

WESTERN SYDNEY
UNIVERSITY



Modern Slavery Statement

Reporting Period: 1 January 2021 to 31 December 2021

Statement of compliance with the *Modern Slavery Act 2018* (Cth).

Western Sydney University (ABN 53 014 069 881) and its controlled entities.

WESTERN SYDNEY
UNIVERSITY



Acknowledgment of Country

With respect for Aboriginal cultural protocol and out of the recognition that its campuses occupy their traditional lands, Western Sydney University acknowledges the Darug, Eora, Dharawal (also referred to as Tharawal) and Wiradjuri peoples and thanks them for their support of its work in their lands (Greater Western Sydney and beyond).

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1. Introduction (Criterion 1)

Section 16(1)(a) of the *Modern Slavery Act 2018* (Cth)

The purpose of this Modern Slavery Statement (**Statement**) is to outline the commitment and approach of Western Sydney University (ABN 53 014 069 881) and its five controlled entities¹ (together, **the University**) to identify and minimise the risk of modern slavery in its business operations and supply chains pursuant to its obligations under section 13 of the Australian [Modern Slavery Act 2018](#) (the Act).

Each section of this Statement addresses actions the University has taken in response to the mandatory reporting criteria of the Act during the 2021 calendar year - 1 January 2021 to 31 December 2021 (**Relevant Reporting Period**).

The term “modern slavery” is used to describe situations of serious exploitation where coercion, threats, or deception are used to exploit victims, and undermine or deprive them of their freedom. The Act defines modern slavery as including eight types of serious exploitation:

1. trafficking in persons;
2. slavery;
3. servitude;
4. forced marriage;
5. forced labour;
6. debt bondage;
7. deceptive recruiting for labour or services; and
8. the worst forms of child labour, meaning situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

This is Western Sydney University’s second annual Modern Slavery Statement.

This statement has been approved by the Board of Trustees, as the principal governing body, at its meeting on 8 June 2022.

¹For the list of entities, refer to the table in Section 3.

About Western Sydney University

Western Sydney University is an Australian multi-campus university in the Greater Region of Sydney, and is a provider of undergraduate, postgraduate, and high research degrees to domestic and international students, and researchers. The University is committed to the conduct of business and its delivery of higher education and research in a fair, transparent, accountable, and impartial manner.

It is recognised as one of Australia's leading institutions with an on-going reputation for academic excellence, integrity, pursuit in the higher education sector, and its commitment to research and development.

In the Relevant Reporting Period, the University's [global rankings](#) were:

- Top 251-300 of [Times Higher Education World University ranking](#), including:
 - #34 in the world among universities under 50 years old;
 - #6 in Australia among universities under 50 years old;
 - #17 overall in the Impact Rankings;
 - #3 in the world for [gender equality](#); and
 - #4 in the world for [reducing inequalities](#).
- Top 451-500 of [QS World University ranking](#), including:
 - Top 61-70 Top 50 under 50.
- Top 301-400 of [Academic Ranking of World Universities](#).
- [US News Best Global Universities 2021](#)
 - Top 20 in Australia
 - Top 250 globally
- Recipient of the Workplace Gender Equality Agency's [Employer of Choice for Gender Equality](#) citation for the past 20 years.



Mission, Values, Principles, Enablers

The University's success has been achieved pursuant to the University's Strategic Plan (refer to [Sustaining Success 2021-2026](#)). The Strategic Plan clearly outlines the University's mission and the values underpinning its business to reinforce that it is a values-based and ethical organisation.

Mission

- Students will succeed.
- Research will have impact.
- Communities will thrive through commitment to excellence, sustainability, equity, transformation, and connectedness.

Values

- Commitment to our students, people, and communities, both local and global.
- Boldness, Fairness, Integrity, Excellence.

Principles

- Sustainability, Equity, Transformation, and Connectedness.

Enablers

- People, Place, Learning and Teaching, Student Experience, Research and Innovation, Global Engagement, Indigenous Perspectives, Technology and Systems, and Financial Resilience.

In the **Relevant Reporting Period**, the University's key statistics (as outlined in its [Annual Report](#) 2021) across its multiple campuses in Australia are:

- 47,971 students
 - of which are 5,461 international fee-paying students;
 - of which 58.5% identify as female.
- 3,038 full-time equivalent staff

