

**MODERN
SLAVERY
STATEMENT
2021**





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1. Introduction

La Trobe University (“the University”), has a zero-tolerance approach to slavery and human trafficking in all its forms. The University seeks to engage with suppliers with similar values who are also committed to respecting and protecting human rights within their own organisations and supply chains.

This is the University’s second Statement pursuant to Part 2 of the *Modern Slavery Act 2018* for the reporting period 1 January to 31 December 2021. The Statement sets out the steps the University has taken and will take across our research, teaching and operational activities to address modern slavery.

Acknowledgement of Country

La Trobe University acknowledges that our campuses are located on the lands of many Traditional Custodians in Victoria and New South Wales. We recognise their ongoing connection to the land and value their unique contribution to the University and wider Australian society.

La Trobe University is committed to providing opportunities for Aboriginal and Torres Strait Islander people, both as individuals and communities, through teaching and learning, and research and community partnerships across all our campuses.

2. About La Trobe University

La Trobe University (“the University”) is a Higher Education Institution founded in 1964. The University was created to broaden participation in higher education among communities in Melbourne’s north and Victoria’s regional areas. Since then, the University has grown to rank in the top 1 per cent of universities worldwide¹, while maintaining its mission to be one of Australia’s most accessible.

The University’s mission is to make a positive difference in the lives of our students, partners and communities. La Trobe is one of Australia’s most successful universities in pursuing multiple missions and in 2021 was again ranked fourth in the world for commitment to the United Nation’s Sustainable Development Goals² (SDGs). The University ranked highest in the following SDGs:

- (15) Life on Land (1st in the world)
- (5) Gender Equality (2nd in the world)
- (8) Decent Work and Economic Growth (2nd in the world)
- (3) Good Health and Wellbeing (5th in the world) and

ranked in the top 100 universities for another nine SDGs.

La Trobe is a place where social inclusion and globally recognised excellence come together for the benefit of students and communities.

Our academics and researchers consistently achieve national and international recognition and demonstrate an enduring social conscience and influence. Our alumni achieve extraordinary successes in government, industry and not-for-profit organisations.

The University is Victoria’s only true state-wide university, and our regional campuses continue to be central to the University’s identity, mission and purpose.

1. Times Higher Education (THE), 2021, [World University Rankings 2021](#); Consejo Superior de Investigaciones Científicas (CSIC), 2021, [Ranking Web of Universities](#)
THE World Ranking: 216, CSIC Oceania Ranking: 20, QS Ranking: 362.

2. Times Higher Education (THE), 2021, [Impact Rankings 2021](#).

3. The University's structure, operations and supply chains

3.1 Structure

The University is a statutory body corporate constituted in accordance with the *La Trobe University Act 2009 (Vic)*.

The University Council is the governing body of the University and is chaired by the Chancellor. The Vice-Chancellor is appointed by the Council to be the chief executive officer of the University and has the general direction and superintendence of the University. The Senior Executive Group is the University's principal management committee and provides advice to the Vice-Chancellor on matters relating to strategy, planning, resourcing and operations.

In 2021, the University undertook a Transformation Program to support the University's **Strategic Plan 2020-2030**. The Transformation Program will help the University emerge from the pandemic as a more resilient and future-focused institution. The new University structure will take effect from 4 January 2022.

View the University's **annual report** for further information on the University's structure.

University entities

In 2021, the University owned one entity: LTU Services Ltd (ABN 62 642 748 463). LTU Services Ltd is a company that was established in late 2020 for education services. The entity has not operated and has no assets or revenue for the purposes of reporting in this statement.

