



# Modern Slavery Statement

June 2021

[swinburne.edu.au](http://swinburne.edu.au)

# From our Vice-Chancellor

Freedom from slavery is a human right and an issue of great importance to Swinburne University of Technology. We deplore all forms of slavery and forced labour, and we understand the significant role of universities in helping to end modern slavery.

We are committed to taking the necessary steps to identify and resolve any form of modern slavery within the University's operations, its suppliers and partner organisations.

In 2020, we focused on addressing the potential risk of modern slavery in our supply chain by working collaboratively with our suppliers and peers across our sector. We are working to ensure our policy and practices, contract terms and supplier due diligence is carried out, and see the need for education to identify and address potential modern slavery in our operations as critical.

We also acknowledge the opportunity to influence companies to create positive change through our investments. Addressing human rights issues and modern slavery, in addition to climate change and sustainable development, are our areas of focus with regards to the University's investments.

At Swinburne, we have fostered an inclusive and supportive culture. We drive positive social outcomes through our teaching, research, partnerships and university operations.

We have a zero tolerance stance on all forms of slavery and forced labour. I look forward to Swinburne continuing to play an important role in addressing the significant issue of modern slavery.



**Professor Pascale Quester**  
Vice-Chancellor and President



# This statement covers the period 1 January to 31 December 2020

This statement was approved by the University Council of Swinburne University of Technology on 29th May 2021.



**Professor Pascale Quester**  
Vice Chancellor & President  
24th June 2021



## Acknowledgment of Country

We respectfully acknowledge the Wurundjeri People of the Kulin Nation, who are the Traditional Owners of the land on which Swinburne's Australian campuses are located in Melbourne's east and outer-east, and pay our respect to their Elders past, present and emerging. We are honoured to recognise our connection to Wurundjeri Country, history, culture, and spirituality through these locations, and strive to ensure that we operate in a manner that respects and honours the Elders and Ancestors of these lands. We also respectfully acknowledge Swinburne's Aboriginal and Torres Strait Islander staff, students, alumni, partners and visitors. We also acknowledge and respect the Traditional Owners of lands across Australia, their Elders, Ancestors, cultures, and heritage, and recognise the continuing sovereignties of all Aboriginal and Torres Strait Islander Nations.

## Reporting entity

The parent entity is Swinburne University of Technology (ABN 13 628 586 699), which is registered as an incorporated charitable institution with the Australian Charities and Not-for-profits Commission (ACNC). No other entity owns a share of Swinburne University of Technology.

### Swinburne has the following controlled entities:

Swinburne Student Amenities Association Ltd (trading as Swinburne Student Life)

Swinburne Ventures Limited

Swinburne International (Holdings) Pty Ltd (holding company for Swinburne Business Consulting Nanjing Co. Ltd)

National Institute of Circus Arts Ltd (NICA)

Capsular Technologies Pty Ltd

Consolidated revenue for Swinburne and its controlled entities

from the period 1 January to 31 December 2020

**\$747.5 million**

# About Swinburne University of Technology

Swinburne University of Technology is a world-class university creating social and economic impact through science, technology and innovation.

Swinburne is committed to transforming the future of education by giving students the knowledge, adaptability and experience they need to make a lasting impact on the workplaces of tomorrow. We create future-ready graduates by taking our students outside the conventional classroom and introducing them to new and different ways of learning and thinking. Their future readiness comes from hands-on experience, and connecting with industry leaders, the world around us and one another. Our commitment to knowledge is driven by our research and focus on making a real-world impact that transforms our global and local communities.

As a trusted and respected world-class leader in research excellence, we are determined to make a real difference to the communities we serve. We do all this by providing physical and virtual spaces where ideas are nurtured. Our students and staff around the world are supported to push boundaries and create the future, today. This is our commitment to our students – to those in higher education, those undertaking pathways and vocational education, those who are just starting out and those mastering their field. No matter who our students are or how they want to drive their future, we will help them fulfil their goals in a connected world.

As a dual-sector university, Swinburne offers higher education

alongside vocational education. We deliver courses in a broad range of disciplines, including science, information technology, engineering, exercise and sport science, health sciences, occupational therapy, nursing, psychology, law, arts and humanities, aviation, built environment and architecture, business, design, education, English language and study skills, film and television, games and animation, and media and communications.

