Modern Slavery Statement

2023

Contents

Acknowledgement of Country

The University of Melbourne acknowledges the Traditional Owners of the unceded land on which we work, learn and live: the Wurundjeri Woi-wurrung and Bunurong peoples (Burnley, Fishermans Bend, Parkville, Southbank and Werribee campuses), the Yorta Yorta Nation (Dookie and Shepparton campuses), and the Dja Dja Wurrung people (Creswick campus).

The University also acknowledges and is grateful to the Traditional Owners, Elders and Knowledge Holders of all Indigenous nations and clans who have been instrumental in our reconciliation journey.

We recognise the unique place held by Aboriginal and Torres Strait Islander peoples as the original owners and custodians of the lands and waterways across the Australian continent, with histories of continuous connection dating back more than 60,000 years. We also acknowledge their enduring cultural practices of caring for Country.

We pay respect to Elders past, present and future, and acknowledge the importance of Indigenous knowledge in the Academy. As a community of researchers, teachers, professional staff and students we are privileged to work and learn every day with Indigenous colleagues and partners.

A note from the Vice-Chancellor, Professor Duncan Maskell

The University of Melbourne reaffirms our dedication to upholding individual dignity and human rights across all facets of our operations and supply chain. Recognising the globally pervasive issue of modern slavery, it is our institutional duty to identify and prevent exploitative practices and foster social responsibility in our teaching, learning, research and engagement.

Our commitment to risk reduction and awareness extends across our operations and supply chain, with a particular focus on construction in 2023 as we undertake ambitious building projects, such as the Australian Institute for Infectious Disease. This project has incorporated modern slavery considerations into risk and opportunity mapping throughout the design process. Outcomes will be integrated into the ongoing project and will inform future University construction activity.

The University of Melbourne remains dedicated to proactive advancement of sustainable and ethical practices, in alignment with Advancing Melbourne and the Sustainability Plan 2030, and underpinned by the United Nations Guiding Principles on Business and Human Rights.

This is our fourth Modern Slavery Statement, approved by University Council on 19 June 2024.

Professor Duncan Maskell
Vice-Chancellor

"...it is our institutional duty to identify and prevent exploitative practices and foster social responsibility in our teaching, learning, research and engagement..."

Introduction

This statement has been prepared pursuant to the *Modern Slavery Act 2018* (Cth) and outlines actions taken by the University of Melbourne to identify, assess and address modern slavery risks in operations and supply chains from 1 January 2023 to 31 December 2023.

Statement

1. Reporting entity and structure

The University of Melbourne (ABN 84 002 705 224) was established by an Act of the Victorian Parliament in April 1853. It is a body politic and corporate and continues in existence under the *University of Melbourne Act 2009* (Vic), which establishes the 13-member University Council as the governing body of the University, overseeing its direction and superintendence. The University Council is therefore the appropriate authority to approve the University's 2023 Modern Slavery Statement.

There are seven Council committees, including Academic Board, the chief academic body responsible for academic quality assurance. The University has nine faculties and is led and managed by the Vice-Chancellor and University Executive.

Entities owned or controlled by the University

The University's network includes subsidiary companies, affiliated bodies and non-academic University departments.

This statement is made on behalf of the University and the following entities it owns or controls:

- Australia India Institute Private Limited (India)
- Australian Music Examinations Board (Vic) Ltd
- Doherty Clinical Trials Ltd
- Goulburn Valley Equine Hospital Pty Limited
- Melbourne Business School Ltd
- Melbourne Teaching Health Clinics Ltd
- Melbourne University Publishing Ltd
- Nossal Institute Ltd
- UMELB Pte Ltd (Singapore)
- UoM Commercial Ltd
- UM Commercialisation Pty Ltd
- UoM International Holdings Pty Ltd

Key facts

$2.893bn
Operating income

$1.224bn
Third party spend

53,963[1]
Students

10,514[2]
Staff

Campus locations

University operations are located in Victoria, Australia. The University of Melbourne operates eight campuses across Victoria, with most operations occurring in metropolitan Melbourne.

