

# MODERN SLAVERY STATEMENT

2023

## **ACKNOWLEDGEMENT OF TRADITIONAL OWNERS**

La Trobe University proudly acknowledges the traditional custodians of the lands on which its campuses are in Victoria.

We recognise that Indigenous Australians have an ongoing connection to the land and the University values their unique contribution both to the University and the wider Australian society.

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# 1. INTRODUCTION

La Trobe University (“the University”) is dedicated to ensuring that our operations and supply chains uphold human rights and adopts a zero tolerance stance against slavery and human trafficking in any manifestation. The University aims to engage with suppliers who share its commitment to upholding and safeguarding human rights within their own organisations and supply chains.

This is the University’s fourth Statement pursuant to Part 2 of the *Modern Slavery Act 2018* for the reporting period 1 January to 31 December 2023. The Statement sets out the steps the University has taken and will take across our research, teaching and operational activities to address modern slavery.

## HELP AND ASSISTANCE

The University recognises that this document may evoke distress or concerns for individuals with lived experiences of modern slavery. If you, a close friend, or family member require assistance or would like to speak with someone, there are a range of support services available to help you.

If you are in immediate danger, contact triple zero (000) and follow the advice from the Police. If you are on campus and feel unsafe, contact triple zero (000) and notify Campus Security on (03) 9479 2222.

If you are a student and require specialised help and support, contact our Health, Wellbeing and Inclusion team on (03) 9479 8988 or find support service on the Health, Wellbeing and Inclusion Hub.

## LA TROBE OUT OF HOURS CRISIS LINE

Call 1300 146 307 or text 0488 884 100

## PSYCHIATRIC TRIAGE (OR CRISIS ASSESSMENT AND TREATMENT TEAMS):

CAMPUS	SERVICE	PHONE CONTACT
Melbourne (Bundoora)	Psychiatric Triage – North East	1300 859 789
Bendigo	Psychiatric Triage – Loddon Campaspe / Southern Mallee	1300 363 788
Shepparton	Psychiatric Triage – Goulburn & Southern	1300 369 005
Albury-Wodonga	Psychiatric Triage – North/Eastern Hume	1300 881 104
Mildura	Psychiatric Triage – Northern Mallee	1300 366 375

## LIFELINE

24/7 telephone counselling  
13 11 14

## SUICIDE LINE

24/7 telephone counselling  
1300 651 251

Further emergency contacts can be found at the University’s [Counselling and Emergency Support webpage](#).

## REPORTING CONCERNS

If you have suspicions or believe there may be instance of modern slavery within University operations or supply chains, please report your concerns by emailing [ssp@latrobe.edu.au](mailto:ssp@latrobe.edu.au).

# 2. ABOUT LA TROBE UNIVERSITY

La Trobe University (“the University”) is a higher education institution founded in 1964. The University was created to broaden participation in higher education among communities in Melbourne’s north and Victoria’s regional areas. The University is Victoria’s only true state-wide university, and our regional campuses continue to be central to the University’s identity, mission and purpose.

In 2023, the University (for the second year running) is the top improver among Australia’s top 20 universities in the QS World University Rankings, rising 74 places to claim the new ranking of 242 (out of 1,500 universities evaluated).

The University also rose more than 200 places to be ranked 166 in the world in the QS Sustainability Ranking 2024.<sup>2</sup>

The University is committed to creating a positive difference in the lives of our students, partners and communities. Ongoing challenges such as the COVID-19 pandemic, geopolitical issues in 2023, and extreme weather events linked to climate change have continued to impact the University’s operations. Global supply chain issues continue to impact our spending patterns. La Trobe is one of Australia’s most successful universities in pursuing multiple missions.

## OUR RESEARCH

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The University released a refreshed **Research Impact Strategy 2023 – 2025** in 2023 which is linked to five priority areas of the United Nations Sustainability Development Goals:

- sustainable food and agriculture
- resilient environments and communities
- healthy people, families and communities
- understanding and preventing disease
- social change and equity.

The University’s 2023 submission of **UN Global Compact Communication on Engagement** (for reporting period 2021-2022) also sets out our continued commitments in teaching and research, focusing on improving human rights. Outcomes include teaching of a human rights law subject, La Trobe Business School’s (LTBS) **Sharing Information on Progress Reports** (LTBS are a signatory to the United Nations’ Principles for Responsible Management Education (PRME)). Research focusing on improving human rights is conducted by La Trobe’s Violence Against Women Research Network (LAVAWN) which aims to foster innovative research in violence against women, its evaluation and knowledge translation, growing the University’s internal and external collaboration and partnerships on violence against women research. The University’s **Centre for Human Security and Social Change** also supports positive social change across the Pacific region through regional development and human rights projects in partnership with governments and NGOs.

<sup>1</sup> QS World University Rankings 2024

<sup>2</sup> QS World University Rankings: Sustainability 2024

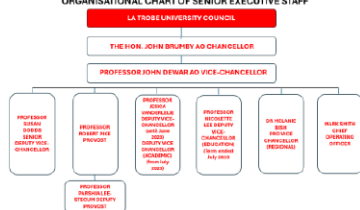
# 3. THE UNIVERSITY'S STRUCTURE, OPERATIONS AND SUPPLY CHAINS

## 3.1 STRUCTURE

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

The University Council is the governing body of the University and is chaired by the Chancellor.

ORGANISATIONAL CHART OF SENIOR EXECUTIVE STAFF



The Vice-Chancellor is appointed by the University Council and is responsible for leading and managing the University's academic, operational and external affairs, shaping, articulating and implementing the University's strategic objectives in research, education and contribution to public policy development.

Led by our Vice-Chancellor and senior executives, our organisational structure comprises several portfolios, as well as academic schools and departments.

The Senior Executive Group is the University's principal management committee and provides advice to the Vice-Chancellor on matters relating to strategy, planning, resourcing and operations.