Swinburne's close ties with industry provide students with opportunities for valuable workplace experiences. Industry representatives inform, shape and challenge our curricula. We continue to lead the sector in our approach to work placements and industry links with a consistent and comprehensive Work Integrated Learning program. Swinburne maintains a strong commitment to quality student outcomes and to teaching and learning experiences.

Swinburne researchers have a reputation for high-quality, award-winning research with particular strengths in computer science and information technology, design, media and innovation, engineering, infrastructure, materials science, astronomy, physics, social impact research, health sciences, neurosciences and mental health.

Swinburne's research institutes foster interdisciplinary collaboration and deeper research connections with industry, business and community – connections that maximise Swinburne's impact. Our institutes provide leadership in data science, health and social innovation, smart cities and the future of manufacturing. Underpinned by leading digital

technology platforms, our researchers are collaborating with industry through embedded partnerships to drive innovation and create impact.

Swinburne has three campuses located in the eastern suburbs of Melbourne at Hawthorn, Croydon and Wantirna. We have a fourth campus in Sarawak, Malaysia, as well as the National Institute of Circus Arts located in Prahran, Melbourne. Swinburne also has locations in Sydney and Vietnam, each offering a small suite of sought-after Swinburne courses. In 2019, we opened an office in Nanjing, China – further connecting us to some of the fastest-growing regions in the world.

We offer a range of qualifications online through Swinburne Online and Open Universities Australia. Swinburne Online began in 2012 through a successful joint venture partnership with Seek Ltd to create educational opportunities for students wishing to study off campus.

Swinburne holds an investment portfolio that is managed by a third-party specialist investment adviser under the direction of the Council and relevant sub-committees, and in line with the university's Responsible Investment Charter.

Swinburne's total student headcount in 2020 was 41,887 across higher education and 16,406 across vocational education. At the end of 2020, Swinburne had 4,820 staff (2,956 full-time equivalent), comprising 1,439 full-time, 342 part-time and 3,039 fixed term/casual headcount staff.



## Our commitment to sustainability and reconciliation

Swinburne recognises the importance of preparing tomorrow's leaders and decision makers to contribute to a sustainable future. Our commitment to sustainability remains one of our core values. It is embedded across our University and our daily operations as we seek to ensure a sustainable future. We take a universal approach to sustainability, considering the physical environment we operate in, as well as our people, practices and research.

Swinburne has made several commitments and taken action to support a sustainable future.

In 2018, Swinburne committed to the United Nation's Sustainable Development Goals (SDGs). Joining organisations from around the globe, Swinburne committed to the 17 SDGs that aim to 'transform our world' through ending poverty, protecting the planet and ensuring prosperity for all on the road to 2030. SDG 8.7 calls for an end to modern slavery by 2030.

Swinburne's 2020–2023 Reconciliation Action Plan (RAP) has been endorsed as an Elevate RAP by Reconciliation Australia, signifying Swinburne's strong commitment to reconciliation.

Swinburne was one of the first universities in Australia to implement a responsible investment charter, ensuring environmental and social impacts are considered in our University's investment choices. In December 2019, Swinburne committed to becoming carbon neutral by 2025. In January 2020, we became the first university in Victoria to sign the Global Climate Emergency Letter in recognition of the need for a drastic societal shift to combat the growing threat of climate change.

<https://www.swinburne.edu.au/about/strategy-initiatives/sustainability-environment/>

## Our risk and governance frameworks

Under the Swinburne University of Technology Act 2010, Council maintains responsibility and oversight of the University's Risk Management Policy and Framework through its Audit and Risk Committee. The Vice-Chancellor, Professor Pascale Quester, is the President and Chief Executive Officer of the University and is generally responsible for the conduct of the University's affairs in all matters. The Council, Audit and Risk Committee, Executive and senior leaders support the desired risk culture by demonstrating consistent mindsets and behaviours.

Swinburne's Enterprise Risk Management Framework defines the University's risk operating model, responsibilities, methodology, and monitoring and reporting obligations. The University bases its risk management framework on the ISO 31000:2018, Risk management – Principles and Guidelines, which ensures continuous improvement in risk management practices and applies the Victorian Government Risk Management Framework. Enterprise and operational risk assessments are undertaken on an annual basis as part of the strategic planning process. Swinburne has a zero-risk tolerance to breaches of our moral and ethical values.