1. Parkville (main campus)
2. Southbank (music, visual and performing arts)
3. Burnley (horticulture and agricultural science)
4. Fishermans Bend (heavy engineering and infrastructure, under development)
5. Werribee (veterinary medicine immersion)
6. Creswick (environmental and forest science)
7. Shepparton (rural health)
8. Dookie (agricultural science)

1   Equivalent Full Time Student Load (EFTSL)
2   Total staff full-time equivalent (FTE) including continuing, fixed-term and casual staff
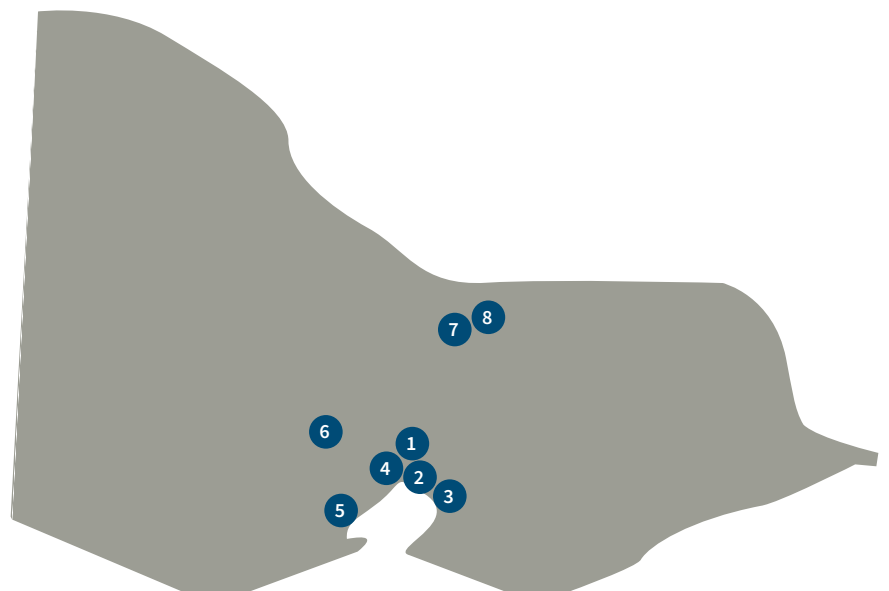
2. Operations and supply chain

Operations

The University of Melbourne is the largest research university in Australia and a world-leading higher education provider. The University's core activities are teaching and research, and the University's faculties, graduate schools and research institutes lead the delivery of teaching, learning, research and engagement.

Research

As outlined in previous statements, the University of Melbourne's Research, Innovation, and Commercialisation (RIC) function operates within the portfolio of the Chief Operating Officer. RIC provides a suite of expert professional services to enable academics to achieve global research excellence and translate their discoveries into real-world innovation and impact.

RIC manages research funding and reviews, negotiates and arranges the signing of the University's research-related contracts, engaging with a broad range of governmental, corporate and civil society partners.

Many of these partners are owned or operated in foreign jurisdictions, where there may be an elevated risk of modern slavery. For research-related engagements, RIC endeavours to understand whether there is:

• Potential to procure goods produced using forced labour or debt bondage, and/or
• Potential to transact with third parties that could perpetrate or perpetuate modern slavery.

In 2023, RIC focussed on continuously improving mechanisms to identify, assess and address modern slavery risks in the research sphere (refer Section 4).

Students

The University's Student and Scholarly Services (SASS) portfolio provides end-to-end student support. Faculties and graduate schools also provide opportunities for work integrated learning (WIL) and other teaching and learning support services, including co-curriculum and student experience activities.

Supply chain

The University of Melbourne's supply chain is diverse and complex. It reflects the broad range of activities undertaken by the University and includes products and services from construction, research equipment, teaching and learning, through to corporate services and facilities management.