Portfolios and academic schools and departments report as follows:

### OFFICE OF THE VICE-CHANCELLOR

- Alumni and Advancement
- La Trobe Art Institute
- Governance
- Government and Community Relations

### SENIOR DEPUTY VICE-CHANCELLOR (RESEARCH AND INDUSTRY AND ENGAGEMENT)

- Industry Engagement
- Global and Graduate Research
- Research Office
- Research Capability

### OFFICE OF THE PROVOST

- Strategy, Planning and Executive Operations
- Partnerships
- Facilities and Technical Services
- School Management and Specific Support
- Schools and Departments

### DEPUTY VICE-CHANCELLOR (ACADEMIC)

- Library
- Education Services
- Quality & Standards
- Executive Education
- Indigenous Strategy and Education
- Student Success
- Student Administration
- Health, Wellbeing & Inclusion
- Student Life

### DEPUTY VICE-CHANCELLOR (FUTURE GROWTH)

- Recruitment and International Operations
- Educational Partnerships
- Media and Communications
- Marketing, Digital and Insights

### PRO VICE-CHANCELLOR (REGIONAL)

- Bendigo
- Albury-Wodonga
- Mildura
- Shepparton

### CHIEF OPERATING OFFICER

- Finance, Procurement and Data Analytics
- Human Resources
- Infrastructure and Operations
- Information Services
- Commercial, Legal and Risk
- Strategy Realisation Office
- University City of the Future

View the University's Annual Report for further information on the University's structure.

### UNIVERSITY ENTITIES

In 2023, La Trobe University (ABN 64 804 735 113) owns two entities:

- LTU Services Ltd (ABN 62 642 748 463). LTU Services Ltd is a company that was established in late-2020 for education services. The entity has not operated and has no assets or revenue for the purposes of reporting in this Statement.
- La Trobe Ltd (ABN 78 618 827 615). As a result of COVID-19 impact, Warwick University (Franchisor - UK) decided to withdraw La Trobe Ltd (previously known as Unitemps) from Australia during the FY 2020. The decision was driven by the challenges of travel restrictions imposed by various governments, pressure on Warwick University finances and the significant shift in working environment in Australia. As a result, effective from 30 September 2020, La Trobe Ltd and Warwick University (UK) agreed to terminate the Franchise Agreement by mutual consent and effectively ceased its operations in Victoria. La Trobe Ltd has since remained dormant to 31 December 2023.

## 3.2 OPERATIONS

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

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

### OUR CAMPUSES

The University operates independently within Australia and has campuses in Melbourne's CBD, Bundoora, Bendigo, Shepparton, Albury-Wodonga, Mildura and Sydney. The Sydney Campus operates under a third-party teaching contract arrangement with Navitas Ltd, who deliver pre-university English language and academic pathway programs on behalf of the University, as well as undergraduate and postgraduate degrees.

### STUDENTS

In 2023, the University had a total of:

- 36,128 students (persons) (up from 2022 figures of 34,386). Of the 36,129 students, 25,461 were EFTSL, including international students
- rated the #1 university for student satisfaction<sup>3</sup> (from a survey of 2,447 current students and graduates from past 10 years with 86.2% overall graduate satisfaction and 95.1% of graduates gaining employment)<sup>4</sup>
- more than one in four students undertook a placement.

### STAFF

- 2,733 staff (FTE):
- 82.07% (2243) are full-time (an increase from 2022 figures of 2096)
- 17.7% (485) are part-time (an increase from 2022 figures of 443)
- 5.92% (162) are casual (a decrease from 2022 figures of 196)
- 55.8 (1697) are professional staff (an increase from 2022 figures of 1544)
- 44.2% (1346) are academic staff (an increase from 2022 figures of 1190)

The University respects all gender identities. We acknowledge the existing constraints with our data systems, which do not capture the full diversity of our University community.

<sup>3</sup> Canstar Blue, 2023, *Best-Rated Universities in Australia (2023)*

<sup>4</sup> Quality Indicators for Learning and Teaching (QILT), 2022 *Graduate Outcomes Survey*

## \$866.748M CONSOLIDATED REVENUE



36,100 TOTAL STUDENTS (PERSONS)



7 CAMPUSES



2,800 STAFF (FTE)



2,900 ACTIVE VENDORS



Efforts are underway to enhance our systems and data practices in relation to representing gender diversity. Presently our systems report the gender breakdown of staff (3,662 individuals) for 2023 as follows:

- 64.9% (2,379) are female
- 34.8% (1,275) are male
- 0.2% (8) are self-described.

### CONSOLIDATED REVENUE

The University had a total consolidated revenue of \$866,748,000 (up from 2022's total consolidated revenue of \$817,100,000).

## 3.3 SUPPLY CHAINS

The University has a large external supplier footprint, with more than 2,900 vendors in 2023. It procures a diverse range of goods and services to support the delivery of core business and campus operations, including but not limited to:

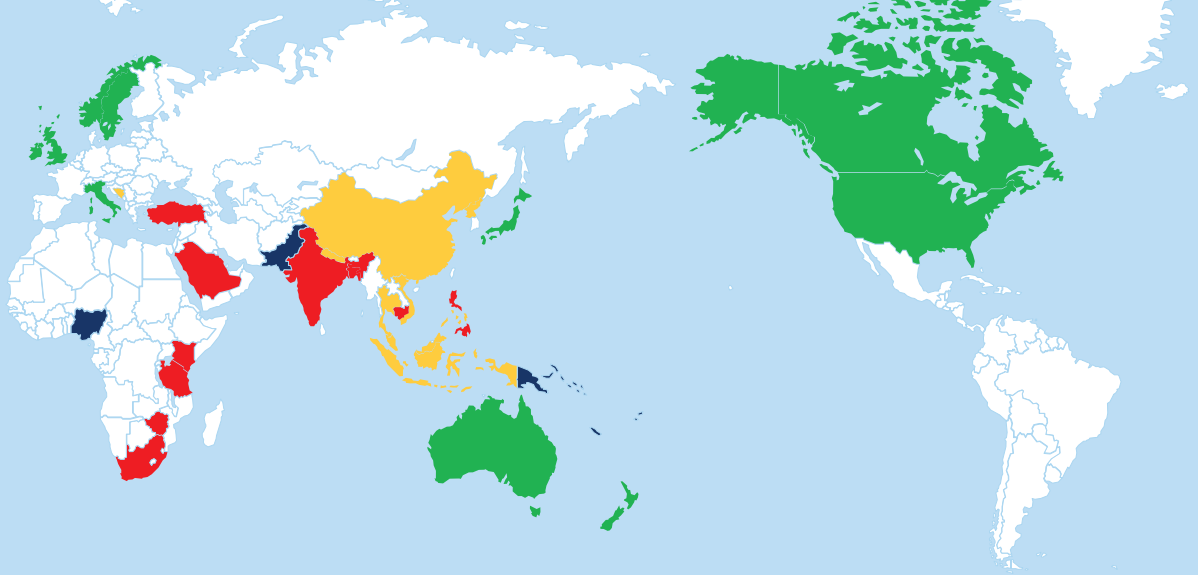
- technology (information services)
- telecommunications
- infrastructure and facilities management
- security
- cleaning
- construction
- marketing and media
- energy
- human resources and labour hire
- finance operations
- fundraising and investment
- library services
- travel services
- laboratory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

No matter the nature of our purchases, our commitment lies in responsible procurement practices. The predominant sources of first-tier goods and services are from Australian-based companies, and contributors to first-tier supply chains are mostly Australian-based companies. Possible risks are concentrated in the 2nd, 3rd and 4th levels of our suppliers' supply chains, largely because we often lack visibility into where our suppliers are obtaining their products further down these chains. This uncertainty is most evident in manufactured items, including the components or materials used in our computer equipment, mobile phones, vehicles, solar energy panels, laboratory essentials, clothing, cleaning agents and construction materials.