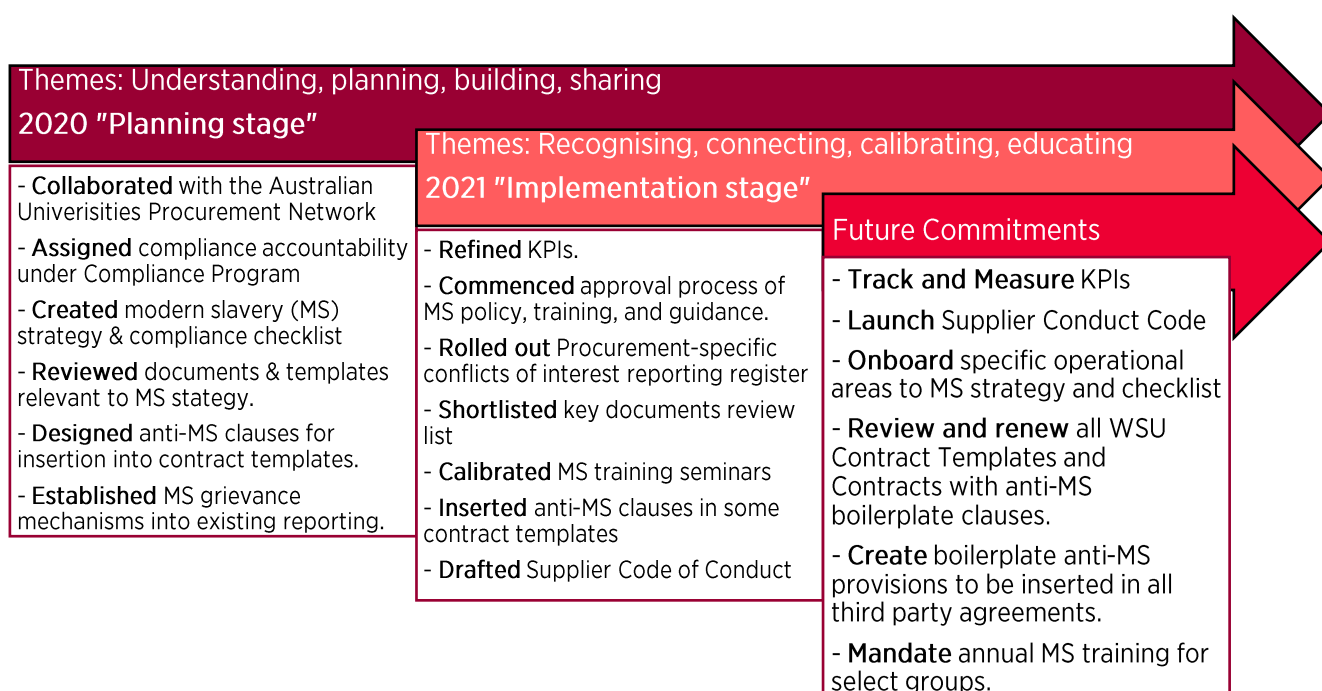
The [University](#) has an international student recruitment presence, international partnerships, and formal agreements with more than 320 international institutions and organisations across 53 countries.

The [University](#) ranked fifth out of twelve Australian universities in its approach to responsible investment.

Key achievements

- Drafted and inserted modern slavery-specific contract clauses in contract templates for use in 2021
 - 2 x Student Placement Agreements (onshore, and offshore)
 - 2 x International Agreements (Admission and Articulation Agreement, and Articulation Agreement)
- Drafted modern slavery-specific contract clauses in contract templates for use in 2022
 - 3 x Procurement agreements (External Master Consultancy Agreement, External Consultancy Agreement, and External Supplier Agreement aka high volume Purchase Order agreements)
 - Terms and Conditions (student external career advertising platform)
- Created a Supplier Due Diligence document for implementation into the Procurement Process
- Reviewed investments for any potential exposure to modern slavery.
- Reviewed 218 policies
- Shortlisted 8 key policies for continuous modern slavery context review
- Inserted modern slavery information into three webpages (accessible by staff & public)
- Commenced formal approval process for the University and Controlled Entities' [Modern Slavery Prevention Policy](#)

Snapshot of key milestone progression





2. Structure, operations, and supply chains (Criterion 2)

Section 16(1)(b) of the *Modern Slavery Act 2018* (Cth)

Western Sydney University is established under and operates by the *Western Sydney University Act 1997* (NSW) (**WSU Act**), and the associated *Western Sydney University By-law 2017*. The WSU Act constitutes the University, and prescribes its functions and the authority of its governing body, the Board of Trustees. Section 8(1) of the WSU Act defines the core object of the University as ‘the promotion, within the limits of the University’s resources, of scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence.’ The WSU Act also requires the University to have particular regard to the needs of Western Sydney in fulfilling this objective.

