



Modern Slavery Statement

STRATEGY AND ASSURANCE



UNIVERSITY
OF WOLLONGONG
AUSTRALIA

2023



1 Acknowledgement of Country

We acknowledge that Country for Aboriginal peoples is an interconnected set of ancient and sophisticated relationships.

The University of Wollongong spreads across many interrelated Aboriginal Countries that are bound by this sacred landscape, and intimate relationship with that landscape since creation.

From Sydney to the Southern Highlands, to the South Coast.

From fresh water to bitter water to salt.

From city to urban to rural.

The University of Wollongong Acknowledges the Custodianship of the Aboriginal peoples of this place and space that has kept alive the relationships between all living things.

The University Acknowledges the devastating impact of colonisation on our campuses' footprint and commit ourselves to truth-telling, healing and education.

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A message from the Vice-Chancellor

The University of Wollongong (UOW) is committed to the protection of human rights, to championing diversity and inclusion and to making a positive impact in our local and global communities. We are opposed to all forms of modern slavery and are striving to create meaningful change in our business operations, our supply chains, and to raising awareness amongst our staff and students about slavery-like practices so as to respond to and reduce the risks of modern slavery.

Modern slavery involves the exploitation of people for financial or personal gain. The practices of modern slavery violate fundamental human rights and are antithetical to the goals and values of the UOW and our commitment to making change that matters to meet this challenge.

Our fourth annual Modern Slavery Statement reports on actions taken during 2023, in collaboration with our controlled entities, UOW Global Enterprises and UOW Pulse, to identify, respond to and assess the effectiveness of our response to modern slavery risks. While continuing to monitor our supply chains and raise awareness about modern slavery amongst our staff, in 2023, we focused on increasing awareness of slavery-like practices that could potentially affect our students, particularly our international students, such as employment exploitation, debt bondage, sexual exploitation and forced marriage, and laying the foundations for an enhanced risk management framework to help build a more rigorous approach to identifying, controlling and monitoring these risks moving forward.

We recognise that modern slavery is a complex issue, requiring collaborative and multifaceted responses to its many aspects. As modern slavery practices can be deeply entrenched in the way our global economy works, it is important we contribute to structural solutions involving the collective efforts of government, non-government organisations, the public and private sector, and us as individuals. We particularly recognise that the higher education sector is well placed to lead real change in the efforts to end the global challenge of modern slavery through its research, partnerships and global reach. The University of Wollongong enterprise is committed to meeting our obligations under modern slavery legislation and to implementing sustained and ongoing contributions to eradicate modern slavery around the world.



Professor John Dewar AO
Interim Vice-Chancellor and President





3 Introduction

At UOW, we recognise the role universities can play in eliminating modern slavery practices. As a public institution we have a wide sphere of influence, serving diverse communities in Australia and internationally; providing thought leadership; and influencing supplier behaviour so we are well-placed to contribute to the prevention of modern slavery.

In 2023, UOW built on the work of previous years and expanded our focus to raise awareness of slavery-like practices potentially affecting our students. Through the provision of online information, advice and resources, we increased the understanding of global and local modern slavery practices amongst our staff and students.

This Modern Slavery Statement is made in accordance with the *Modern Slavery Act 2018 (Cth)* and outlines the approach taken by UOW and its subsidiaries to identify and address risks of modern slavery in our operations and supply chains during the year ending 31 December 2023.

This is a joint statement which covers:

- the University of Wollongong ('University' or 'UOW') (ABN 61 060 567 686); and
- UOWGE Ltd trading as UOW Global Enterprises ('UOWGE') (ACN 628635 067), as UOW's subsidiary reporting entity.

This Statement also includes information about UOW Pulse Ltd ('UOW Pulse') (ABN 28 915 832 337) which, along with UOWGE, is a key controlled entity of UOW. These three entities have worked collaboratively during the reporting period to ensure consistency in the approaches we take to reduce modern slavery and to ensure our efforts to address modern slavery extend to all aspects of our operations.



Who we are

UOW is a vibrant and modern university, ranked 30th in the world by the Times Higher Education Young University Rankings in 2023. We are a research-intensive university with an outstanding reputation for our learning environments across a broad range of disciplines. Our commitment to our students is evidenced in our graduates, who are recognised for their capability, quality and success in the global workplace. At UOW, we are committed to social justice, locally and globally. Our efforts to make an impact in relation to the United Nations Sustainable Development Goals (SDGs) were recognised in 2023 when we were ranked 61st in the world by the Times Higher Education Impact Rankings 2023. This is significant as one of the targets under SDG 8 is to take action and end forms of modern slavery.