Controlled entities

The University's controlled entities are further described in the table below. The controlled entities form part of the University's overall compliance framework (see Section 3 Modern Slavery Risks, Governance structure 2023).
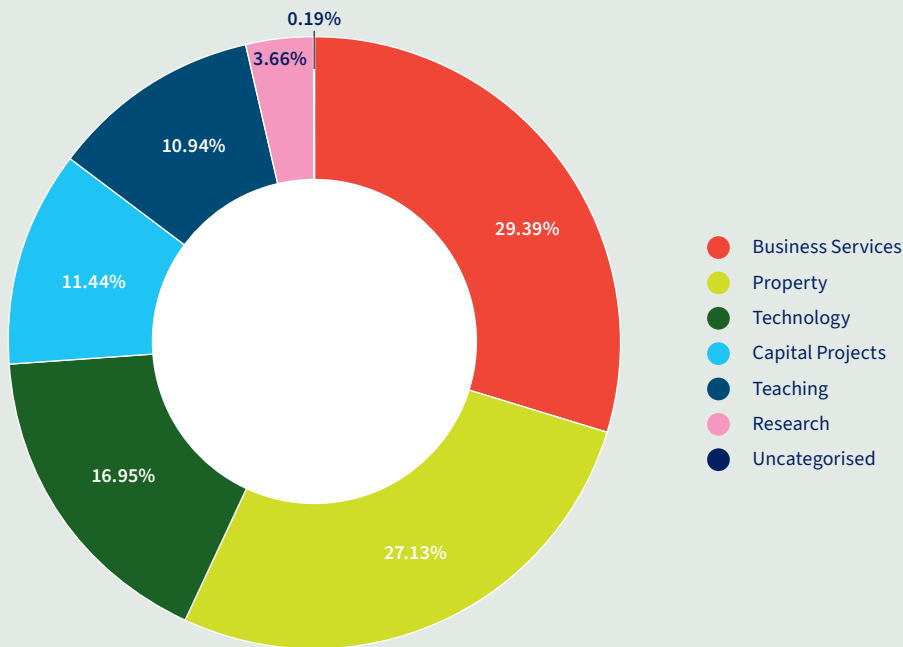
Name of controlled entity	Key business activities and operations	Countries the controlled entity operates in (in addition to Australia)
Australia India Institute Private Limited	Engagement activities relating to the relationship between India and Australia; student recruitment	India
Australian Music Examinations Board (Vic) Ltd	Provision of public examinations in music, speech and drama in Victoria, with around 26,000 examinations typically conducted per annum	None
Doherty Clinical Trials Ltd	Medical research, including delivery of clinical trials	None
Goulburn Valley Equine Hospital Pty Ltd	Referral and first opinion equine veterinary practice for elective and emergency cases, with placement opportunities for final year Doctor of Veterinary Medicine students	None
Melbourne Business School Limited	Provision of educational services, academic research and engagement with alumni and organisations	Malaysia
Melbourne Teaching Health Clinics	Provision of clinical placements for students and clinical care for patients attending the clinics	None
Melbourne University Publishing Ltd	Book publishing	None
Nossal Institute Limited	Provision of teaching in the area of public health; specialist applied research consulting to donors (World Bank, ADB, UN Agencies) and research councils (National Health and Medical Research Council, Australian Research Council)	Papua New Guinea, Pakistan, Fiji, Solomon Islands, Cambodia, Vietnam, Laos, India, Uganda, Thailand, Philippines, Indonesia
UMELB Pte. Ltd	Student recruitment	Singapore
UOM Commercial Ltd	Administration of a trust on behalf of the University for the commercialisation of research	None
UM Commercialisation Pty Ltd	Trustee for Trust holding UoM equity in start-up companies	None
UoM International Holding Pty Ltd	Oversight and governance of the University's off-shore entities in China and Germany	China, Germany (the entity in Germany is currently being wound up)

2023 Spend profile

$1.224bn Spend	**12,829** Suppliers	**50** Countries	**80%** Of spend with **526** suppliers

2023 Third party spend category breakdown

- Business Services — 29.39%
- Property — 27.13%
- Technology — 16.95%
- Capital Projects — 11.44%
- Teaching — 10.94%
- Research — 3.66%
- Uncategorised — 0.19%

Business services	Property	Technology	Capital projects	Teaching	Research
Human Resources	Facilities management	Audio visual	Consultant services	Library services	Grants
Logistics and storage	Plant and vehicles	IT hardware	Furniture and fittings	Student services	Research consumables
Marketing	Property management	IT networks	Works contractors	Teaching services	Research equipment
Office consumables	Utilities and renewables	IT services			Research services
Professional services		IT software			
Student recruitment		Telecom			
Travel and entertainment					

3. Modern slavery risks

The University of Melbourne is committed to taking all steps necessary to identify, assess, address and mitigate modern slavery risks.

Governance structure 2023

The University has a Risk Management Framework and Compliance Management Framework to support mitigation of modern slavery risks in its operations and supply chain.

The Audit and Risk Committee (ARC) supports Council in overseeing and monitoring the assessment and management of risk across the University, including in relation to University commercial activities. The ARC reviews the Risk Management Framework and risk management practices and receives regular reports on significant strategic and operational risks and their management to an acceptable level. The ARC advises Council, and other committees as appropriate, on the Risk Management Framework, practice improvements and progress, as well as significant risks arising from their review. The ARC recommends the Risk Management Framework, Risk Policy and Risk Appetite Statement updates to Council for approval.

In 2023, the ARC continued to oversee risks and continued its work on University risk management, compliance and audit matters. The ARC has considered the modern slavery risks and mitigations outlined in this statement and endorsed it for Council approval. This endorsed statement was subsequently approved by the University Council.

In 2023, a new partnership model to support the University's modern slavery compliance process was adopted. This involves a University senior executive who is accountable for the key area impacted by the *Modern Slavery Act* (as a compliance obligation sponsor) and is supported by other University roles including the Modern Slavery Working Group. The University's Chief Financial Officer was the sponsor in 2023. The University's Modern Slavery Working Group is composed of employees from multiple functions across the organisation that focus on the different components of the University's operations that may lead to modern slavery risks, including Legal and Risk, Student and Scholarly Services, Research Innovation and Commercialisation, and Procurement Services.

