

# Modern Slavery Statement 2024



THE UNIVERSITY OF  
SYDNEY



# Support Services

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

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

In an emergency, you should always call **Emergency Services by dialling triple zero (000)**. Campus Protective Services (+61 2 9351 3333) is available 24 hours 7 days a week if you feel unsafe on campus and to assist in an emergency after calling triple zero (000).

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

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

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

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

If you are experiencing coercion, threats, deception or violence at your workplace or home you may be experiencing modern slavery, which is illegal in Australia. You can contact the following services for support:

- **Anti-Slavery Australia** (+61 2 9514 8115; [asalegal@uts.edu.au](mailto:asalegal@uts.edu.au)) for free and confidential legal and migration services.
- **My Blue Sky** (+61 2 9514 8115; +61 481 070 844; [help@mybluesky.org.au](mailto:help@mybluesky.org.au)) for free and confidential support for forced marriage.
- **The Salvation Army Additional Referral Pathway** (1800 000 277; [arp@salvationarmy.org.au](mailto:arp@salvationarmy.org.au)) for access to case management support from The Red Cross Support for Trafficked People's Program (STPP).
- **The Australian Federal Police (AFP)** (131 237) available 24 hours 7 days a week, who can keep you safe, provide advice and refer you to other services that provide accommodation, financial support, counselling, and legal and immigration advice.

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

You can report a suspected incident of modern slavery linked to the University via our [Modern Slavery Incident Reporting Form](#) or you can contact the University's dedicated modern slavery team directly by emailing [anti.slavery@sydney.edu.au](mailto:anti.slavery@sydney.edu.au) (response within 24-72 hours).

# Acknowledgement of Country

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

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

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

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

The University has established a working party of leading scholars, including key Indigenous scholars, to oversee a 'truth-telling' project, to facilitate a deeper understanding of the University's past and its accountability in relation to benefitting from and perpetuating forms of Indigenous dispossession, unfree labour, racist ideologies and the practices arising from these forms of discrimination. It aims to deepen the understanding of and appreciation for the importance of the highest standards of ethical research and teaching practice.





# Modern Slavery Statement

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#### About this statement:

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

This is the University of Sydney’s Modern Slavery Statement 2024, pursuant to its obligations under section 13 of Australia’s Modern Slavery Act 2018 (Cth). This statement is made on behalf of the University of Sydney and its controlled entities for the calendar year ended 31 December 2024.

The statement has been approved by the Senate of the University at its meeting on 16 May 2025.

# From the Chancellor and Vice-Chancellor

At the University of Sydney, respecting human rights goes to the heart of our vision to deliver world-class teaching and research that transforms peoples' lives and improves our world. We are delighted to present the University's 2024 Modern Slavery Statement. Our fifth report under the *Modern Slavery Act 2018 (Cth)* reflects our unwavering commitment to tackling the global challenge of modern slavery, and our progress over the past year.

In 2024, we continued to take meaningful action to identify and address modern slavery risks across the University's operations and supply chain. We enhanced our due diligence in research and procurement activities, partnerships, and investments. The safety and wellbeing of our students remained a priority, and we actively built awareness and resilience in our student community, especially among international students who may be at heightened risk of modern slavery.

With around fifty million people living in slavery worldwide, and 41,000 here in Australia<sup>1</sup>, addressing modern slavery remains one of the most pressing and complex issues of our time. We welcomed efforts to bolster Australia's national response with the appointment of the inaugural Commonwealth Anti-Slavery Commissioner and look forward to collaborating with the Commissioner in the years ahead.

As Australia's first university, we recognise modern slavery is a challenge where we have a unique role to play in contributing to solutions and informing policy and practice through our research, education, thought leadership and partnerships. In 2025, we will continue these efforts. We will remain transparent about the risks we uncover and the actions we take, and will continue to share our learnings, as we do in the case studies featured throughout this statement.

As we look ahead, we want the work of the University to be more compelling and more important to society than at any other time in our history. We will strive to uphold our commitment and action on modern slavery as a testament to this leadership for good.



Mr David Thodey AO, FTSE  
Chancellor

A handwritten signature in black ink, reading "David Thodey".



Professor Mark Scott AO  
Vice-Chancellor  
and President

A handwritten signature in black ink, reading "Mark Scott".

<sup>1</sup> Global Slavery Index, 2023.

# Snapshot of Our Progress in 2024

In 2024, we focused on continuing to strengthen due diligence in our supply chain, deepening our approach to assessing risks in the University's research activities, and enhancing our engagement with students who may be at heightened risk of modern slavery.

Impact area	Key Deliverables
Reducing risks by embedding best practice due diligence	<p><b>Improved our understanding of our impact on people through our supply chain, research and investment activities.</b></p> <ul style="list-style-type: none"> <li>– Innovated and scaled the Know Your Partner and Project Tool (KYPPT), a bespoke internal tool for identifying modern slavery and other related risks, with 2000 searches performed in the first four months following the launch of the new intranet version.</li> <li>– Uplifted our modern slavery awareness and due diligence processes across the procurement lifecycle, including developing 18 modern slavery sector guides to support staff with planning and early market engagement activities.</li> <li>– Provided tailored modern slavery risk assessments and detailed due diligence on 8 high-risk procurement projects.</li> <li>– Participated in multi-stakeholder initiatives to address modern slavery issues, including monitoring 22 factories linked to the University's ICT supply chain through our affiliation with Electronics Watch.</li> <li>– Screened for modern slavery risks in 689 research projects.</li> <li>– 51 high-risk research projects referred to the Modern Slavery Unit for further review and assessment.</li> <li>– Screened 100% of the University's investment portfolios for human rights risk and engaged 100% of fund managers in the publicly listed portfolio.</li> </ul>
Enhancing knowledge and capabilities of our staff and students, with a culture of continuous learning	<p><b>Supported and enabled our staff to identify and address modern slavery risks.</b></p> <ul style="list-style-type: none"> <li>– 18,000+ staff and affiliates have now completed the Anti-Slavery Awareness training module since the training launched.</li> <li>– 400+ staff participated in tailored briefings and training, through bespoke capacity building and workshops, delivered both internally and with partners including Anti-Slavery Australia, Australian Red Cross, Salvation Army and the Australian Federal Police.</li> </ul> <p><b>Supported our students to access tailored information and know where to get help.</b></p> <ul style="list-style-type: none"> <li>– Almost 16,000 students have voluntarily completed our Anti-Slavery Awareness training module since the module launched.</li> <li>– Engaged over 900 students on modern slavery risks, through student-centred trainings and activations, including during Semester 1 and 2 Welcome Programs.</li> <li>– Enabled student leadership, equipping 41 Peer Support Advisors with knowledge and confidence to engage peers on modern slavery risks.</li> <li>– Developed and integrated a student risk matrix and standard operating procedure.</li> </ul>
Fostering meaningful collaboration and partnerships to contribute to the global effort to eradicate slavery	<p><b>Engaged in meaningful partnerships and networks, with over 30 external collaborations.</b></p> <ul style="list-style-type: none"> <li>– Supported the Office of the NSW Anti-slavery Commissioner as a member of the 'It's healthy to fight modern slavery' health working group.</li> <li>– Contributed to 4 federal government consultation processes on the Modern Slavery Act, forced marriage and guidelines for people with lived experience.</li> <li>– Continued our affiliation of Electronics Watch and membership of the Cleaning Accountability Framework.</li> </ul> <p><b>Contributed to the public discourse on acting on modern slavery.</b></p> <ul style="list-style-type: none"> <li>– Held a public event on modern slavery and ethical procurement, with high-profile speakers from government, business and civil society.</li> <li>– Engaged 6 universities to discuss common challenges and share resources across Europe, Canada and Australia.</li> <li>– Contributed to the Australian Red Cross International Student Steering Committee to develop tailored materials for at-risk students.</li> </ul> <p><b>Fostered solutions focused research and education.</b></p> <ul style="list-style-type: none"> <li>– Launched the University's Modern Slavery Academic Network.</li> <li>– Supported and built awareness of the award-winning OASIS project.</li> </ul>

## Our journey this far

### *Taking meaningful action to address modern slavery*

Since our inaugural Modern Slavery Statement in 2020, the University of Sydney has matured its approach, working towards embedding modern slavery risk management across policy, governance, supply chains, student support, investments, controlled entities and research and education. This snapshot highlights our commitment to continuous improvement, transparency, accountability, and our ongoing efforts to make a meaningful contribution to combating modern slavery.



## Our Journey Over Five Years of Modern Slavery Act (Cth) Reporting



## Who we are

We are Australia's first University, founded in 1850, and a world-renowned teaching and research institution. We educate students from Australia and around the world at facilities primarily across Sydney and New South Wales.

Our research combines the expertise and talents of scholars from many disciplines – and we are dedicated to delivering a transformational student experience.

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

\*Data current as of 31 March 2024 unless otherwise indicated.



### Our People

**15**

Fellows of the Senate, the University's governing authority, chaired by the Chancellor

**19**

Senior executives, with 9 portfolios:

Vice-Chancellor

Provost

Education

Indigenous Strategy and Services

Research

Advancement

External Engagement

Operations

Strategy

**70,701**

Students

36,612 Domestic students

33,489 International students from 133 countries

**29,766\***

University staff

13,783 Casual staff

5,928 Professional staff

3,893 Academic staff

6,162 Affiliates

\* Based on role not unique headcount. Unique headcount = 28,074

Staff breakdown by diversity groups:

263 staff identifying as Aboriginal and Torres Strait Islander

8,484 staff identifying as culturally and/or linguistically diverse

414 staff with disability



### Our Spaces and Operations

**9**

Teaching and research locations

**7**

Campuses registered with Government

Camden

Camperdown

(including Mallett Street)

Dubbo

Lidcombe (Cumberland)

Surry Hills

Sydney

Westmead

**1**

Research station

One Tree Island Research Station

**1**

Teaching facility

Parramatta

**2**

Offshore centres

Centre in China

Sydney Vietnam Institute

**566**

Campus buildings

**7**

Residential colleges



## Our Education and Research

5

Faculties

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

3

Schools

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

913

Award courses (excludes  
cross-institutional)

23

Fields of research

90

Research and teaching centres

\$419,896,782

Awarded in research grants,  
external funding and fellowships\*

\*For period 01 April 2023 - 31 March 2024



## Our Community

464,000

Alumni

200+

Clubs and societies run by  
students with support from the  
University of Sydney Union.

250+

Exchange partners\*

(\*as of 1 November 2024)

117

Exchange partners ranked in  
the Top 200 universities (Time  
Higher Education World University  
Rankings 2025)

(\*as of 1 November 2024)

360+

International partners



## Our Controlled Entities

4

Controlled entities

### Operating in Australia

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

### Operating Overseas

Suzhou Xi Su Commercial  
Consulting Co., Limited (Centre in  
China) – Operator of our multi-  
functional centre in China.

The University of Sydney Vietnam  
Institute Company Limited  
(Sydney Vietnam Institute) – Our  
institute in Vietnam facilitating  
research and engagement  
between Australia and Vietnam.

A14 Holdings Pty Ltd – Holding  
company for the Centre in China  
and the Sydney Vietnam Institute,  
wholly owned and controlled  
by the University.



## Our Supply Chain

\$1,184,563,527.24

spend on suppliers

10,000+

suppliers located across  
138 countries

220

product and service types

139

licenses provided to retail and  
other facilities on campus

(excludes licensees administered  
by University of Sydney Union and  
Sydney University Sport and Fitness)

# How we deliver on our vision

## *Our governance*



### **Senate**

The University Senate approves the University's approach to addressing modern slavery and the annual Modern Slavery Statement.

### **Vice-Chancellor**

The Vice-Chancellor and President is the University's principal executive officer, and the designated owner of the University's Modern Slavery Policy 2020. The Vice President Operations is the Modern Slavery Policy administrator.

### **University Executive Committees**

The University Executive is an advisory committee which provides advice to the Vice-Chancellor and Senate. Together with its subcommittees, it oversees and monitors the University's compliance with the Modern Slavery Act.

### **Modern Slavery Unit, Office of the Provost and Deputy Vice-Chancellor**

The Modern Slavery Unit (MSU) is responsible for embedding respect for human rights across the University and ensuring the University's compliance with the Modern Slavery Act. The team was established in 2022 and is made up of 3 full time and 1 casual staff who support University-wide implementation of modern slavery due diligence and produce the annual modern slavery statement. The MSU also works in partnership with academics, civil society, government, and business to accelerate education and research excellence on modern slavery.

### **Roles and responsibilities for identifying and addressing risks**

As set out in the University's Modern Slavery Policy, implementation of our modern slavery due diligence framework is shared across the University's Senior Executive and key delivery partners including:

- Education
- Research
- Operations
- Procurement
- Human Resources
- Investments
- Legal and Policy

# Our Approach to Addressing Modern Slavery

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Our Theory of Change

Our Approach to Modern Slavery  
Risk Management

Salient Modern Slavery Risks  
in the University's Value Chain

# Our Theory of Change

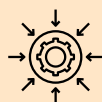
Consistent with the United Nations Guiding Principles on Business and Human Rights, how we take action to address modern slavery is guided by our deep commitment to addressing risks to people.

