

Modern Slavery Statement 2022





Acknowledgement of Country

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

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

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

The University of Sydney has established a small working group to look at the larger question of the historical involvement of the University in the dispossession of Indigenous Australians, slavery, eugenics, anti-semitism and other forms of race-based thinking and interventions. It is early days yet, but we remain committed to better understanding and mapping the scope of such a focus.

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

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

**In an emergency, you should always call
Emergency Services by dialling triple zero (000).**

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

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

You can report a suspected incident of modern slavery linked to the University via our Modern Slavery Incident Reporting Form or you can contact the University’s dedicated modern slavery team directly by emailing anti.slavery@sydney.edu.au.

If you feel unsafe on campus or are concerned for someone else’s safety on campus you can contact Protective Services on 9351 3333, 24 hours a day.

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

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

If you are experiencing coercion, threats, deception or violence at your workplace or home you may be experiencing modern slavery, which is illegal in Australia.

- For free and confidential legal and migration services, contact Anti-Slavery Australia (+61 2 9514 8115; asalegal@uts.edu.au).
- For free and confidential support for forced marriage, contact My Blue Sky (+61 2 9514 8115; +61 481 070 844; help@mybluesky.org.au).

You can also contact the Australian Federal Police (AFP) on 131 237 (131AFP) or go to the AFP website at www.afp.gov.au for help. The AFP can keep you safe, provide advice and refer you to other services that provide accommodation, financial support, counselling, and legal and immigration advice.

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

Modern Slavery Statement

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From the Chancellor and Vice-Chancellor

In 2022 we set out a vision for the future of our University – one in which our world-class research and teaching transforms people’s lives. A vision in which our graduates, academics and multidisciplinary partnerships tackle the world’s greatest challenges. A vision in which we honour First Nations knowledge of these lands and work with Aboriginal and Torres Strait Islander peoples for a future that is better, and more just. A vision that lifts us to the top echelon of the world’s truly great universities.

Respecting human rights goes to the heart of this vision.

This statement, aligned with the University’s 2032 Strategy, details the actions we took to address modern slavery risks in 2022 and sets out our vision for making a meaningful contribution to one of the most challenging human rights issues of our time.

We recognise that with today’s geopolitical, environmental and economic crises this will require ambitious, sustained work. The latest Global Estimates of Modern Slavery are sobering. Today, there are close to 50 million people forced into work or a marriage they did not consent to – 10 million more people since the last estimates five years ago.¹

Slavery is an old and wicked problem – but it persists today, manifesting in new ways. The COVID-19 pandemic’s unprecedented economic disruptions have left workers open to exploitation in global supply chains. Technology has created new opportunities for harm, particularly of children.

Climate change and conflict has displaced millions of people and increased extreme poverty. It is incumbent on institutions such as ours to build a better world. As a research-intensive university, we have a unique opportunity to offer innovative, evidence-based solutions to tackling these systemic challenges, which heighten the risk of modern slavery for the most vulnerable.

As Australia’s first university – founded in 1850 – our strong grounding in public service guides our approach to tackling modern slavery. Since our first Modern Slavery Statement in 2020, we have worked to embed a University-wide approach to addressing modern slavery and respecting human rights. In 2022, we took a significant step to progressing this goal, appointing the University’s first Modern Slavery Director and establishing the Modern Slavery Unit. This expert team works collaboratively across the University to progress our strategic efforts to address modern slavery risks in our operations, supply chain and investments and accelerate world leading education and research on human rights.

In 2022, we also deepened our understanding of our own modern slavery risks and strengthened our due diligence across education and research activities. We continued to update our policies, agreements, templates and contracts to reflect our commitment to respecting human rights. We continued to undertake deep dive assessments of priority suppliers. More than 100 suppliers have now been independently assessed.

We empowered our staff with the knowledge, skills and systems to effectively identify and respond to modern slavery risks. Our mandatory staff Anti-Slavery Awareness Module, launched in 2020, has now been completed by more than 15,000 current and former staff and affiliates. In 2022, we also delivered tailored training to staff in priority areas, including Student Wellbeing, Procurement and our controlled entities.

¹ *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage*, International Labour Organization (ILO), Walk Free & International Organization for Migration, 2022.

More than 8,600 students have voluntarily completed our bespoke Anti-Slavery Student Module, building their knowledge in identifying modern slavery and knowing where to go for help. We continue to support students at risk of exploitation, through targeted communications, resources and our online grievance mechanism.

We also recognise we are uniquely placed to inform government policy and business practice through our research expertise and strong partnerships. In 2022, we launched a new unit of study in the Master of Business Administration, providing future leaders with a cross disciplinary approach to responsible business. We also built new and continued collaborations with the inaugural NSW Anti-slavery Commissioner, civil society, and the business sector.

Looking to 2023, while we strive for best practice in our own due diligence, we will remain open and transparent about the risks we uncover and the actions we have taken to address them. We will remain committed to demonstrating leadership for good by respecting human rights, and to the vision to bring together universities, business, civil society, and government in a unified effort to make modern slavery an issue of the past.



A handwritten signature in black ink, appearing to read 'Belinda Hutchinson'.

Belinda Hutchinson AC
Chancellor



A handwritten signature in black ink, appearing to read 'Mark Scott'.

Professor Mark Scott AO
Vice-Chancellor and President



About this statement

This is the University of Sydney's Modern Slavery Statement 2022, pursuant to its obligations under section 13 of Australia's *Modern Slavery Act 2018* (Cth). This statement is made on behalf of the University of Sydney and its controlled entities for the calendar year ended 31 December 2022.

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

The University of Sydney is committed to respecting human rights and addressing modern slavery in our operations and supply chain. Modern slavery describes some of the most serious violations of human rights, including trafficking in persons, slavery, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour and deceptive recruiting for labour or services. Modern slavery is at the extreme end of a continuum of exploitation and often involves the gradual undermining of a person's freedom, through coercion, threats, and deception.

The statement has been approved by the Senate of the University at its meeting on 3 May 2023.

Controlled Entities covered by this statement

The University has three controlled entities, all of which are covered by this statement:

Operating in Australia

Westmead IVF Pty Ltd (Westmead Fertility Centre) – an Australian company, wholly owned and controlled by the University of Sydney since 2014, which provides affordable access to fertility treatments, underpinned by the latest research and innovation. It is based at Westmead Hospital in Sydney's west.

Operating Overseas

Suzhou Xi Su Business Consulting Co (Centre in China) – a Chinese company which operates a multi-functional centre in China. It was established in 2016 as a foreign owned entity, to support our operations and functions in China. It also functions as a research and education hub and facilitates an increase in intellectual exchange between Australia and China, working closely with the University's existing China Studies Centre. It is a wholly owned subsidiary of A14 Holdings Pty Ltd.

A14 Holdings Pty Ltd is the holding company for Suzhou Xi Su Business Consulting Co. and has no substantive operations. It is wholly owned and controlled by the University.

For more information on the University's consultation with its controlled entities see [Identifying and Addressing Our Modern Slavery Risks: Controlled Entities.](#)

Who we are



Our People

As Australia's first university – founded in 1850 - we have a proud history of global leadership in education and research and inspiring people from all backgrounds to contribute to positive real-world change. We are consistently ranked in the world's top 50 universities.

*Data current as of March 2022.

15

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

8

Senior executive portfolios: Provost, Education, Research, Indigenous Strategy, Operations, External Relations, Strategy and Advancement, led by the Vice-Chancellor

8,483

Staff in academic and professional positions

10,797**

Casual staff

5,596

Affiliates

69,200

Students

38,852

Domestic students

30,348

International students



Our Spaces and Operations

10+

Teaching and research locations

Camperdown/Darlington

Camden Campus

Mallet Street Campus

Sydney College of the Arts

Sydney Medical School Campuses and Teaching Hospitals

Surry Hills Campus

133 Castlereagh Street, CBD

Sydney Conservatorium of Music

Westmead

One Tree Island Research Station

400+

Campus buildings

116

Licenses provided to retail and other facilities on campus, in addition to licensees administered by the student union and Sydney University Sport and Fitness

1

Offshore centre in China



Our Education and Research

5

Faculties

Faculty of Arts and Social Sciences

The University of Sydney
Business School

Faculty of Engineering

Faculty of Medicine and Health

Faculty of Science

3

Schools

The University of Sydney School of
Architecture, Design and Planning

Sydney Conservatorium of Music

The University of Sydney
Law School

900+

Award courses

23

Fields of research

150+

Research and teaching centres



Our Community

400,000+

Alumni

190+

Student organisations

20

International partners

250+

Student mobility partners

800+

International student
placement partners



Our Supply Chain

5,000+

Tier 1 suppliers located across 50+
countries

292+

Product and service types

**Represents the number of casual staff on payroll. Not all casual staff are working all of the time. Our casual workforce are made up of a variety of roles, including professionals employed outside the University who do lectures and tutorials, graduate and undergraduate students and recent graduates.



Our Approach to Addressing Modern Slavery

From the Director of the
Modern Slavery Unit

What we aspire to achieve

How we deliver on our vision

Our approach to Addressing Modern Slavery

From the Director of the Modern Slavery Unit

At the University of Sydney, addressing modern slavery has always been more than a compliance exercise – it goes to the heart of what we stand for as an institution: our commitment to leadership for good. In 2022, our efforts to take meaningful action on addressing modern slavery were recognised as sector leading in Australia, with the University of Sydney being ranked 1st in the RMIT Business and Human Rights Centre [Evaluation of Modern Slavery Reporting in the Higher Education Sector](#). I am personally proud of the action we've taken to realise this commitment, thanks in no small part to the courage and energy shown by so many of our staff, students, suppliers, partners and wider community.

While I'm heartened by our progress, we acknowledge we still have much work to do. In 2022, three years into reporting under the Modern Slavery Act, we took stock of our progress and set new ambitious targets, reflective of efforts to live our vision of leadership for good.

For us, **leadership for good means being transparent** about what's worked, and where we need to strengthen our approach. This year's statement sets out our modern slavery risks across our operations and supply chain. We've been open about our gaps in understanding and action, and the complexities in measuring our effectiveness. In the spirit of collective learning, we continue to share our due diligence framework, along with our strategy, policy and templates on our website.

Leadership for good means working in partnership on a local, national and global scale to collectively tackle the systemic challenge of modern slavery. This year we continued our engagement with civil society to better understand how we can support people with lived experience of modern slavery. We partnered with government to support policy development on addressing modern slavery risks in NSW. We also worked closely with our academic colleagues and across the higher education and business sectors to share learnings along the way.

Most importantly, **leadership for good means meeting our responsibility to contribute to a better world**. We are committed to addressing modern slavery, not only through our due diligence practice, but also through our research and education expertise. Looking to the year ahead, we will drive innovative approaches to tackling modern slavery.

If you share our vision, we invite you to connect. Whether it is through strengthening the evidence base, pooling our leverage to address key risks or sharing our lessons learned, it is only together we will move the dial on one of the greatest challenges of our time.



Esty Marcu

Esty Marcu
Director Modern Slavery Unit

What we aspire to achieve

OUR COMMITMENT

To respect human rights across our research and education activities, supply chain, investments, partnerships and community.

As a higher education institution occupying a unique space at the intersection of public and private enterprise, we recognise the significant role the University, and the sector, can play in tackling human rights challenges.

OUR VISION

To have a meaningful impact on the global challenge of modern slavery, through our world-class education, research, partnerships, and due diligence.

OUR OBJECTIVES

01 Proactively understand our modern slavery risks and transparently measure our impact, demonstrating continuous improvement.

