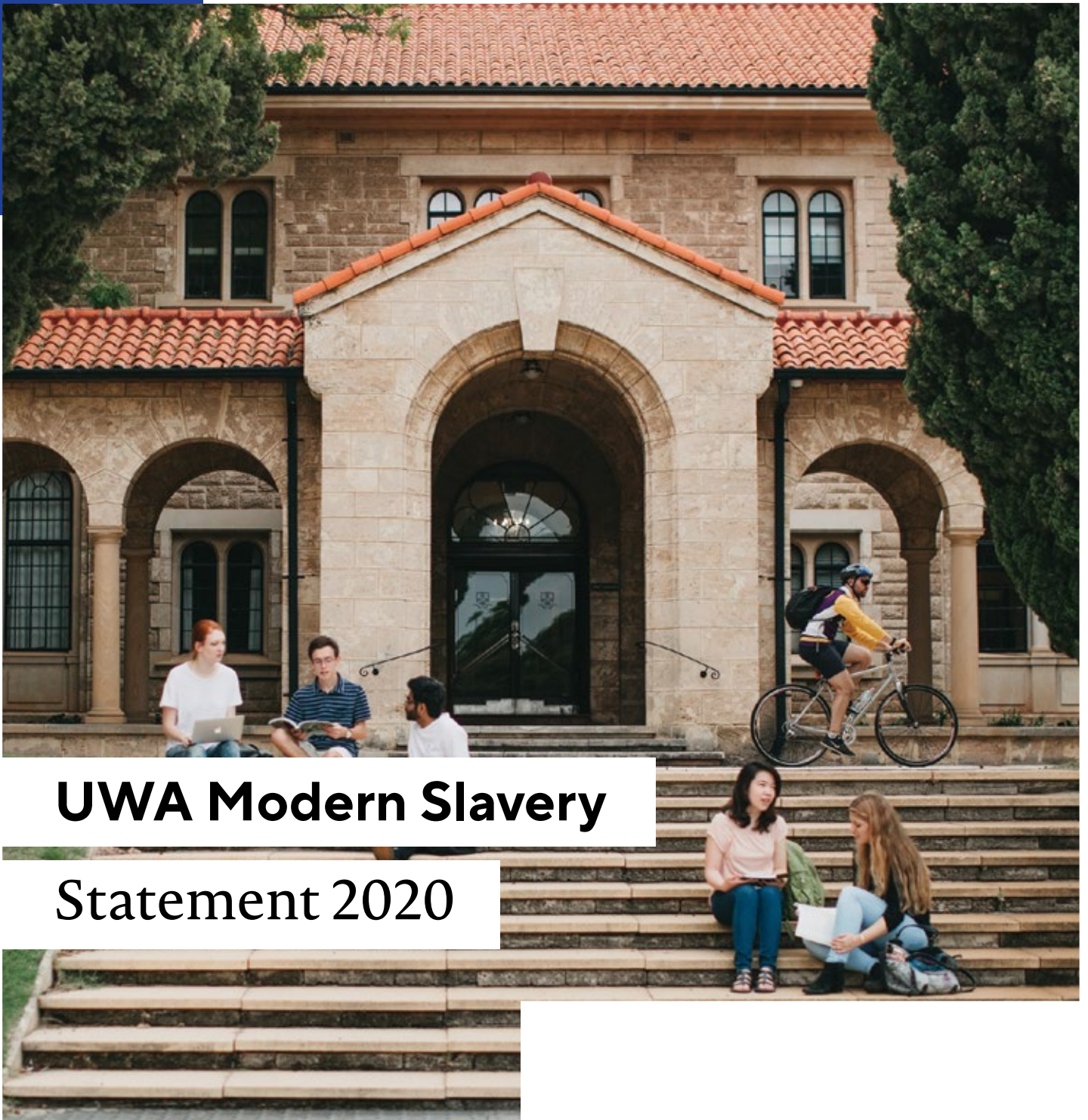




THE UNIVERSITY OF
**WESTERN
AUSTRALIA**



UWA Modern Slavery

Statement 2020

ABN 37 882 817 280

CRICOS Provider Code 00126G



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The University of Western Australia acknowledges that its campuses are situated on Noongar land, and that Noongar people remain the spiritual and cultural custodians of their land, and continue to practice their values, languages, beliefs and knowledge.



Opening Statement from the Vice-Chancellor

The Commonwealth Modern Slavery Act 2018 (Cth) (the **Act**) established Australia's national modern slavery reporting requirement. Under the reporting requirement, certain large entities must publish annual Modern Slavery Statements describing their actions to assess and address modern slavery risks. The University of Western Australia (UWA) is a reporting entity under the requirements of the Act and we recognise our responsibility to address all forms of modern slavery associated with our operations and supply chains.

This Statement is the University's inaugural Modern Slavery Statement, covering the period from January to December 2020 and encompassing The University of Western Australia and its subsidiaries, including:

- The University Club of Western Australia Pty Ltd
- UWA Sport Pty Ltd
- UWA Accommodation Services Pty Ltd
- Perth International Arts Festival Ltd
- Young Lives Matter Foundation UWA Limited

This Statement has been prepared in consultation with the offices of each Executive portfolio and approved by the University's governing body, the Senate. It represents a commitment by the University at the highest level. I thank all those involved in the preparation of this inaugural statement and acknowledge the ongoing efforts of all staff and students to recognise and address modern slavery in all its guises.



Professor Amit Chakma
Vice-Chancellor

Executive Summary

The University is committed to its responsibility to staff, students, suppliers and community to ensure that modern slavery risks are identified and addressed within our operations and supply chains. This Statement reflects that commitment and reports on the steps taken to assess and address the risks of modern slavery within our operations and supply chains for the period 1 January 2020 to 31 December 2020.

The University assesses its overall approach to manage the risk of modern slavery within operations and supply chains to be effective, and will continue effort to enhance and improve on its policies, practices and culture on modern slavery across the University. This assessment is undertaken based on the foundation of our policies and practices and through consultation and inquiry across the University, as well as surveys and analysis undertaken on our supply chains.

The University proposes to develop a three-year plan aimed to enhance transparency and improve development of our assessment and reporting capabilities to actively manage risks of modern slavery within our operations and supply chains.

DEFINITION OF MODERN SLAVERY

Modern slavery is defined by the Department of Home Affairs as situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom.

The term modern slavery encompasses instances of human trafficking, slavery or slavery-like practices, debt bondage, forced labour, forced marriage and the worst forms of child labour.