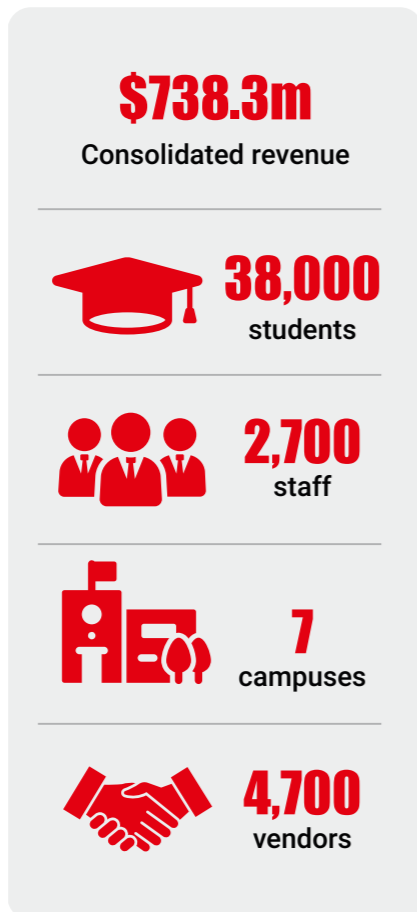
3.2 Operations

The University's core activities are teaching and research and aims to support our community's:

- economic prosperity
- health and wellbeing
- progress towards gender equality
- recognition and acceptance of different cultures
- environmental sustainability.

The University operates independently within Australia and has campuses in Melbourne's CBD, Bundoora, Bendigo, Shepparton, Albury-Wodonga, Mildura and Sydney. The Sydney campus is outsourced to Navitas Ltd, which provides vocational and language pathway programs for the University, as well as undergraduate and postgraduate degrees.

In 2021, the University had a total consolidated revenue of \$738,300,000 (down from 2020's total consolidated revenue of \$786,184,000).

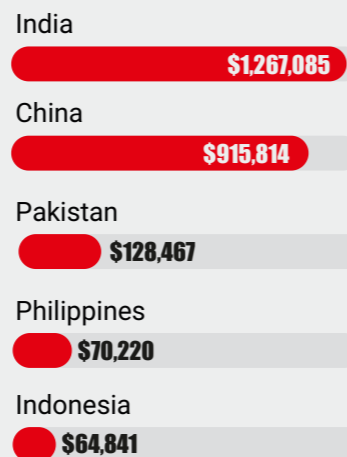


3.3 Supply chains

The University has a large supplier footprint, with more than 4,700 vendors in 2021 (approximately 200 vendors higher than 2020). It procures a diverse range of first-tier goods and services to support our academic activities and campus operations, including but not limited to:

- technology (information services)
- telecommunications
- infrastructure and facilities management
- security
- cleaning
- construction
- marketing and media
- energy
- human resources and labour hire
- finance operations
- fundraising and investment
- library services
- travel services
- laboratory supplies
- catering
- printing.

High Risk Country Spend



Regardless of what we purchase, we are committed to purchasing items in a responsible manner. The predominant sources of these first-tier goods and services are from Australian-based companies, and contributors to these first-tier supply chains are mostly Australian-based companies.

Higher Ed Services, a not-for-profit company owned by Universities Australia, has established an Australian University Procurement Network (AUPN) to significantly improve strategic procurement practices in Australian universities. The AUPN Modern Slavery Risk Tool was developed using spend data mapped to the AUPN category taxonomy³ from 28 Australian universities. The University used the AUPN Modern Slavery Risk Tool in 2021 to identify common suppliers and risk levels based on category type and country risk.

In 2021, the University had 717 high-risk suppliers⁴ across various categories, including: desktop hardware, laboratory supplies, cleaning, research equipment and expenses, catering, animal research supplies, printing, events, office supplies, AV hardware and labour hire. In 2020, the University had 713 high-risk suppliers across those same categories identified in the AUPN Modern Slavery Risk Tool.

In 2021, the University spent a total \$32.6m with suppliers in high-risk categories and \$2.4m was spent with suppliers from high-risk countries. In 2020 the University spent a total of \$49m with suppliers in high-risk categories, and \$9.7m was spent with suppliers from high-risk countries. The majority of the spend on first-tier suppliers in high-risk countries included professional and consulting fees with our education recruitment agents and partners, as well as research services, marketing and promotional activities.



³ The AUPN category Taxonomy is a collaborative initiative of AUPN to support additional benchmarking across the university sector.
⁴ Risk Ratings used in the Modern Slavery Discovery Tool are sourced from the modern slavery index: <https://www.globallslaveryindex.org>

4. The risks of modern slavery practices in the University's operations and supply chains

The University uses several tools to identify risk areas in supply chains and assess processes. These include the *Global Slavery Index*, the *OECD Due Diligence Guidance for Responsible Business Conduct*, the *AUPN Modern Slavery Risk Tool and Modern Slavery Initiative – Policy & Remedy Compliance Checks*⁵.