02 Embed best practice human rights due diligence into our governance and operational settings.

03 Empower our staff with the knowledge, skills and systems to effectively identify and respond to modern slavery risks

04 Support our students to understand their rights, report incidents and access services to prevent and remedy exploitation.

05 Accelerate education and research excellence on human rights and advance the evidence base on modern slavery.

OUR OUTCOMES

01 We understand our modern slavery footprint and target and adapt our actions to effectively address risks.

02 Respect for human rights is embedded into key policies and processes, holding us and our partners to account.

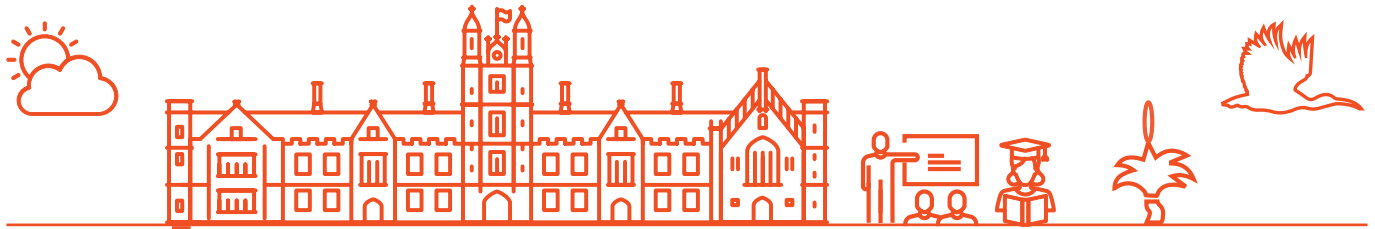
03 Staff can effectively identify and respond to modern slavery risks.

04 Students are informed of modern slavery risks and aware of support services to reduce their risk of exploitation.

05 Our research and education make a meaningful contribution to the sector and global effort to address modern slavery.

How we deliver on our vision

Our governance



Senate

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

Vice-Chancellor

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

University Executive Committees

The University Executive is an advisory committee which provides advice to the Vice-Chancellor and Senate. Together with its subcommittees, it oversees and monitors the University's compliance with the Modern Slavery Act. It receives six monthly reports on our implementation progress.

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

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

Roles and responsibilities for identifying and addressing risks

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

- Supply Chain
- Research Portfolio
- Education Portfolio
- Human Resources and Culture
- Campus Services
- Legal and Policy

How we deliver on our vision

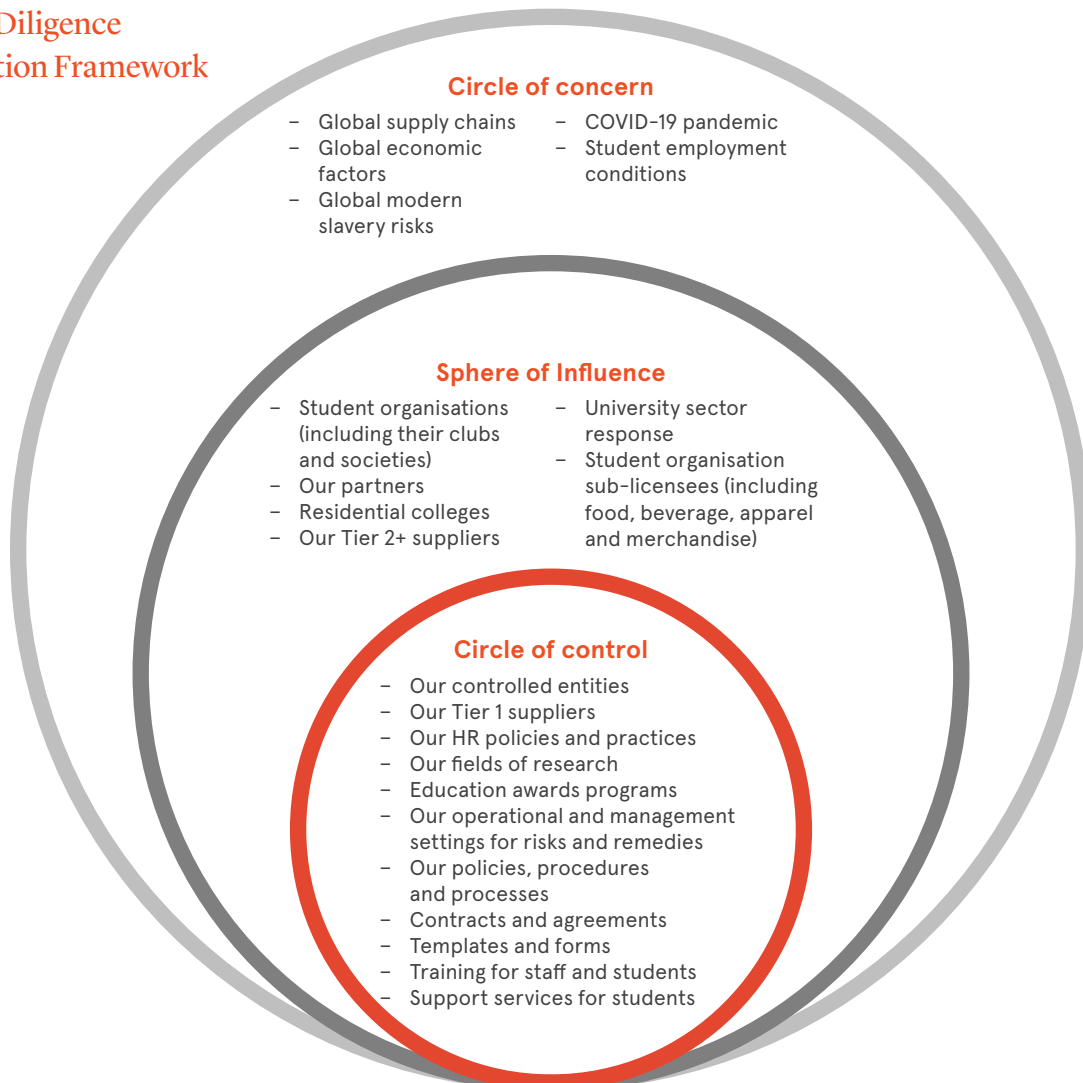
Our capacity to effect change

In line with the United Nations Guiding Principles on Business and Human Rights (UNGPs), we apply our Due Diligence Prioritisation Framework to understand:

- Where we may potentially be at **risk** of causing, contributing to or being directly linked to modern slavery;
- The degree of **leverage** we have to change our practices, and those of our partners, through our policy and legal levers, and due diligence processes; and
- Our capacity to meaningfully identify, mitigate and remediate adverse human rights **impacts**.

Our circle of control is where we have the greatest leverage to address modern slavery risks that we have potentially caused or contributed to. However, we also recognise that our actions, particularly our relationships with suppliers, partners and broader community, can have a positive flow-on effect on risks we may be directly linked to in our sphere of influence. We also seek to collaborate with others and innovate through our research to effect change and address global human rights challenges beyond our control and direct influence.

Our Due Diligence Prioritisation Framework



How we deliver on our vision

Our due diligence framework

We identify, assess and prioritise risks based on analysis across six themes: Industry and business model risks, vulnerable population risks, supplier-specific risks, geographic risks, the University's exposure and the University's organisational leverage.

1

Policy Commitment

Our Modern Slavery Policy sets out our commitment to addressing modern slavery and establishes operating principles and behavioural expectations for our staff, students and affiliates and those with whom we engage, such as suppliers and partners. We continue to amend our contracts, templates and clauses to reflect our policy commitment and ensure our actions are:

- **Risk based**, reflecting the operating environment and nature and severity of the risk
- **Fit for purpose**, adapted to appropriately address the risk and meet organisational needs
- **Embedded in our business-as-usual** operating model and management controls
- **Balanced**, reflecting our capacity to implement and monitor, and not acting as a disincentive for partners or suppliers to engage with us



2

Risk analysis

We apply a four-stage process to identify modern slavery risks.

- 1. Map:** We map our value chain including suppliers, research, education and operational partners, and controlled entities.
- 2. Identify:** We identify modern slavery risks through proactive research, detailed supply chain analytics and engagement with organisations with lived expertise of modern slavery.
- 3. Assess:** We assess risks, impacts and potential gaps in policy and processes to address modern slavery in our sphere of influence and circle of control.
- 4. Prioritise:** We prioritise our actions, where modern slavery breaches are suspected or found, based on the level of risk posed to people and determine our actions based on our capacity to effect change.



3

Training, Collaboration and Engagement

We provide University-wide training for staff and students to equip them to identify and respond to modern slavery. We work collaboratively across the University to embed human rights due diligence into existing policies and procedures.

We partner with community organisations to build our knowledge of lived experience of modern slavery. We engage across the sector to share best practice, reduce duplication and build our leverage with suppliers and partners. We connect with business and government to apply our academic expertise to strengthen modern slavery policy and practice.



4

Grievance Mechanism and Remediation

Our dedicated [online modern slavery reporting form](#) provides a mechanism for staff, students and external parties, such as suppliers, civil society and the public, to report suspected incidents of modern slavery in the University's operations and supply chain. We deliver training to staff in high-risk areas and targeted communications to the University community on the reporting form annually.

The Modern Slavery Unit triages reports, applying the principles of stopping existing harm and preventing the risk of future harm to people. See [Grievance Mechanism and Remediation for more information](#).



5

Monitoring, Evaluation and Reporting

We monitor our progress against key performance indicators linked to our objectives. We report on our performance in our annual modern slavery statement and provide regular progress updates to the University Executive and Senate.

We review our objectives and KPIs every year and are honest about our successes, challenges and our ability to have a measurable impact in preventing modern slavery.