Higher Ed Services, a non-for-profit organisation owned by Universities Australia, established the Australian University Procurement Network (AUPN) with the aim of enhancing strategic procurement capabilities in Australian universities.

In 2023, a collaboration of thirty-eight Australian and three New Zealand universities, through the AUPN, continued their collective effort to identify modern slavery risks within their supply chains. This initiative, now in its second year, faced challenges with the initial analytical tool used. To overcome these obstacles, significant effort was dedicated by the AUPN Anti-Slavery Working Group towards finding a more effective solution. Following comprehensive feedback from the participating universities, the decision was made to shift to using the ArcBlue Consulting Dashboard for spend analysis in the 2023 Modern Slavery Statements, reflecting a sector-wide commitment to a more efficient analysis tool.





Geomap of supplier country risk

Very High High Medium Low

## ANALYSIS OF UNIVERSITY SPEND

In 2023, the University used the ArcBlue Dashboard to analyse country, category, spend and our overall risk<sup>5</sup>. The University expended \$433,140,000, engaging a total of 2,267 unique suppliers.

- \$399,240,000 (92.17%) of this spend was with first-tier Australian suppliers.
- \$33,900,000 (7.82%) of this spend was with first tier international suppliers.

## HIGH RISK COUNTRY SPEND

- \$8,958,581 (2.06%) of total spend was with 88 international suppliers in high and very high-risk countries<sup>6</sup>. The majority of this spend (39.22%) was with student recruitment/ placement agencies. The University’s risk management strategies for this high-risk country spend is outlined in our **Education Agent Management Policy**. This Policy ensures the University’s selection and management of education agents complies with obligations under all applicable acts, regulations and standards. Updated contract clauses set out the responsibilities and obligations of both the agent and the University in accordance with the Education Services for *Overseas Student Act 2000* which also cascades those requirements to their suppliers. Contracts are audited and potentially renewed at the end of the 2-year contract to ensure compliance with legislation and University policies.
- \$24,941,419 (5.75%) of the remaining high-risk category spend was predominantly spread across student recruitment, marketing materials, research and consulting services in low to medium risk international countries.

## BREAKDOWN OF TIER 1 HIGH/VERY HIGH-RISK COUNTRIES AND CATEGORIES

### HIGH-RISK SUPPLIER NUMBERS

HIGH/VERY HIGH-RISK COUNTRIES	CATEGORY OF GOODS AND SERVICES	NO. OF SUPPLIERS
India	Travel agency and airfare services	50
Pakistan	Student recruitment: – agency commissions	6
Sri Lanka	– marketing materials – advertising services.	13
Philippines	Student recruitment: – agency commissions – marketing materials – advertising services – scholarships.	3
Others: Saudi Arabia, PNG, Bangladesh, Timor-Leste, South Africa, Kenya, Cambodia, Nigeria, Turkiye, Zimbabwe, Tanzania.	Student recruitment, marketing materials, consulting (PNG) and (Timor-Leste), Advertising (Kenya and Turkiye).	16

### HIGH-RISK COUNTRY SPEND



\* Others include: Saudi Arabia, PNG, Bangladesh, Timor-Leste, South Africa, Kenya, Cambodia, Nigeria, Turkiye, Zimbabwe, Tanzania.

<sup>5</sup> Category Spend and Overall Risk Ratings used in the AUPN anti-Slavery Supplier Risk Dashboard are sourced from the 2023 Global Slavery Index; the ACAN (Australian Catholic Anti-Slavery Network); the RESPECT (Responsible and Ethical Private Sector Coalition against Trafficking); and the NSW Anti-Slavery Commissioner GRS Inherent Risk Identification Tool.

<sup>6</sup> Country Risk Ratings used in the AUPN Anti-Slavery Risk Dashboard are sourced from the Walkfree Global Slavery Index/downloads



# 4. THE RISKS OF MODERN SLAVERY PRACTICES IN THE UNIVERSITY'S OPERATIONS AND SUPPLY CHAINS

There are two primary areas of modern slavery risk within the University's operations; our people and our operations and supply chains.

## OUR PEOPLE

Our staff and students represent a diverse range of backgrounds. Our international student community is particularly vulnerable, often being young and new to our country. As they are still adapting to new customs, culture and laws, they are at a higher risk of exploitation by employers engaging in deceptive employment practices.

## INTERNATIONAL STUDENTS

Our student body boasts remarkable diversity, and we are dedicated to fostering a supportive and enriching student experience that empowers all individuals to flourish, broaden their horizons and gain the confidence to effect positive change in the world. We acknowledge the heightened vulnerability of our international students to exploitation and modern slavery risks.

A considerable portion of our international students are recruited through our network of recruitment agents, which may pose risks of deceptive recruitment practices, forced labour or debt bondage.

Our dedicated student services are committed to providing comprehensive support throughout their academic journey, from enrolment to graduation. Our support services extend beyond academic assistance, offering a wealth of information, assistance and guidance to help students transition to life in Australia.

We strictly adhere to the National Code of Practice for Providers of Education to Overseas Students 2018 and the

*Education Services for Overseas Students Act 2000* ("ESOS Act 2000").

The ESOS Act 2000 provides legislative requirements and standards for the governance of education and training institutions offering courses to international students. Education institutions must comply with the National Code of Standards to maintain their CRICOS registration. The National Code standard 4 relates to education agents and provides regulations governing them.

This standard sets out that registered providers must ensure their education agents act ethically, honestly and in the best interests of overseas students, and uphold the reputation of Australia's international education sector.

Standard 4 also makes explicit reference to the **Australian International Education and Training Agent Code of Ethics**.

La Trobe utilises a comprehensive Agent Management Framework, which outlines our internal processes for ensuring compliance to standard 4 and the Agent Code of Ethics. Our agents are reviewed twice a year against a number of commercial metrics but also against standards and behaviours pertaining to standard 4. A course of action is prescribed should our agents fail to meet those standards.