The Global Slavery Index 2018 estimated that 40.3 million people globally were living in some form of modern slavery with over half of those identified as being subject to forced labour. Despite the majority of countries declaring modern slavery illegal, very few G20 countries have formally

enacted laws, policies or practices to stop business and government sourcing goods and services produced by forced labour. Modern slavery still exists at an alarming and unacceptable scale.

APPROACH TO REVIEW AND DEVELOP OUR INAUGURAL STATEMENT

In 2020 the UWA Modern Slavery Working Group, comprising representatives across key operational areas, was established to lead the planning and implementation of programs and processes to identify and address the risk of modern slavery. The Working Group operate under the direction of the Office of the Chief Financial Officer within the Executive group.

This inaugural Modern Slavery Statement, prepared with the assistance of the Working Group, identifies areas of potential risk of modern slavery and outlines mechanisms and actions which were already in place or were undertaken in 2020 to identify and address these risks within our operations and supply chain.

In developing this Statement the University recognises that various facets of our operations may be subject to risk of modern slavery and proposes to engage with those areas to identify current mitigations in place and future actions to combat those risks.

These facets of our operations include:

- **Current and future students**
- **Employees**
- **Investments**
- **Supply chain**
- **Subsidiaries**

This Statement recognises areas of risk within our supply chain which have been assessed through targeted analysis encompassing geographical location and spend analytics of high risk supply categories, being Facilities Management

(incorporating construction), Information and Communication Technologies and Equipment and Consumables. The Statement also identifies areas of opportunity for industry collaboration through our membership with the Australian Universities Procurement Network including the development of a modern slavery risk platform and through consultation with the UWA Modern Slavery Research Cluster.

Through this engagement, collaboration and analysis, the University has assessed our overall modern slavery risk rating as low. The University does however acknowledge the work yet to be done to fully interrogate and mitigate these risks, and proposes how this may be undertaken in the future through the development of a three-year plan to expand the breadth and depth of the scope reported within the Statement.

2020 HIGHLIGHTS

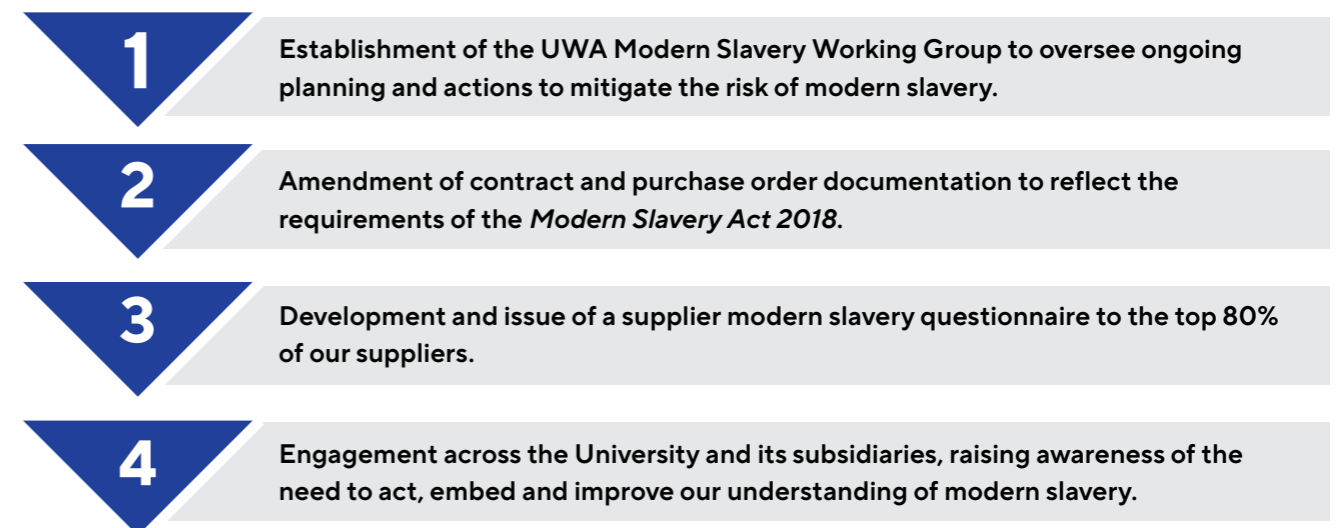


Figure 1. UWA modern slavery highlights 2020



Our University Structure, Operations and Supply Chains

The University of Western Australia (UWA) was established in 1911 as the State's first university. UWA was also the first free university in the British Empire, actively promoting equal access to tertiary education for all social classes.

For over 100 years UWA has had the objective, 'to advance the welfare and prosperity of the people' through educational and research activities – a statement first defined with the foundation of the University by the *University of Western Australia Act 1911 (WA)*.

UWA is a member of the internationally recognised Australian Group of Eight universities, and a foundation member of the Matariki Network of high-quality, research-intensive universities with particular focus on student experience.

UWA has a strong connection to industry and government, supports communities both locally and internationally, and is driven to make the most of its collective potential and contribute to the world's advancement.

Today UWA is ranked in the world's Top 100 universities and number one in Western Australia.

Mission

To provide world class education, research and community engagement for the advancement of the prosperity and welfare of our communities.

Vision

Creating the next generation of global leaders through experience-rich education and world-leading, trustworthy research.

Motto

Seek Wisdom

Our Promise

As a university we will:

- Prepare our students to be globally relevant and responsible leaders
- Enable and promote trustworthy and influential research
- Build just and equitable societies
- Work closely with our communities to improve our environment
- Recognise and value Indigenous peoples' rights, knowledge, culture and values

Values

Excellence

We consistently pursue the highest levels of achievement, creating the best outcomes possible.

Integrity

We are honest and ethical and show respect for, and appreciate, each other, our partners and our communities – valuing our differences.

Innovation

We are constantly, and creatively, improving and adapting.

Collaboration

We share our collective intelligence to achieve more.

Equity

We are committed to providing everyone at UWA equality of opportunity, experience and access.

OUR GOVERNANCE

Senate

The University of Western Australia Act 1911 gives the Senate powers to act in the interests of the University through the making of statutes, regulations, and by-laws and through the management of income and expenditure. It provides powers of delegation for the Senate, so that day-to-day management can be delegated to officers employed by UWA.

UWA is responsible to the State Minister for Education for the proper conduct of its business under the State legislation. However, the majority of our funding is invested by the Commonwealth and UWA is therefore responsible to the Commonwealth Minister for Education for the delivery of our teaching and research programs, and for the provision of adequate infrastructure to support those programs.

Senate membership and information on the number of meetings held can be found on the UWA governance website.