Regulatory framework

The University Statute, Statute and Regulations are administered in accordance with provisions of the *University of Melbourne Act 2009*. The University's regulatory framework comprises the University of Melbourne Statute, three regulations – the Council Regulation, Academic Board Regulation and Vice-Chancellor Regulation – and University policies and processes.

The following University policies and procedures assist in supporting the University's activity to prevent and address modern slavery risks. University staff and students are required to understand their responsibilities and comply with University policies when carrying out their duties or studies. Supplier compliance with relevant policies and procedures is addressed in the Supplier Code of Conduct and, where relevant, applicable agreements.

Policy/Procedure – Operations	Principle
Appropriate Workplace Behaviour Policy	Setting out the standards, values and expectations for appropriate behaviour in the workplace
Child Safety Policy	Outlining appropriate standards of behaviour towards children
Contracts Policy	Governing the negotiation, execution and management of contracts
Fraud and Corruption Management Policy	Providing guidance on behaviour that constitutes fraud and corruption and outlining the responsibilities of staff and management to report and deal appropriately with this conduct
Research Ethics and Bio Risk Management Policy	Outlining the University's obligations to conduct research that meets relevant ethics requirements
Research Integrity and Misconduct Policy	Prescribing the University's expected standards of responsible and ethical research conduct
Risk Management Policy	Outlining the University's risk management approach and establishing staff responsibilities in managing risks
Whistleblower Protection Policy	Providing guidance on the University's commitment to protecting whistleblowers and how the University deals with whistleblower disclosures

Policy/Procedure – Supply Chain	Principle
Procurement Policy	Setting out ethical and appropriate decision making around sourcing
Supplier Code of Conduct	Outlining standards and appropriate behaviour expected from the University's supply base
Supplier onboarding process	Setting out due diligence approach including compliance with legal and regulatory requirements. Currently under review via supplier onboarding and user experience human centred design uplift which includes investigation into processes supported by a tooling improvement to enable enhanced reviews across the University supply base

Policy/Procedure – Controlled Entities	Principle
Controlled Entities Policy	Setting out the governance framework for University's controlled entities

Modern slavery risks in University operations

Research

The following is a summary of operational risks and review processes in the sphere of research, as outlined in the University's previous Modern Slavery Statements. The majority of research agreements are reviewed by the University's research office and assessed for contractual risks. Assessment includes a review of both the research activity and the research partner for reputational or compliance risks, including consideration of the Corruption Perceptions Index score of the partner's primary jurisdiction and location of research activities. Such assessments are in addition to the reviews also conducted by individual University researchers at the beginning of projects. Country assessments also consider data from Walk Free's Global Slavery Index, which triggers further review of the prospective research partner for evidence of modern slavery policies, or instances of complicity in modern slavery.

When higher risks are identified at the review stage, a comprehensive risk assessment is sought and conducted on the research partner and project. If the risks identified in the assessment can be successfully managed, the agreement is signed by an appropriate officer of the University, as defined in the University's Delegations Framework. This provides an additional level of oversight. If the risks identified are unable to be managed within tolerance, the proposed arrangement is escalated to the Faculty and the Research Due Diligence Advisory Group for consideration and advice. The Research Due Diligence Advisory Group is composed of senior representatives from business areas across the University and is chaired by the Deputy Vice-Chancellor (Research). It may include opportunities for consultation with other parties as appropriate (for example, the Academic Board).

Human ethics approval is required for all research conducted with or about people, and their data and tissue. The purpose of the University's ethics review process is to facilitate research that fulfills the principles of human research ethics: research merit and integrity, justice, beneficence and respect. The University's human research ethics committees are convened in line with the requirements stated in the National Health and Medical Research Council's (NHMRC) National Statement on Ethical Conduct in Human Research ('National Statement'). Committee members use the National Statement to identify common ethical issues and to justify decisions made during review.

Administration of the University's human ethics review processes is supported by the Ethics Shared Service within the Office of Research Ethics and Integrity (OREI). The Central Human Research Ethics Committee (CHREC) has oversight of all matters pertaining to ethics review of human research at the University and reports to the Research Ethics and Integrity Strategy Committee (REISC), convened by the Deputy Vice-Chancellor (Research).

Students

The University of Melbourne is committed to mitigating modern slavery risk as they relate to students. The University acknowledges potential risk to students both within Australian and overseas, and provides students with accessible and relevant information on support services.