To meet additional standards within the National Code (Standard 1 – Marketing Practices; Standard 6 – Student Support

Services) the University is required to inform prospective students of support services available to them should they enrol at the University. This information is conveyed several ways to students, including through pre-departure seminars in their home country (often conducted with their education agent), pre-arrival digital communications and through the compulsory orientation that students must undertake upon arrival.

All international students are required to participate in an orientation program covering essential topics such as campus safety and available support services. During orientation, students receive vital information about living and studying in Australia, including employment rights and conditions, campus safety and guidelines for working in Australia.

It is crucial for students to understand their entitlements to work in Australia, who to contact in emergencies, and be aware of the available support services such as legal, health and emergency services, and other support resources.

Our **Living in Australia website**, **Living in Australia webinar** and other student materials provide valuable information on accommodation options, living costs, tenancy, rental resources and safety in Victoria and Australia. Due to limited rental properties near our campuses, in 2023, we offer newly enrolled international students an early bird offer of a 20% accommodation



grant discount for on-campus accommodation, providing a safe and supportive environment.

International students often seek part-time employment in low-skilled, low-paying industries like cleaning, hospitality, food manufacturing and construction to supplement their income while studying in Australia. Unfortunately, these jobs may lack union coverage and could expose students to exploitation by unethical employers.

To safeguard the rights of our international students, our student-focused 'International Students and Work Rights in Australia' website offers valuable resources. It provides information on allowable work hours, resources for employers, links to the Office of Fair Work Ombudsman, details on minimum wages and fair conditions, and a Fair Work Ombudsman Fact Sheet to educate international students on their employment rights in Australia. Additionally, we offer a career hub where international students can receive assistance with their resumes, interview skills and job search efforts.

## HEALTH, WELLBEING AND INCLUSION SERVICES

In 2023, our Health, Wellbeing and Inclusion (HWI) team continued to provide support to international students as part of their service offering.

Students can be referred to the team by teaching staff, or by other staff concerned for a student (with the student's consent). Students can refer to HWI to gain support around any life issues they may experience. If a student is identified as a victim of modern slavery, the counsellors, case managers, AccessAbility advisors and other HWI team members will support students to access safety, support the student to report the issue to relevant authorities, and provide confidential support and guidance. The team also works alongside the Safer Community team that supports students who have experienced concerning or threatening behaviour, such as: sexual harm, bullying, aggression, violence, discrimination, stalking or threats. Our Health, Wellbeing and Inclusion webpage serves as a central hub connecting students to a wide range of resources. The team provides free support to students including counselling, case management (Student Wellbeing Connect), and support to students for a range of issues, including: mental health, disabilities, ongoing medical conditions, financial challenges, legal concerns, LGBTIQ+ health and wellbeing matters, men's health and wellbeing matters, and support around spiritual wellbeing.

The team also runs women's safe places on all campuses, a wellbeing mentor service, and the University crisis line to support students after hours.

## OUR OPERATIONS AND SUPPLY CHAINS

The University operates within a complex network, with over 2,900 vendors supplying goods and services to support our academic activities and campus operations. Within these operations and supply chains, modern slavery could potentially exist among many of our suppliers (and further down their supply chains). This risk is particularly prevalent in countries with documented human rights violations, inadequate legal frameworks and high levels of low-skilled labour.

Identifying risks in our supply chains is complex. The University used several tools to identify risk areas in supply chains and assess processes in 2023. These included the NSW Anti-Slavery Commissioner's Guidance on Reasonable Steps to Manage Modern Slavery Risks in Operations and Supply Chains; *OECD Due Diligence Guidance for Responsible Business Conduct*, the AUPN (ArcBlue) Anti-Slavery Supplier Risk Dashboard 2023 and the 2022 List of Goods Produced by Child Labor or Forced Labor (Dept of Labor USA) and List of Goods. [Click here to download Excel sheet.](#)

The University acknowledges that we may procure goods and services from suppliers and supply chains where slavery may have been involved in the sourcing of raw materials and manufacturing processes. In assessing our supply chain for potential risks, we consider the nature of the goods and services we procure, as well as their sourcing locations.

Additionally, the activities of our researchers may also have connections to modern slavery. This could occur through the procurement of lab consumables, the research projects they undertake and the partnerships they establish worldwide.

## PROMOTING USE OF PRE-QUALIFIED CONTRACTED SUPPLIERS

The University promotes the utilisation of pre-qualified and socially responsible suppliers who adhere to and effectively address social procurement principles within their supply chains, aiming to identify and mitigate modern slavery practices. The University's Procurement Policy and guidelines mandate staff to prioritise engagement with existing vendors wherever feasible.

These vendors have undergone onboarding by the finance department and have been provided with educational materials on modern slavery. This includes guidance on identifying indicators of modern slavery within their own supply chains, along with a University contact number to report any suspicions of modern slavery occurring within the University's operations or in their own supply chains.

The University expects its suppliers to adhere to the same high standards, conducting due diligence within their supply chains to identify and mitigate risks of modern slavery. Suppliers may be requested to provide information about their supply chain risk assessments and the measures implemented to address potential risks.

## TENDERING

When tendering for potential suppliers, the University utilises comprehensive tender documentation that includes a risk reducing sourcing strategy, which enquires about the supplier's modern slavery and broader supply chain transparency procedures. This practice aids in our evaluation and comprehension of potential modern slavery risks within the supply chains of prospective suppliers. The assessment of risk levels considers factors such as industry/category type, manufacturing locations, and the potential for modern slavery to exist in the supplier's supply chains.

## RAISING CONCERNS OF SUSPECTED MODERN SLAVERY

Our procurement guidelines set out the procedure to be followed when a staff member or supplier raises concerns regarding suspected modern slavery in our operations or in a supplier's operations. When a concern is reported to our Executive Director Procurement and Business Services, a comprehensive investigation will ensue, including discussions with the relevant individual within the supplier organisation, and requests for corrective actions to address the concerns and safeguard vulnerable workers. If the University finds that satisfactory action has not been taken, it will initiate remedial measures within the terms of the contract.

Simultaneously, the University will assess the appropriate timing and method for reporting the concerns to relevant authorities, with the overarching goal of preventing further harm to the victim. All discussions and actions taken will be documented for audit and reporting purposes to our Senior Executive Group and Corporate Governance and Risk Committee.