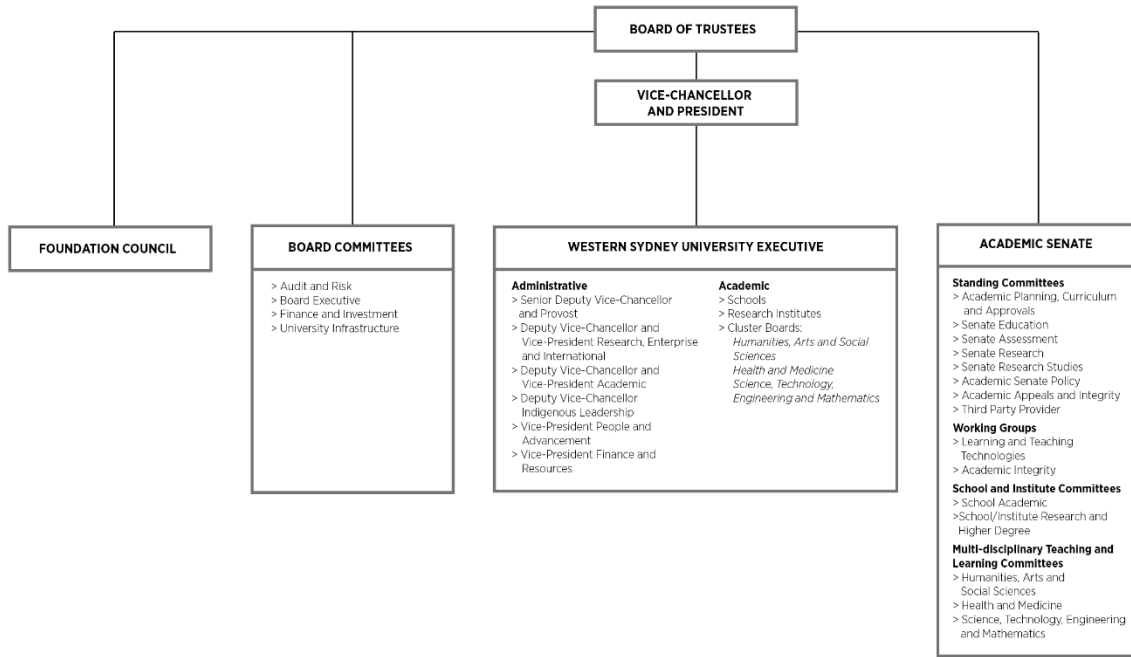
Governance structure

The Board of Trustees is the governing body of the University with those functions prescribed under the WSU Act. It acts for and on behalf of the University. Its key functions are to develop broad policies and strategic plans concerning the University, manage the University’s resources, and monitor the University’s performance. The members – official, appointed and elected – meet approximately six times each year in addition to a strategic planning day. The Board of Trustees is supported in its work by several specialist committees and advisory councils.

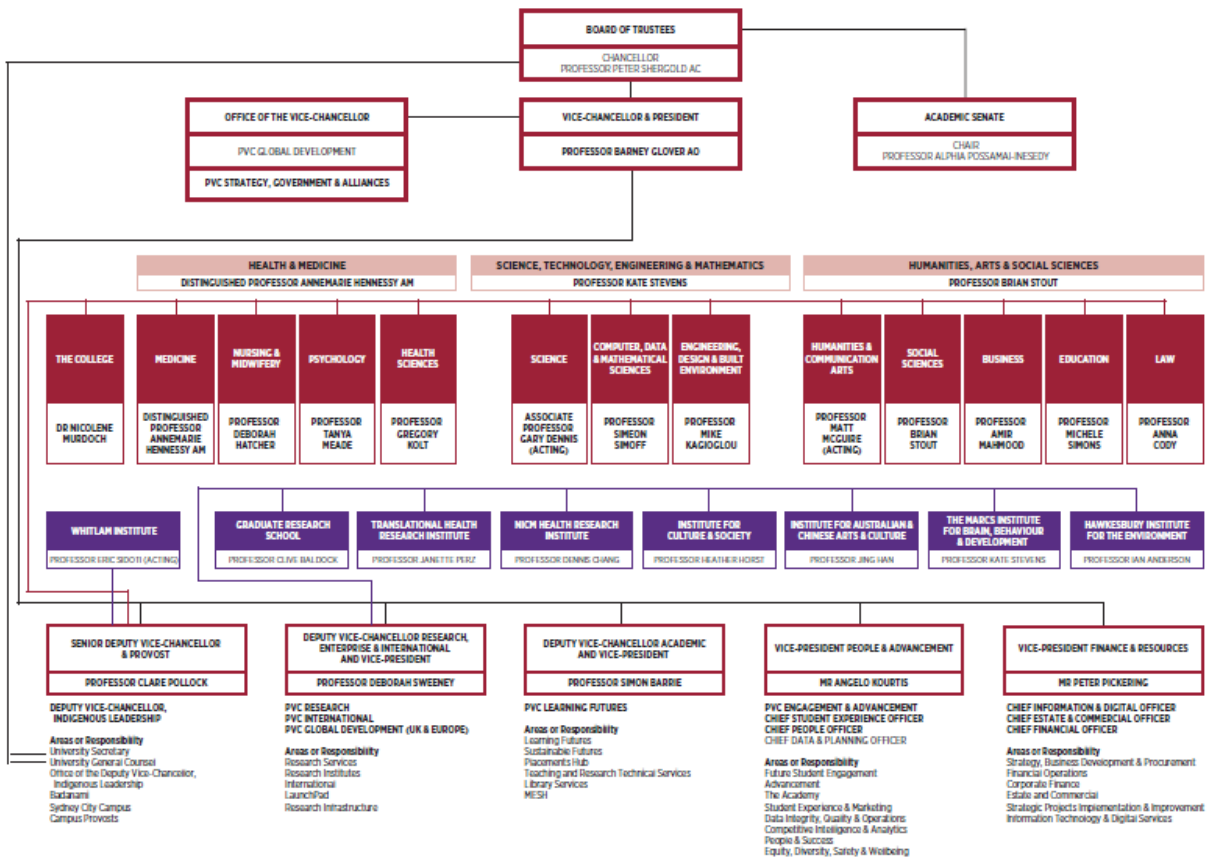
Organisational structure

The Principal Officers of the University as at the Relevant Reporting Period comprise of:

