



Bond University

Modern Slavery Act Statement 2022

2022

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Our commitment to Australian Aboriginal and Torres Strait Islander people

Bond University acknowledges the people of the Yugambeh language, upon whose ancestral lands our University now stands, and celebrates the contribution that Aboriginal and Torres Strait Islander people make to our institution.

Bond University has a long-standing and deeply embedded commitment to building strong relationships with the Aboriginal and Torres Strait Islander communities, with the primary goal of improving educational opportunities and providing culturally safe and supportive learning environments for our Indigenous students.



Introduction

Modern Slavery is a global issue. It occurs when a person is coerced into work and exploited for gain including offences such as forced labour, servitude, debt bondage and child labour. Bond University is committed to treating all workers and our supply chains with respect and dignity, ensuring safe working conditions, and conducting ethical operations. Bond University has produced this Modern Slavery Statement for the period January to December 2022, aligning with the university's financial reporting year and pursuant to the Modern Slavery Act 2018 (Cth).



Part A – Reporting entity

Bond University is Australia's first private, not-for-profit university with approximately 4,000 enrolled students. The University has annual turnover of circa \$200 million. The Act's reporting requirement applies to large businesses and other entities in the Australian market with annual consolidated revenue of at least AUD\$100 million. Bond University will meet this threshold for the foreseeable future.

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Bond University,
QLD 4229



Part B – Structure, operations, and supply chains

Structure

Bond University Limited is incorporated as a company limited by guarantee. Pursuant to the constitution of the company, each member has undertaken in the event of a deficiency on winding up, to contribute an amount not exceeding \$10. At 31 December 2022, the registered membership of the company was thirty and the collective liability of members was \$300.

The University's controlled entities are Campus Operations Pty Ltd (100% ownership) and Lashkar Pty Ltd (100% ownership). Campus Operations Pty Ltd operates student accommodation including food and beverage facilities. Lashkar Pty Ltd holds and manages the Bond Institute of Health and Sport building located in Robina, Queensland. Risk assessment, reporting and data presented within this statement is for the consolidated group.

Operations

As Australia's first private not-for-profit university, Bond University seeks to be recognised internationally as a leading independent university, imbued with a spirit to innovate, a commitment to influence and a dedication to inspire tomorrow's professionals who share a personalised and transformational student experience. As a not-for-profit entity, the institution reinvests its surplus from operations back into the University and continues to introduce new courses, maintain and enhance an innovative and agile teaching and learning environment with the increasing use of technology, and invests in research.

Supply Chains

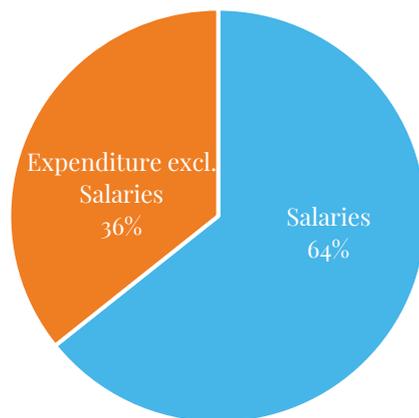
Supporting operations of the University requires a diverse range of goods and services from a wide range of suppliers and staff:

- Employment of workers - Approximately 1,200 staff are employed and predominantly domiciled in Australia. The Bond University Act 1987 provides for two staff associations. Professional staff are engaged under a Collective Agreement in the federal jurisdiction and a negotiated agreement (MOU) between the University and Staff Association. Academic staff are covered by a federal Award and a negotiated MOU.

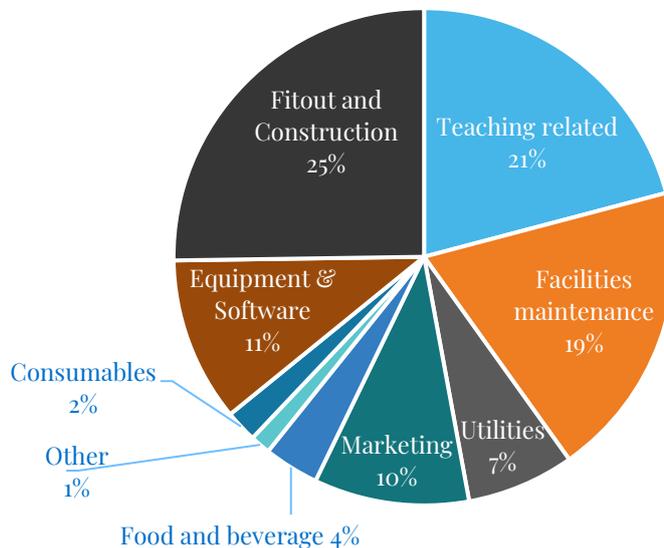
- Maintenance and construction of buildings and facilities - All University facilities and buildings are located on the Gold Coast and Brisbane.
- Procurement to support delivery of innovative and agile teaching and learning environments with the increasing use of technology and online platforms - Tangible items are sourced primarily from domestic service providers, manufacturers and retailers and includes office equipment, stationery, computer and laboratory supplies. Intangible items such as database access, clinical placements and subscriptions are sourced directly from both domestic and internationally based suppliers.
- Student accommodation - Accommodation services for up to 590 students includes cleaning and linen services.
- Food and beverage - Food and beverage services are based on campus.