The University recognises there may be some goods and services purchased from suppliers and supply chains that fall into any of the top five imported products at risk of modern slavery (electronics, garments, fish, rice and cocoa). Modern slavery could potentially exist in the operations and supply chains of many suppliers (and in their supply chains) that the University conducts business with throughout the world, particularly countries with low-skill labour.

The University encourages staff and suppliers to purchase through socially responsible suppliers. Part of the evaluation process for new suppliers requires Modern Slavery Act 2018 compliance and reporting responses. Sourcing medium and high value suppliers requires the disclosure and acceptance of the requirements of the Modern Slavery Act 2018, with submission of internal documented evidence, where applicable. The University continuously educates staff and relevant vendors to support informed onboarding of suppliers of low value requirements. Information packs help staff and suppliers know what they should look out for when fulfilling their purchasing requirements and managing their supply chains respectively. The University chooses to partner with socially responsible suppliers that comply with and appropriately address Social Procurement Principles within their supply chains to identify and minimise modern slavery practices.

The University also relies on our suppliers' due diligence processes and quality standards when purchasing and sourcing goods and materials.

When tendering for new suppliers, the University has robust tender documentation that enquires about the potential supplier's modern slavery governance procedures. This helps us assess and understand the potential risks of modern slavery in prospective suppliers' supply chains. Levels of risk are assessed depending on the industry type, where products are manufactured and whether modern slavery could potentially exist in the supplier's supply chains.

The University recognises that modern slavery is hard to detect. The hotels our staff stay at and the local businesses they visit or purchase goods or services from may also be at risk of modern slavery practices, especially in high-risk countries.

5. Modern Slavery Initiative is founded by Sunil Rao, Lecturer, Law La Trobe University. Sunil is an international human rights law expert, academic and legal practitioner in the area of regulatory compliance of business and modern slavery.

5. Addressing modern slavery

5.1 Completed actions

The University continues to have a strong approach to preventing modern slavery, protecting human rights and contributing to responsible business through the following initiatives:

The FRDM tool (development)

- Through our AUPN membership (a collaboration of 34 universities in Australia and New Zealand) the University has partnered with FRDM, a supply chain technology company that will algorithmically identify modern slavery risks throughout universities' supply chains.
- The University Finance team has mapped our finance GL codes to the AUPN taxonomy in preparation for uploading two years of spend data into the FRDM tool which went live in February 2022.

High-risk operations

The University identified and focused on three high-risk operations of the sector in 2021:

- latex glove manufacturing
- international educator agent contracts
- apparel.

1. Latex glove manufacturing

An article on 'NHS glove supplier linked to forced labour'⁶ triggered a search of the University's scientific catalogue suppliers to ensure that none of our suppliers were sourcing product from the corporation named in the article. The search revealed some latex gloves were supplied by the banned company. An audit was then carried out on 10 of our scientific catalogue suppliers. One supplier had been selling the banned gloves but had since sold out and withdrawn the product from their catalogue. Nine suppliers confirmed they didn't use the banned supplier and confirmed their own

6. NHS glove supplier linked to forced labour.

commitments and due diligence processes on modern slavery within their supply chains.

2. International educators

Of the University's international students, 80-90% are recruited via our agent network across 73 high-risk countries within Africa, Asia, the Middle East and Europe. International agents assist students in finding the right course and help navigate Australia's application and visa processes. The University has agreements in place with over 280 agents; and in 2021, La Trobe International (LTI) reviewed and renewed 109 agreements. *The Education Services for Overseas Students Act 2000* requires that our agreements set out the responsibilities and obligations of both the agent and the University. A further 148 agreements will be renewed in 2022 with new modern slavery clauses included in those agreements. The remainder of our agent agreements will be renewed in 2023.