Identifying and Addressing our Modern Slavery Risks

Our Supply Chain

Our Education Activities

Our Research Activities

Our Investments

Our Controlled Entities

Grievance Mechanism
and Remediation

Collaboration and Engagement

Identifying and Addressing our Modern Slavery Risks

Our Supply Chain



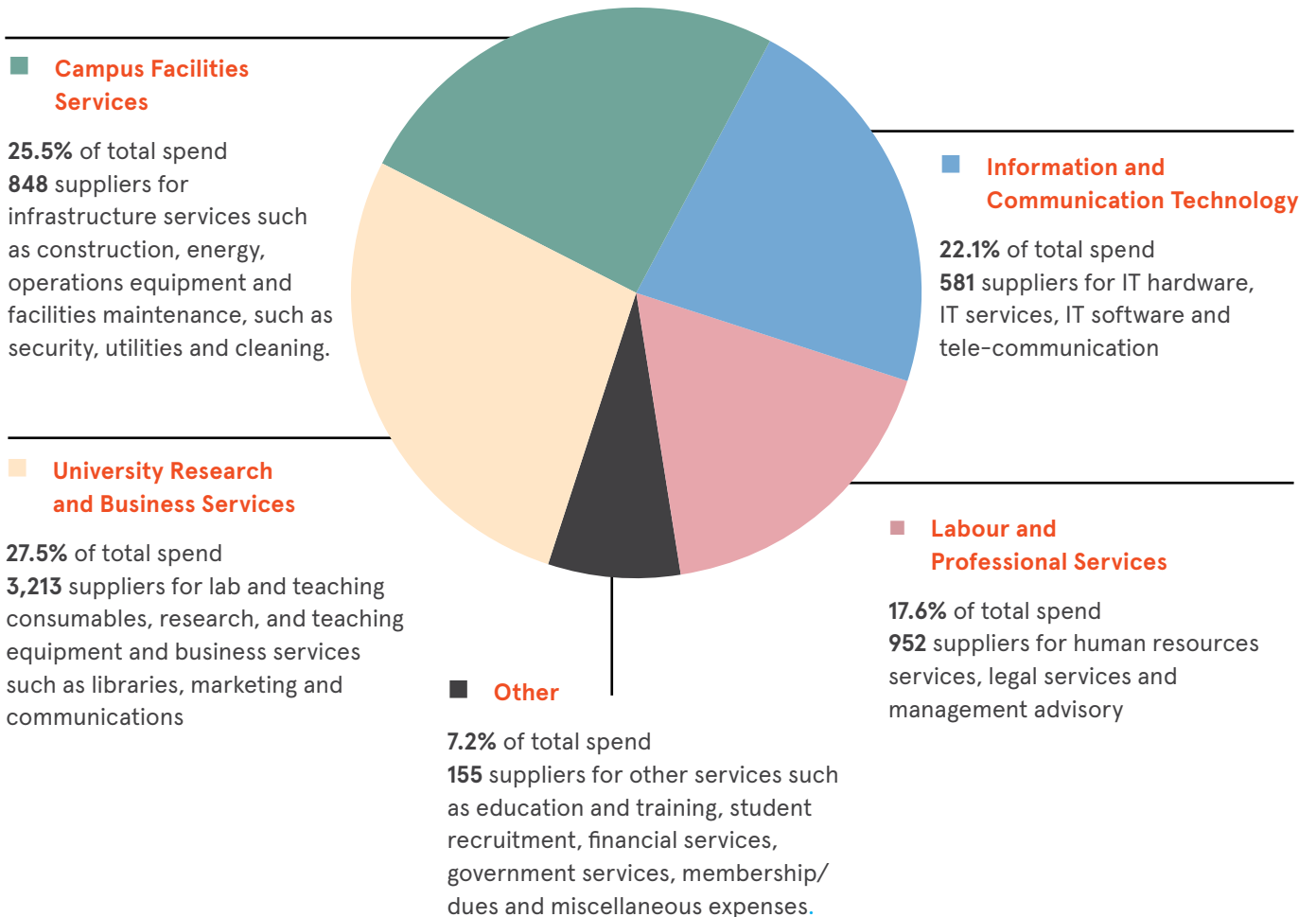
We have over **5,700 Tier 1 suppliers** across **57 countries**, which support our education, research, administrative and infrastructure functions. We use a centralised online buying system (UniBuy) to provide visibility and transparency over the goods and services we buy.



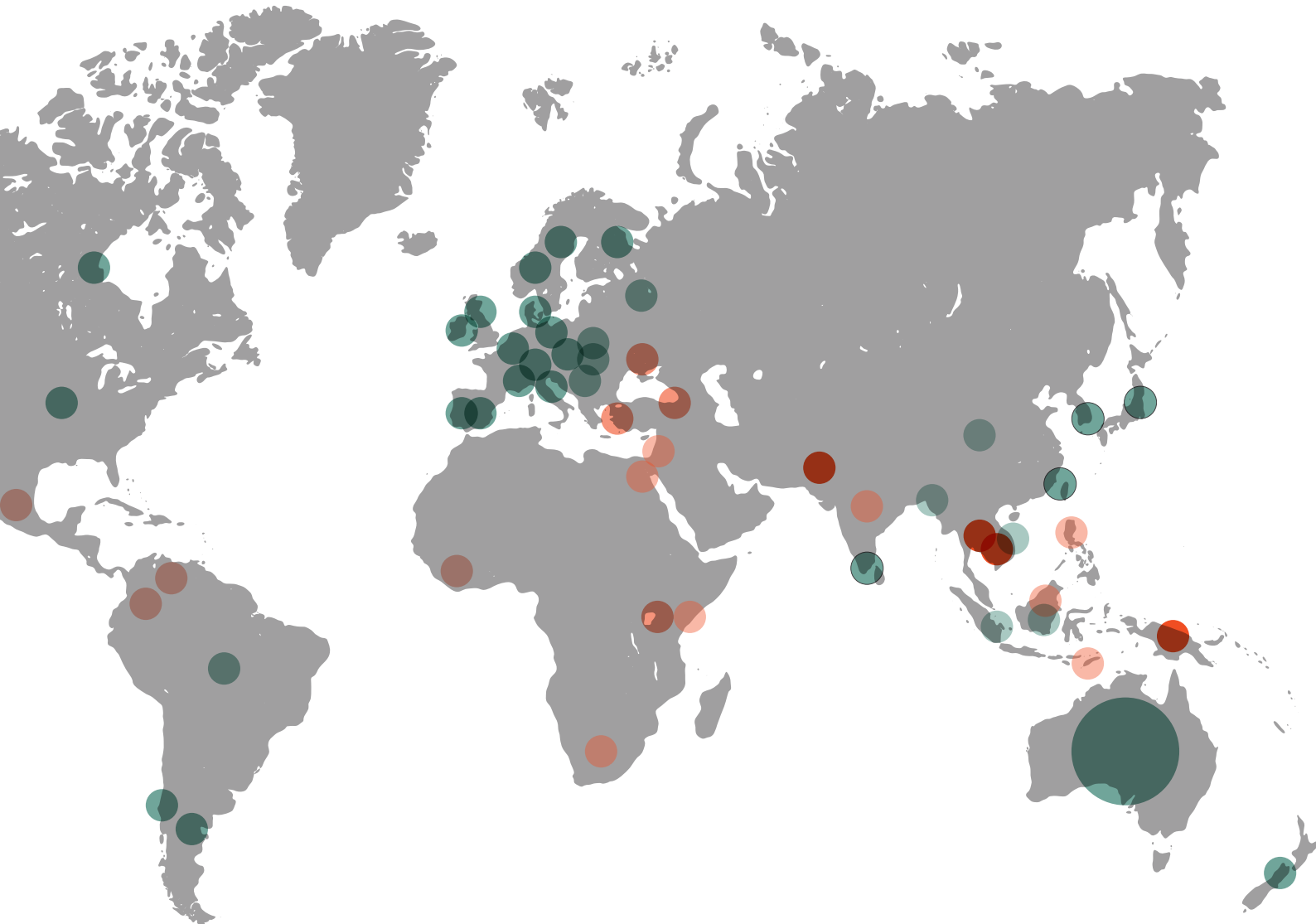
84.9 % of direct spend is with suppliers headquartered in Australia, followed by **United States (3.6%)**, and **China (2.2%)** respectively



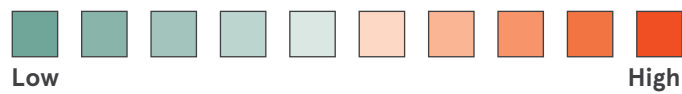
Breakdown of procurement spend



The University's supplier numbers by country headquarters (size and location of circle), overlaid with the prevalence of modern slavery by country (colour of circle)²



Estimated Prevalence of Modern Slavery



² Prevalence of modern slavery by country from the Global Slavery Index, Walk Free, 2018.

Our Supply Chain

Risks in our supply chain

Applying our due diligence framework, we identified a potential risk that our supply chain may be directly linked or contribute to modern slavery, particularly deceptive recruitment practices, forced labour, debt bondage and child labour.



Lab and teaching consumables

4.6% of total spend
985 suppliers
17.1 % of total suppliers

As a teaching and research institution, the University procures a range of laboratory and teaching consumables, including lab chemicals, lab gases, glassware, plasticware, labware, life science reagents and personal protective equipment (PPE). Laboratory and teaching consumables have the largest supplier count among the University's high-risk categories.

Lab and teaching consumables are predominately manufactured in high-risk countries. The extraction of raw materials and the manufacture of plastic, rubber, ceramic, cotton and glass products and, surgical instruments may involve **child labour**, **forced labour**, excessive working hours, **deceptive recruitment practices**, and exposure to hazardous chemicals and machinery.³



IT services

5.9% of total spend
157 suppliers
2.7% of total suppliers

The University provides over 90 technology and digital services for both education and research. The University partners with suppliers across cloud services, audio visual services, computer support, email and collaboration, learning and teaching technology, and ongoing maintenance.

Although most of our direct suppliers are based in Australia, some services are outsourced to high-risk countries. Workers may be vulnerable to **forced labour**, **deceptive recruitment practices** and **debt bondage**, particularly if workers have been recruited by third-party agencies and work in subcontracted, high demand, short delivery timeframes.⁴

³ Boersma, M., *Do No Harm? Procurement of Medical Goods by Australian Companies and Government*, Australian Nursing and Midwifery Federation & The Australia Institute, 2017; *Labour rights abuse in global supply chains for PPE through COVID-19 – issues and solutions*, British Medical Association, 2021; *Modern Slavery in the Health Services Sector*, KPMG & Australian Human Rights Commission, 2021.

⁴ *Monitoring Reports*, Electronics Watch.

High risk categories of spend contributed to **42.8%** of the University's total procurement spend and **39.3%** of the University's total number of suppliers. This is a **0.2%** decrease compared to 2021.



IT hardware

6.1% of total spend
192 suppliers
3.3% of total suppliers



Construction

6.6% of total spend
120 suppliers
2.1% of total suppliers

The University sources a range of IT hardware, including audio visual, multimedia and teleconferencing equipment, networks and servers to thousands of devices, such as laptops, desktops, tablets, printers, phones, mobiles and IT accessories including keyboards, mice, cables, data storage devices and headsets.

In the electronics industry, **child labour**, **forced labour** and poor working conditions have been well documented in the raw material, manufacturing, assembly and disposal stages, often involving migrant workers.⁵ In addition, there have been reports of **human trafficking** in the extraction of critical raw materials, such as cobalt, in unregulated mining in conflict-affected countries.⁶

The University undertakes work in planning and design, engineering, property investment and development, infrastructure delivery and space management. Major construction projects in 2022 included the Sydney Biomedical Accelerator and the Cladding Replacement Program.

Competitive and cost-driven bidding processes, complex subcontracting and regular use of short-term engagements across multiple sites increases workers' risk of exploitative conditions. Raw materials, including timber, rubber, cement, bricks and granite, in the extended supply chain are also at risk of **forced labour**, **debt bondage** and **child labour**.⁷

⁵ *Monitoring Reports*, Electronics Watch.

⁶ *Trafficking in Persons Report: Democratic Republic of the Congo*, US Department of State, 2022.

⁷ *Property, construction & modern slavery*, KPMG & Australian Human Rights Commission, 2020.



Cleaning

2.6% of total spend
21 suppliers
0.4% of total suppliers

The University engages suppliers to provide cleaning services across our 700+ facilities. In response to COVID-19, the University scheduled regular enhanced cleaning, focusing on high-traffic areas, as well as targeted, deep cleaning in response to positive cases on campus.

In the cleaning sector, unauthorised subcontracting arrangements, excessive working hours, occupational health and safety issues, underpayment of wages and withholding of wages are well reported. Migrant workers are particularly vulnerable to **forced labour, deceptive recruitment practices** and **debt bondage** due to language barriers, limited knowledge of their workplace rights and visa insecurity.⁸



Maintenance

8.5% of total spend
614 suppliers
10.7% of total suppliers

The University’s maintenance services include whole-of-life asset management, protective services, electrical and fire safety, buildings and grounds maintenance. Services include electrical, mechanical, plumbing and hydraulic, emergency and exit lighting.

Similar to cleaning and security services, complex subcontracting arrangements, downward price pressures on suppliers and reliance on base-skill labour in maintenance services increases workers’ risk of **forced labour, deceptive recruitment practices** and **debt bondage**.¹⁰



Security

1.3% of total spend
15 suppliers
0.3% of total suppliers

The University’s security services include monitoring of building access, parking and the procurement of CCTV cameras, alarms and security hardware.