In 2024, we continued to reflect on and refine our Theory of Change, which provides the roadmap for delivering on this commitment and ensuring our actions are fit for purpose, targeted and have meaningful impact for those most affected by modern slavery.



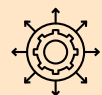
## We are GUIDED BY...

- Stakeholders – staff, students, partners and community
- Voices of people with lived experience
- The UN Guiding Principles on Business and Human Rights
- The Modern Slavery Act Guidance for Reporting Entities
- The NSW Anti-slavery Commissioner's Guidance on Reasonable Steps
- Sydney in 2032 Strategy



## And by strategically investing in and utilising our resources (INPUTS)...

- Robust governance and leadership commitment
- Human and financial resources, including a dedicated Modern Slavery Unit with subject matter expertise
- Technology and innovation
- Modern Slavery Academic Network
- Stakeholder networks and partnerships
- Access to referral services
- Key learnings and best practice



## We will deliver key ACTIVITIES and OUTPUTS, tools and initiatives to identify, manage and mitigate modern slavery risks...

- Modern slavery due diligence
- Reporting
- Collaborations and multi-stakeholder partnerships
- Training and capacity building
- Saliency risk assessments
- Governance and policy frameworks
- Grievance mechanism
- Remediation process
- Research
- Thought leadership, events and engagement
- Know Your Partner and Project Tool (KYPPT)



## To contribute to meaningful change OUTCOMES

- **Reduction in modern slavery risks:** Embed best practice due diligence across the University to identify, mitigate, prevent and respond to modern slavery risks in operations and supply chains.
- **Improved understanding and continuous learning:** Enhance the knowledge, awareness and capability of staff and our student community to identify and respond to modern slavery risks and know how to access support, fostering a culture of continuous learning and feedback.
- **Solutions-focused research, education and partnerships:** Increase and accelerate education, research, collaborations and partnerships that contribute to global solutions to eradicate modern slavery.



## Supporting our long-term vision and IMPACT

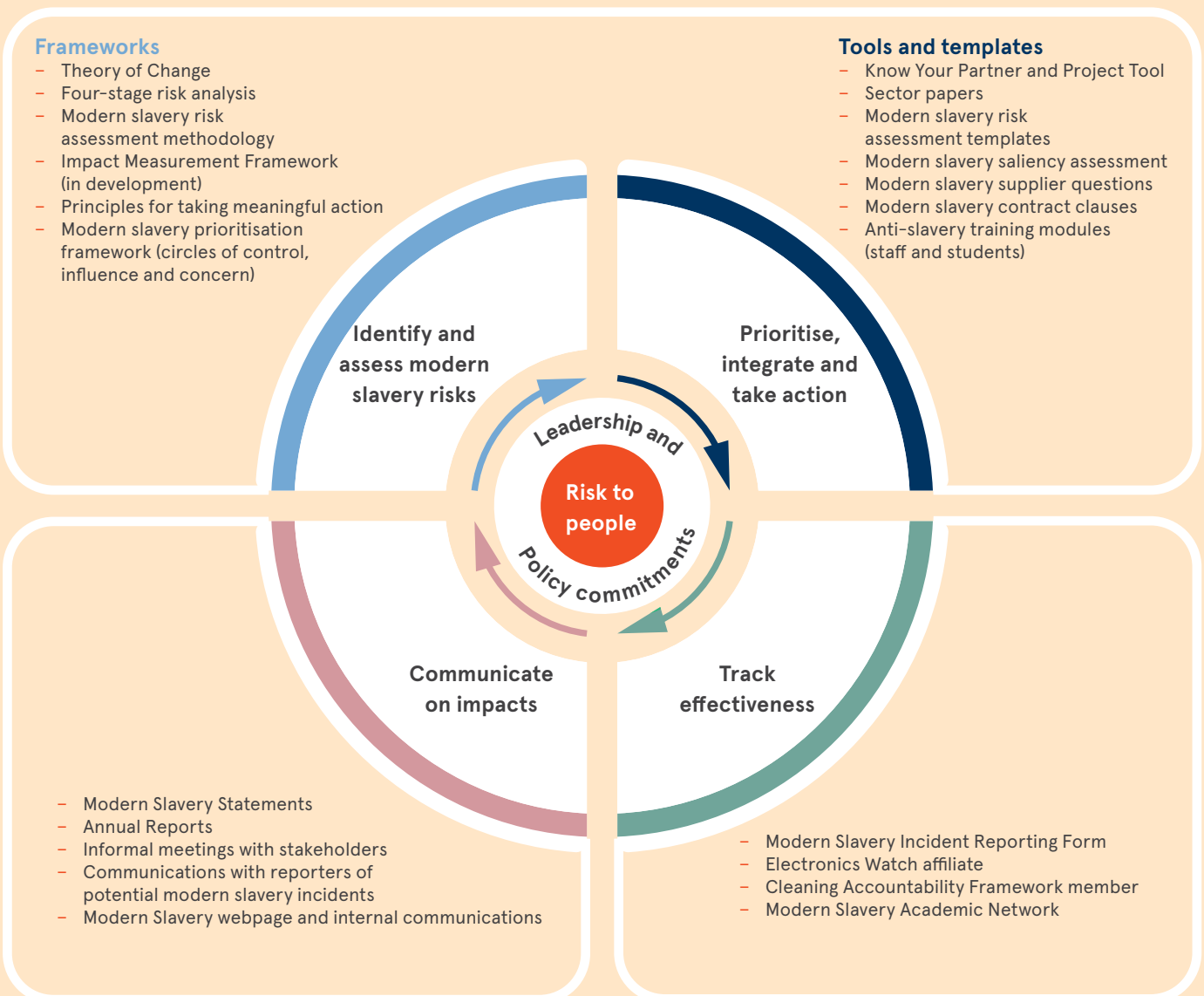
To have a meaningful impact on the global challenge of modern slavery.

# Our Approach to Modern Slavery Risk Management

Focusing on continuous improvement, the University's approach to modern slavery risk management has evolved since our first statement. Our approach focuses on addressing *risks to people* and involves:

- Identifying where we may be at risk of causing, contributing to or being directly linked to modern slavery
- Assessing the saliency of those risks (severity and likelihood)
- Prioritising our actions (based on the degree of leverage we have)
- Evaluating our effectiveness
- Communicating our impact.

We draw on frameworks, tools and partnerships to implement this approach, informed by best practice guidance and the University's vision, leadership and policy commitment to take action on modern slavery.



# Salient Modern Slavery Risks in the University's Value Chain

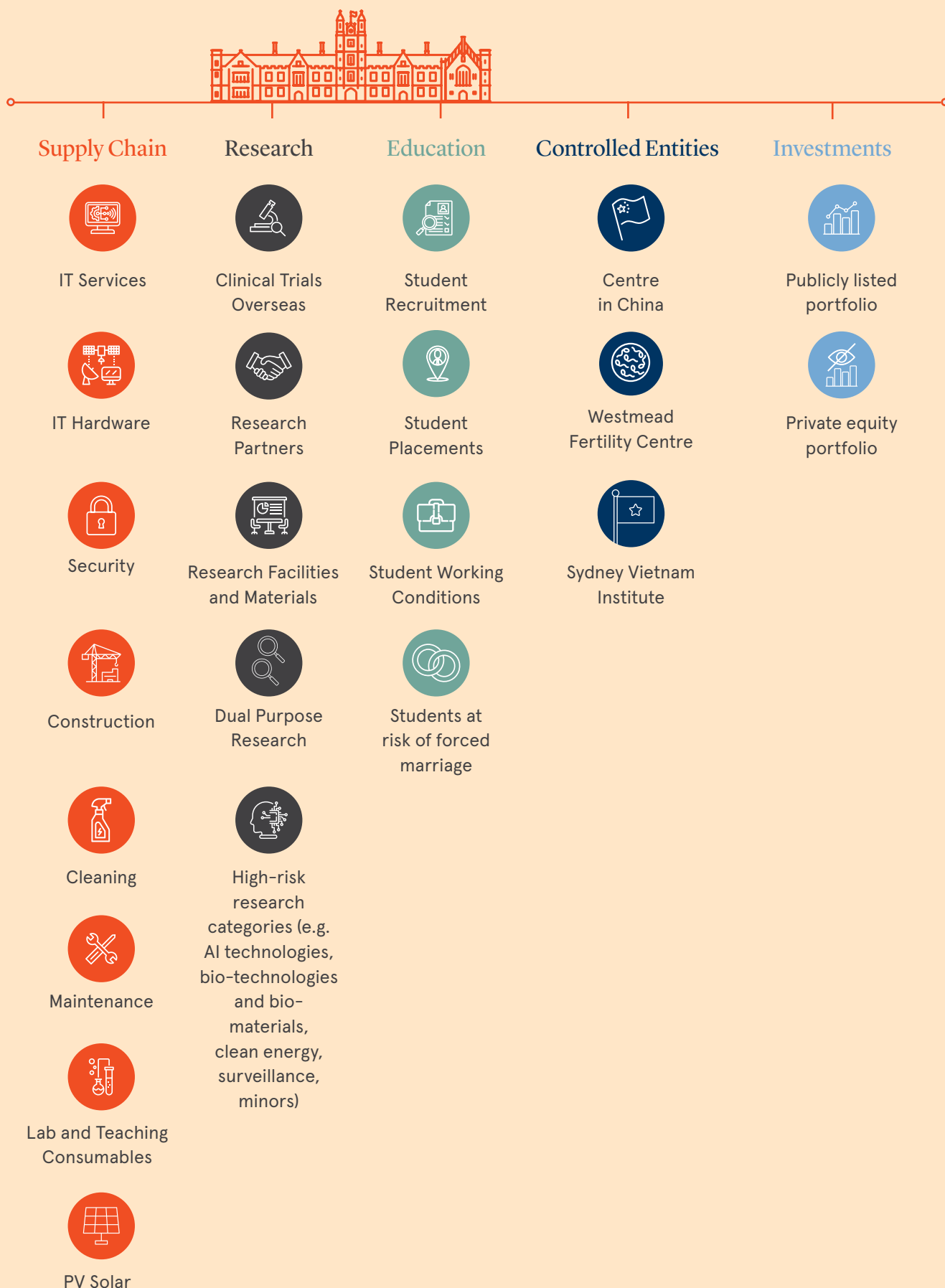
Like all large and complex organisations, universities are linked to modern slavery risks through their operations and supply chain. Universities may also have potential to cause, contribute or be linked to modern slavery risks along their value chains. These may include risks relating to procurement, research, investments and funds under management, controlled entities, and through the risks students may experience in the workplace or community.

Type of potential involvement	Cause	Contribute	Directly linked
Definition	An entity's operations may directly result in modern slavery practices	An entity's operations or actions in its supply chain may contribute to modern slavery, including acts or omissions that may incentivise modern slavery	An entity's operations, products or services may be connected to modern slavery through the activities of another entity it has a business relationship with

How the University could potentially cause, contribute or be directly linked to modern slavery through our role (based on hypothetical, not actual scenarios) ...

As an employer	Potential impact on our people	
As a procurer of goods and services		Via our supply chain
As a research institute	Via our research projects and partnerships	
As a higher education institute		Via risks to our students
As an investor	Via our investments	

# Modern Slavery Risks in the University's Value Chain





# Identifying, Assessing and Addressing Our Modern Slavery Risks

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Our People

Our Supply Chain

Our Research Activities

Our Support to Students

Our Investments

Our Controlled Entities

Grievance Mechanism  
and Remediation

Collaboration and Engagement



# Identifying and Addressing our Modern Slavery Risks

## *Our People*

The University of Sydney has a dynamic workforce of over 28,000 people, in a mix of permanent, fixed term, and casual academic, professional and affiliate roles. Our people are integral to our success in transforming lives through world-class research and teaching.

The University's workforce is diverse, with a significant proportion of casual workers (over 13,000 casual staff) and workers from diverse backgrounds, who all play a crucial role in our operations. When considering the risks of modern slavery practices in the University's operations, our direct employees are considered low risk. Staff are employed under transparent employment conditions that comply with employment requirements. We follow stringent recruitment practices that include background checks and employees are all hired voluntarily. And we strive to provide a safe, inclusive, and supportive work environment, promoting the well-being and professional development of employees.

To further minimise the risks to staff, the University has introduced mandatory modern slavery training for all employees, to build awareness on modern slavery and where to seek assistance. To date, over 18,000 staff have completed the online Anti-Slavery Awareness training module. The University has also established a clear and accessible grievance mechanism that allow staff to report any issues related to modern slavery confidentially, with all reports investigated according to our Modern Slavery Incident Reporting Operating Principles (see page 47).