3. Apparel

The Modern Slavery Working Group (MSWG) focused on the University's supplier of discipline uniforms and branded apparel sold at the University store. Our supplier's code of conduct is based on the standards set out by the Ethical Trade Initiative (ETI) and the International Labour Organisation (ILO) conventions. Our supplier's apparel products are sourced through suppliers who are required to comply with their code of conduct. A large proportion of the University's apparel items are procured through Australian distributors that meet our supplier's code of conduct. However it is noted that their suppliers would deal with multiple factories around the world (including Australia) producing apparel.

All subcontractors to our supplier must be members of Supplier Ethical data Exchange (Sedex), must complete the annual Sedex Members Ethical Trade Audit (SMETA) audit and must provide a summary of the audit to our supplier.

Our supplier has recently partnered with New Balance Apparel. Factories contracted to produce New Balance apparel are inspected by New Balance directly and they also conduct their own audits.

Policy, procedure and guidelines

The University has policies, procedures and guidelines supporting our commitment to zero tolerance of modern slavery and human trafficking. All policies, procedures and guidelines were reviewed and updated again in 2021 to ensure they are aligned, fit for purpose and operable when the new organisation structure comes into effect in January 2022. The University Policy Library is the sole authoritative source of all organisational policy documents for La Trobe University, and is available to all staff and to external suppliers via our public-facing website.

UN Principles for Responsible Management Education (PRME)

La Trobe Business School is a leader in social responsibility teaching, research and partnerships. They continue their role as a PRME signatory and a PRME Champion. The University's Business School is one of only two university business schools in Australia that are PRME Champions, and the only Australian business school that has been a Champion since its inception.

La Trobe Humanitarian Scholarships

The University recognises the important contribution that people from refugee and asylum seeker backgrounds make to the Australian community.

In 2021, the University offered three specific scholarships to asylum seekers or refugees holding a Temporary Protection Visa (TPV) (subclass V785), a Bridging Visa class E (BVE) (subclass V050), or a Safe Haven Enterprise Visa (SHEV) (subclass V790).

The scholarships are for undergraduate studies commencing in 2022 and cover all tuition costs including a AUD \$7,000 annual cost-of-living bursary for the normal duration of the degree.

5. Addressing modern slavery (Cont.)

Our researchers

Our researchers and teaching staff are educating our staff, students and communities via a number of articles, webinars and books on the topic of modern slavery. They have investigated, uncovered and exposed ugly forms of modern slavery and exploitation of susceptible people throughout many industries. These articles are compelling reading and bring to our attention human rights violations against vulnerable groups of workers in order to supply us with services or food, clothing and raw materials for manufacturing. While the University requires our suppliers to inform us about risks of modern slavery in their supply chains, our researchers are interviewing survivors and exposing crimes and activities that adversely impact on human rights. A sample of some of the work our researchers have compiled in 2021:

Associate Professor Sallie Yea, Tracey Banivanua Mar Principal Research Fellow

- La Trobe Asia Podcast: Re-thinking 'sex-trafficking': Critical issues concerning gendered migration in Asia.
- Caught in a Vicious Cycle: Connecting forced labour and environmental exploitation through a case study of Asia-Pacific.⁷
- Transnationalism unstuck: Precarious work and the transnational geographies of failed migration of Bangladeshi migrant workers in Singapore.⁸
- Postcolonial Frameworks with Survivors' Voices: Teaching about contemporary and historical forms of slavery and forced labour.⁹
- Pre-figuring stigma in post-trafficking lives: relational geographies of return and reintegration.¹⁰
- Why is it so difficult to stamp out seafood slavery? There is little justice, even in court.¹¹
- *Re-thinking 'sex-trafficking': Critical issues concerning gendered migration in Asia.*¹²
- *Modern Day Slavery and Human Trafficking in Asia* (Speakers: Associate Professor Sallie Yea, Jenny Stanger, Executive Manager at the Anti-Slavery Task Force, Catholic Archdiocese of Sydney and Sunil Rao, Lecturer, La Trobe Law School, La Trobe University.¹³

Dr Suzanne Young

- *Cyber Technology Offshoring* (incorporating Modern Slavery dimensions).¹⁴
- *Ethics in the Supply chain of Smart Cities* (incorporates Modern Slavery dimensions).¹⁵