Limited visibility over subcontracting arrangements and working conditions exacerbated by service delivery during non-standard hours, and reliance on migrant workers and other vulnerable populations increases the risk of **forced labour, deceptive recruitment practices** and **debt bondage** in security services.⁹

8 *Cleaning Contractors: Modern Slavery Guidance, Cleaning Accountability Framework, 2020; Marshall, S. & Jabber, J., Evaluating University Efforts to Combat Modern Slavery and Labour Abuses in Supply Chains, RMIT Business & Human Rights Centre, 2022.*
9 *Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.*
10 *Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities.*



Our Supply Chain

Actions in our supply chain

Our procurement policies and procedures include modern slavery provisions and are communicated to suppliers throughout the tender and contract management process. Our tools and templates assess and address modern slavery risks throughout our end-to-end procurement process. [For more information see Modern Slavery Due Diligence across the Procurement Lifecycle on our website.](#)

We prioritised	We delivered
Deepening our understanding of modern slavery risks in our supply chain.	Ongoing risk analysis of Tier 1 suppliers. <ul style="list-style-type: none">- Detailed analysis of our Tier 1 suppliers using FRDM, a supply chain technology tool, in partnership with the Australian Universities Procurement Network.- High risk suppliers prioritised for due diligence, based on the University's modern slavery risk register category, third-party supplier-specific assessment, geographic risk, procurement spend, and assessment by portfolio and contract managers.- 5,095 direct suppliers monitored across 522 industries and 66 countries. Initial analysis of risks beyond Tier 1 of our supply chain. <ul style="list-style-type: none">- Using product genome analysis, which provided a predictive bill of materials from international trade data.
Undertaking deep dive assessments of high-risk suppliers and engaging with them to implement corrective action.	Third-party assessments of suppliers through EcoVadis. <ul style="list-style-type: none">- See <u>Independent risk assessment of our suppliers.</u> Engaged with new prioritised suppliers to undertake assessments through EcoVadis. <ul style="list-style-type: none">- Provided tailored communications, including modern slavery expectations on our dedicated supplier website, letters from our Chief Procurement Officer, training and individual supplier meetings. Developed an internal 'modern slavery in supply chain' dashboard to monitor risks and due diligence among our suppliers.



We prioritised	We delivered
<p>Updating our processes, templates and contract terms to demonstrate our commitment to modern slavery</p>	<p>Strengthened our approach to modern slavery risks in the procurement lifecycle.</p> <ul style="list-style-type: none"> - Updated the project risk evaluation tool to better enable procurement staff to assess modern slavery risks in the pre-market engagement stage. - Updated modern slavery questions into the Request for Tender, requiring more detailed information on supplier-specific risks. - Modern slavery risks considered by the Tender Board in evaluating new procurement projects. <p>1,450 new or renewed contracts updated with modern slavery contract clauses.</p> <ul style="list-style-type: none"> - Enforced through supplier assessments, corrective action plans and training. - More stringent contract clauses required for high-risk suppliers.
<p>Building the capacity of our staff to effectively identify and respond to modern slavery risks.</p>	<p>Training for staff with modern slavery assessment and supplier engagement responsibilities.</p> <ul style="list-style-type: none"> - Training on the updated Request for Tender for portfolio, category and contract managers. - Targeted training and communication to staff in key risk areas, such as student recruitment. <p>A new 'Ethical, Sustainable and Indigenous' section on UniBuy.</p> <ul style="list-style-type: none"> - Enables staff to easily find and purchase from ethical suppliers. - Introduced a dedicated section on the staff intranet to encourage staff to support ethical businesses.

Our Supply Chain

Independent risk assessment of our suppliers

In partnership with EcoVadis, we undertake deep dive assessments of suppliers, covering labour and human rights, ethics and sustainability, and environmental impact. In 2022, we assessed 30 suppliers, taking the total suppliers assessed to 119.

Through the global customer network on EcoVadis, 77 of the University's assessed suppliers (65%) completed a re-evaluation in 2022. The significant majority (91%) of these suppliers maintained or improved on their labour and human rights scores.

Average overall scores

The average overall scores for our assessed suppliers have improved since 2021 across all three areas: environment, labour and human rights and ethics, noting that we have also increased the number of assessed suppliers. Most of our suppliers' average scores are at least 10 points higher than the EcoVadis global average.

Labour and human rights scores

- Of our 119 suppliers assessed, 105 suppliers (88%) scored more than 50 overall for labour and human rights
- The average labour and human rights score is 57, higher than the EcoVadis global average of 48
- A total of 14 suppliers (7%) scored below 50 for labour and human rights in the categories of research and teaching equipment, ICT and business services

Graph key (opposite page):

Line graph: Average score distribution among all suppliers assessed in the global EcoVadis network.

Bar graph: Average score distribution among the University's assessed suppliers.

EcoVadis assessment scoring scale

Increasing risk



00-24



25-44



45-64



65-84



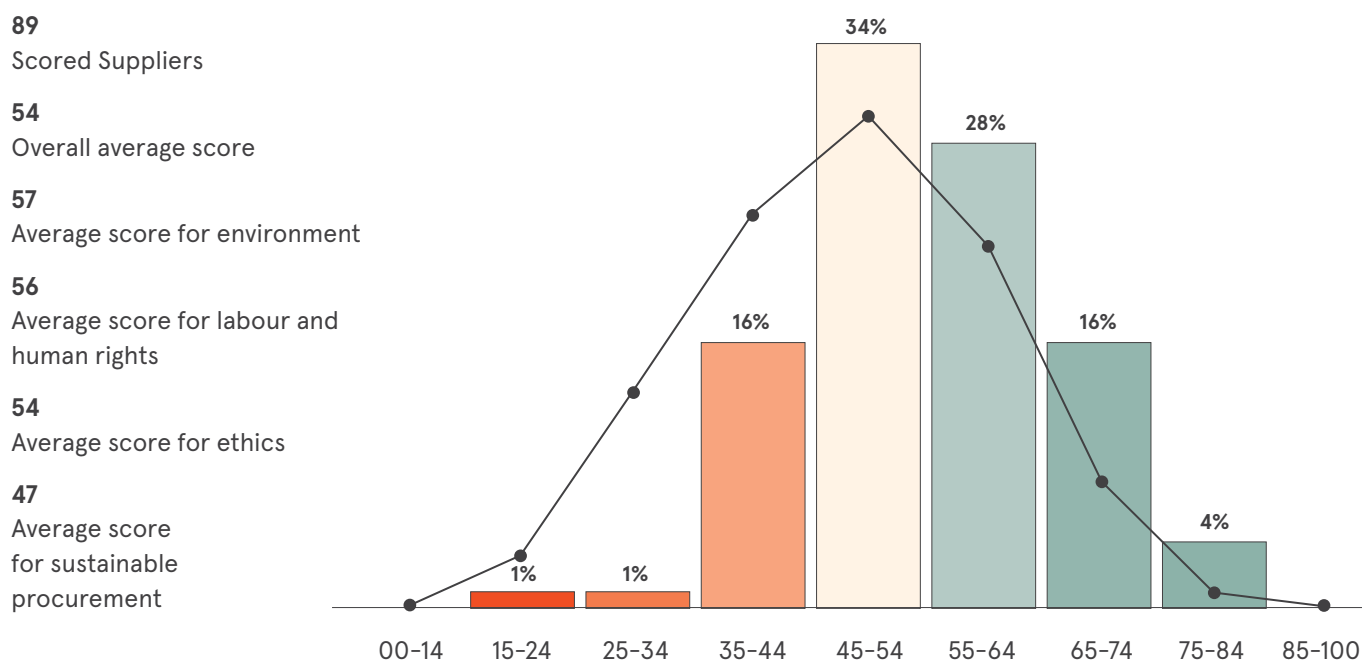
85-100

Best in class

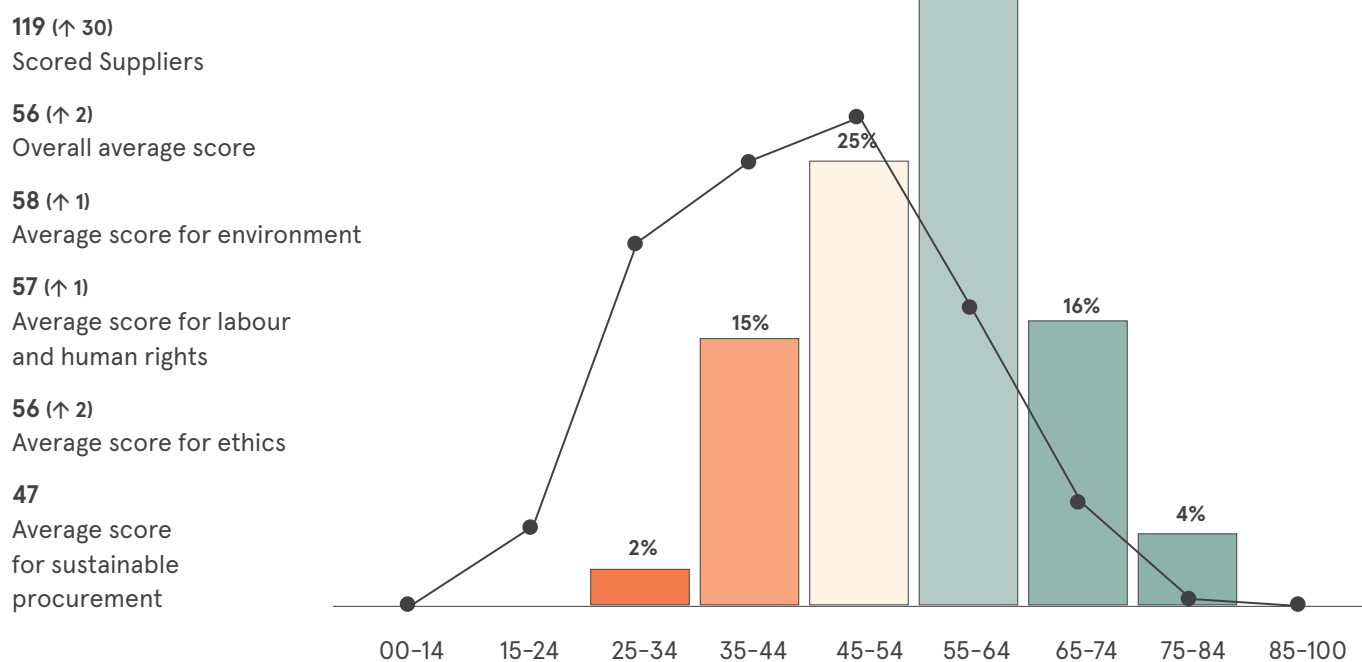
Progress in the overall average score distribution among the University's assessed suppliers - 2021 to 2022

The graphs show the overall average scores, which represent the assessed suppliers' results for all four EcoVadis themes: environment, human and labour rights, ethics and sustainable procurement.

2021



2022



Engaging with our suppliers to improve their modern slavery risk management

While most of our assessed suppliers score above 45, which is generally considered satisfactory, the EcoVadis assessment has identified various key areas for improvement.

- 1% of suppliers did not have policies on labour or human rights issues
- 8% of suppliers did not have evidence of actions on working conditions
- 9% of suppliers did not have evidence of actions on child labour, forced labour and human trafficking
- 15% of suppliers were subject to controversies regarding their labour and human rights practices
- 18% of suppliers did not have a whistle-blower procedure on labour and human rights issues
- 27% of suppliers did not have evidence of reporting on labour and human rights issues
- 61% of suppliers did not have evidence of supplier risk analysis or assessments

In 2022, 11 suppliers (9% of assessed suppliers) implemented corrective actions on labour rights and human rights. This included certification of labour and human rights management systems, introduction of qualitative targets and responding to specific labour and human rights issues. We shared good practice and collaborated to improve the suppliers' policies and processes to address modern slavery.