- Chancellor
- Vice-Chancellor and President
- Senior Deputy Vice-Chancellor
- Deputy Vice-Chancellor and Vice-President (Academic)
- Deputy Vice-Chancellor and Vice-President (Research, Enterprise, and International)
- Deputy Vice-Chancellor, Indigenous Leadership
- Vice-President (Finance and Resources)
- Vice-President (People and Advancement) and Registrar
- Chair of the Academic Senate



WESTERN SYDNEY UNIVERSITY GOVERNANCE STRUCTURE
AS AT DECEMBER 2021



* Bold denotes members of the University Executive Committee
16 NOVEMBER 2021

Entities

The University has a number of controlled entities, which are:

1. Whitlam Institute within Western Sydney University
2. Western Sydney University Enterprises Pty Ltd trading as Western Sydney University – The College
3. Western Sydney University Early Learning Ltd
4. Western Growth Developments (Parramatta Innovation Hub) Pty Ltd
5. Western Growth Developments (Westmead) Pty Ltd

Key operational activities and supply chains

The principal operational activities of the University are the provision of University-level education and research through a wide range of undergraduate and postgraduate courses, and research programs, with a particular focus on Western Sydney. The University's controlled entities undertake specific activities aligned with the mission of the University. For the purpose of this Statement, the key operational activities and supply chains are:

Entity/Type/ABN/ACN	Key operational activities	Key supply chains
Western Sydney University (Other Incorporated Entity) ABN/ACN 53 014 069 881	Delivering higher education services, including research and development services. Key operational functions include: <ul style="list-style-type: none"> - Student placements; - Partnerships in research, collaboration, and joint ventures; - Finance, property, and procurement; - Information technology and digital services; - Human resources; - Governance including legal, compliance, and risk. 	<ul style="list-style-type: none"> - Service professionals who provide services directly to the University - Technology (hardware, software, cloud services) - Utilities and cleaning services - Contractors (individuals or companies) - Library materials
Western Sydney University Early Learning Ltd (WSU Early Learning) (Australian Public Company Limited by guarantee) ABN/ACN 39 155 993 445	WSU Early Learning provides exceptional and responsive education and care environments, embedding the National Quality Framework on multiple WSU campuses. WSU Early Learning strives to provide an innovative research-based education and care service delivering the highest quality care and education for children in their early years and providing a strong foundation for a lifetime of learning. WSU	

Entity/Type/ABN/ACN	Key operational activities	Key supply chains
	<p>Early Learning provides education and care that demonstrates diversity and inclusiveness, with the latest research and best practice models informing our service delivery.</p>	
<p>Western Sydney University Enterprises Pty Ltd trading as Western Sydney University – The College</p> <p>(Australian Proprietary Company Limited by shares</p> <p>ABN/ACN 44 003 474 468</p>	<p>The College provides students with a high-quality academic pathway to study at Western Sydney University through its comprehensive range of University Foundation Studies and Diploma programs. The English Language Centre offers proficiency training and testing services, and The College’s Registered Training Organisation (RTO) offers vocational programs.</p>	
<p>Western Growth Developments (Parramatta Innovation Hub) Pty Ltd</p> <p>(Australian Proprietary Company Limited by shares</p> <p>ABN/ACN 626 590 029</p>	<p>Western Growth Developments (Innovation Hub Parramatta) Pty Ltd promotes scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence. Principally, the entity is the co-developer with respect to the Parramatta Innovation Hub project. The entity shall operate the completed development to generate returns for the purpose of pursuing its objectives.</p>	
<p>Western Growth Developments (Westmead) Pty Ltd</p> <p>(Australian Proprietary Company Limited by shares)</p> <p>ABN/ACN 625 406 411</p>	<p>Western Growth Developments (Westmead) Pty Ltd promotes scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence. Principally, the entity is the co-developer with respect to the Westmead Innovation Quarter project. The entity shall operate the completed project to generate returns for the purpose of pursuing its objectives.</p>	

Entity/Type/ABN/ACN	Key operational activities	Key supply chains
<p>Whitlam Institute within Western Sydney University</p> <p>(Australian Public Company Limited by Guarantee)</p> <p>ABN 50 100 342 309</p>	<p>The Whitlam Institute is a nationally significant institution delivering distinctive, bold and inspiring policy research and programs that promote common ground, inclusive national identity and civic engagement for all Australians. The Institute provides an intellectual and cultural space for thought-provoking events and exhibitions, bringing issues of national significance to local communities and raising issues of concern for local communities into national debates.</p>	



Partnering with suppliers and external partners

The office of Strategy, Business Development and Procurement meets with The Australian Universities Procurement Network (**AUPN**) including the Modern Slavery Working Group, who also work with Arc Blue Consulting and Pillar Two, and host an array of category specific Advisory Groups.

Supply chain and supply risk categories: sector-level vs WSU

The University has identified its risk across two different lenses:

1. Potential modern slavery risks applied against spend categories using AUPN taxonomy; and
2. Potential modern slavery risks applied against country locations using supplier head office location.

These risks are determined through publicly available modern slavery risk (e.g. Global Slavery Index), and prevalence information, together with some reasonable assumptions. According to AUPN's sector-level analysis to date, and the [Global Slavery Index](#), the top 5 high modern slavery risk countries are: i) North Korea; ii) Libya; iii) Eritrea; iv) Central African Republic; and v) Iran. The University does not purchase goods or services from any of these countries.