# 5. ADDRESSING MODERN SLAVERY

## 5.1 PRIOR ACTIONS AND ONGOING COMMITMENT

Since the *Modern Slavery Act 2018* (Cth) was enacted, the University has taken strategic measures to manage risks related to modern slavery in its operations and supply chains. These measures include modifying policies, vendor qualification procedures and regular review of contract clauses. The University expects that its suppliers will maintain the same high standards as the University itself and to cascade these requirements down their supply chains ensuring compliance with legislation across the entire supply chain.

Predominantly underpinned by active collaboration at a sector level, there remains ongoing reviews of high-risk spend at both category and geographic layers.

## 5.2 ACTIONS COMPLETED IN 2023

While there were no reports to our Executive Director Strategic Procurement and Business Services in 2023 of suspected modern slavery in our operations or supply chains, Strategic Procurement:

- are vigilant in assessing new suppliers for potential modern slavery risks
- performs monthly checks of the Australian Border Force Sanctions Imposed on Sponsors of Skilled Foreign Workers List and cross references it with our list of suppliers

- desktop audits verify modern slavery policies; procedures; request for steps taken to ensure modern slavery has been identified and addressed in supply chain of all goods and/or services procured by their organisation; evidence of education and training conducted within the organisation (as well as insurances; working with children checks; sustainability ISO certificates; sustainability plan; UN Global Compact communication on progress; and commitments to net zero.

### SOLAR PANELS

In September 2023, the University unveiled a significant infrastructure initiative aligned with our commitment to achieve net zero by 2029. This project involves establishing the largest urban solar farm in Victoria, featuring approximately 4,300 solar panels. While this project aims to contribute to our net zero target, our Procurement team has identified a potential risk of inadvertently supporting modern slavery. This risk arises from the sourcing of polysilicon, a critical key component in solar panels, and the manufacturing of solar panels in countries with reported state-imposed forced labour – such as the Xinjiang Uyghur Autonomous Region in China, and the Democratic Republic of the Congo.

The Global Slavery Index 2023 report highlights that Australia imports over US\$17.4 billion of high-risk goods, including solar panels, with a significant portion originating from China where

Uyghurs and other Turkic and Muslim groups may face state-imposed forced labour. Around 45% of the world's solar grade polysilicon is produced in the Uyghur region.

Despite the *US Uyghur Forced Labor Prevention Act* preventing the entry of solar panel modules produced in Xinjiang into the US, there is a concern that such products intended for the US may enter the Australian market<sup>7</sup>. The University's commitment to addressing this issue led to a comprehensive examination of our procurement tender process and selection of the solar panel supplier.

### NET ZERO/SUSTAINABILITY TEAM'S EFFORTS IN NAVIGATING THE RISKS ASSOCIATED WITH SOLAR PANEL PROCUREMENT

The University's solar farm tender process prioritised ethical considerations. The University issued a Request for Proposal (RFP) in December 2022, receiving five submissions in February 2023. A diligent evaluation found 2 suppliers were non-compliant and the remaining three were invited to present their proposals to the evaluation panel in March 2023. Qualitative and quantitative evaluation was conducted by a panel of seven members, including three external expert consultants, and identified Next Generation Electrical Group Pty Ltd (t/as Next Generation Electrical) as the preferred tenderer.

<sup>7</sup> PV Tech article "ESMC demands ban on selling modules made with forced labour" (By Simon Yuen, 22 Sept, 2023)





## TIER 2 SUPPLIER

Next Generation Electrical (NG/E) demonstrated a commitment to minimising modern slavery risks in its procurement processes through their tender responses, policies and proposal. For the University's solar farm project, NG/E's procurement team tendered for a solar panel supply chain with minimal risk of modern slavery being present and considering the University's modern slavery commitments, processes and procedures. NG/E's tender process identified Trina Solar (Australia) Pty Ltd as the preferred supplier for our solar farm project.

Trina Solar (Australia) Pty Ltd is an Australian private company and wholly owned subsidiary of Trina Solar Group whose parent company, Trina Solar Co Ltd was founded in 1997 with its headquarters based in Changzhou City, Jiangsu Province, China. Trina Solar Group is a world-leading photovoltaic (PV) and smart energy total solutions provider that provides solar panels to EPC project partners, constructors of solar farms and wholesalers. Trina Solar Group are committed to corporate social responsibility including eliminating all forms of modern slavery and to conducting business ethically and in compliance with all laws, rules and regulations in the places and countries where it operates. Their commitments are implemented through their code of business conduct and ethics, their social responsibility management regulation, Trina Solar Global human rights

principles and other guiding principles within their suppliers' verification and human resource management systems.

## TRINA SOLAR SMETA/SEDEX REPORTS

SMETA Audits were conducted in 2023 on two Trina Solar factories located in China which were provided to the University through the due diligence tender process. The SMETA reports revealed the following information:

- Evidence examined included a worker's manual, written policy meeting human rights and labour standards, factory rules, social compliance management handbook, and training records.
- No complaints were reported by the workers who were interviewed separately, assured of confidentiality and spoke freely of their views of the factory.
- Employees have channels to raise human rights issues confidentially, such as through suggestion boxes or a hotline to the factory. This also includes an on-site union.
- Evidence of wage and benefit policies, employee handbooks, annual leave records, social insurance, payment receipts, and payroll and attendance records for the past twelve months were provided.
- There was no evidence of workers paying fees, taxes or bonds for recruitment purposes, and no recruitment agencies were used.

- Non-compliance issues included inaccessible or locked fire extinguishers, malfunctioning emergency exit lights, improper installation of chemical containers without secondary containers for anti-leaking, and some employees not taking at least one day off per week.

## WHAT THE SMETA REPORTS DON'T REVEAL

The SMETA report for Trina Solar Yiwu Technology Co Ltd based in Suxi Town Yiwu City, Zhejiang Province, China indicates they have two 6-storey dormitories on site but did not provide any information on whether their staff use the accommodation and if so, the conditions of that accommodation for staff at the factory. The report makes no reference to the number of staff accommodated, no reference to an inspection of the accommodation, nor whether the living conditions are adequate and meet legal requirements.

The report indicates that:

- all site accommodation buildings are included in the audit
- they have no off-site provided worker accommodation buildings
- no restrictions were found to workers' freedom to leave the site at the end of the working day.

No further information is provided regarding the dormitory buildings and whether staff are using the on-site dormitories.



## PROCUREMENT RECOMMENDATION

While the University has not received direct feedback from staff or suppliers, it is heartening when key stakeholders inform the Strategic Procurement team that our staff are inquiring about the origins of products and the sourcing of raw materials. This demonstrates that our educational efforts are effective and that the message about scrutinising suppliers is resonating. It is important to note that there are multiple channels available for providing feedback. We offer this to suppliers and staff through a dedicated public webpage – [Doing Business with La Trobe].