In assessing risk across cohorts and student activities, the University identified student employment, placements and internships as areas at greatest risk of modern slavery. International students were again identified as being at higher risk, as outlined in previous years' statements. The University also acknowledges the intersections of modern slavery risk with other compliance obligations and its potential to be uncovered through student engagement with services such as the Safer Community Program.

Controlled entities

The University's controlled entities do not have any operational involvement in the top 10 countries with the highest prevalence of modern slavery, as published in the 2023 Global Slavery Index. However, entities reported operations in several countries located in Asia and the Pacific[3], such as India, Pakistan and China, where Global Estimates show large numbers of individuals are subjected to forced labour. The University acknowledges the risks of modern slavery in its operations are heightened as a result, increasing the potential for exploitation and modern slavery practices to occur.

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3   According to the 2023 Global Slavery Index, due to large populations, an estimated two thirds of people living in modern slavery can be found in Asia and the Pacific.

Modern slavery risks in University supply chain
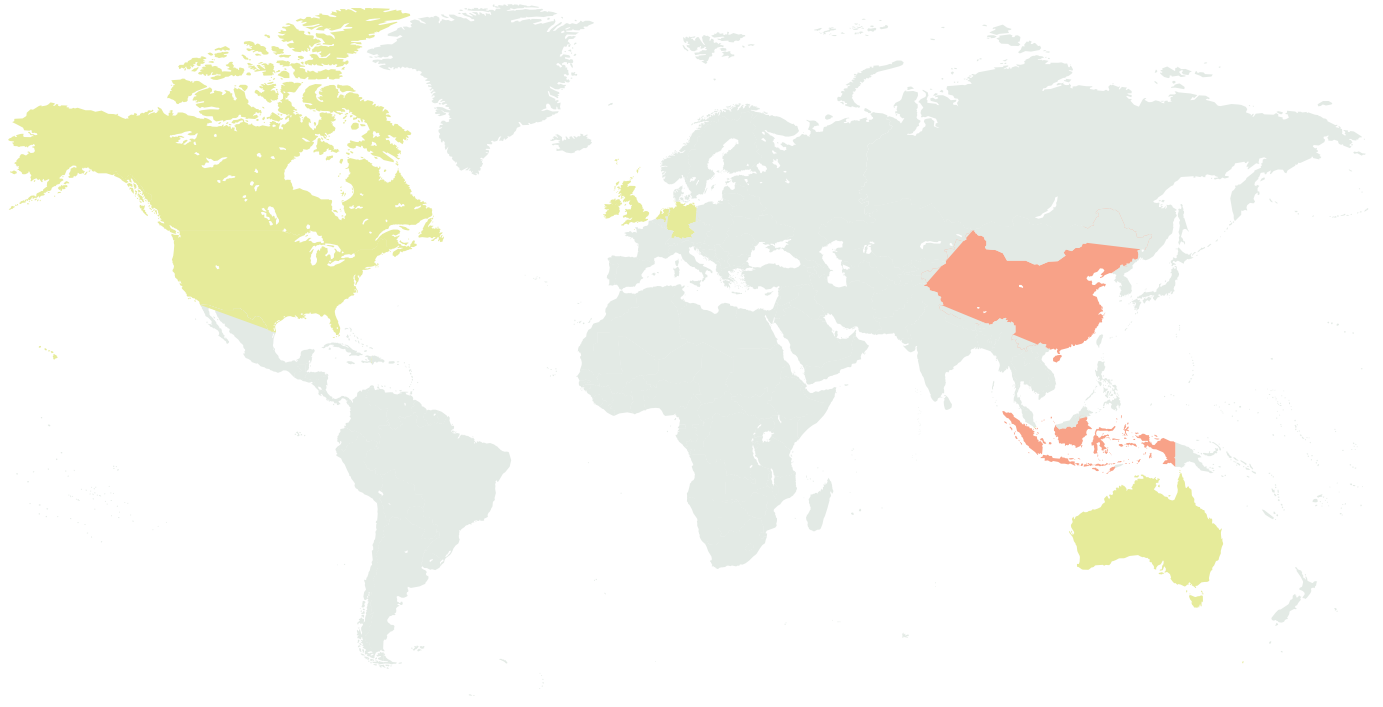
Supply chain overview

The University of Melbourne's supply chain remains complex and diverse, as outlined in Section 2 of this statement. The University acknowledges the presence of modern slavery risks within supply chains, and factors such as geographical location and source locations for materials and products may elevate these risks. The University continues to recognise the lack of visibility in specific overseas markets pose an increased risk of modern slavery, particularly in secondary and subsequent tiers of the supply chain and in the source materials for the University's goods and services. (refer Section 4 for actions taken to address this risk)