When assessing potential modern slavery risks in respect of a particular supplier, the University considers the supplier's geographical location, as well as its line of work, potential for sub-consultants engaged, and the amount of spend.

In the Relevant Reporting Period, the University:

- procured goods and services mainly manufactured in i) Australia; ii) the USA; and iii) the UK;
- engaged with 3,700 suppliers, where the largest category of spend was on AUPN level 3 Real Estate (8.7%) and IT software (7%); and
- identified potential risks of modern slavery practices in its supply chains in i) desktop hardware; ii) cleaning; and iii) public and social organisations.

The University's operations

The University is committed to operating responsibly and undertaking due diligence to identify incidents and assess risks of modern slavery, as well as remedial action to address and mitigate any adverse human rights impacts in any part of its business processes.

Given that the University's operations are based in Australia with the majority of its employees and students also based in Australia, the risk of modern slavery within its operations would be considered low.

Nonetheless, relevant considerations within the University's operations, particularly in the context of Covid-19 pandemic and its impact on resource management, is the health, safety, and well-being of its employees and students. As such, the University has implemented risk management, and due diligence mechanisms to address these considerations, which is outlined in the next section (Mandatory Criterion 4) of this Statement.



Supply governance framework

The University's [Procurement Policy](#) sets out the principles under which procurement occurs in the University. This policy conforms to the NSW Government Guidelines on Procurement, and complies with the *Government Information (Public Access) Act 2009 (NSW)*, and the *Government Sector Finance Act 2018 (NSW)*.

To make the best possible informed decisions for procurement activities, the University considers the following non-exhaustive factors such as value for money, return on investment, whole-of-life costs, timely delivery, post-delivery support, environmental sustainability, social responsibility, evidence of previous performance or experience, effective warranty, and conformity of law in its procurement decisions.

To reduce the exposure to modern slavery risks, the University is committed to the continued development of effective, efficient and transparent controls to verify that its business is (not an exhaustive list):

- a. setting the expected level of conduct, and performing appropriate due diligence of the University's suppliers in accordance with the Procurement Policy, and, if applicable, investigations of any reports of a breach; and
- b. incorporating relevant clauses in the University's standard terms and conditions for supply and service contracts, if applicable.

Review of contract templates

The Office of General Counsel collaborated with several University operating units, such as Procurement, International, Student Placements, Student Careers, and Research to review WSU Contract Templates and renew existing contracts with consideration of inserting Modern Slavery clauses. All contracts suites (e.g. construction, research etc) will be progressively

reviewed and renewed with this consideration. The new and revised contract templates are and will be progressively published on the OGC website for whole of University-use.

Supplier Management and Onboarding

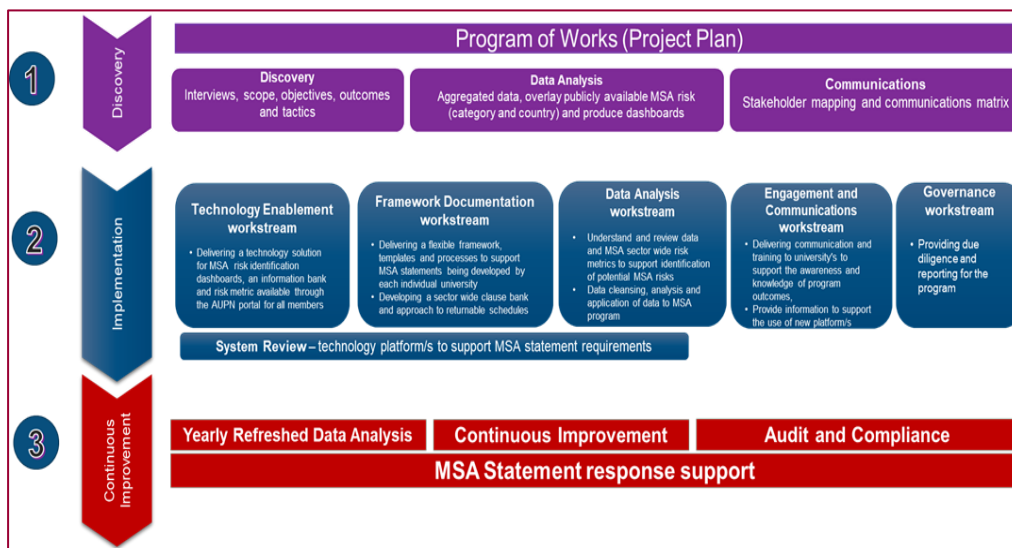
WSU achieved considerable progress in its planned implementation of a supplier Risk Questionnaire and supplier Due Diligence document.

The Risk Questionnaire has been drafted, and is planned to be introduced to the procurement process in the next year. The intention is to gain insight into key suppliers’ management, operations, and supply chain prior to onboarding and engaging. The document is intended to also be used for annual self assessments by key suppliers.

Similarly, the supplier Due Diligence document has been drafted, and intended to be introduced in the next year. It aims to gather necessary information about proposed suppliers prior to onboarding.

Continued sector consultation and collaboration with the Australian Universities Procurement Network

The University continues to be a member of the AUPN, and leverages best practice from its support in meeting the challenge of human rights transparency and risk management in their supply chains, and to the fulfilment of members’ reporting requirement to the *Modern Slavery Act* 2018 (Cth).