Dr Jasmine-Kim Westendorf

- *'WHO workers are accused of sexual exploitation and abuse. That hurts everything the U.N. does.'* Washington Post, 5 Oct 2021.¹⁶
- *"Do no harm": the challenge of transactional sex in humanitarian operations,* Humanitarian Alternatives 24 March 2021.¹⁷
- Research briefing provided to Project Soteria, INTERPOL unit tasked with addressing sexual exploitation and abuse by aid workers, 2021.
- Expert witness in the *UK House of Commons International Development Committee Inquiry on progress on tackling the sexual exploitation and abuse of aid beneficiaries.*¹⁸

Dr Maria Elander

- *Representing Gendered Violence in democratic Kampuchea.*¹⁹
- *In the name of the victim: representing victims in international criminal justice.*²⁰

5.2 Next steps

During 2022, the University Modern Slavery Working Group will conduct a review of a further three selected high-risk categories.

The University's Strategic Procurement team continues to work with key internal stakeholders and external suppliers, building and strengthening partnerships through the supplier relationship management framework.

The FRDM tool went live in February 2022. The FRDM tool allows a deeper analysis of our suppliers and their supply chains; it scans media platforms around the world and sends alerts to the University on our suppliers that have been identified in the media. We can then push a questionnaire to the selected suppliers, seeking information about their policies, how they address international human rights standards, their expectations of their business partners and supply chains and much more. Responses to the questionnaires can be shared with our Australian and New Zealand universities through the FRDM tool.

The FRDM modern slavery tool has online training which will be utilised by the Strategic Procurement team and key internal stakeholders throughout 2022-23. Education of all staff and suppliers will occur when the tools become available.

The MSWG will monitor 3-4 key metrics throughout 2022 and will report those metrics through an internal audit, up to the Corporate Governance Audit and Research Committee on an annual basis.



7. Sallie Yea & Christina Stringer (2021). Caught in a Vicious Cycle: Connecting forced labour and environmental exploitation through a case study of Asia-Pacific. *Marine Policy*. <https://doi.org/10.1016/j.marpol.2021.104825>
8. Sallie Yea (2021). Transnationalism unstuck: Precarious work and the transnational geographies of failed migration of Bangladeshi migrant workers in Singapore. *Global Networks*. <https://doi.org/10.1111/glob.12343>
9. Sallie Yea (2021). Postcolonial Frameworks with Survivors' Voices: Teaching about contemporary and historical forms of slavery and forced labour. *Anti-trafficking Review*. <https://doi.org/10.14197/atr.201221175>
10. Sallie Yea and Wayne Palmer (2021). Why is it so difficult to stamp out seafood slavery? There is little justice, even in court. <https://theconversation.com/why-is-it-so-difficult-to-stamp-out-seafood-slavery-there-is-little-justice-even-in-court-152179>
11. Why is it so difficult to stamp out seafood slavery? There is little justice, even in court (theconversation.com)
12. Sallie Yea (2021). Re-thinking 'sex-trafficking': Critical issues concerning gendered migration in Asia. La Trobe Online Event 20 May 2021.
13. Webinar: *Modern Day Slavery and Human Trafficking in Asia* (Speakers: Associate Professor Sallie Yea, Jenny Stanger, Executive Manager at the Anti-Slavery Task Force, Catholic Archdiocese of Sydney and Sunil Rao, Lecturer, La Trobe Law School, La Trobe University.
14. Funded DFAT Australia-India grant on Cyber Technology Offshoring that incorporates Modern Slavery dimensions- CIs Professors Young, Alahakoon, and Chilamkurti (LTU) and Professor Panta (IIT Kanpur) and Dr Kulkarni (IIT Gandhinagar).
15. IIT Kanpur-La Trobe Research Academy funded PhD research scholarship on Ethics in the Supply chain of Smart Cities that incorporates Modern Slavery dimensions- Professor Young and Alahakoon (LTU) and Drs Rajan and Sam (IIT Kanpur).
16. Jasmine-Kim Westendorf - (Oct 2021). <https://www.washingtonpost.com/politics/2021/10/05/who-workers-are-accused-sexual-exploitation-abuse-that-hurts-everything-un-does/>
17. Jasmine-Kim Westendorf (March 2021) <https://alternatives-humanitaires.org/en/2021/03/24/do-no-harm-the-challenge-of-transactional-sex-in-humanitarian-operations/>
18. Jasmine-Kim Westendorf, expert witness in the *UK House of Commons International Development Committee Inquiry on progress on tackling the sexual exploitation and abuse of aid beneficiaries*. Final report published Jan 2021. <https://publications.parliament.uk/pa/cm5801/cmselect/cmintdev/605/60502.htm>
19. Maria Elander, 'Representing Gendered Violence in Democratic Kampuchea' in Amy Randall (ed) *Genocide and Gender in the Twentieth Century, A Comparative Survey* (2022, Bloomsbury Publishing) 355-374.
20. *In the name of the victim: representing victims in international criminal justice*. Routledge Handbook of International Law and the Humanities 461-471 (12 pages). Routledge. Maria Elander.