Our organisational structure

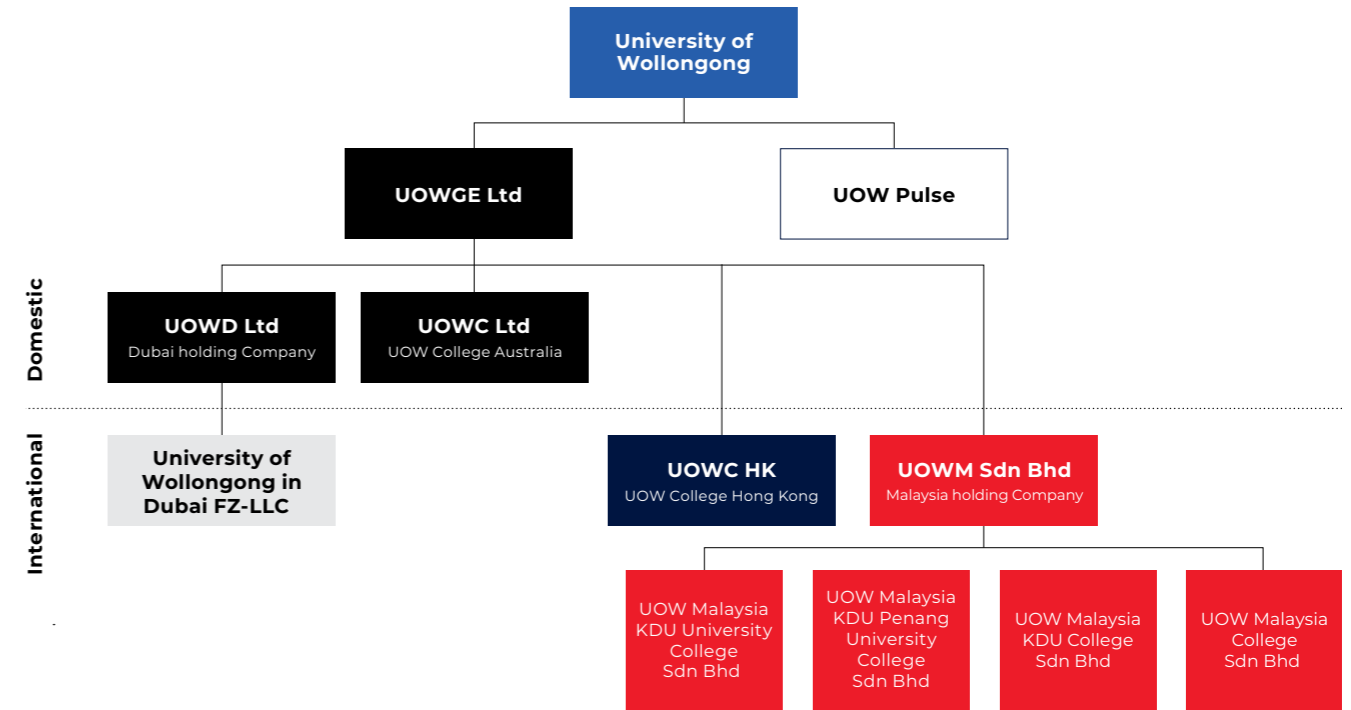
UOW is a statutory corporation, currently established under the *University of Wollongong Act 1989* (NSW) (the UOW Act). The University Council (the Council) is the governing body of the University. The Council acts for and on behalf of the University and controls and manages the University's affairs and concerns. The role of Council includes guiding the strategic direction and development of the University in achieving its functions and overseeing the UOW policy framework to ensure compliance with relevant legislative requirements.

Council consists of 17 members including external members with a wide range of skills and expertise, academic staff, professional services staff, students, and alumni. The Chancellor, Vice-Chancellor and Chair of Academic Senate are ex-officio positions on Council. The Chancellor, Mr Michael Still, is the Chair of Council.

The Council is advised by the Academic Senate and a number of committees which have oversight of significant areas of the University's operations and governance, including the Risk, Audit and Compliance Committee, the Finance and Infrastructure Committee and the People and Culture Committee.

UOW Pulse

UOW Pulse is a subsidiary of the University which provides campus services designed to enrich student and community engagement on our campuses. UOW Pulse complements the University's academic activities through products and services which enhance the social, cultural, sporting, health, and recreation experiences of the community. As a multi-faceted organisation, UOW Pulse provides food & beverage, retail, sports & fitness, catering & events, and children's services, geared to improve the quality of campus life. Our focus has evolved to providing an encompassing campus life with the purpose to enrich our students time on campus through affiliated clubs and societies, faculty clubs, sporting clubs and the other regular student engagement activities.