Assessing our own sustainability performance

In 2023, the University is completing a re-evaluation of its EcoVadis assessment. In 2021, the University achieved a silver rating with an overall score of 57 and a labour and human rights score of 60, placing the University in the top 25% of organisations assessed worldwide. The 2023 assessment will include the University's substantial work on modern slavery risks and supply chain due diligence initiatives introduced since 2021.

Worker-driven monitoring of our electronics supply chain

In 2022, the University affiliated with Electronics Watch (EW) to better understand, mitigate and remediate modern slavery risks linked to our ICT spend. Operating since 2016, EW is an independent monitoring organisation that facilitates over 900 public sector organisations to work together to protect the rights of workers in their ICT supply chains. EW's work has had an impact in remediating deceptive recruitment practices in Malaysia, payment of recruitment fees for 10,000 migrant workers in Thailand and forced student labour in two factories in China.

In 2023 we will work with EW to establish supply chain transparency and conduct ongoing risk screening and compliance investigations of our ICT supply chain, drawing on EW's extensive international network of civil society and union partners.



A31
Sydney Nanoscience Hub

→ Messel Lecture
Theatre
lift

Our Education Activities

Risks in our education activities

Applying our due diligence framework, we have identified a potential risk that our education activities may be directly linked or contribute to modern slavery, particularly deceptive recruitment practices, trafficking in persons, forced labour and debt bondage. In addition, our assessment shows that young people are at greater risk of forced marriage.



International student recruitment and related partners

155 partners
7.2% of total procurement spend
2.7% of total supplier

With over 30,000 students from more than 150 countries, the University engages a diverse range of third-party partners globally to support our international students, including recruitment agencies, event providers, marketing and advertising.

Student recruitment across the sector may present risks of **deceptive recruitment practices, forced labour and debt bondage**, particularly where undisclosed subcontractors offer ancillary services to international students, such as financial loans and migration advice.

There have also been reports of manipulation of Australia's student immigration system to facilitate **trafficking in persons**. In 2022, a media investigation found that migration agents abroad were lodging false education visa applications to traffic young women into Australia for sexual exploitation.¹¹ While outside of our direct control, we recognise the role of universities in monitoring student applications, attendance and payment of fees to identify signs of modern slavery.



Student placements

22,000+ student placements offered in 2022
1,000+ student placement partners in
Australia and overseas

The University engages with a broad range of industry and community partners in Australia and abroad to facilitate opportunities for experiential learning for students. These placements, paid and for credit, range from six-month programs to four-week community placements. Students may also earn credit for voluntary work they source themselves.

Placements located in high-risk countries or where work is unpaid or in exchange for in-kind support, such as accommodation, may heighten students' risk of **forced labour**, particularly in student-organised placements, where we may have limited visibility of the placement partner. There have also been reports of **human trafficking** linked to volunteering abroad. Children are recruited from their families on false promises of education and care and placed into orphanages to attract donations and fees for volunteer service.¹²

¹¹ *Trafficked: An international investigation*, The Age, The Sydney Morning Herald & 60 Minutes, 2022.

¹² ReThink Orphanages Australia; van Doore, K. E., *Please Stop Australians Coming Here: Orphanage Tourism Right and the Australian Response*, Court of Conscience, 2020.



Student working conditions

While students' working conditions are outside of our direct control, we recognise that universities are well placed to inform students of their workplace risks, rights and support services.

Underpayment of wages, sexual harassment and excessive working hours, can be indicators of **forced labour**, and have been well documented in sectors with a high proportion of young workers, such as retail, hospitality, horticulture and the gig economy. International students, in particular, may face pressure to accept high-risk work and living conditions due to visa restrictions, high cost of living and accommodation shortages.

Students may not always feel comfortable reporting exploitative conditions, over concerns their job or visa will be impacted. Students with barriers to accessing information, such as students from non-English speaking backgrounds or students with a disability, face particular challenges in knowing their rights and accessing help.¹³



Other student related risks

Our consultation with Anti-Slavery Australia has also identified **forced marriage** as a risk for students, particularly young women.¹⁴ Forced marriage is the most reported form of modern slavery to the Australian Federal Police.¹⁵ Students may have repeated, unexplained absences from university, fail to return from an overseas trip or be restricted in their movements, such as being unable to visit a support service on campus without a family member.

¹³ Consultation with University of Sydney academics: Dr Susan Banki, Dr Jyotirmoyee Bhattachariya, Associate Professor Stephen Clibborn & Associate Professor Chris F Wright; Farbenblum, B. & Berg, L., *International Students and Wage Theft in Australia*, Migrant Justice Institute, UNSW Law & University of Technology Sydney, 2020.

¹⁴ Consultation with Anti-Slavery Australia.

¹⁵ *Frontline Worker Guide: Identifying and Responding to Forced Marriage in Australia*, Anti-Slavery Australia, University of Technology Sydney, 2022.

Our Education Activities

Actions in our education activities

The COVID-19 pandemic, and associated economic stress, has heightened students' risk of workplace exploitation. Throughout 2022 we focused on supporting students with access to information on identifying risk indicators, and promoting support services available on and off campus.

We prioritised	We delivered
<p>Deepening our understanding of modern slavery risks facing students.</p>	<p>Engagement with academic experts to better understand student vulnerabilities and barriers to reporting.</p> <ul style="list-style-type: none"> - University of Sydney academics contributed to our submission to the Modern Slavery Act review, which recommends for student-related risks to be captured in the legislation. <p>Engagement with Anti-Slavery Australia.</p> <ul style="list-style-type: none"> - Through extending our partnership for an additional three years.
<p>Providing students with information and training on modern slavery risks and support services.</p>	<p>Anti-slavery awareness training, completed voluntarily by more than 8,600 students.</p> <p>Targeted student education initiatives</p> <ul style="list-style-type: none"> - See our Case study: Equipping our students with information and resources to understand their rights and access help.
<p>Building the capacity of our staff to effectively identify and respond to modern slavery.</p>	<p>Bespoke training and engagement with our student-facing teams.</p> <ul style="list-style-type: none"> - Training on modern slavery indicators and referral pathways for staff from counselling, disability and health and wellbeing services, along with our Safer Communities Office and Student Centre. - Keynote address to the Academic Board on modern slavery risks in the student body.



We prioritised

Updating our processes, templates and contract terms to demonstrate our commitment to modern slavery.

We delivered

Strengthened due diligence practice for an at-risk student placement.

- Reviewed a student placement involving partner organisations and international students living in on-site accommodation in Australia.
- Provided advice on measures to ensure the safety of students on the placement and updates to placement documentation.

Strengthened due diligence of international student recruitment agents.

- Introduced the EcoVadis risk assessment process for two agencies. One agency completed an assessment in 2022 while the other agency has made a commitment to complete an assessment in 2023. Introduced our more stringent modern slavery clauses into the agencies' contracts.
- Provided targeted training and communications for staff renewing or commencing contracts with student recruitment agencies.
- All agents receive ongoing training by Sydney Future Students and provide an annual report, including details on their use of subagents and migration agents, conflicts of interest and service fees.
- Compliance to the agency agreement and National Code is monitored monthly by the Agent Compliance Committee.

Our Education Activities

Case study: Equipping our students with information and resources to understand their rights and access help

There is a strong demand from our students to better understand modern slavery risks and support services. Since 2020, over 8,600 students have voluntarily completed our anti-slavery training module, developed in partnership with Anti-Slavery Australia.

While we received no reports of our students experiencing modern slavery in 2022 via our online reporting form, we recognise students need to be better equipped with information and resources.

How we engaged with our students in 2022

2022	February	July	August	September	December
	Collaborated with Anti-Slavery Australia on an interactive art installation: " <u>Human Mart</u> " for Welcome Week.	Student news <u>article</u> distributed to all currently enrolled students.	International Student Newsletter included resources on modern slavery	Launch of a Modern Slavery Student Newsletter.	1,831 visits to our student-facing <u>modern slavery website</u> in 2022.

2023 In 2023 we will widen the reach of our online newsletters and resources and better tailor our communications to at-risk groups. We will also seek more direct collaboration with students to engage with their peers on human rights issues and available support.



Caption: Human Mart at Welcome Week 2022; L-R: General Counsel Olivia Perks, Vice-Chancellor and President Professor Mark Scott, Director Anti-Slavery Australia Professor Jennifer Burn, Senior Manager Ethical and Sustainable Procurement Philip Chan, Director Modern Slavery Unit Esty Marcu.

Our Research Activities

Risks in our research activities

Applying our due diligence framework, we have identified a potential risk that our research activities may be directly linked or contribute to modern slavery, particularly forced labour, debt bondage, deceptive recruitment practices and trafficking in persons.



Research partners

We engage with a diverse range of government and industry partners in Australia and overseas to apply research expertise to complex problems, fund research development and commercialise novel products, processes and services.

In recent years, the higher education sector in Australia and abroad has been linked, through its research collaborations and funding, to organisations with reported connections to human rights violations, including state-sponsored **forced labour**. These partners often demonstrate poor governance and limited transparency and may also pose other risks of concern to the university sector, including cybersecurity, foreign interference and limits on academic freedom.



Research projects

23 fields of research
150+ research and teaching centres

As a research-intensive institute, our academic expertise extends across a diversity of fields from linguistics to nanoscience. Our academics lead the way in clinical trial research, with over 500 clinical trials in progress at any one time, primarily in medicine and health sciences.

There are potentially risks of **forced labour, deceptive recruitment** and other human rights concerns in research conducted in high-risk countries, particularly for projects involving vulnerable populations and, third-parties with weak governance on informed consent. Specific high-risk research categories include clinical trials overseas, genetic typing and DNA harvesting and dual-purpose research, where a research output may be misapplied by a third-party, such as artificial intelligence enabled surveillance technologies or biometric technologies including facial, voice and movement tracking technologies.¹⁶



Research facilities and materials

8 specialist core research facilities
400+ instruments available for use

Our core research facilities provide access to a diverse range of research infrastructure, including robotics, X-ray imaging, data analytics, manufacturing, microscopy and microanalysis and biomedical and clinical facilities.

Lab, research and teaching consumables, such as personal protective equipment or human tissue and cadavers, and services, such as construction and cleaning, may be linked to human rights violations, including **forced labour, debt bondage** and **human trafficking**. In particular surgical instruments manufactured in Pakistan have well documented reports of child labour and forced labour.¹⁷ There have also been reports of forced labour in PPE manufacturing in Malaysia.¹⁸ These risks are covered in more detail in [Identifying and Addressing our Modern Slavery Risks: Our Supply Chain](#).

¹⁶ Xiuzhong Xu, V., Cave, D., Leibold, J., Munro, K. & Ruser, N., Uyghurs for sale: 'Re-education', forced labour and surveillance beyond Xinjiang, Australian Strategic Policy Institute, 2020; *Trafficking in Persons Report*, US Department of State, 2022.

¹⁷ McVeigh, K. & Junjua, H., *NHS admits doctors may be using tools made by children in Pakistan*, The Guardian, 2018.

¹⁸ Bhutta, M., Bostock, B., Brown, J., Day, E., Hughes, A., Hurst, R., Trautrim, A. & Trueba, M., *Forced Labour in the Malaysian Medical Gloves Supply Chain before and during the COVID-19 Pandemic: Evidence, Scale and Solutions*, Modern Slavery & Human Rights Policy & Evidence Centre, 2021.