2023 country spend breakdown (Tier 1 suppliers)

Top 10 countries of spend	Country risk level	% of 2023 spend
Australia	Low	96.56%
United States	Low	1.65%
United Kingdom	Low	0.72%
Germany	Low	0.24%
Singapore	Low	0.17%
Netherlands	Low	0.16%
Canada	Low	0.12%
Indonesia	High	0.07%
China	High	0.06%
Ireland	Low	0.04%

2023 high risk category breakdown

Risks in the University of Melbourne's supply chain
Construction 6.42% of total spend 201 suppliers 1.57% of total suppliers
Recruitment - Labour 6.10% of total spend 1198 suppliers 9.34% of total suppliers
Facilities management 5.84% of total spend 1247 suppliers 10.03% of total suppliers
Laboratory consumables 3.38% of total spend 1828 suppliers 14.25% of total suppliers
Research equipment 2.75% of total spend 936 suppliers 7.30% of total suppliers
IT hardware 2.25% of total spend 80 suppliers 0.62% of total suppliers

Controlled entities

The most significant modern slavery risks associated with the University's controlled entities continue to be in their supply chains. Of the 12 entities, three reported engagements of suppliers in the Asia and Pacific region – namely Pakistan, India, Cambodia and Papua New Guinea. Controlled entities were asked if they had mapped and conducted independent audits of their supply chains, including identifying potential modern slavery risks. Controlled entities reported that, while they are aware of their direct suppliers, they lacked visibility further along the supply chain. In 2024, there will be a greater emphasis on audits of supply chain operations to determine how materials are sourced, and periodic risk reporting to the University's Risk Officer.

4. Actions taken to assess and address risk

Research

As outlined in the 2022 Modern Slavery Statement, the RIC function is committed to developing and maturing its processes to identify and mitigate modern slavery risk in research-related activities. Supported by a cross-functional working group, RIC set clear key performance indicators to enable the implementation of compliance requirements and support continuous improvement of modern slavery risk literacy and effectiveness measures for 2023-24. The University has continued to review foreign grants and research agreements for modern slavery risk, incorporating the use of the Australian Universities Procurement Network (AUPN) modern slavery risk-based tool into due diligence assessment processes for rating modern slavery risks at the individual research partnerships level. The RIC function also administered a pilot training course focusing on public procurement, using content with permission from the Business and Government Engagement Section of the Modern Slavery and Human Trafficking Branch in the Attorney General's Department. This training course was delivered to research services staff. RIC is on track to ensure that 100 per cent of research contracts and grants officers have completed the training by the end of Q1 2024.

Students

Student support activities

Building on actions undertaken in the 2022 reporting period, in 2023 the University continued to support students by committing to new and ongoing initiatives, including:

- Continued work with University stakeholders to identify and promote a best practice approach to the management of student placement and internship risks through the following actions:
  - Ensured students are provided with appropriate resources and referral regarding exploitation in any industry or community-facing programs (e.g. Melbourne+, Micro Industry Internships)
  - Strengthened controls regarding remuneration of students engaged in casual work at the University to ensure remuneration is in line with Enterprise Agreement requirements, and
  - Delivered 'workplace preparation' training for students undertaking internships and placements and established a mechanism to ban employers known for engaging in or connected to exploitative practices. Training programs included the following:
    → Careers and Employability's self-sourcing internship preparation series (co-curricular) including Fair Work information and practice
    → Careers and Employability's employer/student (extra-curricular, for jobs board) issue handling process finalisation and dissemination.

- Undertook an Internal Audit assessment of existing governance frameworks in relation to student placements to ensure appropriate compliance, risk management and oversight practices are in place, with the ultimate aim of ensuring students are well supported and safe while on placements. Several opportunities for improvement were identified in the final audit report, including the recommendation that a Student Placements Working Group be formed. Terms of Reference for the working group have been developed, with rollout planned for February 2024. The Student Placement Working Group will consider and propose solutions in relation to the audit findings, share best practice and enhance reporting capabilities.

- Boosted information to international students, who have been identified as more at risk of modern slavery, through the following activities:
  - Leveraged the work of student associations in providing employment related support and welfare services (e.g. University of Melbourne Student Union Legal Services)
  - Enhanced programmatic career support targeted at international students for work both within the University and externally that includes information on visa restrictions and work rights.

- Committed to improving and strengthening controls around employers posting job opportunities for students on the University's managed career and job website in terms of information and monitoring, and support provided through Student and Scholarly Services. Measures taken to ensure this include:
  - Seeking further understanding of the relationship between scams involving international students where they have acted under duress and its characterisation as 'modern slavery', and
  - Reviewing the use of student volunteers to ensure their involvement in key student events is compliant with the University's Enterprise Agreement and policies.