The collaboration of AUPN members to implement a modern slavery monitoring tool is progressing well with a provider selected and a planned go live in February 2022. As a product of this initiative, the University will participate in sector initiatives to address modern slavery risks as well and obtain more up to date information with regards to the focus areas for further review across the supplier base.

In the Relevant Reporting Period, the University did not identify any modern slavery incidents directly or indirectly within its operation and supply chains, based on its risk indicators and internal reporting mechanisms.

Workforce

There are a number of risk management and due diligence controls in place to mitigate the risk of modern slavery within the University's workforce such as:

- staff (excluding senior staff) employed and remunerated in accordance with the Enterprise Bargaining Agreements, which are negotiated with the relevant unions and approved by the Fair Work Commission under the *Fair Work Act 2009* (Cth), and are offered flex-leave for hours worked beyond the standard 35-hour work week;
- staff recruitment practices are merits-based (and not based on factors such as whether a staff member is willing to work unnecessary longer hours);
- diligent vetting and verifying all new employees have the right to work in Australia, and not subject to any sanctions per the *Autonomous Sanctions Act 2011* (Cth);
- accessible training courses and other career opportunities that respond to the University's value of having a diverse and balanced workplace;
- reporting compliance with the *Workplace Gender Equality Act 2012* (Cth); and
- high expectations of conduct required of staff through their employment, which is supported and guided by enterprise-wide policies.

In the Relevant Reporting period, the Compliance Program Unit received 0 incident reports identifying modern slavery affecting the health, safety, and wellbeing of University staff.

Review of policies and guidelines

The Compliance Program Unit (CPU) has fulfilled its 2020 commitment of reviewing all policies as part of its continuous improvement process to ensure that these complement its modern slavery strategy. From there, the CPU compiled a shortlist of those highly relevant in the context of modern slavery, and is notified of when these documents are revised in order to provide feedback and recommended insertions related to modern slavery as part of the document's consultation phase. The CPU is committed to reviewing this shortlist annually.

For the Relevant Reporting Period, the shortlist of policies and guidelines relevant to and in proportion to modern slavery compiled by the Compliance Program Unit include:

- Modern Slavery Prevention Policy (commenced the formal approval process);
- Contract Management Framework;
- Code of Conduct;
- Conflicts of Interest Policy;
- Gender Equity Policy;
- Procurement Policy;
- Whistleblowing (Reporting Corruption and Other Wrongdoing) Policy;
- Fraud and Corruption Risk Framework;
- Work Health and Safety Policy.

Training

Training is an integral part of the University's compliance framework to ensure staff are aware of their legal, regulatory, and compliance responsibilities as it pertains to combatting and reporting modern slavery risks. As such, the University has:

- Shortlisted available modern slavery training for specific and general groups of staff, and students.
- Developed factsheets and guidance on how to recognise, combat, and report modern slavery, and has begun circulating to select staff.
 - These factsheets stipulate the behaviour the University expects of its Board of Trustees, senior executives, staff, and suppliers, and how to engage with the reporting mechanisms to report any risks or actual incidents of modern slavery.

The CPU and a representative of the office of Strategy, Business Development and Procurement (SBDP) attend at least one annual webinar/training session hosted by an external organisation (e.g. law firm, government agency) to keep up to date with modern slavery requirements. Additionally, both these units are subscribed to legislative alerts for any amendments to the Act.

In the Relevant Reporting period, the Compliance Program Unit identified the following online training modules as relevant to modern slavery are available to staff:

- i) Fraud and corruption risks; ii) Work, health and safety; iii) Whistleblower Reporting; iv) Compliance Management Program; v) Non-Compliance Incident Reporting.

Grievance mechanisms

University staff, students, and suppliers are able, and are encouraged, to raise modern slavery concerns confidentially under the current process available under the University's [Whistleblowing \(Reporting Corruption and Other Wrongdoing\) Policy](#) and [Procedures](#) which are available online. More details of the procedures can be found [here](#). The University's Whistleblowing (and Public Interest Disclosure) Coordinator is the University Secretary.

The University's primary Compliance Representative and Compliance Contact for the *Modern Slavery Act* 2018 (Cth) are listed on the University's Compliance Management Program's [Compliance Directory](#), which is also accessible by the public. Anyone who has concerns may contact the CPU, and/or the Compliance Representative and Compliance Contact at any time.

There is also a public register to report non-compliance incidences, and any modern slavery concerns are automatically filtered via the Whistleblowing and Complaints Resolution procedures. These provide additional avenues for individuals, including staff, to raise any legislative non-compliance in relation to modern slavery.

In the Relevant Reporting period, the Compliance Program Unit received 0 non-compliance incident reports relating to modern slavery, and 0 filtered through the other grievance mechanisms.

University Compliance Management Program

The University's Compliance Management Program enables and assures of legislative compliance, whereby operational compliance ownership is assigned to one or multiple portfolios across the University.