In 2022 the University expenditure totalled \$209 million from over 2,000 unique suppliers.

2022 Total supply chain



2022 Expenditure excluding salaries



Part C – Risks of modern slavery practices in operations and supply chains of the university and subsidiaries

Risks in Operations

Bond University's primary source of revenue is generated from tuition revenue and the main input to deliver this service is domestic salaries (64% of total expenditure). With a large portion of staff highly educated, based primarily in Australia and engaged under applicable Collective Agreements and MOUs, the University assesses the risk to be low.

Risks in our Supply Chain

There are some risks within the University's supply chain given the diverse range of products and services purchased. Relative risk is shaped by recognised factors including geographic location and expenditure category.

Products and services identified as of higher-risk and significant annual spend include:

- Cleaning Services
- Building construction and maintenance services
- Desktop Hardware

Risks in Subsidiaries

The University's subsidiary entities, Campus Operations Pty Ltd and Lashkar Pty Ltd, are 100% owned and managed by Bond University Ltd. This statement is for the consolidated group.

Part D – Actions taken to assess and address risks

Bond University took the following actions to assess and address modern slavery risks in our operations and supply chain.

Collaboration with AUPN

Bond University continues to collaborate with the Australian Universities Procurement Network (AUPN), a collaboration of 38 Universities, and the Modern Slavery Working Group (MSWG). All AUPN member universities are actively contributing substantial resources, including staff time and expertise. This collaborative approach is the most effective way to share expertise to assess and address modern slavery through our operations and supply chain.

Biannual extraction of procurement data, cleansed and transformed to meet the AUPN taxonomy, has been submitted to AUPN for collation, analysis, and reporting. The analysis of consolidated expenditure data utilises the services of FRDM (pronounced Freedom). FRDM is a specialist in supply chain risk management software providing insights, visual optics, and risk classification. Risk classification is based on the associated industry, country of manufacturing/service delivery origin, purchases, and entity risk. A list of priority (highest risk) suppliers with whom oversight, and compliance efforts are prioritised.

The assessment of modern slavery risk within our supply chain is further evaluated with questionnaires to identify high risk suppliers. The questionnaire was developed to collect information including:

- Supply chains of goods they sell
- Reporting status under Modern Slavery Act
- Systems, processes, practices for identifying modern slavery

Guiding Policies and Procedures

Bond University has developed and implemented the policies listed below, which assist in addressing overarching risks of modern slavery within our operations and supply chains. Procurement guides for tendering incorporate specific assessment of modern slavery.

- Ethical Conduct
- Code of Conduct
- Conduct for Working with Children and Young Persons
- Public Interest Disclosure
- Sexual Exploitation, Abuse, Assault and Harassment
- Human Research Ethics
- Bullying and Harassment
- Workplace Health and Safety
- Procurement
- Student Regulation
- Student Code of Conduct

Training and education

Bond University has implemented a training program whereby key procurement staff undertake online training programs developed by the AUPN and FRDM. Information updates and advice to wider University procurement functions also ensures awareness of policies and compliance requirements. This is an area of continuous focus and development and will ensure knowledge and skills are maintained and improved.

Part E - Assessment of the effectiveness of actions

Bond University aims to continuously improve our processes to address the challenging and complex issue of Modern Slavery.

Action	Effectiveness
Understand the Legislation	Bond University understands the intent of the legislation and takes action to continue to comply and support making a genuine impact on modern slavery.
Engage with Industry Experts	Continuing engagement with AUPN, FRDM and the UPH (University Procurement Hub) provides the university with access to specialist advisors, synergies to seek in depth supply chain data and the ability to influence suppliers to ensure modern slavery is eliminated.
Procurement Process Updates	Our procurement and tender guidelines incorporate specific assessment when conducting new tenders to ensure compliance with the Act and has been successful in raising the awareness of modern slavery across the University.
Ongoing Supplier Analysis	Continuing progress in 2022 to build structures to enable assessment and awareness of modern slavery issues of compliance within our supply chain in conjunction with AUPN and FRDM. This will be an area of focus for continuous improvement as this cannot be a static assessment.



Part F – Consultation

The University's subsidiary entities, Campus Operations Pty Ltd and Lashkar Pty Ltd, are 100% owned by Bond University Limited and management across the three entities are consistent. The risk assessment, reporting and data for this statement is for the consolidated group.



Part G – Other information and conclusion

Bond University is proud of our progress to date. We are committed to the ongoing delivery of our initiatives and partnering with our stakeholders to eradicate modern slavery.

Our continual improvement process provides ongoing focus on:

- Continuing to develop the maturity of our supplier assurance program and deepen our supply chain knowledge.
- Implement education programs to an expanded range of personnel to inform and bring awareness across the university and our suppliers to prevent modern slavery.
- Continuous review and refinement of University policies and procedures to further support the endeavours of the Modern Slavery Act.

Through this multi-faceted approach to addressing modern slavery, Bond University is confident we will see meaningful progress on this global issue at our University and in the businesses that we engage with.

Signed

A handwritten signature in black ink that reads "Tim Brailsford". The signature is written in a cursive, flowing style.

Professor Tim Brailsford

Vice Chancellor and President

This statement was approved by the council of Bond University Ltd.