three entities are consistent. The risk assessment, reporting and data for this statement is for the consolidated group.



Part G – Other information and conclusion (Criterion 7)

Bond University is proud of the significant progress we have made in our ongoing efforts to address modern slavery, and we remain steadfast in our commitment to expanding our impact beyond our supply chains. Our dedication to eradicating modern slavery extends to partnering with stakeholders across various spheres of influence, including academia, industry, and government. Through these collaborations, we aim to amplify our collective efforts and drive positive change on a broader scale.

As part of our continual improvement process, we are focused on several key areas:

1. Enhancing the maturity of our supplier assurance program and deepening our understanding of supply chain dynamics to identify and mitigate modern slavery risks more effectively.
2. Expanding education and awareness programs to a wider range of personnel, including students, staff, suppliers, and contractors, is a key aspect of our commitment to combatting modern slavery. In 2024 initiatives include
 - a. Sharing academic research findings with industry partners to enhance their understanding of modern slavery risks and prevention strategies.
 - b. Specific initiatives tailored for international students who may be involved in part-time work, ensuring they are well-informed about their rights and responsibilities in relation to modern slavery.
 - c. Continuing development of our training and support tools for staff to better assist in assessing Modern
3. Conducting ongoing reviews and refinements of University policies and procedures to align with best practices and regulatory requirements, thus providing a stronger framework for addressing modern slavery.

By fostering a culture of vigilance, responsibility, and collaboration, Bond University is confident that we will continue to make meaningful progress in combatting modern slavery and promoting ethical practices in all aspects of our operations and engagements.

Signed

A handwritten signature in black ink that reads "Tim Brailsford". The signature is written in a cursive style with a prominent initial 'T'.

Professor Tim Brailsford

Vice Chancellor and President

This statement was approved by the council of Bond University Ltd.