Corporate governance at the University is the set of values, principles and processes by which the University is directed and controlled. The University's corporate governance underpins the behaviours and practices expected of Council, each member of Council, all staff and the university in carrying out their responsibilities. The aim of the University's corporate governance is to ensure that good, ethical decisions are made by the right person.

## Our supply chain

Swinburne procures goods and services from a broad range of industries that support the running of our physical campuses (such as cleaning, security, maintenance), enable the effective delivery of teaching and research (such as IT software, library subscriptions, laboratory consumables) and generally supports the running of the business (such as advertising, recruitment, office supplies).

In 2020, the University engaged 6,981 suppliers to supply 43,114 transactions of goods or services across different spend areas as demonstrated in Table 1.

In 2020, 94.5 per cent of Swinburne's supply chain spend was with Australian-based suppliers, including a considerable proportion located in the areas surrounding the University's campuses. Internationally, Swinburne has supply arrangements with businesses located across Europe, America and Asia. Table 2 outlines the most common locations of the University's suppliers outside Australia.

Typically, Swinburne establishes and maintains long-term relationships with high value and/or strategic suppliers. Swinburne aims to cultivate partnerships with select suppliers where we may collaborate on research or educational outcomes. Suppliers of low-value and low-risk goods or services may be based on either an ongoing or ad hoc yet transactional relationship.

**Table 1: Spend by area**

Spend area	Proportion of total spend (%)
Corporate professional services	15%
Construction, refurbishment and works	13%
IT software	10%
Marketing and media	9%
Human resources	8%
Buildings and grounds	7%
Library services	6%
Lecturer and teaching services	4%
Laboratories and research	4%
IT professional services	4%
Utilities and renewables	4%
IT hardware	3%
Student services	2%
Telecommunications	2%
Travel and entertainment	1%
Audio visual	1%
Office supplies	1%
Other	6%

**Table 2: Most common locations of International suppliers**

Supplier country	Number of suppliers	Predominant spend area
United States of America	142	Electronic library supplies, software (support, teaching & research)
India	52	Student recruitment (international), course development services
Germany	25	Electronic library supplies, research services & equipment
Singapore	21	Electronic library supplies, software (teaching & research)
Sri Lanka	18	Student recruitment (international)
Ireland	9	Support software
Finland	3	Scientific equipment service & maintenance



## Understanding our modern slavery risks

Swinburne recognises and supports that freedom from slavery is a fundamental human right.

We recognise our moral obligation to respect human rights in our operations, across our supply chain and in our investments. We support the UN Guiding Principles on Business and Human Rights (UN Guiding Principles), which are the recognised global standard for preventing and addressing business-related human rights harm.

### Operational risks

Most Swinburne staff are covered under an enterprise agreement. Staff are represented in the enterprise bargaining process by the National Tertiary Education Union and Australian Education Union. Staff who are not covered by an enterprise agreement are covered by modern awards. Swinburne supports freedom of association and employee representation.

Swinburne is compliant with local labour laws and regulations. We do not impose any penalties or other negative consequences on employees wishing to cease their employment. Employees leave their jobs without barriers or fear of consequences. We do not source labour or use recruitment agencies (including labour brokers) that source labour from outside Australia.

We have policies and procedures in place to ensure a safe, equitable and supportive working environment for our staff and students. The University's People, Culture and Integrity Policy sets out the University's commitment to building a positive culture, promoting integrity and supporting University members, community and industry partners. Ethical conduct is expected, encouraged and supported with

no tolerance for corrupt conduct, fraudulent activities and maladministration. The policy requires that responsible persons must be free from a conflict of interest, bias and inappropriate influence when making decisions and dealing with other persons or organisations on behalf of the University. These policies are supported by the Complaints, Reviews, Appeals and Misconduct framework for students and staff.

The University is committed to providing an environment for work and study that is free from bullying, violence, sexual harassment and assault, discrimination, and harassment and vilification. The University is also committed to the safety of children and has zero tolerance for child abuse.

The University's position on improper conduct (including fraud and corruption, criminal offences, substantial risk to health and safety of a person) is guided by the principles of:

- upholding the highest standards of legal, ethical and moral behaviour
- ensuring the organisational culture and embedded risk controls effectively deter improper conduct
- building willingness to report wrongdoing
- ensuring compliance with public interest disclosure or whistleblower legislation (including the Public Interest Disclosure Act and the Corporations Act)
- protections for individuals who disclose improper conduct
- natural justice.