Our Research Activities

Actions in our research activities

We prioritised	We delivered
<p>Deepening our understanding of modern slavery risks across our research activities.</p>	<p>Enhanced understanding of potential modern slavery, and other intersecting risks, across our research activities.</p> <ul style="list-style-type: none"> - Provided detailed modern slavery risk assessments as requested by the Research Risk Advisory Committee. - Detailed data analysis of all research projects and grants with potential links to companies or entities known for human rights abuses, including modern slavery. - Initiated development of a due diligence tool to screen human rights violations and other related risks in our engagement with partners and collaborators.
<p>Embedding modern slavery considerations across our research governance settings and operations.</p>	<p>Updated agreement templates to include modern slavery provisions.</p> <ul style="list-style-type: none"> - Multi-institutional agreement templates. - Research collaboration agreements. - Research service agreements. <p>Updated research approval processes and checklists.</p> <ul style="list-style-type: none"> - Updated Pre-Execution Checklist to include a modern slavery check. - Where applicable provide a modern slavery risk assessment to the Research Risk Advisory Committee.
<p>Providing bespoke training, toolkits and workshops for our research teams.</p>	<ul style="list-style-type: none"> - Developed due diligence framework and toolkit including checklists and knowledge base articles. - Provided training and workshops to research portfolio staff. - Created awareness across the university (including Faculties and Schools) of modern slavery risks in research. - Developed research specific FAQs and other supporting information for all staff.

Our Research Activities

Case Study: Assessing risks in joint venture funding

A Joint Venture between the University and the NSW Government received a research funding proposal from a large, global ICT manufacturer based in Asia. The Joint Venture was in the early stages of operations and was looking for suitable funding partners to support research operations.

The Chief Operating Officer of the Joint Venture reached out to the Modern Slavery Unit to seek assistance with identifying any potential modern slavery risks and other related counterparty risks associated with partnering with the ICT company.

The Modern Slavery Unit applied its modern slavery due diligence framework. Detailed desktop research found the company had a well-documented history of poor labour practices and human rights violations, including debt bondage, forced labour and child labour. Publicly available information also showed little to no evidence of remediation action taken to address these issues.

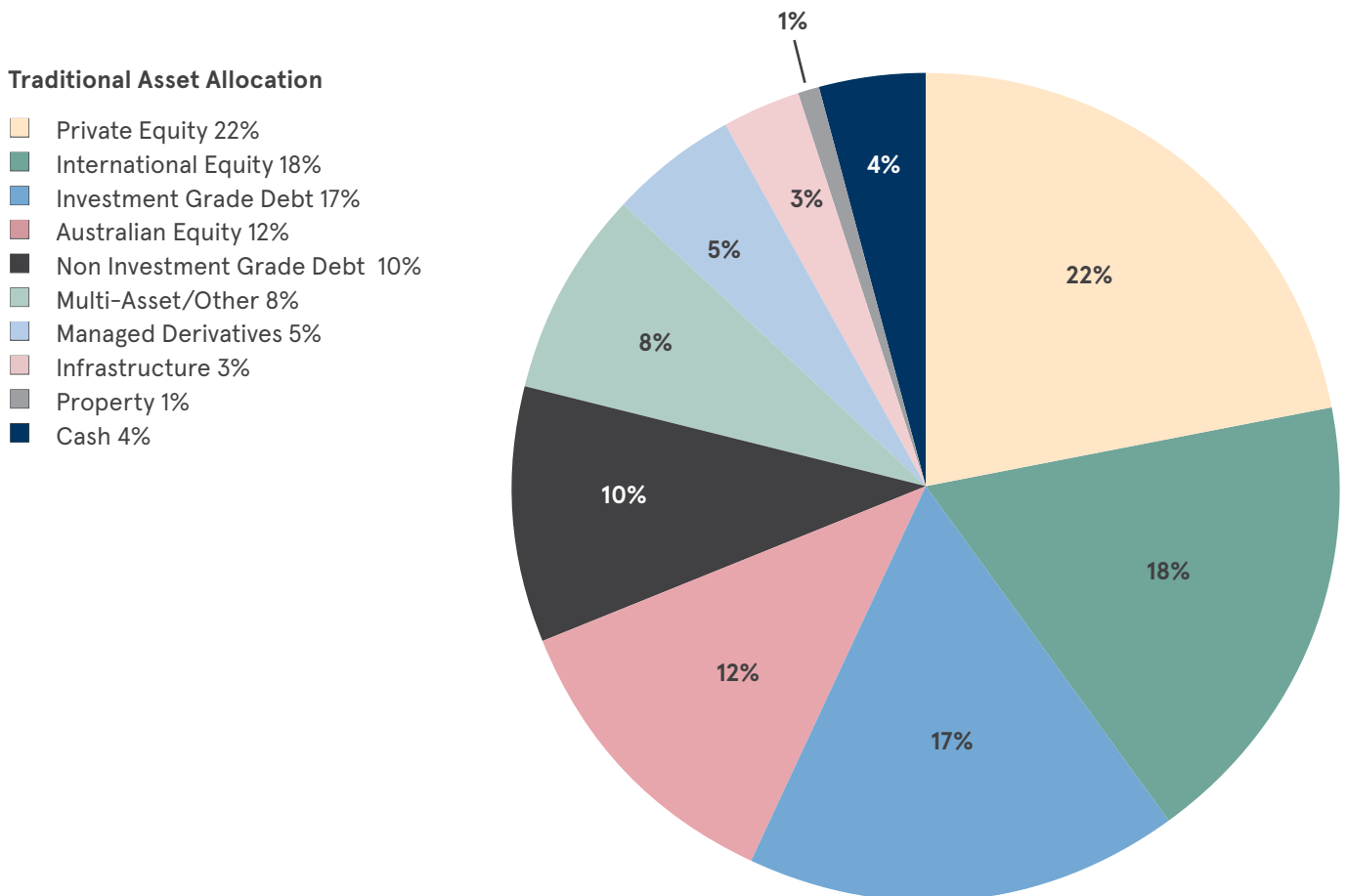
The Director of the Modern Slavery Unit presented the findings to the Joint Venture's board. The risks identified were serious and significant in nature, to the extent that an association with the company would directly link the Joint Venture to human rights abuses and risk existing and future funding by government and other partners. As such, the funding proposal did not proceed and the Joint Venture was provided with a set of principles to inform their search for suitable funding donors.

Our Investments

We manage endowment funds that are invested in financial assets to meet long-term academic and research goals. These funds consist mainly of bequests and donations that have been gifted to the University for a range of purposes.

The University employs a small asset allocation and portfolio construction team, who in turn allocate capital to specialist external managers for portfolios managed to medium- and long-term timeframes. Our long-term fund represents the bulk of the University’s financial asset investments, with around 60% of these funds held in trust for specific purposes.

The University’s portfolio by asset allocation, as of December 2022



Our Investments

Risks in our investment activities

Modern slavery risks in our investments are assessed as part of our annual Environmental, Social and corporate Governance (ESG) review, undertaken by third-party provider Mercer.

The University's listed equity holdings were screened using Institutional Shareholder Services' (ISS) ESG data for allegations of severe, ongoing instances of human rights abuses, including forced labour and child labour. Based on this analysis, as of June 2022, there were no "red flag" modern slavery breaches identified in the University's listed equity holdings. Red flag breaches refer to reported controversies that are generally ongoing, very severe and verified by an independent, authoritative source. The assessment was limited to listed equities because similar data is not yet available for other asset classes. Recognising this paucity of data, the University also uses its annual ESG survey to question managers on their policies and procedures to identify risks of modern slavery and other human rights abuses. 72% of the managers surveyed, representing over 80% of the assets under management where a risk could be apparent, explicitly prohibit or limit investments contributing to this problem.

In 2023, we plan to complement Mercer's analysis with a further risk assessment of our portfolio to identify potential indicators of modern slavery, along with reported incidents. Investment holdings, particularly in emerging markets with poor labour protections and in high-risk sectors with complex offshore supply chains, may present modern slavery risks.¹⁹ In particular, the lack of comprehensive data, guidance and corporate transparency in alternative asset classes, such as private equity, makes it challenging to assess risks. We also recognise that investment managers that are not subject to modern slavery legislation may not have as rigorous risk screening and due diligence processes as those in countries with explicit laws in place.

¹⁹ *Financial services and modern slavery*, KPMG & Australian Human Rights Commission, 2021; Sheehan, K. & Kinley, D; *The 2020 Financial Services Human Rights Benchmark Report*, The University of Sydney, 2020; *Unlocking Potential: A Blueprint for Mobilizing Finance Against Slavery and Trafficking*, United Nations University Centre for Policy Research, 2019.

Our Investments

Actions in our investment activities

We prioritised	We delivered
Updating our policy settings following the publication of the Sustainable Investment Strategy in 2021.	Revised Investment Policy and Procedures to reflect the University's commitment to modern slavery and expectations of external investment managers.
Continued engagement with our investment managers through our annual ESG survey.	<p>A review of our investment managers' approach to modern slavery, through our annual ESG survey. As of June 2022:</p> <ul style="list-style-type: none"> - 67% of the University's investment managers have a policy to manage the risk of modern slavery, up from 54% in 2021. - 72% of managers prohibit or otherwise limit investments contributing to modern slavery or human rights abuses. - Investment managers engaged with 14 companies in 2022 on human rights.
Including modern slavery on agendas for meetings when reviewing manager performance.	Increased visibility of the issue, particularly with unlisted managers in the United States, who are not subject to legislation.

Case study: Addressing risks in our investments through engagement

In August 2022, the United Nations Office of the High Commissioner for Human Rights confirmed reports of human rights concerns in the Xinjiang Uyghur Autonomous Region in China. Global supply chains, particularly in the apparel, electronics and renewable energy sectors, have been linked to the forced labour of Uyghur and other ethnic minorities.²⁰

One of our investment managers engaged with a portfolio company on its exposure to forced labour risks in the Xinjiang region. The company is expected to make significant progress on supply chain management and disclosure over the next 12-24 months, including achieving set milestones to align with business and human rights due diligence standards.

²⁰ Murphy, L. T., & Elimä, N., In *Broad Daylight: Uyghur Forced Labour and Global Supply Chains*, Helena Kennedy Centre for International Justice, Sheffield Hallam University, 2021; OHCHR *Assessment of human rights concerns in the Xinjiang Uyghur Autonomous Region, People's Republic of China*, United Nations Human Rights Office of the High Commissioner, 2022; Xiuzhong Xu, V., Cave, D., Leibold, J., Munro, K. & Ruser, N., *Uyghurs for sale: 'Re-education', forced labour and surveillance beyond Xinjiang*, Australian Strategic Policy Institute, 2020.





THE UNIVERSITY OF
SYDNEY

INSPIRED

Our Controlled Entities

Actions with our controlled entities

The University's controlled entities were consulted in preparation of this statement and share our commitment to addressing modern slavery risks. All controlled entities are subject to the University's Modern Slavery Policy, and the Modern Slavery Unit works with their senior executive teams to implement the policy, identify risks and train staff.

We prioritised	We delivered
Deepening our understanding of modern slavery risks in our controlled entities' supply chains.	Detailed modern slavery risk assessments as requested by our controlled entities, including recommendations for practical actions to mitigate risks.
Updating our controlled entities' processes, templates and contract terms to demonstrate our commitment to modern slavery.	Development of a modern slavery due diligence framework for controlled entities Greater visibility of supply chain risks through enabling access to EcoVadis.
Building the capacity of the staff at our controlled entities to effectively identify and respond to modern slavery risks.	Training for all staff at Westmead Fertility Centre. See our Case Study: Identifying and addressing modern slavery risks with our controlled entity, Westmead Fertility Centre . This training will be rolled out as part of onboarding for new staff in the future. Briefing sessions with our Centre in China to identify specific risks linked the Centre's operations and supply chain.