[Governance.uwa.edu.au/committees/senate](https://governance.uwa.edu.au/committees/senate)

Executive

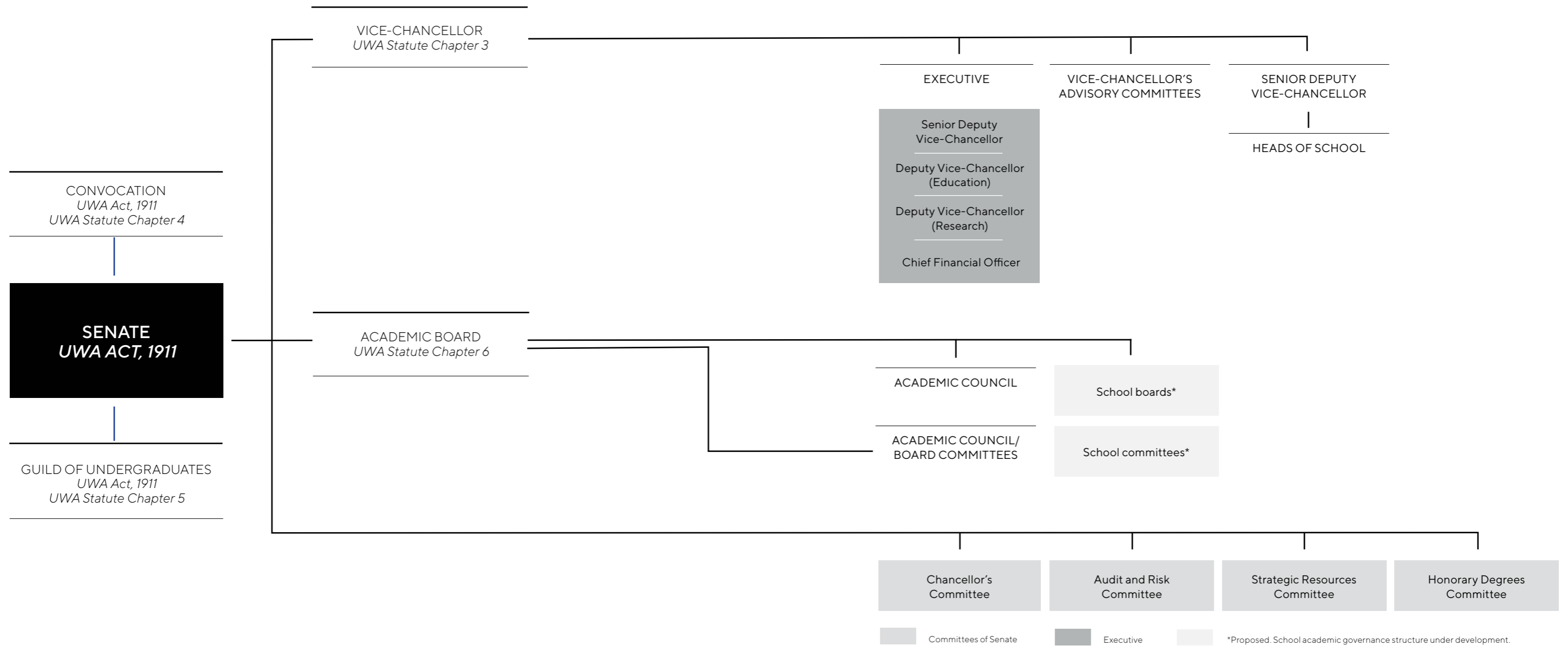
The Senate appoints the Vice-Chancellor and works in partnership with the incumbent in this role to maximise the University's capacity and performance, and to ensure our fiscal viability.

The Vice-Chancellor is delegated operational responsibility of the University. The Vice-Chancellor appoints an executive group to assist with responsibilities for the academic, financial, administrative and other business of the University.