# Identifying and Addressing our Modern Slavery Risks

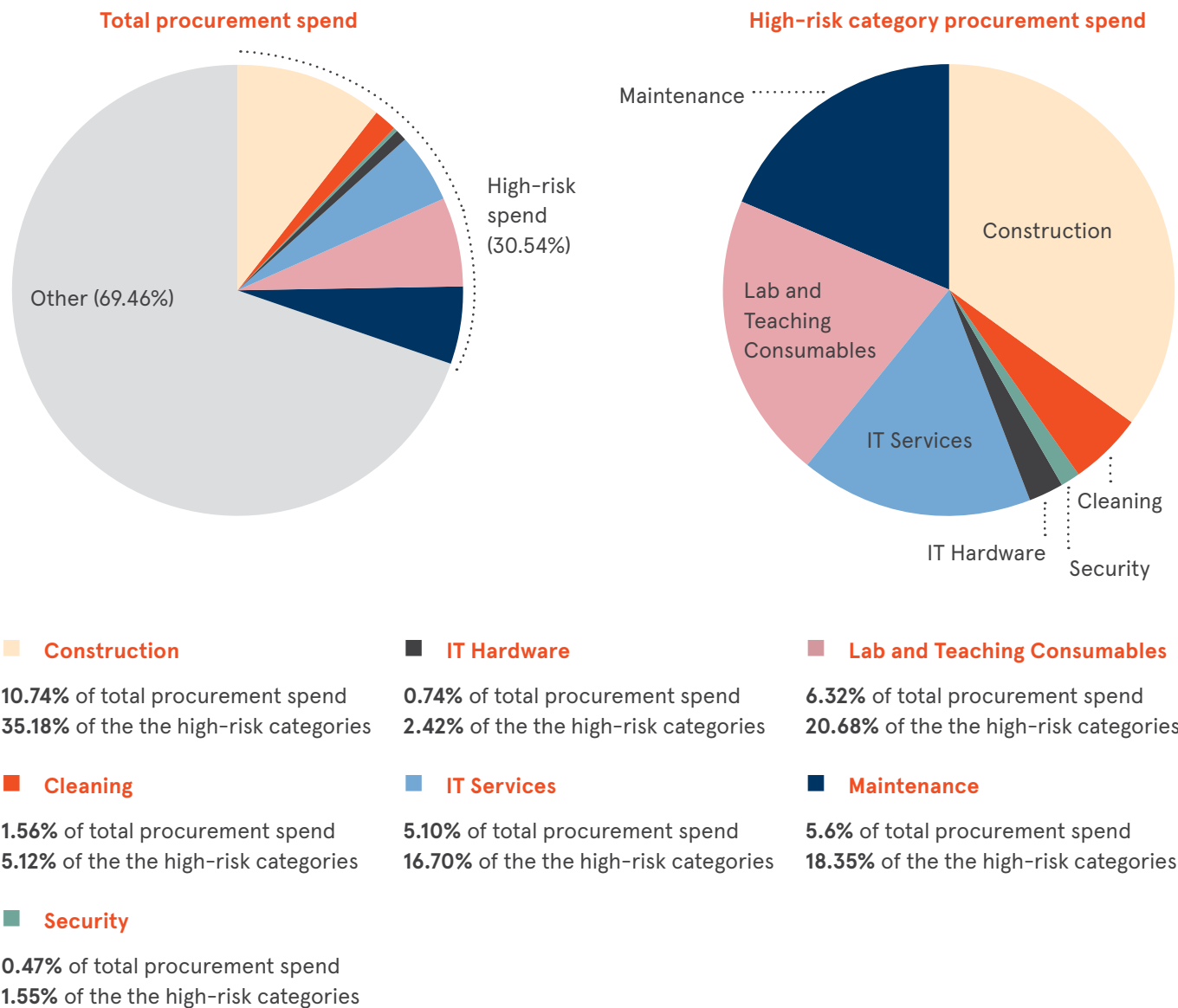
## *Our Supply Chain*

The University’s supply chain is complex and diverse. In 2024, the University spent over \$1.18 billion procuring goods and services, with over 10,000 suppliers and nearly 220 product and service types from 138 countries.

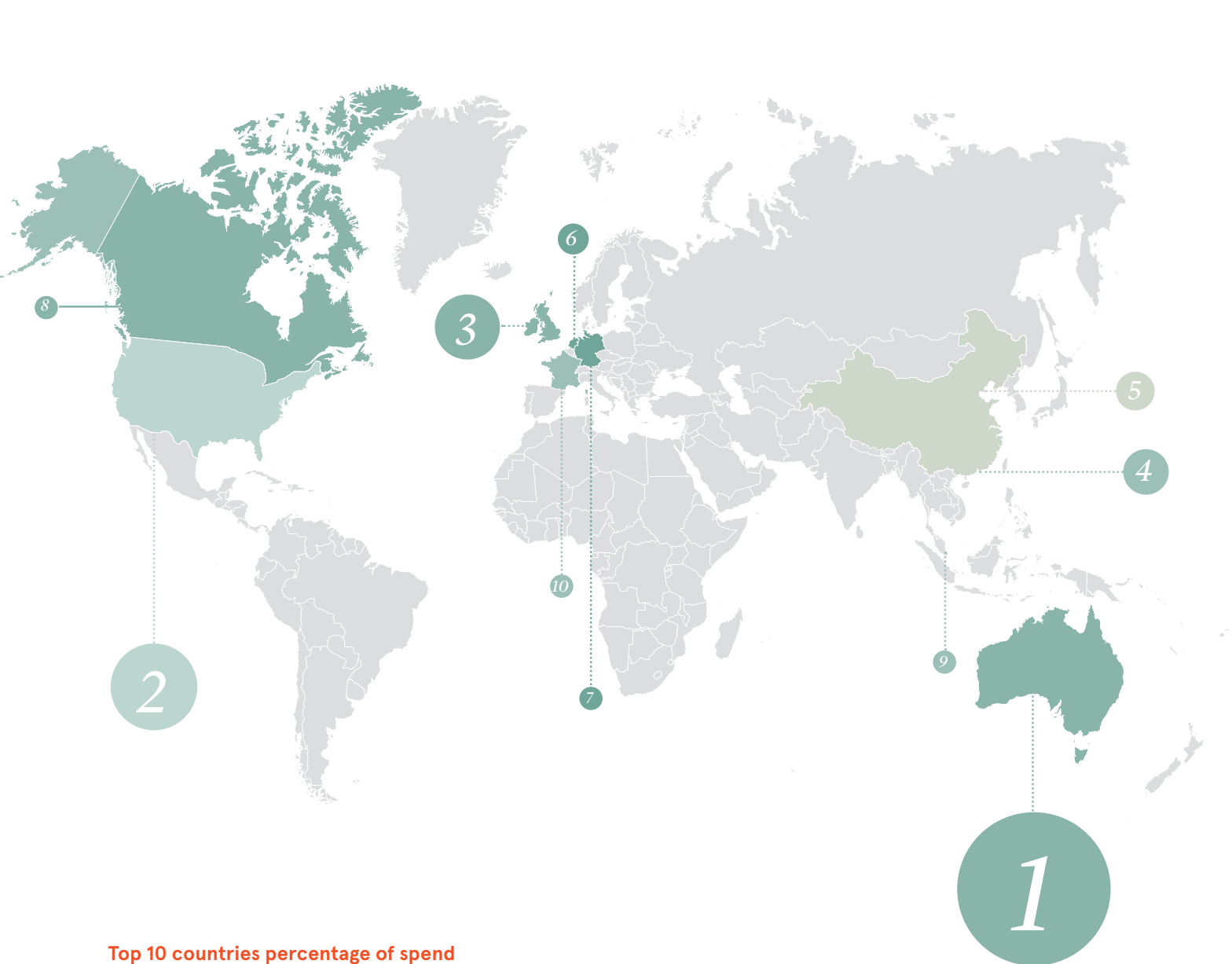
In line with best practice and the Commonwealth Modern Slavery Act Guidance for Reporting Entities, we consider sector and industry risks, product and services risks, geographic risks, and entity risks. The University has identified eight procurement categories with high inherent risk of modern slavery: lab and teaching consumables, IT services, IT hardware, construction, cleaning, maintenance, security, and solar panels.

These high-risk categories contributed to 31% of the University’s total procurement spend.

Breakdown of 2024 procurement spend



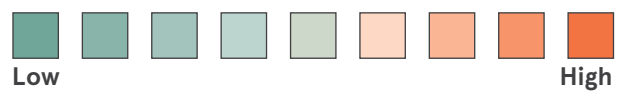
## Top 10 countries of procurement spend and the Modern Slavery risk



Top 10 countries percentage of spend

Map legend	Country	Percentage
1	Australia	89.01%
2	United States	3.30%
3	United Kingdom	1.05%
4	Hong Kong	1.05%
5	China	1.03%
6	Netherlands	0.78%
7	Germany	0.52%
8	Canada	0.40%
9	Singapore	0.29%
10	France	0.27%

Estimated Prevalence of Modern Slavery



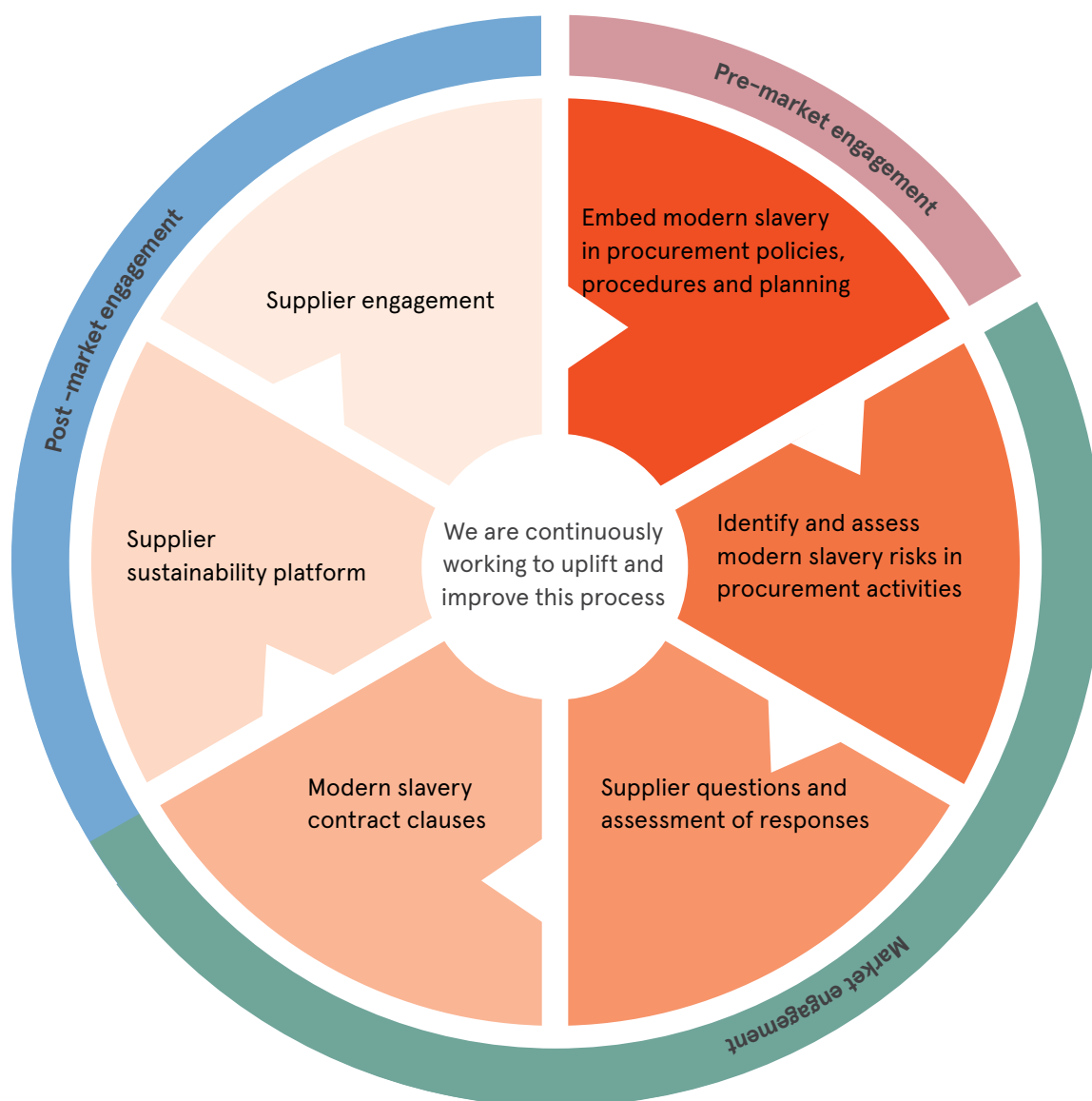
\*Source: Global Slavery Index, Walk Free, 2023

# Identifying and Addressing our Modern Slavery Risks

## *Risk management across the procurement cycle*

The University takes a risk-based approach to managing modern slavery risks in our supply chain. We focus our due diligence on high-risk categories, and working together with our suppliers and partners, recognise we have a shared responsibility and role to play in addressing modern slavery across the supply chain. Our risk management approach is detailed on page 13. We apply this to procurement through the steps outlined in the diagram below, drawing on a toolkit of resources for each stage of the procurement lifecycle.