## SUPPLIER RELATIONSHIP MANAGEMENT

In late-2023, construction commenced on the solar farm site, marking a significant milestone in our commitment to sustainable practices. Throughout 2023 and early-2024, our project team actively engaged in regular meetings with NG/E, emphasising the critical importance of minimising modern slavery risks within our solar panel supply chains. The University acknowledges the inherent challenges in achieving this goal, particularly when sourced minerals and components are likely to have originated from countries with reported state-imposed forced labour.

By advocating for comprehensive details in SMETA reports and fostering continuous dialogue with our partners, we aim to create a supply chain that upholds human rights, fair labour practices and ethical standards. Our supplier relationship management initiatives involve ongoing discussions with tier 1 suppliers, specifically focusing on mitigating the risk of modern slavery in the sourcing of solar PV modules.

## ELECTRIC VEHICLE BATTERIES

Just as we encounter risks when sourcing solar panels, the University faces similar risks in the car manufacturing industry. In 2022, the International Aluminium Institute reported that 59% of global primary aluminium production occurred in China. Cobalt – crucial for lithium-ion batteries in electric vehicles – comes from countries like Xinjiang Uyghur Autonomous Region in China and the Democratic Republic of the Congo, where state-forced labour is reported. This raw material sourcing for vehicles, parts and EV batteries poses a risk of inadvertently supporting modern slavery, as identified by the University.

In 2023, the University expanded its electric vehicle fleet by leasing an additional six vehicles, bringing the total to 16 EVs across three campuses accessible to staff (Bundoora, Bendigo and Albury-Wodonga).

Procurement conducted a desktop review of *Hyundai's Modern Slavery Statement 2022*, along with their Supplier Engagement Policy and Supplier Code of Conduct. Hyundai engaged with key suppliers, issued surveys, identified risks and continues to monitor compliance with new suppliers and key stakeholders. While Hyundai manufactures its vehicles in South Korea and Czech Republic, which have low to medium modern slavery risk ratings<sup>8</sup>, Hyundai enforces strict compliance with labour laws and has codes of conduct addressing modern slavery.

However, Hyundai's suppliers for spare parts, brake pads, batteries and electronics are imported from medium and high-risk countries. Hyundai's Australian supplier screens its own suppliers, takes corrective and preventative actions, conducts regular assessments and plans to introduce audits. Hyundai recognises risks stemming from a lack of visibility in raw material sourcing and manufacturing locations.

The University engages in discussions with our key stakeholders regarding supplier transparency and the potential risks of modern slavery within supply chains. We advocate for collaboration among industry leaders, similar to the collaboration universities engage in through the AUPN, to mitigate modern slavery risks across supply chains.

## STRATEGIC PROCUREMENT

In 2023, Strategic Procurement:

- Conducted a comprehensive review leading to the revision of the Procurement Policy and the development of a new Procurement Procedure, superseding the previous Procurement Guidelines. This initiative ensures strict compliance with legislative requirements and enhances the modern slavery management framework, addressing potential risks associated with human trafficking or labour abuse within our supply chains.
- Delivered a modernised and holistic framework to procurement that places an active focus on environmental, social and governance (ESG) factors, of which modern slavery will remain a core focus.
- Implemented new RFX sourcing materials that will ensure routine and consistent modern slavery and ESG messaging – the University is sending a clear message to suppliers that these issues are apportioned with increased importance, now weighted beyond ensuring baseline compliance.

## POLICY, PROCEDURE AND GUIDELINES

The University has reviewed and updated existing policies, procedures and guidelines which articulate its dedication to upholding human rights principles and supports a diverse and respectful learning community and workplace. Among our key policies reinforcing our zero tolerance stance towards modern slavery and human trafficking are:

- Public Interest (Whistleblower) Disclosure Policy
- Diversity and Inclusion (Staff) Policy
- Gender Equity Policy
- Charter of Student Rights and Responsibilities
- Student Behaviours Policy
- Workplace Behaviours Policy
- Sexual Harm Prevention and Response Policy
- Sexual Harm Prevention and Response Procedure – DFAT Funded Program and Activities
- Working with Children Policy
- Child Safety and Wellbeing Policy
- Code of Conduct.

These commitments are disseminated through staff and student induction, training and communication channels.

The University Policy Library is the sole authoritative source of all organisational policy documents for the University and is available to all staff and to external suppliers via our public-facing website.

## SCHOLARSHIPS

### LA TROBE HUMANITARIAN SCHOLARSHIPS

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

In 2023, the University offered three specific scholarships to asylum seekers or refugees holding a Temporary Protection Visa (TPV) (subclass V785), a Bridging Visa class E (BVE) (subclass VO50 or VO51), a Safe Haven Enterprise Visa (SHEV) (subclass V790), a Temporary Humanitarian Concern (786) or a temporary Humanitarian Stay Visa (449).

The scholarships are for undergraduate studies commencing in 2024 and cover all tuition costs, including an AUD \$7,000 annual cost-of-living bursary for the normal duration of the degree. The University is offering five humanitarian scholarships in 2024.

<sup>8</sup> Country Risk Ratings used in the AUPN Anti-Slavery Risk Dashboard are sourced from the Walkfree Global Slavery Index/downloads

## SHAH RUKH KHAN LA TROBE UNIVERSITY PHD SCHOLARSHIP

La Trobe University was the first Australian University to award Shah Rukh Khan with his first Australian Honorary Degree, Doctor of Letters (honoris causa) in 2019. This prestigious honour was presented in recognition of Shah Rukh Khan's wide-ranging humanitarian work, including establishing the Meer Foundation to support and empower women who have survived acid attacks in India.

The first Shah Rukh Khan La Trobe University PhD scholarship was announced in 2019.

Applications for the second PhD Scholarship were opened in August 2022. The successful recipient was selected in 2023 and announced in March 2024.

## OUR RESEARCHERS

Our researchers and teaching staff actively engage in educating our staff, students and communities through mediums such as lectures, articles, webinars, and books on the crucial topics of modern slavery and human rights. They are dedicated to investigating, uncovering and shedding light on the distressing realities of modern slavery and exploitation across numerous industries. These efforts aim to raise awareness about the exploitation of vulnerable individuals involved in supplying us with essential services, food, clothing and raw materials for manufacturing.

Our La Trobe Asia team is also making significant contributions, notably through their seminar program. In 2023, presentations by University academics included discussions on modern slavery, bringing attention to the crimes and activities that undermine human rights. These initiatives underscore our commitment to addressing and combatting modern slavery and promoting human rights.