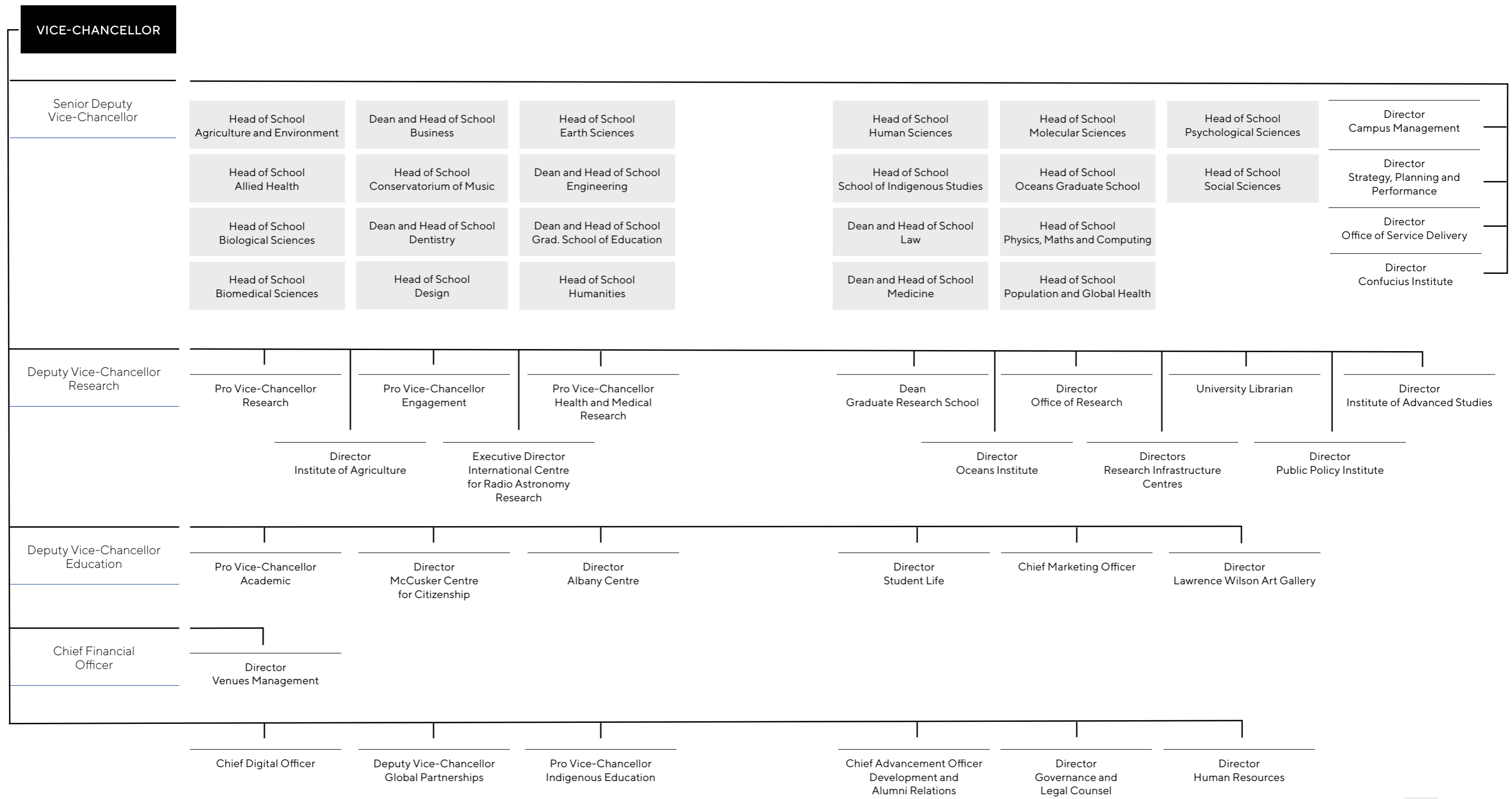




University Governance



UWA Management Structure



College of Schools

OUR OPERATIONS

As a higher education institution, UWA's core activities of teaching, research and community engagement are highly dependent on the calibre and integrity of its people. The University therefore, has a responsibility to ensure that its workforce and student body are provided with safeguards and mechanisms to mitigate modern slavery risks.

Education

UWA students actively engage in a learning experience delivered through our flexible course structure that includes engagement in service learning and opportunities to provide input and feedback on their experience at UWA.

Responsibility for the quality and delivery of education at UWA primarily lies with our schools. They design and deliver courses and units and are accountable for quality of teaching and student satisfaction with their educational experience. The Deputy Vice-Chancellor (Education) leads the University's academic programs and education mission.

Research and Innovation

UWA has acquired an international reputation for excellence and enterprise in its research impact. It is regarded as one of Australia's top research institutions, attracting researchers of world standing across the range of disciplines, with international leaders in many diverse fields.

Responsibility for the quality and delivery of research at UWA lies with our schools, institutes and centres. They foster collaborative and multidisciplinary research teams that resolve real-world challenges that are critical to the planet and its people. The Deputy Vice-Chancellor (Research) leads the University's research mission and programs.

Global Partnerships

UWA is passionate about its partnerships and creating positive change for the wider community. It embodies this through support for a wide range of initiatives in key development areas of art, culture, sport, education and philanthropy.

Sustainable Environments

UWA is recognised as one of the most beautiful campuses in the world with our 'campus in a park' ethos, the carefully planned and executed heritage landscape and biodiversity is treasured by our staff, students and the wider community.

Management of UWA's sustainable environments, including our campus planning, capital development and the operations and maintenance of its grounds and facilities is the responsibility of Campus Management under the leadership of the Senior Deputy Vice-Chancellor.

UWA's digital environment was significantly tested in 2020, with the rapid movement of students to online learning and staff to working from home situations. The University was able to adapt to and accommodate this increased demand with minimal disruption. Looking forward, it is recognised that off-campus support of both students and staff is likely to require increased attention as traditional ways of working have been disrupted. Our focus on information technology and complementary on campus learning and working requirements will be developed to support that evolution.



OUR SUPPLY CHAIN

Our procurement activities apply to the acquisition of goods and services, whether purchased or leased, for all business units, across all sources of funding. These activities are guided by our procurement principles of probity, fair competition, value for money, sustainable procurement and risk managed procurement.

UWA non-employee related annual spend for 2020 was \$227 million, across 3,700 vendors through active contracts ranging from one-off research equipment purchases to large value, multi-year contracts.

UWA classifies its external spend across six key category areas to support the business needs of its schools as well as the operational business units.

UWA is committed to transparency across our processes and policies as a means to drive up standards and highlight issues across our supply chain. In this inaugural Modern Slavery Statement, UWA recognises that the risks identified and actions taken are just the first steps in developing our approach to addressing modern slavery in procurement and operations.



Figure 2. UWA Procurement categories

Risks of Modern Slavery Practices in Our Operations and Supply Chains

Utilising the data and information available from our supply chain and through our wider consultation processes with our directorates, school and subsidiaries, UWA would assess our risk of modern slavery in our operations and supply chain at this time to be low. UWA does however recognise that there is further work to do to improve our maturity in terms of identifying and responding to modern slavery risks.

OUR STUDENTS

In 2020, 26,282 students were enrolled at UWA, with an equivalent full-time student load of 18,717.

UWA implements a range of policy and procedures upholding the rights and freedoms of all our students in line with national legislation and international commitments.

The University Charter of student rights and responsibilities (uwa.edu.au/students/My-course/University-Charter) sets out the fundamental rights and responsibilities of students and their organisations at UWA.

Within the Office of the Deputy Vice-Chancellor (Education), **Student Life** encompasses services to students across student administration functions from enrolment through to graduation. Health and well-being services, social and academic support and the provision of participation opportunities through dedicated student equity programs are also available.

University Hall provides a comprehensive on campus residential student experience. Additional off campus accommodation services, childcare services and sport and recreation programs, activities and clubs are provided through affiliate relationships also reporting into the Student Life portfolio. Supply chains in key aspects of the Student Life portfolio are managed through University delivered procurement and purchasing services including student employees, who are recruited under relevant Awards and UWA processes.

Student classroom learning is supported via experiential learning opportunities facilitated by the University through:

- paid and unpaid placements/Internships - undertaken for both credit and not-for-credit,
- overseas placements with host organisations; and
- placements undertaken via third party providers.

University approved Student Placement Agreements comprise obligations under the *Fair Work Act 2009 (Cth)* and students are counselled prior to embarking on Placement Agreements. International students are also supported through the provision of a dedicated International Student Support team, which includes an identified advisor for students with federal scholarships through the Department of Foreign Affairs and Trade and third party sponsorship agreements.

OUR EMPLOYEES

In 2020, UWA's full-time staff equivalent was 3,390 with 3,915 employees employed by the University.

UWA's terms and conditions of employment, which are set out in employment contracts and Enterprise Agreements, meet all relevant legislative and common law obligations and provided to all employees when they are engaged by UWA.

At a minimum, the engagement of employees at the University complies with the *Fair Work Act 2009 (Cth)* and any other relevant legislation.

The vast majority of University employees' employment is governed by one of the University's enterprise agreements:

- The University of Western Australia Academic Employees Agreement 2017;
- The University of Western Australia Professional and General Employees Agreement 2017;
- The University of Western Australia ELICOS Teachers Agreement 2018; and
- The University of Western Australia Child Care Employees' Collective Agreement 2015.