Modern slavery risk management across the procurement cycle



## Case Study

### *Cleaning Services on the Camperdown Campus*

The University of Sydney's Camperdown campus includes diverse teaching and learning spaces, with specialised cleaning requirements.

Cleaning has been identified by the University as a sector at high-risk of modern slavery. In 2023, we undertook increased due diligence during the tender process for cleaning services and put mitigants in place to help the University monitor modern slavery risks in these contracts. Following this, in 2024, the University engaged the services of two cleaning contractors for its Camperdown campus. To ensure modern slavery remains a focus of supplier engagement, modern slavery risk management is discussed regularly as a standing agenda item during quarterly meetings with the contractors. This is an opportunity to raise awareness of the University's expectations, and to hear from contractors about how they are managing the risks in their business operations, working towards building a relationship with our contractors where they feel comfortable raising concerns and issues.

Another risk mitigant in place is that the cleaning contracts include an annual pricing review. This process allows the price to fluctuate, accommodating changing circumstances or legislation, and alleviating costs pressures on the supplier, while ensuring that pricing is sufficient for employees to be paid at least the minimum wage. This reduces the risk that the University could unintentionally contribute to modern slavery by pricing the contract at a level that leads to extreme cost pressures on a supplier and compromised labour conditions for workers.

We also monitor the modern slavery risks in our cleaning supply chain by auditing the suppliers' records (undertaken twice-a-year by a third party). The first audits are currently underway, with results due in early 2025. The audit checks that accurate records relating to employment are kept including working hours, wages, superannuation, leave entitlements, and pay slips, and that wages are paid accurately and on time. The audits also check that workers' conditions meet the minimum standards, for example, that workers are paid the award rate and receive appropriate breaks and are employed appropriately. Should issues arise, we will work with the contractors to address the concerns and prevent recurrence. We will continue to engage with the cleaning suppliers in 2025 to continue to improve our shared modern slavery risk management approach.



# Identifying and Addressing our Modern Slavery Risks

## *Our Supply Chain Activities*

In 2024, we focused on enhancing modern slavery risk management in procurement, developing new tools and guidance, and enhancing our visibility of risks to people beyond the first tier of our supply chain.

An ongoing uplift will continue to enable the University to deepen our understanding of salient modern slavery risks in our supply chain and build the capability of our suppliers to manage modern slavery risks, take steps to mitigate and address risks, and integrate modern slavery considerations into decision making.

We focused on	We delivered ACTIVITIES and OUTPUTS to identify, manage and mitigate modern slavery risks		To drive meaningful OUTCOMES
	Activity	Output	
<b>Continuing to improve our supply chain due diligence</b>	<ul style="list-style-type: none"> <li>Reviewed the University's Procurement Policy and Supplier Business Ethics Statement of Expectation (due to be completed in 2025).</li> <li>Uplifted our modern slavery due diligence processes across the procurement lifecycle and developed tools, methodology and resources to increase awareness and understanding of modern slavery risks in supply chains.</li> <li>Reviewed and uplifted our modern slavery contract clauses, considering the model clauses from the Office of the NSW Anti-slavery Commissioner and the shared-responsibility approach.</li> <li>Designed and delivered tailored staff training/briefings on modern slavery risks in procurement and the University's due diligence approach.</li> </ul>	<ul style="list-style-type: none"> <li>103 tenders included modern slavery questions, compared with 55 in 2023.</li> <li>289 new or renewed University contracts included modern slavery clauses, up from 122 in 2023.</li> <li>3.5% increase in the number of visits to the University of Sydney's Supplier webpage in 2024 when compared to 2023. This page contains information on modern slavery.</li> <li>Tender questions (standard and high-risk) were revised, and we developed category specific questions for high-risk procurements, accompanied by guidance on how to assess responses.</li> <li>18 modern slavery sector guides developed to support staff with planning and early market engagement activities. These explain why the sector is high-risk and what to do.</li> <li>390 University staff participated in 2 tailored briefings on modern slavery risks in procurement.</li> </ul>	<p><b>Reducing modern slavery risks</b> by uplifting our procurement due diligence process</p> <p><b>Improving understanding and enhancing the knowledge and capability</b> of staff to identify and respond to risks</p>
<b>Identifying and assessing risks and embedding good practice due diligence into procurement processes</b>	<ul style="list-style-type: none"> <li>Conducted in-depth risk assessments and reviews of high-risk projects.</li> <li>Screened the University's suppliers for human rights risks.</li> <li>Continued our partnerships with Electronics Watch (EW) – including joining the EW Apple Working Group – and the Cleaning Accountability Framework.</li> <li>Reviewed and actioned recommendations from the supply chain mapping to Tier 10 commissioned in 2023 using the University's Open Analysis to Address Slavery in Supply Chains (OASIS) project.</li> </ul>	<ul style="list-style-type: none"> <li>16 modern slavery risk assessments, reviews of high-risk projects and enhanced modern slavery due diligence was undertaken on procurement activities related to solar panels, contingent labour, maintenance services, uniforms, building works, construction, catering, ICT services and hardware, and lab and vet consumables.</li> <li>Developed an assessment checklist and reviewed 1 set of solar panel traceability documentation.</li> <li>100% of suppliers screened for human rights risks, with 10 matches identified for potential human rights concerns. These were reviewed, and no further action was required.</li> </ul>	<b>Reducing modern slavery risks</b> by identifying, assessing and managing risks in our supply chains

We focused on	We delivered ACTIVITIES and OUTPUTS to identify, manage and mitigate modern slavery risks		To drive meaningful OUTCOMES
	Activity	Output	
Engaging suppliers on modern slavery	<ul style="list-style-type: none"> <li>Engaged directly with suppliers on modern slavery. This included making recommendations to suppliers to uplift modern slavery risk management, monitoring contract implementation, building suppliers' capacity, requesting information to support worker driven monitoring, delivering market briefings, and addressing reports received.</li> <li>Received and assessed quarterly reports from EW on factories in our ICT supply chain that EW monitors.</li> </ul>	<ul style="list-style-type: none"> <li>2 audits that incorporate modern slavery considerations undertaken with suppliers during 2024 (results due in early 2025).</li> <li>8 suppliers directly engaged on modern slavery, including suppliers in high-risk sectors, e.g. cleaning, ICT, maintenance and solar panels.</li> <li>Highlighted modern slavery risks and the University's expectations at 2 supplier briefings for guarding and concierge and events and catering tenders.</li> <li>1 supplier engaged following a report to the University via the online <a href="#">Modern Slavery Incident Reporting Form</a> (see the case study on page 46).</li> <li>2 ICT suppliers completed EW factory disclosure forms, detailing where components and final assembly of ICT products occurs; 3 other suppliers were engaged to request factory disclosures.</li> <li>22 factories in our ICT supply chain are currently being monitored by EW, with 17 ICT factories in our supply chain with known human rights violations, and remediation activities underway in 8 factories.</li> </ul>	Improving understanding and continuous learning, and enhancing the knowledge and capability of our suppliers
Sharing our approach to supply chain due diligence with external stakeholders	<ul style="list-style-type: none"> <li>Participated in the Australasian Universities Procurement Network's (AUPN) Anti-Slavery Working Group and shared our experience and learnings.</li> <li>Supported sector collaboration and met with other universities to share our risk management approach.</li> <li>The University of Sydney's Institute of Transport and Logistics Studies collaborated with the Office of the NSW Anti-slavery Commissioner (OASC) to develop and maintain the <a href="#">Inherent Risk Identification Tool (IRIT)</a>. The IRIT is incorporated into the OASC's Guidance on Reasonable Steps.</li> </ul>	<ul style="list-style-type: none"> <li>Delivered 2 presentations relating to modern slavery risk management in supply chains to 94 people in the AUPN Anti-Slavery Forum and attended 9 AUPN Anti-Slavery Forums.</li> <li>Met with 3 Australian universities and 1 overseas university to share our approach to due diligence.</li> <li>Presented our approach to modern slavery due diligence in supply chains to 80 representatives from tertiary education institutes at the ACTS Future of Sustainability Conference.</li> </ul>	Improving understanding and continuous learning, and enhancing knowledge and capacity in the university sector

### Lessons learnt:

**Supply Chain Complexity:** Our diverse supply chain involves multiple internal stakeholders in procuring goods and services and managing supplier relationships. Raising awareness, enhancing capabilities and embedding due diligence requires an ongoing and sustained commitment.

**Supplier engagement:** We have opportunities to deepen engagement with suppliers on modern slavery, sharing our approach and learning from them.

**Contract management:** Effective contract management is crucial for modern slavery risk management. We have ongoing opportunities to improve our engagement and assessment of suppliers' maturity.

# Case Study

## *Laboratory and Teaching Consumables*

Laboratory and teaching consumables include products such as rubber gloves, lab supplies, glassware, chemicals, reagents, and many other items that are essential for the University's research and teaching activities.

Universities represent a significant share of the research and laboratory consumables market in Australia. For example, in 2024, the University of Sydney spent over \$74 million on lab and teaching consumables. Laboratory consumables are considered a high-risk category for modern slavery. Workers along the supply chain, including those involved in the extraction of raw materials and the manufacture of components, may have experienced child labour, forced labour, excessive work hours, deceptive recruitment practices and exposure to hazardous chemicals and machinery.

In 2024, we collaborated with other universities in Australia on two projects aimed at leveraging our combined purchasing power to improve modern slavery risk management in the sector. In the first project, which was coordinated by the Australasian University Procurement Network's (AUPN) Anti-Slavery Program, participating universities shared their spend and supplier data for lab consumables. Analysis identified 72 priority suppliers for targeted engagement. These suppliers were asked to complete an assessment questionnaire on their modern slavery due diligence approach. Forty-four suppliers completed the questionnaire, from which five suppliers were identified for further engagement, which will continue in 2025. The University is actively working on this project, leading the engagement with one supplier.

In the second project, the University collaborated with other members of the AUPN University Procurement Hub to leverage our combined purchasing power to deliver better modern slavery and sustainability outcomes. Through this work, participating universities raised awareness of modern slavery and how it occurs in the production of lab and teaching consumables and worked with suppliers to enhance their modern slavery risk management. This work will continue in 2025, enabling suppliers' responses to modern slavery and sustainability to be considered when making purchasing decisions. The University of Sydney has been a driver of this project, leading engagement on supplier modern slavery risk management in manufacturing and sourcing of raw materials, scope 3 emission reduction opportunities, and diversity in our supply chain.

## Case Study

### *The Intersection of Modern Slavery and Climate Change in Procurement and Research Activities*

The intersections between climate change and modern slavery are increasingly recognised. By 2050, it is estimated that 216 million people will be displaced due to climate change<sup>2</sup>, and many will face increased vulnerability to modern slavery.

Physical impacts of climate change can trigger forced migration and increase vulnerability to human trafficking and other forms of exploitation. There are also transitional impacts of climate change that may exacerbate modern slavery. For example, practices such as forced labour and child labour are particularly prevalent in the supply chain of the renewable energy sector, from the sourcing of raw materials to manufacturing, final assembly, transportation and installation.

The University is committed to source 100% of electricity from renewables by 2025.<sup>3</sup> The University has installed solar panels on 38 buildings to date and is on track to reach our commitment of three megawatts of on-site renewable electricity by 2025. To ensure these decarbonisation targets also reflect our commitment to human rights, we have designed and are implementing a due diligence process to identify, assess and mitigate modern slavery risks in the procurement of solar panels. The University:

- Asks suppliers to address modern slavery questions, including solar specific questions, and reviews the responses from suppliers.
- Requires suppliers to provide fully traceable panels and complete documentation to demonstrate traceability.
- Assesses and reviews traceability documentation, using a checklist and assessment framework we developed in 2024 to screen the supply chain for human rights risks.
- Includes bespoke solar-specific modern slavery clauses into suppliers' contracts.
- Engages suppliers, sharing the University's expectations, building relationships and, where appropriate, supporting them to develop their modern slavery risk management approach.

The University's research also tackles climate change as one of the greatest challenges of today. However, climate-related research may also intersect with modern slavery risks. In 2024, we continued to enhance the modern slavery risk assessment process for research activities, to help ensure research mitigates adverse unintended modern slavery impacts. For example, as described above, the development of clean energy technologies has a high inherent modern slavery risk. Clean energy research projects that meet certain thresholds are referred to the Modern Slavery Unit for review (see case study on page 30). We undertake detailed risk assessments to consider if the project could cause, contribute, or be directly linked to modern slavery. These assessments identify the salient modern slavery risks related to the project, the partners involved, research outputs, where the research will be carried out, and potential unintended impacts from use of the research outcomes. The Modern Slavery Unit provides recommendations, to help enable the projects to contribute to the common good both tackling climate change and mitigating modern slavery risks.