## AUPN PROGRAM KEY ACHIEVEMENTS IN 2023



### DATA AND TECHNOLOGY

- FY2022 data upload to FRDM tool
- FRDM Participation Agreements signed – 35 Universities
- Modern Slavery software review and recommendation
- ArcBlue engaged to provide 2023 modern slavery risk dashboards



### TRAINING AND CAPACITY

- Monthly University Modern Slavery Forum meetings with expert guest speakers
- FRDM software training sessions/recordings/user guides
- AUPN Portal set up with internal and external MS training resources



### FRAMEWORK

- University Media Alert process approved and implemented
- Expert legislative guidance guest speakers at forum presentations
  - > NSW Anti-Slavery Commissioner
  - > Monash Centre for Financial Studies



### ENGAGE AND COMMUNICATIONS

- AUPN LinkedIn activity
- Engagement with community and industry
- The Faculty Presentation
- London University Purchasing Consortium
- Australian Red Cross
- Electronics Watch
- The Mekong Club
- Be Slavery Free
- Australian Catholic Anti-Slavery Network
- TelcoTogether
- SA Modern Slavery Network



### GOVERNANCE

- University Anti-Slavery Program Manager commences
- New Academic Advisory Board & Working Group members appointment
- Academic Advisory Board meeting
- Monthly Anti-Slavery Working Group meetings
- Monthly reporting on program results to AUPN Executive



### THIRD PARTY ENGAGEMENT

- Australian Red Cross International Student Worker Exploitation Hub project initiated
- Contributed modern slavery data requirements into the University Procurement Analytics Service Project
- Electronics Watch pilot

## AUSTRALIAN UNIVERSITIES PROCUREMENT NETWORK (AUPN) ANTI-SLAVERY PROGRAM

The University Procurement team have a strong relationship with AUPN. Our Executive Director Procurement Business Services is Co-Chair of the AUPN and our Procurement Process & Projects Advisor is a member of the Modern Slavery Software Assessment Group. Procurement attend and contribute to the University Anti-slavery Forum monthly updates.

The key achievements of the AUPN Anti-Slavery Program for 2023 include:

The monthly University Anti-Slavery forum program highlights 2023 included:

- monthly forums with guest speakers
- media alert response process established (media alerts summarised at each forum and high-risk/high influence alerts discussed/due diligence for each University and other actions required).
- Cleaning Accountability Framework established with opportunity to collaborate on project
- access to modern slavery literature and training tools (available through the AUPN portal)
- shift to ArcBlue Modern Slavery Risk Dashboard for 2023 data
- addressing International Student Risk with Australian Red Cross and ACRATH (Australian Catholic Religious Against Trafficking in Humans). Meetings in 2023 with ARC and ACRATH discussed University tools currently available to international students, feedback on what universities think are the issues/barriers, demonstration of the WRH, and discussion on proposal to adapt tool specifically for international students.

## MATURING A SECTOR-WIDE TECHNOLOGY SOLUTION

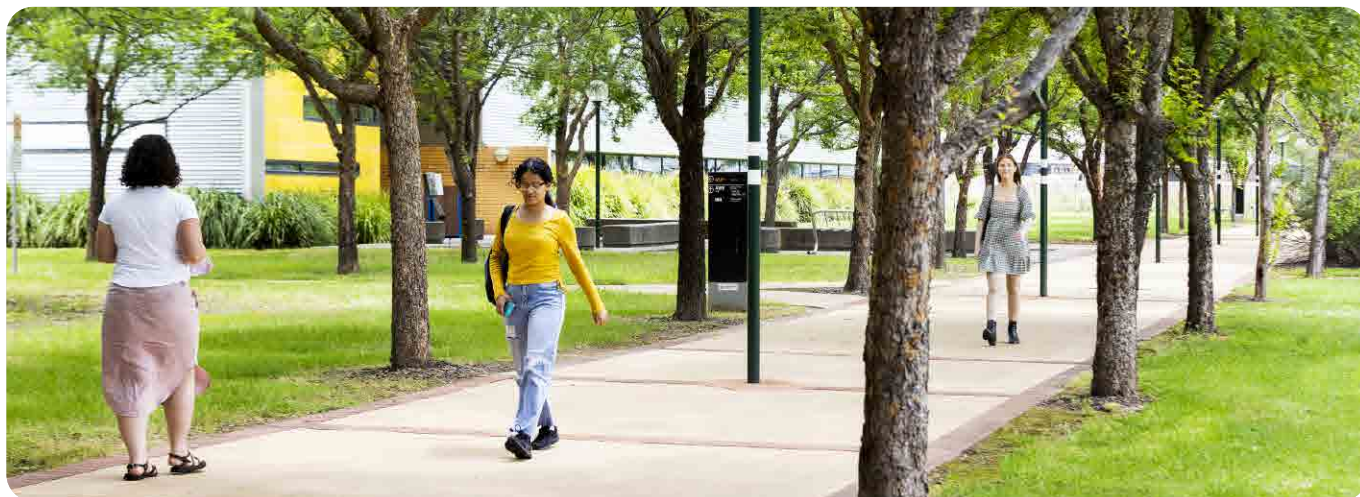
- The AUPN tendered for a technology solution that would deliver functionality for individual universities and the sector collaboration. The evaluation team assessed over 16 solutions and FRDM was recommended as the preferred supplier. AUPN acknowledged that the FRDM tool didn't meet all University criteria as the *Modern Slavery Act* was new in Australia and organisations were developing new tools to meet the functionality of the Act.
- After 2 years working with FRDM, some universities have questioned the use and value of the FRDM Tool. In September 2023, universities were invited to complete a survey on the tool and alternative solutions. Feedback was then presented to the AUPN Executive. It's important to note that the AUPN Anti-Slavery team have spent an inordinate amount of time working with FRDM to develop the tool and address ongoing technical issues. One issue was that FRDM changed their risk methodology, which meant we had a misalignment with how FRDM measured risk and how business in Australia measured risks.
- The AUPN Executive remains committed to offering a program that addresses the requirements of all university members and has chosen to revert back to ArcBlue for data analysis in 2023. AUPN has formed a new software assessment group to potentially tender in 2024, but that decision has been postponed until new implementation of the new Sievo software (another AUPN initiative). The AUPN/ArcBlue Dashboards were utilised for spend analysis in 2023.