Swinburne researchers are committed to the highest ethical, professional and scholarly standards. Our research adheres to the Australian Code for the Responsible

Conduct of Research. We are committed to ensuring that all research is conducted responsibly with honesty, integrity and respect for human research participants, animals and the environment. Research may be undertaken in partnership with a variety of Australian and international external parties that may include startups, small to medium enterprises, not-for-profit enterprises, multinationals and government bodies. Due diligence is carried out on potential research partners to assess ethical and sustainable business practices that align with Swinburne's own integrity standards.

Swinburne has an independent disclosure service (called Stopleveline) for employees and third parties to report suspected or actual illegal or improper activity. Information outlining how to access this service and the process for managing claims is found within Swinburne's Improper Conduct and Whistleblowing Guidelines. Disclosers may disclose anonymously if they wish.

### Investment portfolio risk

Through investments in public and private companies, we can have an impact on the environment and communities worldwide. We believe we have an opportunity to influence those companies to create positive change. Our areas of focus are:

- climate change
- human rights and modern slavery
- sustainable development.

Swinburne's current investment fund manager has undertaken an incident analysis across their listed equity and fixed income funds for any red flag incidents in relation to modern slavery (aligned to UN Global Compact principles on forced labour and child labour). There were no holdings with red flag incidents found in any funds

and no amber flags in any of the funds in which Swinburne invests.

The University's investment manager has also developed a proprietary approach to proactively assessing fund exposure to countries and industries with a high risk of modern slavery. They analysed more than 20 investment strategies and determined that no funds fell into the severe risk quartile. Six Mercer funds were assessed as being of high risk to modern slavery, of which Swinburne invests in three of these. Our investment manager, on Swinburne's behalf, has commenced and will continue to engage with these fund managers on their modern slavery-related activities.

Swinburne's investment manager reports at least annually to the Swinburne Philanthropy, Infrastructure and Investments Committee, and Council, on regular assessments undertaken to confirm this position.

**Supply chain risks**

Analysis was conducted on Swinburne's procurement spend to determine where the risks of modern slavery may be higher across our supply chain.

The risk assessment methodology was developed in consultation with ArcBlue, Pillar Two, and representatives across the university sector (further information on the sector collaboration below). The methodology consists of a high/medium/low modern slavery inherent risk level assigned on both a spend category and supplier country

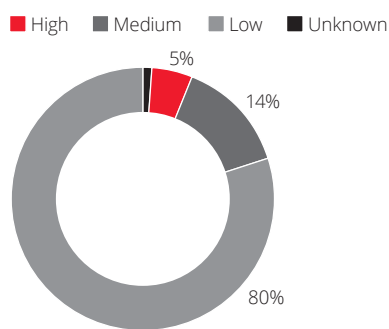
basis using publicly available data sources, including the Global Slavery Index<sup>1</sup>. At this point, inherent risk analysis has been undertaken across our direct suppliers, however, work is underway with a new solution that will support risk analysis through sub-tier suppliers in 2021.

The insights highlighted that in 2020 Swinburne procured from 451 suppliers (representing 13 per cent of total suppliers, 5 per cent of total spend) who are identified as being of a higher risk of modern slavery due to the type of industry, product and its components, and the global nature of their supply chains (see Graph 2).

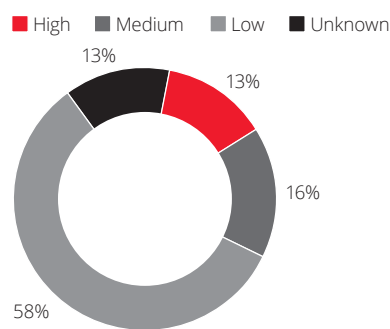
Key areas of the University's spend identified as a higher risk are listed in Table 3.