<sup>2</sup> Groundswell Report, World Bank, 2021

<sup>3</sup> University of Sydney Sustainability Strategy, University of Sydney, 2020

# Identifying and Addressing our Modern Slavery Risks

## *Our Research Activities*

The University of Sydney’s research expertise spans 23 fields, with projects as diverse as printing artificial bones, trialling psychiatric drugs, using robotics in agriculture, enhancing renewable energy storage devices and using artificial intelligence (AI) to enhance health care. While this research is addressing the world’s greatest problems, it can expose the University to unintended modern slavery and human rights risks. In 2024, we focused on enhancing our approach to identifying, understanding and assessing modern slavery risks when making decisions on research and partnerships.

We focused on		We delivered ACTIVITIES and OUTPUTS to identify, manage and mitigate modern slavery risks		To drive meaningful OUTCOMES
		Activity	Output	
Streamlining modern slavery risk identification and embedding due diligence across the research pipeline	<ul style="list-style-type: none"> <li>- Embedded modern slavery risk screening into the due diligence process at the contract award stage.</li> <li>- Engaged Pre-Award and Post-Award teams and faculties on the Know Your Partner and Project Tool, a bespoke tool designed by the University to check prospective partners for human rights risks (see case study on page 31).</li> </ul>		<ul style="list-style-type: none"> <li>- 689 projects screened for modern slavery risks via the Contract Risk Tool (CRT).</li> </ul>	Reducing modern slavery by increasing visibility of risks in research
Assessing modern slavery risks and tailoring due diligence for research projects	<ul style="list-style-type: none"> <li>- Research projects identified with heightened modern slavery risks were referred to the Modern Slavery Unit for detailed assessment.</li> <li>- Screened all referrals and undertook further assessments based on project risks (see case study on page 30).</li> </ul>		<ul style="list-style-type: none"> <li>- 51 research projects referred to the Modern Slavery Unit for further assessment; 17 projects referred to the Modern Slavery Unit for further assessment following screening via the CRT and 34 research projects referred from other sources.</li> <li>- All referrals were screened by the MSU               <ul style="list-style-type: none"> <li>- 18 research projects required detailed modern slavery risk assessments, 8 received light-touch assessments based on the risk profile, 18 did not meet the threshold for further assessment, and 7 required tailored recommendations.</li> </ul> </li> <li>- 1 research project was referred to the Research Risk Committee and did not proceed.</li> </ul>	Reducing modern slavery risks by increasing visibility of risks in research and incorporating modern slavery considerations into decision-making

We focused on	We delivered ACTIVITIES and OUTPUTS to identify, manage and mitigate modern slavery risks		To drive meaningful OUTCOMES
	Activity	Output	
<b>Building capacity of staff to identify modern slavery risks in research activities</b>	<ul style="list-style-type: none"> <li>Supported research staff and partners to effectively identify and address modern slavery risks.</li> </ul>	<ul style="list-style-type: none"> <li>83 people attended 5 training sessions on modern slavery risks in research and how to screen for these risks.</li> <li>3 Faculties directly engaged, to share information and tools on modern slavery risks in research.</li> </ul>	<b>Improving understanding of modern slavery risks</b> in research and how to respond
<b>Fostering collaboration and thought leadership</b>	<ul style="list-style-type: none"> <li>Established the multidisciplinary Modern Slavery Academic Network at the University of Sydney</li> <li>Mapped teaching and research across the University on modern slavery-related topics.</li> </ul>	<ul style="list-style-type: none"> <li>23 academics from 5 disciplines joined the Modern Slavery Academic Network.</li> <li>17 academics in the Network are conducting research on modern slavery, 11 are teaching on modern slavery related topics, and 4 are supervising students researching modern slavery.</li> </ul>	<b>Accelerating solutions-focused research and teaching</b> to have an impact on modern slavery as a global challenge

#### Lessons learnt:

**Enhanced Risk Visibility:** The University could unintentionally cause, contribute or be directly linked to modern slavery through research activities. Implementing a consistent, structured assessment process is enhancing the University's visibility of, and ability to identify and mitigate modern slavery risks in research activities.

**Baseline Risk Profile Established:** The data collected in 2024 provides a baseline modern slavery risk profile for research projects, enabling us to monitor and assess changes in subsequent years.

“The Post Award team has effectively utilised the new Contract Risk Tool to identify research contracts that may pose modern slavery risks. By leveraging this tool, we have been able to send 17 referrals to the Modern Slavery team for thorough assessment. This proactive approach has significantly enhanced our understanding of modern slavery risks within our research activities. Additionally, by identifying these concerns early, we have been able to develop and implement mitigation strategies to reduce these risks, ensuring that we uphold ethical standards and contribute to the global fight against modern slavery.”

**Mark Kay**  
Director, Post Award Team

## Case Study

### *Assessing Modern Slavery Risks in Research Projects*

The University is working with central research teams, faculties and schools to screen for modern slavery risk in research projects. If research projects are identified as having heightened modern slavery risks, they are referred to the Modern Slavery Unit for in-depth assessment.

This assessment considers:

- Research category – is there an inherent modern slavery risk with the research category?
- Project partners – are there modern slavery or human rights risks associated with collaborating with a particular partner?
- Research inputs – are materials needed for the project may have been produced with modern slavery?
- Research outputs – could the research be used in a way that could negatively impact human rights or cause or contribute to modern slavery?
- Geographical risks – is there a high modern slavery risk in the research location(s)?

These assessments increase the University's visibility and understanding of modern slavery and counterparty risks in research projects, enabling appropriate mitigants to be recommended and helping to inform decision making. Where risks cannot be effectively mitigated, assessments outlining the modern slavery risks are considered by senior leaders when making decisions about research projects.

This approach, which will continue to be embedded in 2025, centres on assessing the risks to people, but also recognises the significant reputational harm such risks could generate.

## Case Study

### *Launching the Modern Slavery Academic Network*

Research institutes are uniquely placed to make a meaningful impact on the global challenge of modern slavery, through solution-focused research and education. Universities play a pivotal role in bridging gaps in research and evidence, to help inform policy and drive systemic change.

The University of Sydney established the Modern Slavery Academic Network in 2024 to connect academics across multiple schools and faculties. Academics teaching or researching modern slavery were invited to join the Network and help shape the Network's scope and focus.

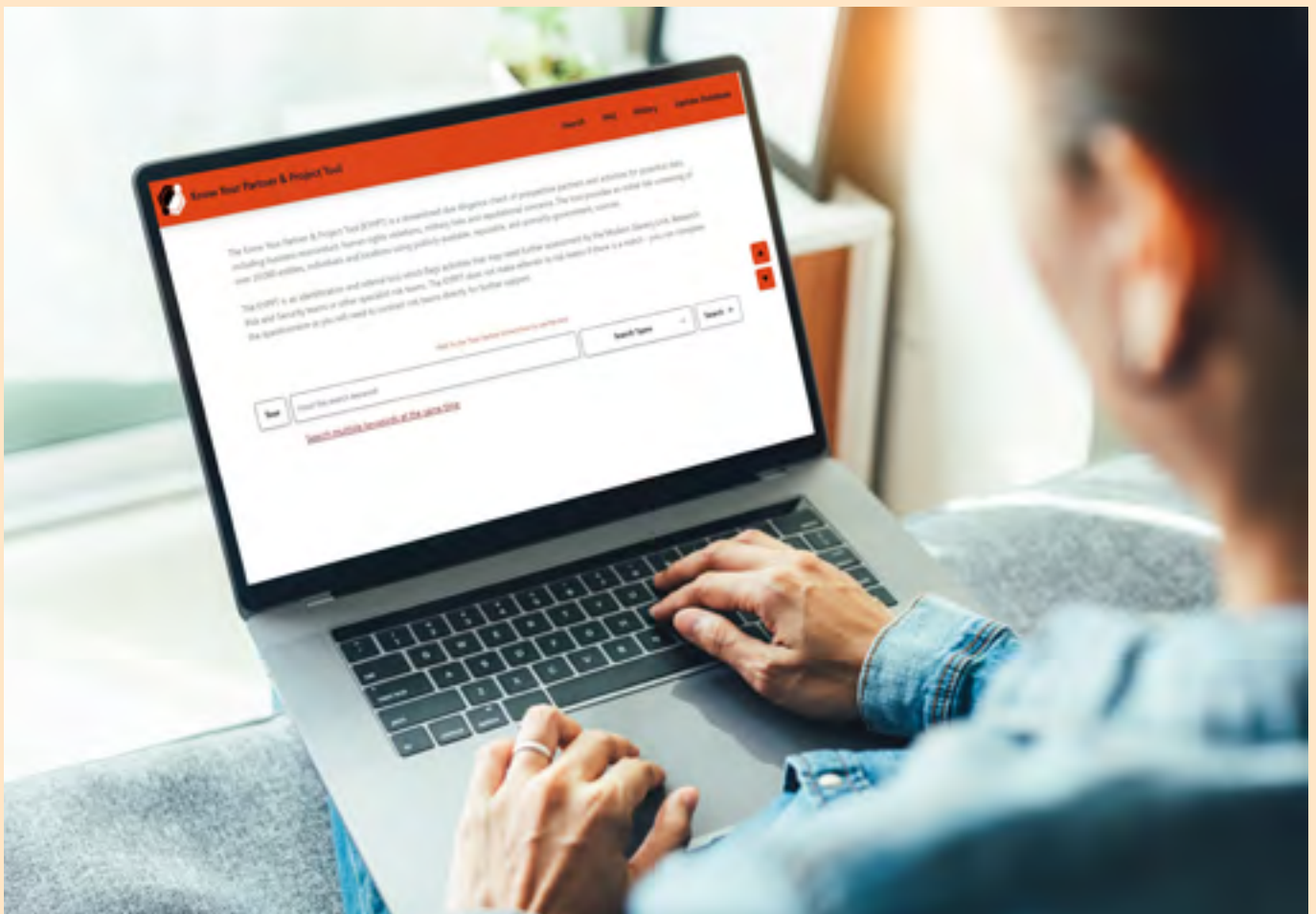
Twenty-three academics from five disciplines – Business, Arts and Social Science, Law, Medicine and Science – joined the network, which was launched in November.

The Network aims to create a collaborative space for sharing modern slavery research and teaching and identifying opportunities for collaboration. Priorities and focus areas will continue to evolve in 2025.

# Know Your Partner and Project Tool

Developed by the University and piloted in 2023, the Know Your Partner and Project Tool (KYPPT) is a streamlined due diligence check of prospective partners and activities for potential risks, including business misconduct, human rights violations, military links and reputational concerns.

In 2024, we enhanced the KYPPT, creating an online version of the tool which made it more accessible to staff and easier to use. The KYPPT is increasing visibility and understanding of risks, including modern slavery risks, across the University. Around 2000 searches were performed by 67 users in the first 4 months after the online version of the tool was launched. Efforts are ongoing to build awareness and embed the KYPPT in appropriate due diligence processes.



# Identifying and Addressing our Modern Slavery Risks

## *Our Support to Students*

Students’ safety and wellbeing is one of the University’s highest priorities. Through a risk-based and person-centred approach, the University prioritises students’ individual needs, including supporting students who may be at heightened risk of modern slavery.

International students and students from some culturally and linguistically diverse backgrounds or from a lower socio-economic background may be at heightened risk of forced labour, forced marriage, debt bondage, trafficking and deceptive recruitment. This may be due to language or cultural barriers, limited knowledge of Australian work rights, cost of living pressure or family pressure. Throughout 2024, we focused on raising awareness, building the capacity of staff, and fostering student-centred and peer-led approaches to student engagement.