(collectively, the Enterprise Agreements).

These Enterprise Agreements provide the minimum terms and conditions of employment, for the individuals covered by them. Each of the Enterprise Agreements have been approved by the Fair Work Commission. Senior employees have individual employment contracts which are drafted to comply with current legislation.

UWA does not tolerate slavery, human trafficking, or child or forced labour of any kind and has a suite of policies, procedures and practices in place which assist in managing human rights, promoting diversity and ensuring compliance with relevant legislation.

UWA has a comprehensive people focused policy suite that provides protection for prospective employees (during recruitment and selection), and for employees during their employment.

These policies are designed to ensure a safe working environment, protection from mistreatment at work, and aim to provide a workplace free of intimidation, threats, actual or threatened physical and/or sexual violence, forced labour and abusive working conditions.

These policies include:

- Selection for Appointment Policy
- Academic Appointments Policy
- Immigration Policy
- Casual Appointments Academic Policy
- Casual Employment Professional and General Policy
- University Code of Conduct and Code of Ethics
- Flexible Work Practices
- Hours of Work
- Parental Leave (including Partner Leave)
- Research Integrity Policy
- Home Based Work
- Managing Misconduct
- Professional Relationships in the Workplace
- Sexual Misconduct
- Prevention and Resolution of Bullying on Campus
- Whistleblower Policy

Policies are available to employees through the University's Policy Library. Employees are required to comply with the University's policies at all times. Any failure to do so may result in disciplinary action.

There are also a range of mechanisms in place for employees to make enquiries or complaints regarding their employment without fear of prejudice or adverse consequence. UWA has a dedicated Human Resources team to assist employees with enquiries or complaints, and if employees remain unsatisfied or do not feel comfortable to approach Human Resources, then they are able to lodge a dispute or grievance under the Enterprise Agreements.



Actions Taken to Assess and Address Risks



OUR MODERN SLAVERY WORKING GROUP

The role of the Modern Slavery Working Group is to provide a governance structure, under the direction of the Office of the Chief Financial Officer to address the risk of modern slavery.

Under this framework the Working Group identified areas across the University's operations and supply chains with potential exposure to the risk of modern slavery and engaged with representatives from a broad cross-section of the University to enable adequate understanding and oversight of those risks.

This Working Group and the identified representatives are responsible for the coordination and preparation of this Statement as well as the future planning and oversight of modern slavery risk mitigations and remedies.

The Working Group comprises:

- Governance
- Legal
- Procurement
- Human Resources
- UWA Modern Slavery Research Cluster
- Student Life
- Campus Management

Further consultation was undertaken by Working Group members within their Directorates to capture relevant risks.

OUR STUDENTS

Managing modern slavery risks for our students

The primary risk of student exploitation exists across arrangements in which students independently enter into unpaid placements or internships that are not-for-credit with external organisations. For international students this also includes employment in Australia, which may be exploitative, or involve sophisticated scams that could result in modern slavery.

Assessment of risk has identified that elevated risk exists across placements undertaken with host organisations overseas; placements undertaken via third party providers; external employment arrangements for international students and potential scams.

UWA is working towards developing appraisal processes of independent providers of work-experience and placement opportunities. It is intended that prior to approval, third party providers of co-curricular activities seeking official badging recognition are asked to self-declare their observance of guidelines under the *Modern Slavery Act* and publication on the Modern Slavery Register (as applicable). To mitigate risk and raise awareness of exploitation, UWA provides information to international students of the potential risks when undertaking employment in Australia during their orientation and onboarding. UWA also provides information of ongoing support services available.

Managing modern slavery risks in student recruitment

As well as ensuring employees are aware of their obligations to comply with UWA policies, the University seeks to ensure that legal obligations are complied with at every stage of the employment life cycle from recruitment and onboarding to employment.

UWA seeks to undertake due diligence on scholarship/sponsorship body/organisation/ individual (entity) with whom UWA enters into a contract.

Should the due diligence or any review during the duration of agreement identify concerns or acts of modern slavery, UWA is committed to appropriately addressing these with the contracted party.

UWA Future Students Recruitment portfolio within the Office of the Deputy Vice-Chancellor (Education) ensures compliance with Education Services for Overseas Students (ESOS) and ESOS National Code, working only with education agents and third parties who have been vetted, and who have references from other tertiary institutions.

UWA's in-market teams, agents and on-campus staff advise students appropriately of their rights and obligations and respond promptly to and investigate complaints or concerns students raise. The University's engagement network with other Australian institutions such as the Australian Universities and the International Directors Forum, also allows for broader awareness and identification of any industry concerns of modern slavery.

OUR EMPLOYEES

Managing modern slavery risks in employment

As well as ensuring employees are aware of their obligations to comply with UWA policies, the University ensures that all legal obligations are complied with at every stage of the employment life cycle from recruitment and onboarding to employment.

UWA does not charge employees for the costs associated with their recruitment or engagement, and ensures employees have the appropriate working rights to work in the country within which they are working.

OUR INVESTMENTS

The University has Environmental, Social and Governance (ESG) provisions outlined in its Investment Policy Statement (IPS) which governs operations relating to the management of the University's investment portfolio. The University works closely with its investment managers to ensure compliance with all ESG requirements as outlined in the IPS.

Recently, the University amended its IPS to include a statement on modern slavery. The University requires its investment managers to assess and address modern slavery risk as they would any other portfolio risk. The University requires its investment managers to manage and report on this issue annually in line with the regulations and in line with the IPS.

Under the current process, the University's investment managers integrate ESG (including modern slavery) risk assessments throughout their investment decision processes.

OUR SUPPLY CHAIN

Procurement Contracts

In 2020, UWA updated its goods and services contract template, including the UWA Purchase Order Terms and Conditions to include clauses related to modern slavery. These clauses have been in effect since 27 October 2020, and are on all of UWA's goods and services contracts (issued by Procurement) and all UWA Purchase Orders issued since that date (Purchase Order Terms and Conditions under clause 27, and UWA Goods and Services Term and Conditions under clause 22).

UWA is conscious that it does not have full visibility through all tiers of its supply chain and the risks of modern slavery. In accordance with UWA's philosophy of working together with its suppliers to collaborate and coordinate management of these risks, the terms and conditions include the obligation on the supplier to incorporate similar terms in their subcontract agreements.

Vendor Evaluation

In 2020 UWA developed a modern slavery questionnaire, sent to the top 80 per cent spend category vendors. Selected vendors within high-risk industries and services were also invited to complete the questionnaire regardless of total spend. This equated to 252 vendors.