**Graph 2: Summary of high-risk suppliers by spend and volume**

**Supplier Risk - Spend**



**Supplier Risk - Volume**



•	•	•	•	•
•	•	•	•	•
•	•	•	•	•
•	•	•	•	•
•	•	•	•	•

**Table 3: High risk spend areas**

**Goods**

- Desktop hardware
- Equipment (scientific, engineering, telecommunications, AV, medical)
- IT network infrastructure
- Stationery and kitchen supplies
- Laboratory supplies
- Merchandise and apparel
- Mobile devices and accessories

**Services**

- Commercial cleaning
- Construction
- Catering

Swinburne procures goods directly from some overseas countries that our risk assessment identified as having a higher prevalence and therefore inherent risk of modern slavery (see Table 4). With a focus on local procurement, Swinburne's spend with suppliers based in high-risk locations outside of Australia are predominantly for student (international) recruitment services.

The industries and countries we have identified as higher risk will be the subject of Swinburne's detailed analysis to be conducted progressively from 2021 and beyond. Many of the spend areas require an analysis of level 2 and beyond suppliers within complex global supply chains. Strategic procurement projects delivered across Swinburne in 2020 considered the inherent modern

slavery risk level for the spend area and/or country.

While we continue to understand and address risk across our operations, investments and research activities, our supply chain emerged as our primary focus in this reporting period, given this is where risks of our activities being linked to modern slavery are more prevalent.

1. <https://www.globallslaveryindex.org/>



**Table 4: High-risk country supplier summary**

Supplier country	Number of suppliers	% of total spend
India	66	0.5%
China	45	0.1%
Indonesia	13	0.1%
Pakistan	7	0.1%
Bangladesh	4	0.04%
Thailand	13	0.01%
Philippines	2	0.001%

## Our actions to assess and address risks of modern slavery

Swinburne recognises its responsibility to act to prevent, mitigate and, where appropriate, remedy modern slavery in our operations. We also accept our obligation to work collaboratively with our direct and indirect suppliers to address the risks or occurrence of modern slavery across our supply chain. In 2020, we undertook several actions and contributed significantly to the Australian Universities Procurement Network (AUPN) Modern Slavery Program's sector response.

### Swinburne's procurement policy and practices

At Swinburne we take a holistic view of value for money in our strategic procurement of goods and services. This means that we balance our decisions across a wide variety of criteria, including environmental and social factors, as well as more traditional criteria of quality, timeliness and cost. We avoid setting unrealistic delivery timeframes and we do not drive for lowest prices, understanding the risks that this can present to labour exploitation (including modern slavery) and other negative impacts.

Swinburne has embedded due diligence measures in our procurement processes to understand the risk of modern slavery across new engagements and our existing supply base. This includes updating templates to incorporate a focus on modern slavery risk in strategic procurement project planning, evaluation and

decision-making. A modern slavery risk questionnaire has been developed and is now included in any strategic procurement (tendering) projects where the risk of modern slavery exists.

Key tenders led by Procurement in 2019 and 2020 where the risk of modern slavery was assessed in detail includes security services, apparel supply, waste management services and catering. To mitigate the risk of modern slavery in key service contracts, including commercial cleaning, the following is undertaken by the procurement team:

- tender evaluation requiring suppliers to demonstrate policies, processes, and/or systems to reduce the risk of modern slavery and actions to mitigate or address modern slavery risks
- periodic assessment of wages paid at market rates, including auditing of employee payslips
- executing contracts with obligations specific to reducing labour exploitation and modern slavery.

### Swinburne's contract terms

As a key control, Swinburne has commenced updating our standard contract templates with clauses addressing modern slavery risk. Based on the contract clause bank developed by the AUPN Modern Slavery Program, these terms and conditions outline the supplier's obligation to investigate modern slavery in its operations and supply chains, assess and address risks, take meaningful actions including due diligence and remediation, and

have necessary processes and systems in place. They also include an obligation for suppliers to include similar clauses in their contracts with suppliers, supporting our intent to create positive impact through the end-to-end supply chain beyond our direct suppliers. These new clauses are being embedded in relevant new supply arrangements and, going forward existing supplier contracts will be reviewed based on saliency of potential risk across our supply chain.

### Supplier due diligence

A selection of Swinburne suppliers identified through the risk assessment as presenting a high inherent risk of modern slavery due to the category of spend and/or location were requested to respond to the AUPN program's modern slavery risk questionnaire. To date, 12 suppliers have responded, representing 10 per cent of Swinburne's total spend with suppliers identified as high-risk. Overall, the responses indicate that many businesses are still building the foundations of their programs to address modern slavery risks. Most have policies and supplier code of conducts in place, but few appear to be undertaking audit programs or to have developed remediation processes.