We focused on		We delivered ACTIVITIES and OUTPUTS to identify, manage and mitigate modern slavery risks		To drive meaningful OUTCOMES
Activity		Output		
Strengthening and integrating risk identification	<ul style="list-style-type: none"> <li>Embedded modern slavery into the Student Wellbeing Risk Framework.</li> </ul>	<ul style="list-style-type: none"> <li>Developed a risk matrix and modern slavery Standard Operating Procedure, which was integrated into the Student Wellbeing Risk Framework.</li> </ul>		<b>Reducing modern slavery risks to students:</b> Modern slavery risks specific to students are identified, triaged and addressed
Building awareness and capacity of staff to identify modern slavery risks to students and refer students to appropriate support	<ul style="list-style-type: none"> <li>Delivered information, training and awareness sessions for staff and shared tailored resources.</li> </ul>	<ul style="list-style-type: none"> <li>4,127 staff completed the Anti-Slavery Awareness training module in 2024, with 18,567 staff completing the training since the module launched.</li> <li>17 student-facing staff attended a case consultation session with key anti-slavery community organisations (see case study on page 34).</li> <li>11 staff who are Justice of the Peace participated in an information session on modern slavery risk indicators.</li> <li>4 tailored resources shared with Education Innovation, Careers Centre and Faculty staff on understanding modern slavery risks with student placements and internships.</li> <li>394 visits to the intranet modern slavery page containing information and resources for staff.</li> </ul>		<b>Improving understanding and enhancing the knowledge and capability of staff</b> to identify and respond to risks  Staff have knowledge of key anti-slavery support services and referral processes to support students at risk

We focused on	We delivered ACTIVITIES and OUTPUTS to identify, manage and mitigate modern slavery risks		To drive meaningful OUTCOMES
	Activity	Output	
<b>Building knowledge on modern slavery risks and available support through student-centred information, training and activations</b>	<ul style="list-style-type: none"> <li>– Directly engaged students on modern slavery and related risks (e.g. job scams), with an active presence at the University's Welcome Program, the 2024 International Student Information Fair, and other targeted training and engagement for international students.</li> </ul>	<ul style="list-style-type: none"> <li>– 598 students visited the <i>Anti-Slavery at Sydney</i> stalls during semester one and two Welcome Programs (see case study on page 35).</li> <li>– 7,277 students voluntarily completed the Anti-Slavery Awareness training module in 2024, bringing the total number of students to 15,706 who have completed the training.</li> <li>– 172 international students visited the <i>Modern Slavery</i> stall at the international student fair to access information on workplace rights.</li> <li>– 52 international students attended the 'Know Your Rights' workshop on employment and tenancy rights.</li> <li>– 45 students from Taylors College (pathway college) attended a tailored information session on modern slavery risks and support.</li> </ul>	<p><b>Improving understanding and enhancing the knowledge and capability of students</b> to identify and respond to risks</p> <p>Students have increased awareness of deceptive recruitment practices, forced labour and forced marriage and are aware of support services on campus</p>
<b>Enabling peer-led approaches to mitigating risks to students</b>	<ul style="list-style-type: none"> <li>– Provided training to and collaborated with the University's student Peer Support Advisors (PSAs). PSAs were equipped to engage other students on modern slavery, refer peers to support, and empower students to understand how modern slavery could impact them.</li> </ul>	<ul style="list-style-type: none"> <li>– 89 participants, including Peer Support Advisors and student-facing staff, trained over 2 sessions on how to support students and peers at risk of modern slavery.</li> <li>– Peer Support Advisors played an active role in the stalls at Welcome Program events, including communicating with peers in languages other than English.</li> </ul>	<p><b>Improving understanding and continuous learning</b>, enhancing students' ability to engage peers on modern slavery risks and refer to appropriate support</p>
<b>Amplifying information for students on modern slavery risks and sharing opportunities for students to engage on human rights</b>	<ul style="list-style-type: none"> <li>– Expanded digital student communications on modern slavery and human rights. Grew the Student Human Rights Network.</li> </ul>	<ul style="list-style-type: none"> <li>– 2,202 visits to the University's modern slavery webpages in 2024.</li> <li>– 1,323 visits to the student-focused modern slavery webpages in 2024.</li> <li>– 7 newsletters sent to the Student Human Rights Network.</li> <li>– Membership of the Student Human Rights Network reached 238, up from 151 in 2023.</li> <li>– 4 international student news articles on modern slavery sent to 30,000+ international students.</li> </ul>	<p><b>Enhancing knowledge and awareness of modern slavery risks amongst students</b></p>

### Lessons learnt:

**Peer Engagement:** Students engage more effectively on modern slavery through peer interactions with other students.

**Cultural Awareness:** Enhancing cultural awareness is crucial. Many international students initially had limited knowledge of modern slavery, but relatable language and contexts helped them understand modern slavery risks.

**Risk Screening:** Effective risk screening is essential to prevent exploitation from escalating to modern slavery. Proper identification and assessment of student risks helps ensure safety and wellbeing, reducing the risks of student exploitation at the University.

**Collaborative Approach:** Multi-agency collaboration and a unified approach with key stakeholders are vital to effectively address modern slavery.

## *Collaborating with Anti-Slavery Organisations to Empower Our Frontline Staff*

In 2024, we supported multi-stakeholder collaboration and learnt from best practice advice by designing and facilitating an interactive case consultation for student facing staff with key anti-slavery community organisations. The panel included experts from Anti-Slavery Australia, the Australian Federal Police, The Australian Red Cross Support for Trafficked People's Program and the Salvation Army Additional Referral Pathway. Experts shared advice and discussed two realistic (hypothetical) case studies – forced labour and forced marriage – which are both prominent concerns for at risk students.

A critical takeaway from the session was the importance of building trust with students by providing students with information and support options available so that they can make informed decisions.

"The case consultation session reminded us all how important it is to identify and support students who are impacted by these issues. We understand that it takes a unified approach to tackling and eliminating these issues with the collaboration of stakeholders such as the Australian Federal Police, the Salvation Army, the Australian Red Cross and Anti-Slavery Australia. Student Wellbeing were very pleased to welcome the insights of the case consultation session and look forward to applying key learnings such as how to determine a student's level of risk when experiencing issues of modern slavery".

**What are students at risk of? Why?**

Risk	Why?
<b>Personal wellbeing</b> Stress, anxiety, depression, self-harm, eating disorders, substance use, suicidal thoughts, suicide	Transition to university Academic pressure Financial pressure Social pressure Loneliness Isolation
<b>Academic</b> Failing a module, failing a year, dropping out, not completing a degree	Transition to university Academic pressure Financial pressure Social pressure Loneliness Isolation
<b>Social</b> Bullying, harassment, sexual assault, sexual harassment, sexual violence, sexual exploitation, sexual abuse, sexual assault, sexual violence, sexual exploitation, sexual abuse	Transition to university Academic pressure Financial pressure Social pressure Loneliness Isolation



34 —————

# Case Study

## *Stronger Together: Students Supporting Students*

In the past year, we have seen an increase in deceptive recruitment practices in the form of employment or internship scams targeted at students. Students can be particularly at risk of online scams, as they may face visa-related work restrictions (international students) and/or be seeking additional work to ease cost-of-living pressures or work experience while studying.

To mitigate these risks, the Modern Slavery Unit held two *Anti-Slavery at Sydney* stalls during the 2024 semester one and two Welcome Programs. The stalls focused on raising awareness about deceptive recruitment and forced labour amongst new and continuing students.

With support from the University's Peer Support Advisors (PSAs) – who are current students providing peer advice and support with settling into university – students attending our Welcome Program participated in an interactive activity. Students were shown a range of job advertisements and asked to identify if the job was a legitimate advertisement or a scam. Nearly 600 students took part in the activity and were provided with key resources to safeguard themselves against deceptive work practices. Around 40 participants completed a voluntary survey on their experiences at the *Anti-Slavery at Sydney* stalls, and all reported an increased understanding of the types of modern slavery students may be at risk of experiencing and where to access support on campus.

Through the peer-to-peer model, students were more actively engaged and interested in learning from each other. Students have reported that they “got good information on working conditions and rights”.

A participating PSA said:

"Helping at the modern slavery stall during Welcome Week was a rewarding experience. As a Peer Support Advisor and fellow student, I found students more willing to engage once they learned I was both a student and staff member at the University. International students, in particular, had limited knowledge about modern slavery but seemed to learn a lot after we discussed it in relatable terms."

We are continuing to enhance these student-centred approaches to tackling modern slavery and ensuring our students have the knowledge and capacity to mitigate risk and access support.

Images: (Left) Peer Support Advisors at the Anti-Slavery at Sydney Stall; (Right) Resources for Students at our Welcome Program.



# Identifying and Addressing our Modern Slavery Risks

## *Our Investments*

The University manages endowment funds to meet its long-term academic and research goals. These funds consist mainly of bequests and donations that have been gifted to the University. Our portfolio is made up of diverse assets, including Australian and international equity, private equity, debt and property.

Investments under management may be made in sectors and jurisdictions that have high inherent human rights risks. Investors can cause, contribute or be directly linked to adverse human rights impacts including modern slavery. In 2024, we continued to screen the publicly listed and private equity portfolios for modern slavery risks and undertook an annual ESG assessment. We also engaged investment fund managers in the University's publicly listed portfolio, gaining greater insights into modern slavery risk across the investment portfolio and the capabilities of fund managers to manage modern slavery risk.

We focused on		We delivered ACTIVITIES and OUTPUTS to identify, manage and mitigate modern slavery risks	To drive meaningful OUTCOMES
		Activity	Output
<b>Embedding modern slavery and human rights commitments and due diligence</b>	–	Reviewed our investment fund managers' approach to modern slavery risks, through our annual ESG assessment report.	<b>Reducing modern slavery risks</b> by considering human rights and upholding the commitment to respect human rights in investment decisions
	–	<ul style="list-style-type: none"> <li>100% of direct agreements between the University and investment fund managers require managers to adhere to the Investment Policy and Procedures, which reflect the University's commitment to respect human rights.</li> <li>74% of the University's investment fund managers have a policy to manage the risk of modern slavery. This figure did not change from 2023.</li> <li>84% of the University's investment managers prohibit or otherwise limit investments contributing to modern slavery or human rights abuses, compared to 81% in 2023.</li> </ul>	
<b>Enhancing modern slavery risk identification</b>	–	Screened our publicly listed and private equity portfolios for human rights risks. The publicly listed portfolio is screened quarterly, and the private equity portfolio is screened annually. The private equity portfolio screening was completed in May on the portfolio as of 31 December 2023.	<b>Improving understanding of modern slavery risks</b> in investments
	–	<ul style="list-style-type: none"> <li>Undertook risk prioritisation assessment of the publicly listed portfolio considering exposure to high-risk industries, modern slavery risk management approach, and investment fund managers' sustainability capacity.</li> <li>All the University's equity assets under management were screened for human rights risks.</li> <li>1 at-risk entity was identified in the screen. This entity was originally identified in 2023 during a screening of the portfolio. This holding is held in a fund-of-fund investment. The underlying fund is in the process of exiting the company and has guided investors to a 2025 sale. The University's exit of this entity is not due to human rights risks.</li> <li>Identified investment fund managers in the publicly listed portfolio for heightened engagement in 2025, based on the risk prioritisation assessment.</li> </ul>	

We focused on	We delivered ACTIVITIES and OUTPUTS to identify, manage and mitigate modern slavery risks		To drive meaningful OUTCOMES
	Activity	Output	
<b>Engaging fund managers on modern slavery risk</b>	<ul style="list-style-type: none"> <li>– Engaged directly with investment fund managers on modern slavery. This produced a baseline assessment of fund managers approaches to modern slavery risk management.</li> <li>– Developed and shared materials relating to investments and human rights, human rights due diligence and industry specific modern slavery risks to help develop the capability of investment fund managers.</li> </ul>	<ul style="list-style-type: none"> <li>– All investment fund managers in the publicly listed portfolio directly engaged by the University on modern slavery risks.</li> <li>– 24% of investment fund managers tracked and reported human rights related engagements with companies, an increase from 16% in 2023.</li> <li>– 32 companies engaged by investment fund managers on human rights, compared with 26 in 2023.</li> </ul>	<b>Improving understanding and continuous learning:</b> Investment fund managers have increased awareness of the University's modern slavery expectations and that we will support them as appropriate to improve their understanding

#### Lessons learnt:

**Diverse Capabilities:** The University works with a diverse set of investment fund managers, each with varying levels of modern slavery risk management capabilities.

**Awareness Building:** The University has a role to play in raising awareness of modern slavery risks and communicating our risk management expectations and human rights commitments.

**Tailored Engagement:** Engagement with investment fund managers should be tailored to their risk profiles, ensuring it is fit for purpose and balanced, in line with the University's principles for addressing modern slavery risks.

## Case Study

### *Engaging Investment Fund Managers on Modern Slavery*

The University engages annually with investment fund managers. In 2024, we used these meetings to directly engage with investment fund managers in the publicly listed portfolio on modern slavery.

The University sought to provide its investment managers with more information about modern slavery legislation, risks and how they could play a role in identifying and managing these risks more effectively. These discussions aimed to:

- Convey the University’s commitment to human rights and modern slavery and expectations of investment fund managers.
- Provide investment fund managers with more information to understand how they can more effectively identify and manage modern slavery risks.

Discussions covered how investment fund managers identify and monitor modern slavery risks, how they assess and integrate modern slavery considerations into decisions, how they measure the effectiveness of actions taken, and how they engage with companies. All investment fund managers engaged in the discussion with the University and shared their approaches to modern slavery risk management, including the challenges they face which can impact their efforts. Information from these discussions was used in a risk prioritisation assessment and will inform future engagements with investment fund managers.

As part of this engagement, we also developed and actively shared resources on investments and human rights, human rights due diligence and industry specific modern slavery risks to help develop the capability of some fund managers.