Our Controlled Entities

Case study: Identifying and addressing modern slavery risks with our controlled entity, Westmead Fertility Centre

Over the past few years, the University’s Modern Slavery Unit has consulted with senior executive at Westmead Fertility Centre to understand how their operations and supply chain may be linked to modern slavery. Its premises are under a Licence with Westmead hospital, which is responsible for the maintenance of facilities, cleaning, and security.



Close to 3,000

Cycles of treatment annually with assisted reproductive technology.



43 staff

Nurses, scientists, administration, and trainee doctors.



\$2million +

Procurement spend annually.

“Following the discussions and the presentation by the Modern Slavery Unit, my eyes have been opened to risks that may have a possibility of affecting our procurement and service provider practices, and more directly, our patient cohort. We are now on a committed journey of embedding awareness and revising organisational and care processes to mitigate risk”

Member of Leadership Team, following anti-slavery training

“I’ve realised, modern slavery may be the person you are talking to, and you know very little about their personal circumstances”.

Member of Nursing team, following anti-slavery training

How we assess risks

Westmead Fertility Centre has been supported to undertake modern slavery risk analysis of its procurement spend since 2020. In 2022, an updated assessment drawing on evidence of key risks in the health sector, identified two priority areas:

- Lab consumables, medical equipment and PPE, which may be at risk of being directly linked to **forced labour, debt bondage and child labour**
- Patients and their families at risk of **forced marriage or potential coercion for donor arrangements**

Actions taken to address risks

In 2022, we delivered tailored training for all staff and held preliminary discussions on potential risks facing patients. Strict protocols and processes at Westmead Fertility Centre, including mandatory counselling for donors, require that informed consent is verified before any treatments commence. However, it is important that all clinicians and staff are aware of the risk of modern slavery within the patient cohort given the potential for them to encounter people who are vulnerable to exploitation at any stage of the treatment cycle.

Our initial assessment of Westmead Fertility Centre identified eight priority suppliers requiring further action or investigation. The top two suppliers, which represent 36% of all procurement expenditure, now have publicly available statements regarding their corporate policies on human rights and modern slavery. The remaining priority suppliers represent only 2% of all procurement expenditure.

Plan for 2023

Continue to assess risks, build the capacity of staff and monitor effectiveness through quarterly meetings with the Centre. When available, Westmead Fertility Centre will also publish the University’s Modern Slavery Statement on their:

- Marketing website and use this statement to guide expectations and assessments of suppliers.
- Patient portal (an exclusive resource for patients of the Centre) and use this statement to alert patients to Westmead Fertility Centre’s commitment to addressing modern slavery risks. The portal will also include information on indicators of modern slavery and links to support for patients.

Grievance Mechanism and Remediation

Our online grievance mechanism form is an important way for the University to identify and remediate the potential risk of causing, contributing, or being directly linked to modern slavery.

The form is confidential and provides a mechanism for staff, students and external parties (e.g. suppliers, workers, civil society and the public) to report suspected incidents and concerns regarding modern slavery in the University's operations and supply chain. The reporting process is triaged and managed by the Modern Slavery Unit. The form takes a human-centric approach, governed by the principles of stopping existing harm and preventing the risk of future harm to people, which in turn minimises organisational risk.

To date, five reports have been received. The University's response to reports is informed by the UNGPs (Principle 31) and the UN Global Compact Best Practice Guide.

Of the reports received, none of the issues raised constituted modern slavery. Four of the five reports relate to University procurement processes, and one relates to the University's education offerings on modern slavery. These matters were addressed using existing university processes.

Lessons learned and plan for continuous improvement

The usage of the grievance mechanism to date has been low. This is likely due to several factors which we will address throughout 2023:

- Lack of awareness of the form and its purpose among the staff and students it is intended for:
- In particular, the lack of shared knowledge of what constitutes modern slavery and the types of factors which can act as proxy risk indicators
- The form is currently only available in English which may act as barrier to some potential staff users (e.g. supplier staff from non-English speaking backgrounds)
- Inertia to formally raise an incident with the University due to concerns about visa status or perception of wrongdoing. Research has shown this is particularly the case for students who are experiencing severe exploitation in the workplace, with only 5% raising the concerns with their education institution.²¹

Throughout 2023 we will be working in partnership with civil society to undertake a review of our grievance mechanism and approach to remediation with the view to learn from lived experience and improve the usage and accessibility of the form.

²¹ Farbenblum, B. & Berg, L., *International Students and Wage Theft in Australia*, Migrant Justice Institute, UNSW Law & University of Technology Sydney, 2020.

Our Modern Slavery Incident Reporting Operating Principles

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

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

Identify the type of **exploitation**

Identify the level of **urgency**

1.

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

2.

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

3.

Respond to address risk to the University

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

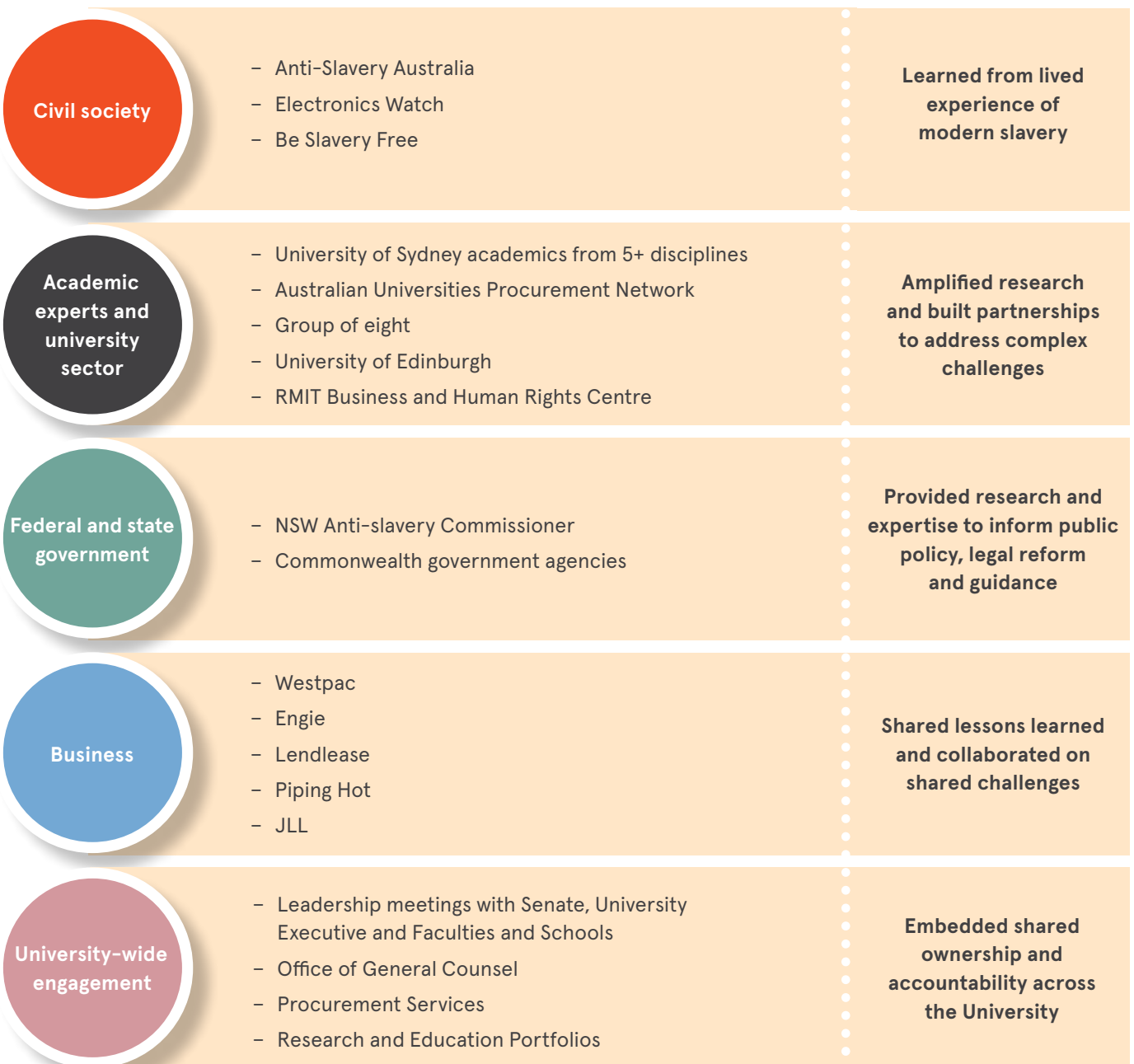
- i) The personal agency of the individual victim/survivor (what they want and need)
- ii) Relevant legislation and mechanisms internal and external to the University to be put into effect to resolve the matter.
- iii) Discretion needs to be exercised based on the level of risk, primarily to the victim,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

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

Collaboration and Engagement

How we collaborate

Partnerships for good are at the heart of our response to modern slavery - from working collaboratively with colleagues across the University to connecting our academics and students with leaders in business and human rights.



Collaboration and Engagement

Our 2022 collaboration highlights

Innovative research to identify supply chain risks

Partnered with the **University of Sydney Centre for Integrated Sustainability Analysis (ISA)**, whose Open Analysis to Address Slavery in Supply Chains (OAASIS) platform uses international trade and social risk data to map hotspots for modern slavery risk across the supply chain. We are working with ISA to pilot the platform for the University's supply chain, applying our practical experience in human rights due diligence.

Equipping future business leaders

Launched a new unit of study, *Shared Value and Inclusive Business Models*, for students in our Master of Business Administration.

Attended by 30 students from the finance, retail, not for profit and government sector, the unit provides a cross disciplinary approach to responsible business, with a key focus on human rights due diligence.

Launched a new Industry and Community Project Unit offering, *Ethical and Sustainable Supply Chain*, a joint initiative between Procurement and our Education Portfolio.

48 undergraduate students from diverse disciplines engaged with industry experts, including the Freedom Hub, a social enterprise café and school for survivors of modern slavery, to develop new approaches to addressing modern slavery, including a tech platform to identify labour rights violations in supply chains and modern slavery star ratings for food retailers on campus.

Informing government policy

Submission to the Australia Government's review of the Commonwealth *Modern Slavery Act 2018*, drawing on our insights as a reporting entity under the Act and including contributions from over 10 academic colleagues.

Submission to the inaugural NSW Anti-slavery Commissioner's consultation on NSW public procurement and modern slavery, recommending steps the Commissioner could take to support government procurers and their suppliers to adopt best practice in responding to modern slavery.

Collaborating across the sector

We are an active collaborator in the Australian Universities Procurement Network's (AUPN) modern slavery community of practice, involving 38 procurement teams across Australian universities. In 2022 we:

- **Participated in a supplier assessment questionnaire pilot** across the sector, which assessed 9 key suppliers and collected feedback to inform the rollout to further suppliers in 2023.
- **Worked with procurement teams across 33 universities** to jointly train, assess and collect feedback from suppliers in high-risk categories including lab consumables, ICT hardware, telecommunications, stationery, cleaning and grounds maintenance. By working together, the sector was able to expand its leverage, develop strong supplier relationships, and share best practice and learnings for continuous improvement.

We participated in the RMIT Business and Human Rights Centre research

On 'Evaluating University Efforts to Combat Modern Slavery and Labour Abuses in Supply Chains', contributing to sector-wide efforts to identify gaps and drive improvements.