The University analysed the spend category breakdown of the top 80 per cent spend. This high level analysis identified the high-risk categories of Facilities Management (including cleaning and security), IT/Telecommunications and Equipment and Consumables (including medical equipment suppliers) represented 41 per cent of the total non-employee related spend in 2020.

The University also assessed the geographical risk of vendors in the top 80 per cent spend against data provided in the Global Slavery Index. The results showed 94 per cent of vendors in the top 80 per cent were from countries assessed as being low risk.

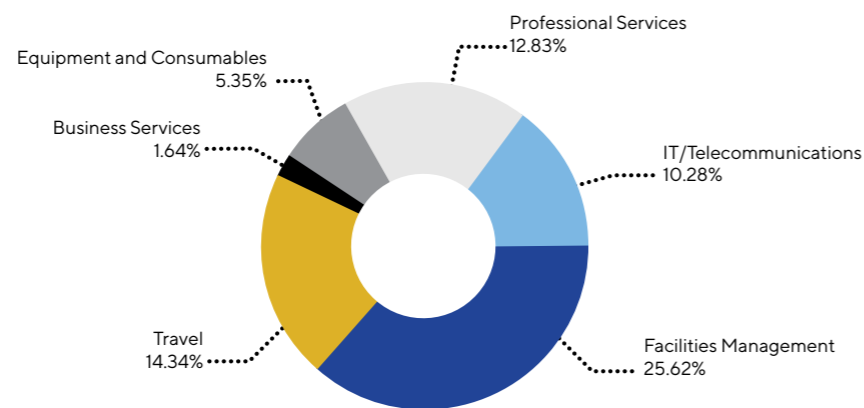


Figure 3. Top 80 per cent spend categorised as percentage of total non-employee related spend 2020

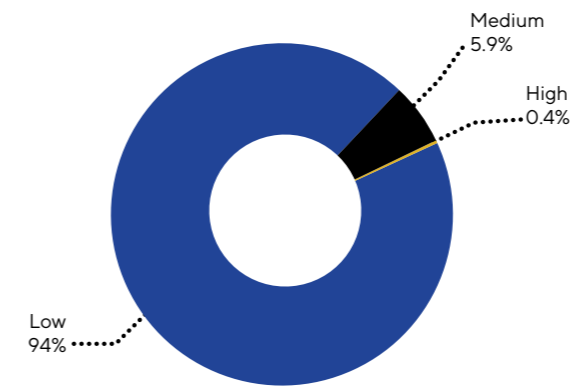


Figure 4. Geographical Risk Rating of top 80 per cent

The University recognises further in depth analysis of each high risk category is warranted however when viewed alongside our geographical risk rating and the analysis provided by the Australian University Procurement Network (AUPN) modern slavery risk dashboard (see below), the University overall supply chain risk is deemed to be low.

AUPN Modern Slavery Risk Dashboard

In 2020 the AUPN developed a modern slavery risk assessment dashboard to be utilised by participating members. The purpose of the dashboard was to provide an indicative assessment of modern slavery risks against categories (defined industry standard categorisation) and countries (based on head office location only).

Through this modern slavery dashboard, UWA was able to identify:

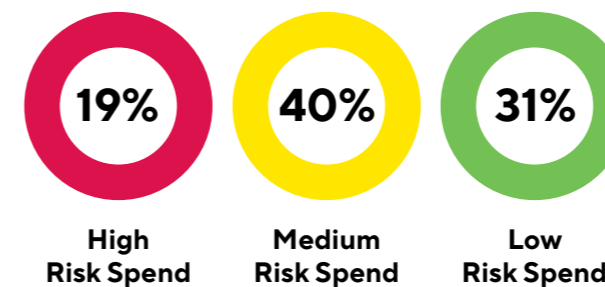


Figure 5. UWA Modern Slavery Risk Categorisation

The remaining 10% of spend was classified as N/A.

AUPN Modern Slavery Risk Platform

The AUPN led a sector collaboration to support all member universities to meet the challenge of human rights transparency in

their supply chains. As part of the program delivery, AUPN executive endorsed a sourcing strategy seeking a third-party technology solution that would support collaboration of its members to gather and interrogate supplier data, identify risk, focus resources, and inform action around modern slavery risk management. The solution will enable universities to assess the modern slavery risks at both sector and individual university level with the additional functionality to assess the risks beyond Tier one suppliers.

COVID-19

During the 2020 financial year, operations and global supply chain were drastically affected by the COVID-19 pandemic. In order to mitigate any adverse affects, UWA established a COVID-19 Taskforce with members from the Critical Incident Management Team representing key areas of Education, Research, Health and Safety and Campus Management.

With regards to the supply chain, critical supply contracts were identified and UWA engaged with stakeholders to mitigate any current and potential supply risks. This included:

- PC supply – increased lead times and lack of components delivered from China and South East Asia: UWA Procurement worked with vendors to secure pre-orders from existing nominated suppliers and also carried out expedited due diligence to source alternative vendors for emergency orders.
- Remote exam provisioning and monitoring services – UWA Procurement facilitated a joint project to ensure students had remote access to undertake examinations during COVID-19 and establishment of off-shore learning centres.
- Remote teaching facilities – UWA facilitated an urgent waiver process to enable quick set up of remote teaching in China via a local proxy service.
- Deferral of payment of commissions for the incumbent supplier of Graduation Regalia services.

These were urgent temporary measures which were not expected to increase the risk of modern slavery. Under usual operations, these risks will be examined more carefully.





Assessment of the Effectiveness of Our Actions

UWA, through the Modern Slavery Working Group, has monitored the development of the actions to assess modern slavery risk within our operations and supply chain throughout 2020.

Supplier Questionnaire

65 questionnaires were returned which constituted 21 per cent of the total annual spend in 2020. Respondents were given six weeks to complete the questionnaire. The structure of the questionnaire and the low return rate will be examined with the aim to address the gaps in the data collected.

Analysis of the responses highlighted:

- Vendors view the completion of the questionnaire as an extra obligation on them.
- Vendors showed varying degrees of understanding of what is required (i.e. looking beyond whether they are required to report under the *Modern Slavery Act*, but also to look further into their own supply chains as they relate to UWA contracts).

UWA aims to develop a plan to engage with vendors and share the importance of modern slavery risks. It is expected that as the requirements under the *Modern Slavery Act* become more widely accepted, vendors will engage more readily.