# Our Controlled Entities

The University's controlled entities were actively engaged and consulted in the development of this statement. With a shared commitment to addressing modern slavery, we collaborated to deepen understanding of the risks in the supply chains and operations of our controlled entities and strengthen foundations for modern slavery risk management. We collaboratively developed due diligence plans for each entity, with specific performance indicators and priority actions for the next 18 months.

As detailed below, these plans outline key focus areas including governance of modern slavery risks, risk identification and assessment, supplier and partner screening and risk management and mitigation.

Westmead Fertility Centre (WFC)		
Focus area	Activity and Outputs	Outcomes
<b>Embedding robust modern slavery risk governance</b>	<p>Actively encouraged robust oversight of modern slavery risks by WFC's senior leaders.</p> <ul style="list-style-type: none"> <li>WFC's senior leadership is engaged and proactive on risk management.</li> <li>3 meetings between MSU and WFC in 2024 in identifying, managing and reviewing modern slavery risks.</li> <li>6 updates to the WFC board from the CEO on modern slavery risks and activities.</li> </ul>	<p><b>Reducing modern slavery risks:</b> Modern slavery awareness and risk management is embedded in the organisation, with appropriate governance oversight</p> <p>Leadership understand the modern slavery risks associated with WFC's environment and how these risks are being managed</p>
<b>Strengthening risk identification and screening</b>	<p>Supported WFC to identify potential risks with partners, patients and suppliers and understand how to mitigate these risks.</p> <ul style="list-style-type: none"> <li>Modern slavery risks added to the WFC risk register to be monitored and reviewed regularly.</li> <li>34 key partners and suppliers screened using the KYPPT.</li> <li>Modern slavery resources and key contacts for patients uploaded onto the Centre's Patient Portal Resource page.</li> <li>Standard, high-risk and sector specific tender questions developed for procurement activities.</li> </ul>	<p><b>Increasing visibility of modern slavery risks,</b> enhancing modern slavery due diligence</p> <p><b>Improving awareness and understanding of modern slavery risks</b> among staff and partners. Patients who may be at risk are aware of the modern slavery scenarios that may be applicable to them and know how to seek support</p>
<b>Assessing the saliency of risks</b>	<p>Undertook a saliency assessment to assess severity and likelihood of modern slavery risks.</p> <ul style="list-style-type: none"> <li>3 priority risk areas identified – supply chains, patients and staff.</li> </ul>	<p><b>Improving awareness and understanding of salient modern slavery risks,</b> with tailored due diligence to address these risks</p>
<b>Engagement and collaboration</b>	<p>Contributed to multi-stakeholder health sector initiatives in NSW to tackle modern slavery.</p> <ul style="list-style-type: none"> <li>Participated in the NSW Office of the Anti-slavery Commissioner's health working groups.</li> <li>Participated in the HEAL Workshop – public health approach to address modern slavery.</li> </ul>	<p><b>Improving understanding and continuous learning:</b> Knowledge, expertise and best-practice are shared and exchanged for the continuous improvement in identifying and responding to modern slavery in healthcare settings</p>

### Centre in China (CIC) (A14 Holdings Pty Ltd)

Focus area	Activity and Outputs	Outcomes
<b>Embedding robust modern slavery risk governance</b>	<p>Actively encouraged robust oversight of modern slavery risks by CIC's senior leaders.</p> <ul style="list-style-type: none"> <li>2 engagements with CIC executive and Board on modern slavery risks.</li> <li>3 structured consultation sessions throughout 2024 between CIC and MSU on modern slavery due diligence.</li> </ul>	<p><b>Reducing modern slavery risks:</b> Modern slavery awareness and risk management is embedded in the organisation, with appropriate governance oversight</p> <p>Leadership understand the modern slavery risks associated with the Centre in China and how these risks are being managed</p>
<b>Strengthening risk identification and screening</b>	<ul style="list-style-type: none"> <li>Shared the KYPPT risk screening tool for future use in due diligence processes.</li> <li>Revision and update of the CIC risk register, including modern slavery risks.</li> </ul>	<p><b>Increasing visibility of modern slavery risks,</b> enhancing due diligence</p> <p>The Centre in China identifies potential risks with partners and suppliers and mitigates these risks</p>
<b>Assessing the saliency of risks</b>	<p>Undertook a modern slavery saliency risk assessment</p> <ul style="list-style-type: none"> <li>3 key priority areas resulted from the saliency risk assessment – procurement, research and student placements.</li> </ul>	<p><b>Improving awareness and understanding of the salient modern slavery risks,</b> with tailored due diligence to address these risks</p>

### Sydney Vietnam Institute (SVI) (A14 Holdings Pty Ltd)

Focus area	Activity and Outputs	Outcomes
<b>Embedding robust modern slavery risk governance</b>	<ul style="list-style-type: none"> <li>Actively encouraged robust oversight of modern slavery risks by senior leaders.</li> <li>4 structured consultation sessions between SVI and MSU in 2024 on human rights due diligence.</li> <li>3 engagements with SVI Executive Director and the Member's Council on modern slavery risks.</li> </ul>	<p><b>Reducing modern slavery risks:</b> Modern slavery awareness and risk management is embedded in the organisation, with increased governance oversight</p> <p>SVI leadership is engaged and proactive on risk management of modern slavery, with foundations in place for robust oversight of modern slavery risks by senior leadership</p>
<b>Strengthening risk identification and screening</b>	<ul style="list-style-type: none"> <li>13 key partners and suppliers (including entities in high-risk sectors) screened using the KYPPT.</li> <li>Modern slavery risks added to the organisation's risk register to be monitored and reviewed regularly.</li> <li>5 tender questions developed for procurement of high-risk categories.</li> </ul>	<p><b>Increasing visibility of modern slavery risks,</b> enhancing due diligence</p> <p>The SVI identifies potential risks with partners and suppliers and mitigates these risks</p>
<b>Assessing the saliency of risks</b>	<p>Undertook a modern slavery saliency risk assessment</p> <ul style="list-style-type: none"> <li>2 key priority areas resulted from the modern slavery saliency risk assessment – procurement and research.</li> </ul>	<p><b>Improving awareness and understanding of salient modern slavery risks,</b> with tailored due diligence to address these risks</p>
<b>Building Staff Capacity</b>	<ul style="list-style-type: none"> <li>30 SVI staff members completed the Anti-Slavery Awareness training module.</li> </ul>	<p><b>Enhancing capability:</b> Staff understand the modern slavery risks associated with the SVI and how these risks are being managed by the University</p>



“The workshop was an honour to be part of and participate in the learning from leading minds – Dr Stoklosa and Dr Stylianou both at the forefront of Modern Slavery awareness training. The discussions and collaboration not only “opened the door” for me to look differently and potentially recognise modern slavery situations, but in turn gave me skills to “open the door” for victims. To be part of a workshop and team that will lead the development of a tool(s) that will fit the Australian healthcare system is exciting and rewarding and motivates me to remain across activities in this area.”

#### Reflection

Westmead Fertility Centre’s Patient Care Manager reflected on her experience attending the HEAL Workshop – a Public Health Approach to Address Modern Slavery hosted by the NSW Office of the Anti-slavery Commissioner.

# Grievance Mechanism and Remediation

Identifying incidents of modern slavery is critical in reducing prevalence and providing remedy. There are several ways staff, students, suppliers, partners and the public can anonymously report suspected cases of modern slavery to the University. These include the online Modern Slavery Incident Report Form, email, and referral to the Modern Slavery Unit by student services, or other teams at the University.

In 2024, we received a total of 25 reports of potential modern slavery incidents through these grievance channels. This was a significant increase on the 7 reports received during 2023, reflecting increased capacity in identifying risk indicators for students.

These reports included:

- 8 via the Modern Slavery Incident Reporting Form
- 16 referrals from other areas of the University (including student services)
- 1 via the Modern Slavery Unit's mailbox.

Of the potential modern slavery incidents raised:

- 19 related to students
- 4 related to University of Sydney staff
- 1 related to a supplier
- 1 related to a member of the public.

All reports were assessed and none were considered to meet the threshold for modern slavery. Reports were triaged and where appropriate, referred to specialist support services or internal teams for further action.



We focused on	We delivered ACTIVITIES and OUTPUTS to identify, manage and mitigate modern slavery risks		To drive meaningful OUTCOMES
	Activity	Output	
<b>Raising awareness of our grievance mechanism</b>	<ul style="list-style-type: none"> <li>– Raised awareness of the Modern Slavery Incident Reporting Form as part of regular training and information sessions with staff and students.</li> </ul>	<ul style="list-style-type: none"> <li>– The Modern Slavery Incident Reporting Form was referred to in 2 training and information sessions that were attended by 390 people.</li> <li>– 4,127 staff completed the Anti-Slavery Awareness training module in 2024, which raises awareness of the Modern Slavery Incident Reporting Form.</li> <li>– 15,705 students have completed the Anti-Slavery Awareness training module to date (up from 8,400 students in 2023), which explains how to make a report of suspected incidents.</li> <li>– The Modern Slavery Incident Reporting Form webpage had 294 views in 2024.</li> </ul>	<b>Increasing awareness</b> of how potential incidents of modern slavery can be reported
<b>Assessing incidents in line with our Modern Slavery Incident Reporting Operating Principles</b>	<ul style="list-style-type: none"> <li>– Assessed and triaged potential incidents reported to the University and provided guidance and referrals as appropriate.</li> </ul>	<ul style="list-style-type: none"> <li>– 100% of reports of potential modern slavery incidents (25 reports in total) were assessed and triaged, none met the threshold for modern slavery.</li> <li>– 1 reported incident requires ongoing monitoring in 2025.</li> </ul>	<b>Reducing modern slavery risks</b> by identifying and assessing incidents

### Lessons learnt:

**Unique Student Risks:** Students face unique modern slavery risks, including unpaid wages, deceptive recruitment practices, job scams, forced marriage, and poor working conditions in internships. The increase in reports since 2023 indicates that the University's efforts to build awareness and enhance staff and student capacity to identify and respond to potential incidents are effective.

**Grievance Mechanism Usage:** Despite the increase in reports, usage of the online grievance mechanism remains low. Barriers such as lack of awareness, language issues, and concerns about reporting outcomes may need to be addressed to improve reporting rates.

**Supplier Due Diligence:** Suppliers, especially in high-risk categories, should be encouraged to have grievance mechanisms in place. The University requires suppliers to promote these mechanisms to workers as part of high-risk modern slavery contract clauses.

## Case Study

### *Engaging a Supplier on a Potential Modern Slavery Incident*

In 2024, we received a report via the online [Modern Slavery Incident Reporting Form](#), raising concerns about the alleged payment practices of a supplier to the University.

The Modern Slavery Unit worked with several teams across the University to investigate the incident, following the Modern Slavery Incident Reporting Operating Principles. After assessing that the people involved were not at immediate risk, we took steps to understand the issues raised, the type of exploitation alleged and the level of urgency. This involved gathering more information, including on the alleged concerns regarding the late payment by the supplier of their workers.

During engagements with the supplier to discuss the concerns, we took a shared-responsibility approach, where we demonstrated willingness to work together, while outlining the University's commitment to human rights and our expectations of suppliers. These discussions identified that while the incident was not considered to be modern slavery, there were opportunities for the supplier to improve several processes and practices. The supplier is engaging with the University in an open, willing and transparent manner and this engagement will continue in 2025.

As part of this process, we also reflected on our relationship with the supplier to determine if the University had caused or contributed to the incident, drawing on the UN Guiding Principles framework. We considered the services being delivered, if the supplier could deliver the service for the price without causing or contributing to modern slavery, and if there were other ways the University may have contributed to this incident, through late payments or similar. This analysis indicated that, while the University had not caused or contributed to it, through our business relationship and the supplier's operations on campus, the University was linked to the incident.



## Our Modern Slavery Incident Reporting Operating Principles

To **stop** existing harm and **prevent** the risk of future harm to **people**.

Assess the **level of risk to the person**

Identify the type of **exploitation**

Identify the level of **urgency**

1.

Respond to **stop** existing harm to the person (remediate and address incident/risk)

2.

Respond to **prevent** future harm to people (mitigate the risk of harm eventuating)

3.

Respond to address risk to the University

### How we respond is informed by our Modern Slavery Risk Framework:

- i) The personal agency of the individual victim/survivor (what they want and need)
- ii) Relevant legislation and mechanisms internal and external to the University to be put into effect to resolve the matter.
- iii) Discretion needs to be exercised based on the level of risk, primarily to the victim, and then to the University.

*We will set realistic expectations about what we can and cannot do.*



# Collaboration and Engagement

Throughout 2024, we partnered with civil society, academic institutions, industry and government to take meaningful action on modern slavery. We participated in over 30 initiatives, forums and meetings with external stakeholders to share perspectives, best practice and learnings. Academics across the University provided their expertise in various public forums.