Legislation is also assigned to portfolios' "watchlists" so that area is specifically aware of any legislation that may impact or affect their area, operations, and/or strategy even if they do not execute on controls relating to specific obligations of a law. The *Modern Slavery Act 2018* (Cth) is one of these legislation, and is assigned to:

- Compliance Program Unit;
- Strategic Business Development and Procurement;
- The College (controlled entity);
- Office of Governance Services (for remaining controlled entities).

In the Relevant Reporting period, the relevant laws on the Compliance Directory identified by the Compliance Program Unit are:

i) Modern Slavery Act 2018 (Cth); ii) Workplace Gender Equality Act 2012 (Cth); iii) Independent Commission Against Corruption 1988 (NSW); iv) Fair Work Act 2009 (Cth); v) Autonomous Sanctions Act 2011 (Cth); vi) Education Services for Overseas Students Act 2000 (Cth); vii) Education Services for Overseas Student Regulations 2000 (Cth); and viii) National Code of Practice for Providers of Education and Training to Overseas Students 2018.

The relevant Compliance Owners of the above legislations attested that the laws do not pose a material non-compliance risk to the University.

Students

Wage theft, forced labour, and debt bondage may particularly afflict students, and may occur in employment sought by the student outside of their tertiary studies, as noted in the Federal Government's "[Hidden in Plain Sight](#)" inquiry report about establishing a Modern Slavery Act in Australia.

Commitment to students is a strong value of the University, and it acknowledges that the University is an appropriate avenue to provide information, recommend best practice, and facilitate authentic work place learning for students. It recognises it plays an important role in supporting students' overall well-being, and preparation for their chosen profession or discipline.

As such, the University has numerous procedures in place to assist students, such as counselling services, welfare service inclusive of financial assistance, sexual offences reporting hotline, a Careers Hub, and information on and referrals to other external agencies.

The University has also created Modern Slavery-specific clauses for the terms and conditions for its student external job search platform to establish the appropriate standard and expectation of conduct of its external advertisers. The University also disseminated bespoke factsheets to the Student Careers staff and students using the platform to raise awareness and knowledge on the risks and markers of modern slavery, as well as how to report such incidences.



During this reporting period, the University's focus was to gain a better understanding of its modern slavery risks, how such risks may be present in its operations and supply chains, and any trends since the last Statement. This was a natural progression from its focus in the previous reporting period, which was establishing frameworks for supporting modern slavery risk assessments and understanding key exposure areas.

The University recognises that the measurement of its actions to identify and address modern slavery risks in operations and supply chains is an ongoing and evolving process as it gains better insights into the data. Nevertheless, the University has some foundation measurement strategies in place such as:

- tracking actions and outcomes;
- partnering with suppliers, and other external partners; and
- undertaking regular internal assurance processes.

Based on the results of these processes, the University is committed to adapting and strengthening its actions to continually improve its response to modern slavery.

Established reviews and consultation to track actions and outcomes

- The CPU meets fortnightly with the University General Counsel, and units in the portfolio i.e. Complaints Resolution Unit, Office of General Counsel.
- Established 6 monthly progress meetings between the CPU and SBDP, with a rigorous communication schedule in the three months prior to submitting the annual Modern Slavery Statement.
- Regular contact with the University Secretary and units in the portfolio i.e. Audit and Risk Assessment, Secretariat.
- On an annual basis, the CPU submits a discussion paper to the University's Senior Executive Group for review and feedback on the University's Modern Slavery Statement.

- The CPU at least annually reports on its activity to the Board of Trustees' Audit and Risk Committee, which includes information on non-compliance incidences. The CPU meets with all compliance owners under the University's Compliance Management Program on laws which include those related to modern slavery.

Partnering with suppliers and external partners

The office of Strategy, Business Development and Procurement meets with the AUPN including its Modern Slavery Working Group who also work with Arc Blue Consulting, and Pillar Two, and host an array of category specific Advisory Groups.

Key Performance Indicators

The CPU, in partnership with relevant operating units, annually tracks the following:

- the number of modern slavery training (specific and related) delivered / communicated University-wide;
- the completion rates for modern slavery awareness training (specific and related);
- the number of modern slavery cases identified and remediated via grievance mechanisms;
- the number of actions that have been implemented to deadline;
- the number of contracts that include modern slavery clauses;
- the number of contracts varied or terminated relating to modern slavery including any prolonged negotiations over anti-modern slavery clauses.

Internal assurance processes

All compliance owners under the University's Compliance Management Program continuously self-assess the risk of non-compliance to laws, which include those laws specific or related to modern slavery risks. Self-assessment also includes listing specific controls / actions to ensure compliance with legislation. Each year, these compliance owners provide an assurance attestation as to these controls and non-compliance risk. All compliance owners, as with all University staff, are obligated to report any incidences of non-compliance, and to manage and prevent reoccurrence of these incidences should they arise.