Of those vendors who responded:

- 22 have a Modern Slavery Statement which addresses the requirements of the *Modern Slavery Act* of which 13 are required to do so under the Act.
- 39 had no Modern Slavery Statement, with 16 indicating their intention to submit a modern slavery statement in the future.
- 4 did not provide a response to the question.

UWA recognises the need to increase the maturity of vendor modern slavery risk classification.

In particular, to better identify high risk vendors (e.g. by industry, country of origin) in the supply chain to prioritise efforts in these areas. The vendor category risk breakdown of direct suppliers, based on current category classification, places a large percentage of vendors in the high risk category. However, as an example, not all of the vendors categorised as Facilities Management would in fact be classed as high risk despite the category containing high risk sub categories such as cleaning and security.

The questionnaire will be used as an initial baseline with the intention to repeat the process on an annual basis to measure improvements in transparency and risk mitigation. As the questionnaire matures, so too will the reporting data.

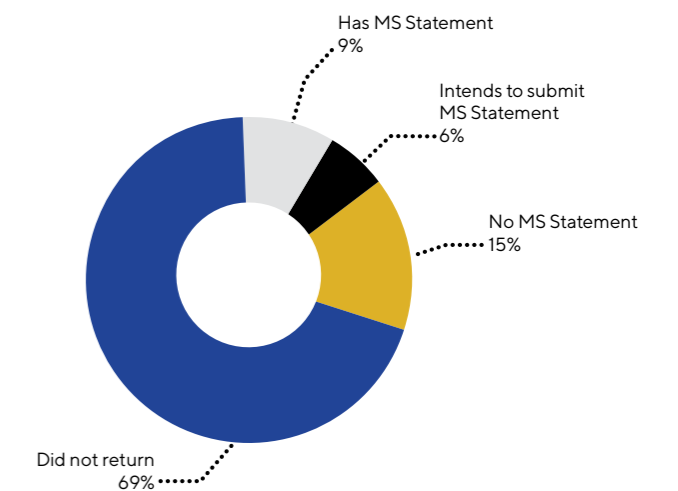


Figure 6. Modern slavery maturity of UWA supply chain

Procurement Contracts

During the 2020 reporting period, 30 procurement contracts were executed. Of those contracts, 16 were executed after 27 October and therefore included the clauses specific to modern slavery. This does not include agreements executed under UWA Purchase Order Terms and Conditions since the implementation of the clauses in October 2020.

Our Process of Consultation with Controlled Entities

OUR SUBSIDIARIES

UWA's subsidiaries are:

- **The University Club of Western Australia Pty Ltd** - Principal Activity - Events and Function Centre
- **Perth International Arts Festival Ltd** - Principal Activity - Arts and Culture Events
- **UWA Sport Pty Ltd** - Principal Activity - Sports and Recreational Activities
- **UWA Accommodation Services Pty Ltd** - Principal Activity - Student Accommodation
- **Young Lives Matter Foundation UWA Limited*** - Principal Activity - Youth Suicide Prevention Research

*Limited by guarantee

For the purposes of this Statement, subsidiaries were asked to provide details of current policies, processes and activities in place to address the risk of modern slavery. All subsidiaries will engage further with the Working Group and UWA Procurement to identify and mitigate supply chain risks going forward.

The information currently available is detailed below:

The University Club of Western Australia Pty Ltd (University Club)

Equal Opportunity Policy

The University Club is committed to promoting equal treatment of all employees.

Recruitment and Selection Policy

The University Club will conduct all recruitment and selection processes in a fair and confidential manner while aligning to the *Fair Work Act 2009 (Cth)* and the requirements of the vacant position.

Code of Ethics

This Code of Ethics is a statement of the ethical principles, values and behaviours of the staff and members of the University Club.

The University Club fosters the values of openness, honesty, tolerance, fairness and responsibility.

The Code of Ethics is based on three principles:

- Equity and Justice,
- Respect for People and;
- Personal and Professional Responsibility.

Code of Conduct

The Code of Conduct is based on principles, values and behaviours outlined in the Code of Ethics. It is a formulation of policies, rules or guidelines that define the specific actions or procedures for a range of specific ethical issues.

This code applies to all staff and members of the University Club, contractors, their employees and representatives, and visitors engaging in any University Club-related activity are expected to conduct themselves in a manner consistent with this code.

Perth International Arts Festival Ltd (Perth Festival)

Perth Festival's risk assessment of current activity is deemed to be minimal in relation to modern slavery. The 2020 Perth Festival closed just prior to the state lockdown in response to the COVID-19 pandemic. At that event there was a large contingent of performers from Western Australia and interstate.

The Perth Festival acknowledges that in the arts there is risk of non-payment to performers and other artists, however it is vigilant in ensuring that these practices do not happen. The Perth Festival places high value on its people and has a dedicated Head of People and Culture to ensure fairness in all aspects of their activities. This is the only role of its kind at any festival in Australia. Perth Festival diligently focuses on ensuring that all their employees are paid correctly and at the appropriate rates by undertaking regular contract reviews, confirming salary advice with Live Performance Australia and having a system of checks and balances across its operations.

UWA Sport Pty Ltd

Employees of UWA Sport are considered UWA staff and are covered under the appropriate safeguards and agreements applied by UWA. UWA Sport also has functions dedicated to People, Culture and Inclusion to oversee the safety and wellbeing of its staff. While UWA Sport's supply chain includes some high risk categories such as sporting goods and uniform suppliers, it endeavours to source locally where possible to reduce exposure to modern slavery risks in overseas countries where employment safeguards may not be as stringent.

UWA Accommodation Services Pty Ltd

This subsidiary does not have any employees and is not an operating entity. This entity processes incentives under the National Rental Affordability Scheme Incentive, that the University receives from the government as part of an accommodation affordability scheme. Operation and management of the property and tenancy management services are performed by the University.

Young Lives Matter Foundation UWA Limited

Young Lives Matter Foundation does not engage employees directly but is an establishment of a board of UWA researchers and industry professionals committed to raise awareness and prevention of youth suicide.



Other Information



OUR SUSTAINABILITY COMMITMENT

The University demonstrates strong leadership in sustainability commitment and planning. Sustainability includes the social dimensions of wellbeing, equity and liveability.