We focused on	Activity	Our contribution
Fostering meaningful collaborations and partnerships to contribute to the global effort to eradicate modern slavery	Engaged in meaningful partnerships, forums and networks with the <b>Commonwealth Government</b> .	<p>We helped shape effective policies, legislative settings and practices at the national level by:</p> <ul style="list-style-type: none"> <li>Contributing a submission to and providing evidence at the Inquiry on <i>Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Bill 2023</i>.</li> <li>Contributing to consultations on the <i>Modern Slavery Practice Guidelines: Working with people in, or at risk of modern slavery</i>.</li> <li>Contributing to consultation on <i>Enhancing Civil Protections and Remedies on Forced Marriage</i>.</li> <li>Participating in the Australian Government's <i>Human Trafficking and Modern Slavery Research Network</i>.</li> </ul>
	Engaged in meaningful partnerships, forums and networks with the <b>NSW Government</b> .	<p>We helped shape effective policies, legislative settings and practices at the state level by:</p> <ul style="list-style-type: none"> <li>Contributing to the NSW OASC's <i>It's Healthy to Fight Modern Slavery</i> health sector working group and <i>HEAL Trafficking workshop</i>.</li> <li>Participating in the inaugural NSW Anti-slavery Forum and other OASC webinars and events</li> <li>Two University academics provided evidence at the NSW Modern Slavery Committee Inquiry into the <i>Ethical Clothing Extended Responsibilities Scheme 2005 (NSW)</i>.</li> <li>Two University academics gave evidence at the NSW Modern Slavery Committee Inquiry into the <i>Procurement Practices of Government Agencies and its Impact on Social Development of People of NSW</i>.</li> </ul>
	Engaged in meaningful partnerships, forums and networks <b>across the University sector</b> .	<ul style="list-style-type: none"> <li>Co-hosted an academic roundtable with the UN Special Rapporteur on contemporary forms of slavery during his visit to Australia.</li> <li>Shared learnings, common challenges and our modern slavery approach with global universities (including the University of British Columbia (UBC), Canada), and with Australian universities (UTS, UNSW, Macquarie University, Deakin University and through the AUPN).</li> <li>Contributed to the Red Cross International Students' Steering Committee Working Group alongside 7 other Australian universities.</li> <li>Collaborated with Settlement Services International in disseminating modern slavery resources in language to students.</li> </ul>
Demonstrating leadership for good by sharing learnings and expertise	Convened and participated in events, initiatives and forums with <b>business and civil society</b> .	<ul style="list-style-type: none"> <li>Hosted a panel discussion with Ethical Clothing Australia and the University of Sydney MBA Dimensions Program on supply chain transparency in the fashion industry, with speakers from civil society, government, academia and industry.</li> <li>Supported and contributed to the Migrant Justice Institute's National Temporary Migrant Work survey.</li> <li>Attended the UN Global Compact Business and Human Rights Dialogue and other civil society forums.</li> <li>Presented at one tertiary education sector conference on our supply chain due diligence.</li> </ul>



# Assessing Our Effectiveness and Looking Ahead

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Progress Against Our 2024  
Action Plan and Priorities

Looking Ahead - Our Action  
Plan For 2025

# Progress Against Our 2024 Action Plan and Priorities

As a higher education institution dedicated to excellence, we remain committed to continuous improvement and transparent reporting on the effectiveness of our actions.

Throughout 2024, we monitored key activities, outputs and outcomes, and reflected on our progress towards long-term impact. We used a combination of methods and data sources to evaluate our effectiveness, including reviewing feedback from stakeholders, best practice literature and third-party reports, assessing incidents reported, and case studies on key learnings. The table below summarises our progress in 2024 mapped against the forward priorities and actions we set out in our 2023 Statement.

Focus areas	Activities	Status
Embedding best practice due diligence	– Review and uplift our governance and policy framework (including considering recommendations from and the response to the independent review of the Modern Slavery Act).	
	– Review the supplier assessment platform.	
	– Develop and implement new tools and guidance to support effective methodology.	
	– Continue to identify and address risks beyond Tier 1 of our supply chain	
	– Update modern slavery contract clauses to reflect best practice.	
Enhancing our culture of continuous learning and feedback	– Deepen engagement and support for students (2024 work plan completed, with engagement ongoing).	
	– Update our Anti-Slavery Awareness training modules for staff and students (student module completed, staff module update ongoing).	
	– Expand our Student Human Rights Network and student engagement.	
	– Increase engagement with civil society and people with lived experiences.	
	– Review our grievance mechanism. (Note: this action was postponed to 2025 to incorporate the Government's response to the review of the Modern Slavery Act, which was released in December 2024).	
Designing solution-focused modern slavery research and education	– Facilitate opportunities and collaboration for academics with government, industry and civil society.	
	– Establish the University of Sydney's Modern Slavery Academic Network	
	– Participate in the Australian Government Modern Slavery and Human Trafficking Research Network.	
Contributing to the global effort to eradicate modern slavery	– Support progress on the award-winning <a href="#">OAASIS Project</a> .	
	– Develop a university sector modern slavery network/community of practice.	
	– Build on the University's research, practice and thought leadership.	

## Key:

■ In progress / Ongoing\*

■ Completed

■ Not started.

\*'Ongoing' includes activities that are recurrent and/or business as usual (BAU).

### Internal Stakeholder Survey

In 2024, to enhance understanding of the effectiveness of our actions, we trialled a stakeholder survey. Targeting a small sample of internal stakeholders, the survey provided an opportunity to gain feedback on the effectiveness of our efforts to address modern slavery and ongoing opportunities for improvement.

Key insights from the stakeholder survey included:

- All respondents agreed that the University of Sydney is taking meaningful action to address modern slavery.
- 86% of stakeholders surveyed believe that modern slavery risks within their area of the University are well understood and managed, with 93% of respondents saying that they understand the modern slavery risks that relate to their area of the University and could support their team and colleagues to identify and manage these risks.
- 93% of stakeholders surveyed believe that the Modern Slavery Unit (a specialist team) has helped the University improve how it identifies and manages modern slavery risks. All respondents said they value their support and/or collaboration with the Modern Slavery Unit and the Unit's guidance, recommendations and assistance.

Insights from the survey will be used to help inform future planning.





# Looking Ahead

## *Our Action Plan for 2025*

Looking ahead to 2025, we remain committed to tackling modern slavery by mitigating risks and adverse impacts, benefiting our stakeholders and leveraging the University's expertise to contribute to solutions. Our focus remains on continuing to enhance our due diligence practice, foster a culture of continuous learning and improvement, and leverage our research and education excellence and partnerships.

Focus areas	Activities
Reducing modern slavery risks by <b>embedding best practice due diligence University-wide</b> .	<ul style="list-style-type: none"> <li>– Ongoing uplift of our governance and policy framework, identifying opportunities for improvements. Refresh our salient modern slavery risks and high-risk procurement and research categories.</li> <li>– Continue to strengthen modern slavery risk screening and risk assessment in research activities and other key projects and partnerships.</li> <li>– Deepen and target our engagement with suppliers, both to share our approach and uplift capabilities, and learn from other good practices.</li> <li>– Implement a new supplier assessment platform to enhance visibility and management of risks beyond Tier 1 of the supply chain.</li> <li>– Review the University's grievance mechanism to align with best practice and our lessons learnt.</li> </ul>
Building capacity of our staff and students, <b>enhancing our culture of continuous learning and feedback</b> .	<ul style="list-style-type: none"> <li>– Build on the student-centred and peer-led approaches piloted in 2024 to engage students and build awareness of modern slavery risks, including relating to placements.</li> <li>– Continue to build the capacity of staff, especially Student Wellbeing teams, to identify risk indicators and know how to access support.</li> <li>– Foster engagement with civil society partners and integrate perspectives of people with lived experience.</li> <li>– Refresh our Anti-Slavery Awareness training module for staff.</li> </ul>
Accelerating <b>solution-focused modern slavery research and education</b> .	<ul style="list-style-type: none"> <li>– Grow and enhance the University of Sydney's Modern Slavery Academic Network.</li> <li>– Facilitate opportunities to leverage the University's expertise and deepen connections between academics, government, business and industry, civil society and people with lived experience.</li> </ul>
Contributing to <b>global solutions</b> to eradicate modern slavery.	<ul style="list-style-type: none"> <li>– Continue to collaborate with government and other partners, including the Australian Government Modern Slavery and Human Trafficking Research Network, and working groups led by the NSW Anti-slavery Commissioner.</li> <li>– Foster best practice in the university sector, including taking on the role of chair of the AUPN Anti-slavery Program.</li> <li>– Build on the University's research, practice, and thought leadership, through events and other forums.</li> <li>– Continue to refine, strengthen and share our impact management framework and theory of change.</li> </ul>

# Glossary

## Affiliate

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

## Assets under management

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

## AUPN

Australasian Universities  
Procurement Network

## Child labour

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

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

## Controlled entity

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

## Debt bondage

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

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

## Deceptive recruiting for labour and services

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

## ESG

Environmental, social and governance.

## Forced labour

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

## Forced marriage

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

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

## Grievance mechanism/Modern Slavery Incident Reporting Form

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

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

## Human rights due diligence/due diligence

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

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

## Know Your Partner and Project Tool (KYPPT)

The University of Sydney's bespoke risk identification tool that enables staff to quickly check a new research project for potential modern slavery and counterparty risks, based on publicly available, reputable sources.

## Lived experience

A 'person with lived experience' describes someone who has directly experienced modern slavery. This definition is consistent with the Australian Government's guidance on Modern Slavery Lived Experience Engagement and Empowerment (2024). We recognise that other terms, including but not limited to, 'victim', 'survivor', 'victim-survivor', 'survivor leader', and 'survivor advocate' may also be used. We also recognise that individuals have preferences on how they self-identify, and these terms may not resonate with some people.

## MBA

Masters of Business Administration.

### Modern slavery

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

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

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

### Modern Slavery Act

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

### Partner

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

### PPE

Personal Protective Equipment.

### Principal Officer

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

### Saliency

In accordance with international good practice, the 'significance', 'severity' or 'salience' of modern slavery risks considers the following three dimensions, as well as likelihood of a risk:

- Scale - the gravity of the adverse impact.
- Scope - the reach of the impact, for example the number of individuals that are or will be affected.
- Irremediable character - any limits on the ability to restore the individuals to a situation equivalent to their situation before the adverse impact.

### Servitude

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

### Slavery

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

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

### Supplier

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

### Trafficking in persons/human trafficking

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

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

### UNGPs

United Nations Guiding Principles on Business and Human Rights.

### USU

University of Sydney Union

# Index

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

## **Identify the reporting entity**

- About this statement (p. 3)

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

- Who we are (p. 8)
- Salient Modern Slavery Risks in the University's Value Chain (p. 14)
- Identifying, Assessing and Addressing our Modern Slavery Risks:
  - Our People (p. 19)
  - Our Supply Chain (p. 20)
  - Our Investments (p. 36)
  - Our Controlled Entities (p. 40)

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

- Our Approach to Modern Slavery Risk Management (p. 13)
- Salient Modern Slavery Risks in the University's Value Chain (p. 14)
- Identifying, Assessing and Addressing our Modern Slavery Risks:
  - Our People (p. 19)
  - Our Supply Chain (p. 20)
  - Our Research Activities (p. 28)
  - Our Support to Students (p. 32)
  - Our Investments (p. 36)
  - Our Controlled Entities (p. 40)

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

- Our Theory of Change (p. 12)
- Identifying, Assessing and Addressing our Modern Slavery Risks:
  - Our People (p. 19)
  - Our Supply Chain (p. 20)
  - Our Research Activities (p. 28)
  - Our Support to Students (p. 32)
  - Our Investments (p. 36)
  - Our Controlled Entities (p. 40)
  - Grievance Mechanism and Remediation (p. 44)
  - Collaboration and Engagement (p. 49)

## **Describe how the reporting entity assesses the effectiveness of these actions**

- Our Approach to Modern Slavery Risk Management (p. 13)
- Our Theory of Change (p. 12)
- Identifying, Assessing and Addressing our Modern Slavery Risks:
  - Our People (p. 19)
  - Our Supply Chain (p. 20)
  - Our Research Activities (p. 28)
  - Our Support to Students (p. 32)
  - Our Investments (p. 36)
  - Our Controlled Entities (p. 40)
  - Grievance and Remediation (p. 44)
- Assessing our Effectiveness and Looking Ahead:
  - Our Progress Against our 2024 Action Plan and Priorities (p. 52)

## **Describe the process of consultation with any entities the reporting entity owns or controls**

- Who we are (p. 8)
- Identifying, Assessing and Addressing our Modern Slavery Risks:
  - Our Controlled Entities (p. 40)

## **Provide any relevant information**

- Acknowledgment of Country (p. 1)
- From the Chancellor and Vice-Chancellor (p. 4)
- Our Theory of Change (p. 12)
- Our Approach to Modern Slavery Risk Management (p. 13)
- Identifying, Assessing and Addressing our Modern Slavery Risks:
  - Collaboration and Engagement (p. 49)
- Assessing our Effectiveness and Looking Ahead:
  - Our Action Plan for 2025 (p. 55)





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