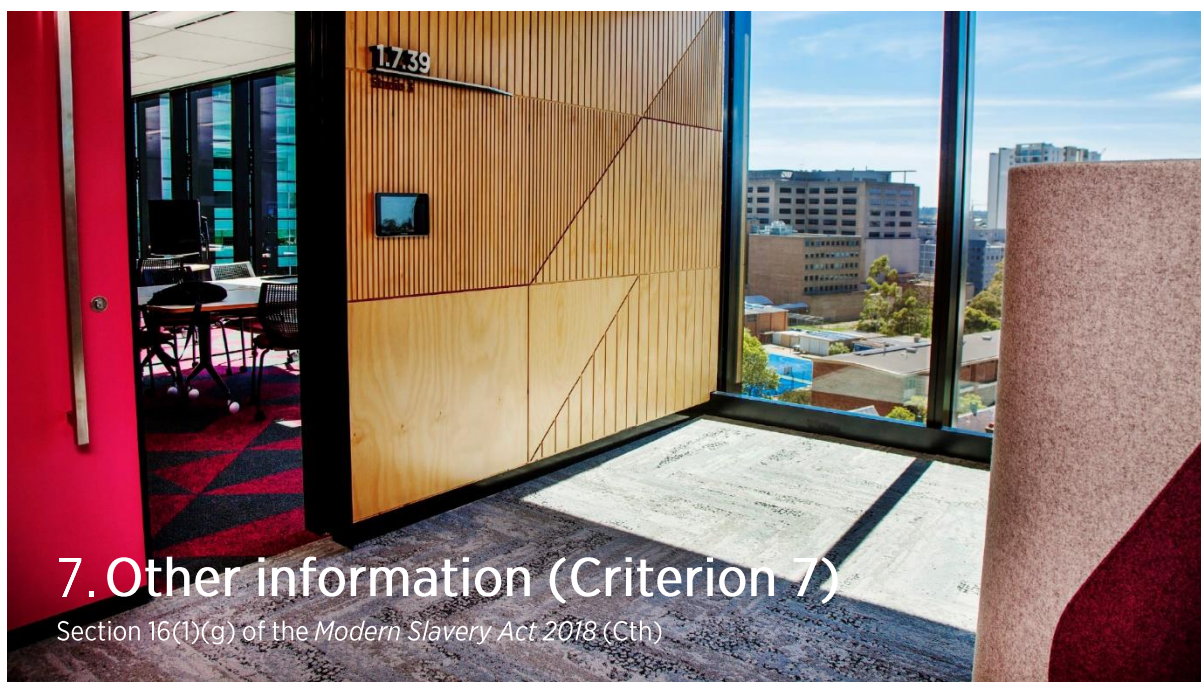
In preparation of its first Modern Slavery Statement, the University by way of its University Secretary and General Counsel who is also Corporate Secretary to 3/5 of the controlled entities at the time, shared details of the Modern Slavery Act's reporting requirements.

For this Relevant Reporting Period, the University followed up with a discussion paper to document progression of the University's modern slavery reporting requirements. All controlled entities agreed to be bound by the University's Modern Slavery Prevention Policy, once adopted.

Controlled entities receive all communication and information on modern slavery including how to report. They can also access any communicated modern slavery training modules.

At least annual consultations are scheduled for the future years, where the University Compliance Manager meets with each controlled entities' Board. The consultation process for future reports will include identifying how the University can strengthen risk control within its controlled entities, including by adopting standard University policies, templates, and processes across controlled entities.

The Associate Director, Secretariat, under the University Secretary, who is now the Corporate Secretary to 3/5 of the controlled entities, has been assigned the *Modern Slavery Act 2018* (Cth) as a Watchlist item under the University Compliance Management Program to ensure robust liaison continues. The assignment to the other entities (The College, and Early Learning Ltd) will occur in the next year.



Covid-19

The Covid-19 global pandemic has had a significant impact on the University as with other organisations. Travel restrictions resulted in a decline in the number of international students enrolled with the University, which in turn has had a significant impact on the University's budget and income. As part of its response, the University has had to implement significant cost savings measures, including suspending some external contract work in order to remain competitive and operational.

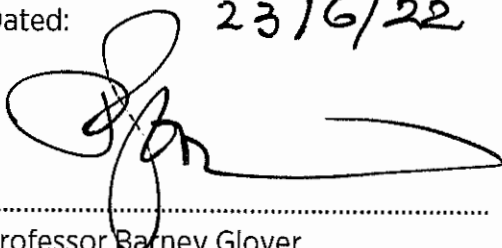
The University acknowledges that variations or terminations of contracts may increase modern slavery risks for workers in the supply chain as outlined in the Australian Border Force's [Modern Slavery Act Information Sheet: Coronavirus](#). For example, suppliers may engage in measures to cut costs to meet cash flow pressures, or if there has been a significant increase in the demand for certain goods, resulting in workers being forced to work in modern slavery conditions. In this regard, the University maintains open dialogue with its suppliers to ensure that contracts are not unreasonably varied or terminated, which may give rise to increased modern slavery risks.

In the Relevant Reporting period, the University found 0 unreasonably varied or terminated contracts on grounds which may not comply with the *Modern Slavery Act 2018 (Cth)*.



This Statement is made in accordance to the *Modern Slavery Act 2018 (Cth)* and constitutes as the annual modern slavery statement of Western Sydney University for the reporting calendar year ended 31 December 2021.

The Board of Trustees has approved this statement on 8 June 2022, in its capacity as the principal governing body of the University, as defined by the Act.

Dated: 23/6/22


.....
Professor Barney Glover
Vice-Chancellor and President
Western Sydney University

Signing as the defined "responsible member" of the University, as defined by the Act, and a member of the University's Board of Trustees.