6. How the University assesses the effectiveness of its actions

In 2021, the University strengthened its due diligence processes. While every staff member is reasonably accountable for managing risk, each business unit is also responsible for due diligence in their own unit's processes. The University's Procurement, Finance, Risk Management, Research, Information Services and Infrastructure and Operations teams have due diligence processes in place, and carry out regular reviews on their processes and suppliers through their Supplier Relationship Management Frameworks.

The University's standard terms and conditions are reviewed annually and are in the process of being updated to ensure legal compliance with the *Modern Slavery Act 2018* and other new legislation. Our T&Cs ensure our suppliers work with us in tackling modern slavery throughout their supply chains.

Financial investments

The University employs an external financial management fund that provides a transparent means of accessing an environmental, social and governance (ESG) enhanced portfolio of Australian shares. The share portfolio is weighted to companies that demonstrate positive ESG characteristics after negatively screening for companies with core business in tobacco, alcohol, gambling, pornography, controversial and non-controversial weapons, and coal mining.

Onboarding infrastructure and operations contractors

Contractors engaged through the Infrastructure and Operations team to work with the University are required to use a contractor management system (Rapid) to register and induct all new contractors. New contractors are required to provide all compliance documentation and complete a preferred supplier questionnaire. The University reviews the registration information and approves the contractor or requests further information to demonstrate the contractor's compliance. The quality management process requires companies to re-register every five years and redo their inductions every two years.

8. Other relevant information

The COVID-19 pandemic

As a result of the COVID-19 pandemic, the University suffered significant financial detriment. A full financial recovery could take three to five years. As a result, we will be a smaller institution measured by revenue, staff and students. The damage from the pandemic is expected to affect businesses, increase unemployment and widen pre-existing economic and social inequalities. Many businesses will need to rebuild their supply chains. Because of this, the University will be focused on the needs of our local communities and continues to work closely with our local suppliers to ensure continuity of goods and services.

The FRDM tool

With full implementation and go live in 2022, the FRDM tool will assist the University to provide a clean and resilient supply chain by:

- monitoring all levels of the University's tier-one suppliers and pushing alerts directly to the University's dashboard
- running monthly risk checks (media, industry, suppliers) on suppliers for modern slavery risks
- prioritising and segmenting all tier-one suppliers based on high, medium and low-risk priorities
- providing generic modern slavery online training that can be accessed by the University and the University's suppliers
- providing access to FRDM supplier self-assessment questionnaires to assess the maturity of our suppliers' policy commitments, governance and controls
- providing reporting insights to inform action planning.

7. The process of consultation with University entities

The Finance team consulted with the director and company Secretary of LTU Services Ltd regarding the structure and status of the entity.

LTU Services Ltd had no revenue or assets in 2021 and is not required to report under the *Modern Slavery Act 2018*.

9. Approval

This statement was approved by the University Council on 6 June 2022 (Council Ref no. #514)

 (sgd)

Professor John Dewar AO
Vice-Chancellor and President
La Trobe University
Dated 7 June 2022



Disclaimer: Every effort has been made to ensure the information contained in this publication is accurate and current at the date of printing. For the most up-to-date information, please refer to the La Trobe University website. Published by La Trobe University, May 2022. La Trobe University is a registered provider under the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS). La Trobe University CRICOS Provider Code Number 00115M.

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