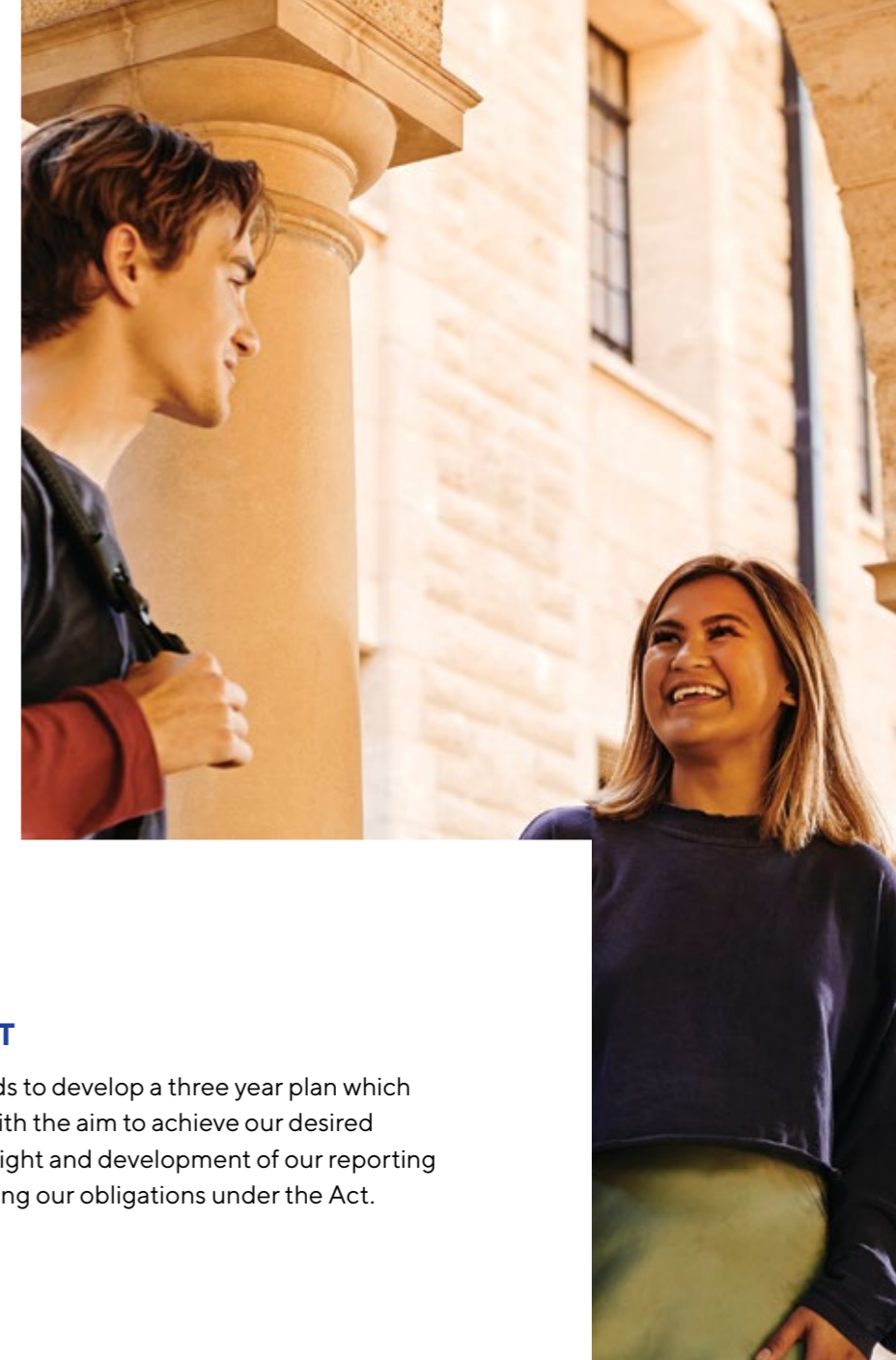
In 2020, the University reinforced its high-level commitment to sustainability and the Sustainable Development Goals (SDGs) through:

- A Sustainability Committee chaired by the Deputy Vice-Chancellor (Education) – a high-level advisory body to the Executive.
- A *Climate Change Community of Practice* – to share and advance teaching and research in climate change topics.
- Two Grand Challenges – to focus activities within the themes of ‘A Just and Equitable Society in a Post-COVID World’ and ‘Climate Change’.

Looking Ahead

UWA is committed to the fair and humane treatment of all our stakeholders as evidenced by the policies and mechanisms in place to safeguard against modern slavery.

With the introduction of the *Modern Slavery Act 2018*, UWA will strive to further improve our performance in the area of modern slavery mitigation.



OUR CONTINUED COMMITMENT

The Modern Slavery Working Group, intends to develop a three year plan which would seek to consider several initiatives, with the aim to achieve our desired outcomes of transparency, enhanced oversight and development of our reporting capabilities to enhance our actions in meeting our obligations under the Act.

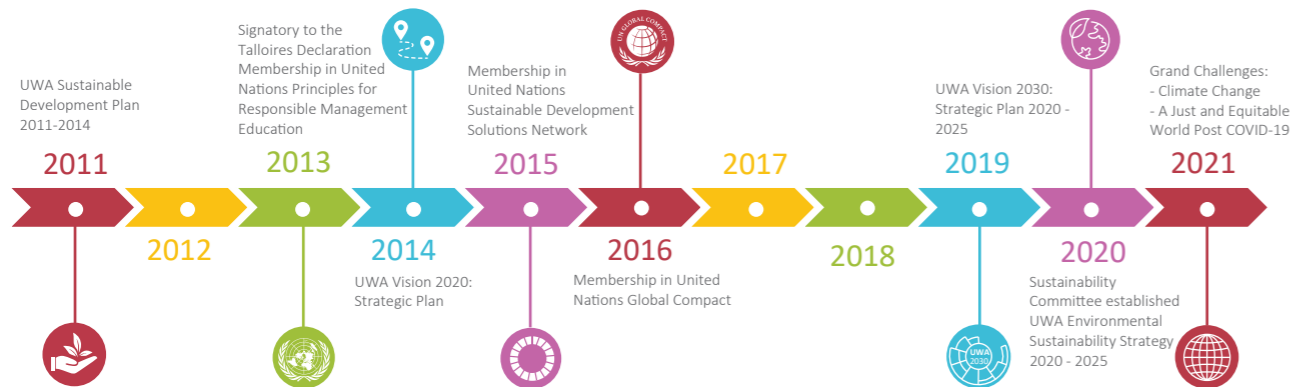


Figure 7. UWA sustainability commitment timeline

The University proposes to:

Continue to develop our internal reporting, practices and processes to ensure an effective response to the issues of modern slavery across the whole of University and subsidiaries.

Demonstrate leadership through a responsible, collaborative procurement approach, drawing on the internal and external expertise available.

Develop wider engagement through shared knowledge, training and transparency across our supply chain and operational business units.



THE UNIVERSITY OF
**WESTERN
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