## NEXT STEPS

During 2024, the University aims to:

- Through the AUPN, collaborate with Australian Red Cross and ACRATH on a project to develop a section of the Australian Red Cross' Work Right Hub (WRH) to be tailored to the risks international students may experience in Australia. The project team will adapt materials on the WRH to support international students in identifying signs of exploitation and understanding avenues of support. Information on workers' rights in Australia, exploitative situations and how and where to go for trusted advice and support. The materials are also intended for frontline responders in universities on indicators of labour exploitation and avenues of support.
- Procurement team will continue modern slavery supplier risk assessment through questionnaires targeted to suppliers in high-risk categories.
- Procurement team will persist in educating and fostering understanding about modern slavery, ESG principles, and additional ethical and sustainable procurement practices among specific groups across the University.
- Procurement team will further engage in collaboration with key suppliers and other universities to exchange knowledge and minimise duplication in supplier efforts. Collaboration with key suppliers aims to educate and empower suppliers to recognise instances of modern slavery within their own supply chains.

By implementing these measures, the Strategic Procurement team will uphold its commitment to promote responsible and ethical procurement practices, mitigate the risk of modern slavery, and reinforce the University's dedication to social responsibility and sustainability.





# 6. HOW THE UNIVERSITY ASSESSES THE EFFECTIVENESS OF ITS ACTIONS

In 2023, the University continues to strengthen its due diligence processes. While every staff member is reasonably accountable for managing risk, each business unit is also responsible for due diligence in their own unit's processes. The University's Procurement, Finance, Risk Management, Research, Information Services and Infrastructure and Operations teams have due diligence processes in place and carry out regular reviews on their processes and suppliers through their supplier relationship management frameworks.

The University's standard terms and conditions (T&Cs) requires our vendors comply with applicable labour, anti-slavery, human rights and human trafficking legislation and regulations in Australia and worldwide. The T&Cs recommend that vendors implement and maintain appropriate processes, procedures and policies to address modern slavery risks in their own operations and supply chains. Our T&Cs also note that the University may request reasonable documentation from a vendor to validate compliance with the *Modern Slavery Act 2018*. Our T&Cs ensure our suppliers work with us in tackling modern slavery throughout their supply chains.

## PROCUREMENT OPERATIONS AND STRATEGIC PROCUREMENT

Procurement Operations and Strategic Procurement conduct routine due diligence when onboarding new vendors or contractors. Where the University has a preferred contractor in place, staff are directed to use them. In cases where there is no preferred supplier in place, an assessment is carried out on the vendor's industry and country of origin to evaluate the risk of potential modern slavery. However, there remains instances where staff bypass University procedures and engage a supplier without proper due diligence, then raise a purchase order for payment of the invoice. In such cases, the P2P process directs the request to the Strategic Procurement team who scrutinise and challenge the request.

## CASE STUDY: DUE DILIGENCE ON A SUPPLIER

- A staff member engaged a t-shirt printing company to supply and print t-shirts for a University event.
- As the supplier was not a contracted supplier, a new vendor request was initiated, alerting Strategic Procurement. Strategic Procurement investigated why the staff member hadn't used the University's preferred on-site uniform and apparel supplier.
- Strategic Procurement then reviewed the t-shirt supplier's website, which lacked any mention of ethical purchasing practices or details regarding the manufacturing/origin of

their t-shirts. Additionally, their terms and conditions specified that their terms of service were governed by the laws of the supplier's address (not the appropriate State of Victoria). This supplier was deemed non-compliant and unsuitable for business dealings with the University.

- Strategic Procurement informed the staff member of the outcome of their investigation, the reasons why the supplier was non-compliant and that future apparel requirements must be directed to the University's modern slavery compliant apparel provider.

## UNIVERSITY'S COMPLIANCE MANAGEMENT FRAMEWORK AND RISK MANAGEMENT STRATEGY

The University's Compliance Management Framework and Compliance Management Policy outlines the University's commitment to legislative compliance, and establishes a structure to support the University in managing obligations imposed by law.

The University Council emphasises risk management as a key platform of corporate governance and a vital component of effective decision making. The Council's Corporate Governance, Audit and Risk Committee (CGARC) provides oversight of risk management and assurance activities across the University. Where our Director of Strategic Sourcing and Procurement has undertaken an investigation into a report of suspected modern slavery, and a breach has been found, this is reported to our CGARC.





## ASSURANCE GROUP

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The University's Assurance Group is responsible for delivering key strategic and operational risk management programs. Risk management is undertaken using a university adaptation of the Victorian Government Risk Management Framework and Australian and New Zealand Standard (AS/NZS ISO 31000:2018). Identification, assessment and progress on risk treatment is reported to management and CGARC at quarterly meetings.

## FINANCIAL INVESTMENTS

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The University's responsible investment framework is guided by clear objectives that align with its Investment Policy, which dictates the exclusion of certain products or services from investment portfolios if they do not align with the University's principles.

## ONBOARDING INFRASTRUCTURE AND OPERATIONS CONTRACTORS

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Proposed partners of Infrastructure and Operations must provide details within their quotation/tender submission on the measures their organisation takes to ensure the absence of modern slavery practices within their operations and supply chain. Prior to the issuance of a contract to a preferred partner, the partner must register and attain compliance within the University's contractor management system, Rapid. This entails completion of a supplier questionnaire and submission of compliance documents for review and approval. The University evaluates the registration details and either approves the partner or requests further information to validate compliance. Contractors engaged by the partner must complete an induction in Rapid before being granted access to campus

premises. The induction material includes information on modern slavery, including a high-level summary of the types of modern slavery. The quality management process requires partners to re-register within Rapid every five years and contractors to re-do their inductions every two years.

## FEEDBACK

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Although we don't receive feedback from staff or suppliers, it is heartening when key stakeholders inform Strategic Procurement that our staff are enquiring about the origins of products and the sourcing of raw materials. This demonstrates that our educational efforts are effective and that the message about scrutinising suppliers is resonating.

# 7. THE PROCESS OF CONSULTATION WITH UNIVERSITY ENTITIES

The Finance team consulted with the Director and Company Secretary of LTU Services Ltd and La Trobe Ltd regarding the structure and status of the entity. Neither LTU Services Ltd nor La Trobe Ltd had any revenue or assets in 2023 and are not required to report under the *Modern Slavery Act 2018*.

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# 8. OTHER RELEVANT INFORMATION

Nil.

# 9. APPROVAL

This Statement was approved by Out of Session Council approval completed on 11 June 2024 (No. 3 Council OOS for 2024).



(sgd)

Professor Theo Farrell  
Vice-Chancellor and President  
La Trobe University

Dated: 25-06-2024

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