Collaboration and Engagement

Case study: James Martin Institute for Public Policy

– NSW Government Consultation

The University of Sydney is a founding partner of the James Martin Institute for Public Policy (JMI), with the NSW government, alongside Western Sydney University and the University of Technology Sydney (UTS). JMI is an independent, non-partisan policy institute, established to bring together government, academic and other experts to develop practical solutions that address societal challenges and improve lives.

In 2022, JMI and the NSW Anti-slavery Commissioner partnered to harness the diverse expertise of survivors, anti-slavery researchers, government agencies, not-for-profit organisations, business and the general public. Through cross-sector collaboration, JMI has supported the NSW Anti-slavery Commissioner to better understand modern slavery challenges in NSW and to identify potential pathways to address these.

The Modern Slavery Unit provided a seconded staff member to JMI to provide research and advisory support to develop the NSW Commissioner’s strategic plan. The Modern Slavery Director also participated in three consultation workshops with human rights experts across civil society, business and government.



Photo credit: James Martin Institute for Public Policy.





Measuring Progress and Looking Ahead

Evaluating Effectiveness

Plan for 2023

Evaluating Effectiveness

Since starting this journey, we have committed to monitoring our efforts and demonstrating continual improvement. As our understanding of risks has evolved, so have our due diligence efforts. While some initiatives have been effective in achieving set outcomes, others require a sustained and evolving effort. These are some of our key learnings and reflections on our effectiveness:

1

Responsibility for identifying and addressing modern slavery needs to be shared across the organisation. No team, no matter how large or expert, can identify and address all relevant risks across a large and complex organisation.

In 2022, we launched our Modern Slavery Compliance Framework which identifies how roles and responsibilities for addressing modern slavery are shared across the senior executive and their respective portfolios. Once this was established, the Modern Slavery Unit became responsible for supporting each portfolio by providing the enabling tools, process improvements and modern slavery risk assessments.

2

What worked in the previous reporting period may no longer be sufficient to adequately address complex and converging risks.

This is especially the case for modern slavery risks which are often wrapped up in other significant counterparty risks, such as foreign interference and national security.

3

Policy and legal-centric approaches, which require anti-slavery commitments by suppliers and partners, while critical first steps, are limited in their capacity to effectively identify modern slavery risks.

For example, the common practice of including “modern slavery contract clauses” relies on an implicit shared understanding of modern slavery. We’ve learned knowledge of modern slavery is often limited, with differing interpretations. Introducing “proxy indicators” of modern slavery risks (e.g., breaches of workplace and immigration laws) is a much more practical and useful way to identify risks.

4

A modern slavery grievance mechanism is only as useful and effective as the awareness about the mechanism and its purpose.

The usage of the University’s grievance mechanism has been low. In 2023 we will work with civil society to improve the accessibility of the mechanism.

Evaluating Effectiveness

Our 2022 outcomes and KPIs

We understand our modern slavery footprint and target and adapt our actions to effectively address risks

Ongoing supplier assessments

- 90.83% of suppliers in high-risk categories assessed as part of the supplier assessment program
- 9.16% of current suppliers declined to participate in the supplier assessment program

Roll-out of new procurement requirements for new suppliers

- 204 suppliers with \$250,000 or more in value of goods and services onboarded in the modern slavery due diligence framework

Roll-out of research projects modern slavery risk assessments

- 15 research projects reviewed for links to modern slavery risks and other human rights violations

Respect for human rights is embedded into key policies and processes, holding us and our partners to account

Modern Slavery Unit established

- Hired 2 new full-time and 1 new casual staff

Senate and University Executive oversight

- 5 presentations to senior leadership, including University Executive, Senate committees and Academic Board
- Rolled out Modern Slavery Compliance Framework establishing senior executive roles and responsibilities for identifying and addressing risks

Strengthening new contracts and templates

- 1,450 new or renewed contracts updated with modern slavery supplier contract clauses
- 3 research related agreements updated with modern slavery provisions
- 3 high risk contracts renewed with bespoke modern slavery clauses

Monitoring suppliers' performance

- 5,095 direct suppliers monitored across 522 industries and 66 countries
- 119 suppliers completed independent risk assessments
- 9% of assessed suppliers implemented improvement actions on labour and human rights arising from the supplier assessment program

Due diligence of our investments

- 67% of the University's investment managers have a policy to manage the risk of modern slavery
- 72% of managers prohibit or otherwise limit investments contributing to modern slavery or human rights abuses.
- 14 companies engaged on human rights issues by investment managers

Roll-out of online modern slavery grievance mechanism

- 5 grievances reported, triaged, and resolved

Staff can effectively identify and respond to modern slavery risks.

Anti-slavery Awareness Training for staff

- 15,000+ current and former staff and affiliates completed training

Targeted staff training

- 2 training workshops conducted for staff in student support roles, including Safer Communities Office, Student Wellbeing and disability services.
- Training for Procurement portfolio, category and contract managers on changes to modern slavery due diligence processes
- All staff training for Westmead Fertility Centre (controlled entity)

Students are informed of modern slavery risks and aware of support services to reduce their risk of exploitation.

Anti-slavery awareness module for students

- 8,600+ students voluntarily completed training

Modern slavery student information campaign

- Launched a Modern Slavery Student Newsletter
- 1 article published in student news
- 1 article published in International Student Newsletter
- 1,831 visits to our student-facing [modern slavery website](#)
- 3 days spent engaging with students at Human Mart during Welcome Week

Our research and education make a meaningful contribution to the sector and global effort to address modern slavery.

Engagements and contributions to the sector

- 1 University submission to the Commonwealth Modern Slavery Act 2018 review
- 1 University submission to the NSW Anti-slavery Commissioner public procurement and modern slavery consultation
- 1 affiliation agreement signed with Electronics Watch
- 3 roundtable discussion engagements hosted by NSW Anti-slavery Commissioner
- 3-year extension to our partnership with Anti-Slavery Australia
- 30 students participated in new MBA unit of study, *Shared Value and Inclusive Business Models*
- 48 students participated in new Industry and Community Project Unit offering, *Ethical and Sustainable Supply Chain*



Evaluating Effectiveness

Vice-Chancellor's Awards for Excellence

The University's work in responding to the risks of modern slavery and the positive impact that this work has had on staff, policies and processes were recognised by the University in the 2022 Vice-Chancellor Awards for Excellence.

Modern Slavery Unit Director Esty Marcu received the Outstanding Contribution to the University Community Award at the ceremony which took place on 30 November 2022. This peer nominated award recognises exceptional performance from staff in supporting the initiatives of the University. Esty was nominated by General Counsel and Vice Principal Operations.

"Esty has provided us with an authentic and practical strategy, framework, and tools to deliver a sector-leading modern slavery approach – but, more importantly, has energised our community to make a change."

Olivia Perks
General Counsel, University of Sydney



Photo credit: Nicola Bailey

Plan for 2023

Looking ahead we remain committed to tackling modern slavery, not only through our due diligence practice, but also through our research and education expertise. Throughout 2023 we will focus our efforts on maturing our understanding of risks and evolving our due diligence practices to effectively address these risks.

Supply Chain

- Work with our suppliers to increase visibility of modern slavery risks beyond Tier 1, including further risk analysis, risk assessments, training and ongoing engagement.
- Increase the number of ethical suppliers we onboard onto our buying platform (UniBuy)
- Leverage our affiliation with Electronics Watch and provide tailored training for our ICT category management team. We will also work with EW to establish supply chain transparency and conduct ongoing risk screening and compliance investigations of our ICT supply chain, drawing on EW's extensive international network of civil society and union partners.

Education Activities

- As international students return to campus and travel abroad resumes, we will focus our actions on at-risk groups, including newly arrived international students and students on self-organised placements.
- Widen the reach of our online newsletters and resources and better tailor our communications to at-risk groups.
- Work with Student Wellbeing teams to streamline referral processes and improve access to support services.

Research Activities

- Collaborate across the sector to better understand intersecting risks such as modern slavery, foreign interference and national security with the aim to develop a streamlined, coordinated approach to due diligence.

Investments

- Publish our updated Policy and Procedures and strengthen our risk assessment process with the aim of developing a more specific internal toolkit to better identify risks, particularly in the unlisted equity space
- Encourage investment managers who do not currently have a policy on modern slavery and human rights to introduce one.

Controlled Entities

- Westmead Fertility Centre will publish modern slavery information on its patient portal and provide resources on modern slavery indicators and support services.

Grievance Mechanism and Remediation

- We will work in partnership with civil society to undertake a review of our grievance mechanism and approach to remediation with the view to learn from lived experience and improve the usage and accessibility of the form.



Glossary

Affiliate

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

AUPN

Australian Universities Procurement Network

Child labour

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

- exploited through slavery or similar practices, including for sexual exploitation
- engaged in hazardous work which may harm their health or safety
- used to produce or traffic drugs.

Controlled entity

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

Debt bondage

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

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

Deceptive recruiting for labour and services

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

ESG

Environmental, social and corporate governance

Forced labour

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

Forced marriage

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

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

Grievance mechanism/modern slavery incident reporting form

A confidential **online form** which is intended for use by University of Sydney staff and students and external parties to report cases of modern slavery that may be linked to any part of the University's operations or functions, including:

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

Human rights due diligence/due diligence

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

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

MBA

Masters of Business Administration

Modern slavery

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

- trafficking in persons,
- slavery,
- servitude,
- forced labour,
- forced marriage,
- debt bondage,
- deceptive recruiting for labour or services and
- the worst forms of child labour.

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

Modern Slavery Act

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

NHMRC

National Health and Medical Research Council

Partner

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

PPE

Personal Protective Equipment

Principal Officer

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

RFT

Request for tender

Servitude

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

Slavery

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

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

Supplier

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

SUSF

Sydney Uni Sport and Fitness

Trafficking in persons/human trafficking

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

- the prostitution of others without their consent or other forms of sexual exploitation;
- forced labour or services;
- slavery or practices similar to slavery;
- servitude; or
- the removal of organs.

UNGPs

United Nations Guiding Principles on Business and Human Rights

USU

University of Sydney Union

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

Identify the reporting entity

About this statement (p. 7)

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

Who we are (p. 8), Identifying and Addressing our Modern Slavery Risks: Our Supply Chain (p. 20), Our Investments (p. 40)

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

Risks in our supply chain (p. 22), Risks in our education activities (p. 32), Risks in our research activities (p. 37), Risks in our investment activities (p. 41)

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

How we deliver our vision (p. 14), Actions in our supply chain (p. 26), Independent risk assessment of our suppliers (p. 28), Actions in our education activities (p. 34), Case study: Equipping our students with information and resources to understand their rights and access help (p. 36), Actions in our Research Activities (p. 38), Case Study: Assessing risks in joint venture funding (p. 39), Actions in our investment activities (p. 42), Case study: Addressing risks in our investments through engagement (p. 42), Grievance Mechanism and Remediation (p. 48), Collaboration and Engagement (p. 50)

Describe how the reporting entity assesses the effectiveness of these actions

Evaluating Effectiveness (p. 56), Plan for 2023 (p. 60)

Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)

Controlled entities covered by this statement (p. 7), Our Controlled Entities (p. 45), Case study: Identifying and addressing modern slavery risks with our controlled entity, Westmead Fertility Centre (p. 46)

Provide any other relevant information

Acknowledgment of country (p. 3), From the Chancellor and Vice-Chancellor (p. 4) Our approach to Addressing Modern Slavery: From the Director of the Modern Slavery Unit (p. 12), What we aspire to achieve (p. 13), Case Study: James Martin Institute for Public Policy – NSW Government Consultation (p. 53)



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