Further work is required to engage with these and other high-risk suppliers to assess risks and identify any remediation activities that could value Swinburne's collaboration.

## Raising Swinburne's awareness and understanding of modern slavery

As an educational institution, Swinburne recognises the importance of raising awareness and educating our students and staff on the critical human rights issue of modern slavery.

Throughout 2020, we delivered a series of presentations to the Executive Group, staff and students. These provided information on the issue of modern slavery and its prevalence, the actions being undertaken by Swinburne to assess and address the risks, and, importantly, what individuals can do in both their personal and work life to help. Staff undertaking procurement on behalf of Swinburne will receive more in-depth training on how to assess and mitigate modern slavery risk during 2021.

Representatives across Procurement, Legal, Risk and Governance, Research and other operational teams have been engaged on this issue to mobilise cross-university collaboration.

## Collaboration as a university sector

The Australian University Procurement Network (AUPN), the peak body for strategic procurement across the higher education sector in Australia and New Zealand, is taking an active approach to address this critical human rights issue. Recognising the opportunity for universities to work together to leverage buying power and resources, a modern slavery working group was established in August 2019 to find a sector-wide solution. The vision is to enable a coordinated approach to identifying risks and the occurrence of modern slavery across the sector's supply chains and to collaborate with our suppliers on remediation and mitigation. The program aims to improve human rights transparency across the sector's supply chains and reduce the inefficiency of individual universities taking similar actions across similar suppliers. Swinburne's Director of

Sustainability and Procurement is co-chair of this program. Working group members contribute their time and effort on a voluntary basis, with each AUPN member university contributing towards the program through a portion of membership fees. This funding goes towards engagement of specialised subject matter expertise, as well as execution of specific programs. It is envisaged that both the AUPN members and their suppliers will benefit from the improved operational efficiencies of the collaboration and gain improved effectiveness in mitigating risk and improving social performance in supply chains.

Following a discovery phase focused on analysing sector spend data and identifying program priorities, the program has delivered several key initiatives.

### Academic Advisory Board

An Academic Advisory Board was established in July 2020 consisting of 12 academics from nine universities with experience and expertise in modern slavery, aiming to enrich the sector approach. Meetings were held monthly in 2020 and topics of discussion included remediation approaches, questionnaire and contract clause templates, risk assessment tools and statement guidance. Members of the Academic Advisory Board also participated in a panel discussion at an AUPN community virtual meeting, attended by representatives from most Australian universities, and shared their insights into modern slavery risks and action.

### Risk assessment and reporting dashboard

A proprietary risk assessment tool was developed to understand the inherent risks of modern slavery across the supply chains of an individual university and the sector. The tool's determination of risk is based on publicly available modern slavery risk information (for example, Global Slavery Index) applied on a category and country location basis. Spend data from 26 Australian universities between 2018 and 2020 has been gathered, cleansed and mapped into the risk assessment

tool. Dashboards were developed to provide universities with a visual representation of their supply chain modern slavery risks and to support the prioritisation of initiatives for the program and individual universities. The aggregated data reflects the large breadth and scale of our combined supply chains across the sector and the crossover of suppliers being used by multiple universities. Data continues to be gathered from other universities.

### Supplier Engagement Group

Using the program's risk assessment of sector spend, suppliers were selected for a Supplier Engagement Group based on their high inherent risk rating and the sector being in a position of influence due to size of combined spend. The group includes companies supplying desktop hardware, laboratory supplies, cleaning services, office suppliers and construction services. The suppliers were invited to participate in two discussions during 2020 to share insights and best practice, and provide feedback on the AUPN program.

All 17 suppliers from this Supplier Engagement Group were asked to complete the AUPN modern slavery questionnaire. To date, seven have provided responses that have been published to the AUPN community for review.

### Templates and guidance

Templates and guidance documents have been developed by the program and made available to all AUPN members, including:

- supplier modern slavery risk questionnaire/response schedule
- modern slavery contract clauses
- supplier code of conduct guidelines
- modern slavery statement template guidance.

### Support and guidance from external experts

In early 2019, ArcBlue, procurement consultants with expertise in social and sustainable procurement, were engaged to facilitate the discovery phase and support establishment of the AUPN program. ArcBlue collaborated with the AUPN program team to develop the risk assessment tool. They deliver the

periodic spend data analysis and reporting dashboards and manage the online AUPN portal where program content is currently shared to member universities.