Supply chain

The University's approach to managing high risk suppliers in 2023 continued to be through supplier management of Tier 1 suppliers. The University's Supplier Code of Conduct (the Code) communicates the requirement for suppliers to ensure their supply chains meet requirements relating to human rights and labour practises. This includes communication of the Code to related entities, suppliers and subcontractors who support them in supplying to the University, so that these parties are aware of, understand and comply with its application. Standard University agreements for goods and services commit suppliers to take reasonable steps to identify, assess and address risks of modern slavery practices in the operations and supply chains used in supplying to the University.

Key improvement actions from 2023 included:

- Commenced development of a supplier tool kit which provides guidance on modern slavery, publicly available training modules, the University's Whistleblower Policy and Whistleblower tool, and the Supplier Code of Conduct

- Developed enhanced modern slavery due diligence questions which are being trialled in tender packages for the Fishermans Bend construction project in 2024. These aim to support robust due diligence improvements via greater transparency of supplier subcontractors, their supply chains and modern slavery risk mitigation practises in place

- Completed a retrospective third-party risk profile (refer to Section 5). This activity conducted further supplier due diligence to identify recent supplier policies and practices in place to support human rights and address risk of modern slavery. The 2023 profile has informed development of a supply chain review exercise to be conducted in 2024

- Developed training modules[4] for the University's staff on the University Learning Management Systems to build awareness of modern slavery, risks and when and how to escalate/report concerns. We will continue to focus on implementing and promoting this training across the University in 2024

- Commenced a human-centered design supplier onboarding initiative which considers modern slavery at the onboarding point of a supplier's relationship with the University. Work on this initiative and potential improvements will continue through 2024

- Participated in the AUPN Modern Slavery Working Group, contributing to development of a sector approach to the management of modern slavery media alerts.

Controlled entities

Comprehensive questionnaires were sent to controlled entities, aimed at identifying and assessing modern slavery risks in their operations and supply chains. Entities were approached on an annual basis and supported by the University's resources to assist in the identification and mitigation of modern slavery risks. Further, several controlled entities reported they had implemented steps to establish or update relevant policies aimed at minimising potential modern slavery risks within their operations. These policies are provided to staff and stakeholders and published externally.

Case study: Continuous improvement in construction activity

- A social procurement and green star workshop, guided by Green Star and AS ISO20400 requirements, was held as part of the schematic design phase for the Australian Institute for Infectious Disease (AIID) project. Modern slavery was considered as part of the risk and opportunity mapping for key construction procurement items. The outcomes of this workshop were captured in the schematic design report and taken forward in the project. The University provided feedback to the consultants who ran the workshop on how it could be improved in future

- AIID Architectural leads and FF&E consultants requested to complete modern slavery training to support best practice modern slavery mapping and approaches for the AIID project

- The University's building design standards were updated in 2023. The previous requirement to undertake a modern slavery risk assessment was strengthened to require a risk and opportunities assessment, in accordance with Sections 7.2 and 7.3 of AS ISO 20400 Sustainable Procurement, for main items (key materials, equipment, trades/labour). This assessment must include modern slavery, human rights violations, and unfair and unsafe labour practices as potential risks

- Embedded the new design standards in major capital projects

- Followed through the sustainable procurement risks and opportunities in the AIID project

- Undertook a sustainable procurement risk and opportunity review for the Fishermans Bend project.

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4   Developed with permission using content from the Business and Government Engagement Section of the Modern Slavery and Human Trafficking Branch in the Attorney General's Department.

5. Effectiveness of University actions

Research

In 2023, there were 151 agreements assessed for modern slavery risks. However, in many cases, there was limited data available on research partners' supply chain risks using the AUPN modern slavery risk-based tool. In order to strengthen capturing of modern slavery risks in research partnerships as part of the research due diligence process in 2024, the University is intending to investigate tools to support risk review activity. This will be used as part of the risk review of foreign grants and research agreements for modern slavery risk. Approximately 80 per cent of staff in the Research, Grants Contracts and Finance team completed the modern slavery pilot training course in 2023, and 100 per cent completion is expected to be achieved in early 2024. RIC will use feedback captured from the pilot rollout of the modern slavery training to inform its delivery at a University-wide scale. RIC will also seek to develop additional training modules to build on the first course to encourage continuous development of risk literacy – these training modules will focus on equipping staff with skills to effectively identify and respond to modern slavery risks. The University is currently a new Research Management System, and will use this opportunity to standardise, simplify and modernise reporting processes to flag high-risk assessments for risk of modern slavery.