Modern slavery specialists Pillar Two were engaged in May 2020 following a tender process to provide modern slavery subject matter expertise and support to the program. To date, Pillar Two has provided:

- a full review of the AUPN program approach and priorities – the review identified 25 recommendations to enhance the sector’s approach, which the program is in the progress of delivering
- expertise and support through the program’s risk and reporting solution tender process
- a review of the AUPN’s modern slavery risk assessment tool
- a set of recommendations on how the AUPN can approach remediation.

### **Engagement and communications**

The modern slavery working group has developed an engagement and communications plan to ensure the program achieves one of its aims of raising awareness, educating and seeking support for action across the university sector, external stakeholders and suppliers. Virtual presentations are run frequently to update the AUPN community on progress and invite discussion or feedback on key elements of the program. Representatives from our Academic Advisory Board and Pillar Two have been involved in some of these presentations to share insights and provide recommendations on effective ways to assess and address risks. Program progress updates are published monthly via email and on the AUPN community portal.

#### **Case study:**

#### **Gloves Manufacturing**

The AUPN program was made aware of media highlighting potential human rights issues with a Malaysian glove manufacturer. Given many universities procure gloves to support research and education activities, the program commenced a deeper review of the issue. To date, several steps have been undertaken to better understand the prevalence

of this risk across AUPN member supply chains and to act:

- Pillar Two were consulted to provide a high-level review on the status of Malaysian glove manufacturing and further guidance on remediation steps and engagement with the suppliers.
- The issue was tabled with the Academic Advisory Board, which provided feedback on this issue, emphasising the need for the sector to use their buying power to influence major suppliers to take more action.
- Analysis was carried out on sector spend to try to understand the scale of spend and transparency of the supply chain to indicate origin of manufacture.
- Ten key suppliers who have been identified through the analysis as supplying gloves to multiple member universities were contacted. Suppliers were requested to complete the AUPN questionnaire and attend any future AUPN-led awareness sessions on modern slavery. Eight suppliers have responded to date.

Further work will be undertaken to address responses from the surveys and progress actions.

The AUPN program is using the learnings from this experience to develop our approach to acting on issues of modern slavery as they are identified going forward across our combined supply chains. Overall, responses indicate that Australian glove distributors have moderate to limited visibility of their supply chains and are at various levels of developing their policies to address the risks. The AUPN recognises there is a lot more to be done and will continue to develop our supplier engagement approach and remediation processes to be more effective in gaining visibility of the supply chain and leveraging the sector’s buying power for better outcomes.

### **Measuring our effectiveness**

The influence and purpose of a university in society creates an opportunity for Swinburne to take a leadership role, together with the

wider university sector, in addressing this issue. Swinburne recognises that our approach to this critical issue will continue to evolve over time and that measuring our effectiveness is essential to prioritise our efforts for the periods ahead.

We will measure our effectiveness through:

- contribution to reviews of Swinburne’s risk assessment framework and processes to ensure appropriate and up-to-date consideration of human rights issues across our operations and supply chains
- periodic reviews, at least biannually, of the risk profile of Swinburne’s existing supplier base with attention to the progress made to reduce supplier risk profiles through action and review (for example, responses to questionnaires)
- periodic reviews, at least biannually, of the completion and effectiveness of actions undertaken by Swinburne
- annual monitoring of progress against Swinburne modern slavery key performance indicators, including the number of:
  - Swinburne staff and students made aware of the modern slavery issue through communications and training
  - Swinburne supplier engagement reviews (for example, tenders) that have incorporated an assessment of modern slavery risks in the supplier’s operations and supply chain
  - Swinburne supplier contracts that include modern slavery clauses
  - high-risk suppliers engaged in response to risk alerts or undertaking proactive reviews.


### **Consultation with our controlled entities**

The activities we have undertaken to date to assess and address the risks in the supply chain of Swinburne covers all controlled entities.

### **FURTHER INFORMATION ON THE AUPN PROGRAM**

<https://www.hes.edu.au/australian-university-procurement-network>

## FURTHER INFORMATION

 1300 794 628

 [www.swinburne.edu.au](http://www.swinburne.edu.au)

The information in this report was correct at the time of publishing, June 2021. The University reserves the right to alter or amend the material contained in this publication.

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