Students

The University continues to expand the use of its existing care management system to capture modern slavery cases that affect students. Expected implementation in early 2024 will enable the University to identify incidents of modern slavery and further track the nature of cases and understand where further action may be required to elevate risk management and/or provision of information or services. Effectiveness of University actions will be assessed through regular evaluation of services and processes. The University will also ensure that actions to address risks relating to student placements and internships are subject to periodic review.

Supply chain

A retrospective University third-party risk profile was completed in December 2023, which reviewed all active[5] University suppliers. Using a modern slavery risk assessment tool,[6] 49,280 suppliers were assessed for current modern slavery risk, modern slavery allegations and sanctions. No use of sanctioned suppliers or adverse allegations were found as part this process. The risk profile informed development of an extended supply chain review. This 2024 review will focus on developing a process for increasing transparency in supply chains identified as high risk and in categories with higher potential for risk of modern slavery, and will be trialled in at least one high risk category. Effectiveness measures for this activity include successful mapping of high risk supplier supply chains to identify potential gaps or areas where transparency efforts need to be strengthened, and establishing mechanisms for continuous review and improvement of the transparency process based on lessons learned and emerging trends.

Controlled entities

The University conducted a three-year baseline review of responses from controlled entities to an annual modern slavery questionnaire. The same questions were asked over the three-year period. The baseline review revealed an overall improvement in the identification, assessment and understanding of modern slavery risks in the operations and supply chains of controlled entities. Further, entities reported an increased awareness of modern slavery risks within their organisations as a result of the actions taken by the University and its entities to mitigate the risks of modern slavery. With a baseline now established, there will be an increased focus in 2024 on assessing how effectively the University's controlled entities are managing the modern slavery risks relating to supply chains. Controlled entities will be required to incorporate this information into risk assessments, which will be submitted as part of their risk plan to the University's Risk Officer.

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5   Active suppliers are defined as having been engaged by the University within the last 24 months.
6   Developed from a modern slavery risk assessment tool shared by University of Queensland.

6. Consultation with controlled entities

The University of Melbourne actively engaged with all 12 controlled entities in the development of this statement, including discussions around the completion of the modern slavery survey. The survey was conducted to evaluate the potential for modern slavery practices within the University's controlled entities and to gain insights into the risk mitigation strategies employed by each entity.

The responses contained valuable information including:

- The amount of money spent on goods and services
- Industries where the greatest expenditure occurs (higher risk vs lower risk)
- Geographical location of suppliers
- Identification of due diligence practices and risk mitigation strategies
- Scope of each entity's supply chain map

All entities were asked to rate the risk of modern slavery within their operations and supply chain, and describe actions taken to identify, address and monitor these risks.

As part of this consultation process, the Modern Slavery Working Group provided controlled entities with tailored information and resources about modern slavery and the University's reporting requirements under the *Modern Slavery Act 2018* (Cth). Entities were asked to ensure that all staff involved in procurement and/or engagement of groups or individuals in other countries complete modern slavery training by the end of Q1 2024.

In 2024, the Modern Slavery Working Group will conduct a detailed analysis of the responses to the three-year baseline review to further address any areas of concern. Modern slavery risk management activities over the next 12 months will likely include:

- Implementation of a Controlled Entities Policy which *inter alia:*
  − Promotes good governance and facilitates compliance by controlled entities with the University's requirements in relation to commercial activities
  − Requires controlled entities to adopt specific University policies (or alternative policies that are equivalent in all material respects), including the Whistleblower Policy. The Whistleblower Policy serves as a crucial mechanism to raise and rectify corrupt, illegal or other undesirable conduct in relation to the operations or activities of the University and its controlled entities, which may include grievances about modern slavery
- Makes available University modern slavery training to controlled entities to be assigned to relevant staff in line with their own risk mitigation activity
- Sees representatives from controlled entities invited to the Modern Slavery Working Group.

The Working Group will also continue to engage with controlled entities to ensure robust policies and practices are in place to mitigate modern slavery risks.

7. Any other relevant information

During the reporting period, the University's ongoing modern slavery program has closely monitored the Government's review of modern slavery legislation and will continue to do so in 2024. This activity aims to enhance current modern slavery due diligence maturity and position the University effectively to meet anticipated legislative changes.

The University of Melbourne participated in a multi-year collaborative research project which published The Good Practice Toolkit: Strengthening Modern Slavery Responses report in 2023. It follows earlier reports, 'Australia's Modern Slavery Act: Is It Fit For Purpose?', 'Broken Promises', and 'Paper Promises'.

All reports can be read here: **humanrights.unsw.edu.au/research/testing-effectiveness-Australia-modern-slavery-act**