UOW Global Enterprises

UOWGE is a wholly-owned subsidiary of the University of Wollongong, aligned with UOW's goal to be a global education provider. Established in 1998, UOWGE owns and operates:

- The University of Wollongong in Dubai (UOWD);
- UOW College Australia (UOWCA);
- UOW College Hong Kong (UOWCHK); and
- UOW Malaysia (UOWM).

These institutions offer more than 210 programs, including higher education, vocational training, English language and professional development programs, to around 15,500 students annually. UOWGE is governed by a board of directors, with representation from University of Wollongong, and supported by key academic and operational committees.

UNIVERSITY OF WOLLONGONG IN DUBAI

UOW Dubai was established in 1993 as an English language centre by the University of Wollongong. UOWD is a vibrant, dynamic and diverse institution, with an outstanding record of educating highly employable graduates and an international reputation for the quality of its educational practices. With more than 4,600 students from 108 nationalities being taught by

academics from around 50 countries, UOW Dubai offers a truly multicultural learning environment. Students can study one of 43 programs, from foundational courses to undergraduate and postgraduate degrees, spanning 10 industry sectors, including engineering, business, IT, education studies, nursing, communications and media.

UOW COLLEGE AUSTRALIA

UOW College Australia is one of Australia's longest operating university pathway providers. It provides a supportive learning environment where students build skills and knowledge through the delivery of quality academic pathway programs and vocational courses. UOW College Australia also provides English language programs for tertiary study and IELTS preparation and is an official IELTS Test and Occupational English Test (OET) Centre.

UOW COLLEGE HONG KONG

UOW College Hong Kong is a highly regarded institution in Hong Kong, providing quality tertiary education for over 2,470 students. The College offers a wide range of accredited degree and associate degree programmes, accredited UOW top-up degrees, and diploma courses across a range of disciplines.

UNIVERSITY OF WOLLONGONG, MALAYSIA

With 40 years of experience, UOW Malaysia is a pioneer in private higher education in Malaysia, welcomed as part of UOW's global network in September 2019. From 1983 to now, UOW Malaysia has grown in size, stature and network. UOW Malaysia was elevated to full University status in November 2023 and now has university college facilities at Utropolis, Glenmarie, a university college at Jalan Anson in the heart of Georgetown, Penang, and a fourth campus now in Batu Kawan, Penang. These highly respected colleges have more than 5,500 students, and deliver 89 programs across disciplines such as business, communications, computing, creative arts, engineering, hospitality, nursing, tourism and culinary art.

UOW INDIA (BRANCH OF UNIVERSITY OF WOLLONGONG)

UOW will launch its first campus in India, at Gujarat International Finance Tec-City (GIFT), with its first offerings due to commence in the second half of 2024. With an initial focus on finance and business postgraduate programs, UOW will build on its strong partnerships in India that stretch across higher education, government, industry and research organisations.

Our operations

The University has around 2,500 academic and professional staff members (full time equivalent), based across nine domestic campuses, located between Sydney and Bega. The main campus is located within the city of Wollongong, in the Illawarra region south of Sydney. In Australia, our campuses are supported by approximately 200 UOW Pulse staff. Internationally, we have campuses in Dubai, Hong Kong, Malaysia and India, staffed by 1,292 UOWGE employees (except India, which is a branch of University of Wollongong), as well as partnerships in China and Singapore.

The UOW Act states that the object of the University is "the promotion, within the limits of the University's resources, of scholarship, research, free inquiry, the interaction of research and teaching and academic excellence". Our pursuit of these objectives is guided by our principal functions as set out in Section 6 of the UOW Act.

EDUCATION

A GLOBAL EDUCATION

UOW's ambition is that our graduates will be ethical, critical thinkers who are competitive in a global economy and who make a difference in their communities.

FACULTIES

- The Arts, Social Sciences & Humanities
- Business & Law
- Engineering & Information Sciences
- Science, Medicine & Health.

331

UOW offered 331 degrees and courses in 2023 across our onshore, offshore and online delivery operations.

STUDENTS

We provide a range of services to support our student population and conduct student recruitment activities across our Australian and global campuses.

37,589

total student enrolment in 2023 for UOW and UOWGE

24,935

onshore

12,654

offshore

RESEARCH



Our focus is on fostering globally recognised, impactful research that drives positive change, with an emphasis on partnership and collaboration. In the latest Excellence in Research Australia (ERA) results (2018), 90% of UOW disciplines were rated at, above or well above world standard. UOW has also been awarded 5 stars for our research quality in the current QS World University Rankings.

PHILANTHROPY



UOW became an autonomous institution thanks to the commitment, advocacy and donations of local people who had a vision of a brighter future for the Illawarra region. We continue to engage in a range of fundraising activities to support our operations across all our communities.

FACILITIES



UOW has 9 domestic campuses and 4 international campus locations, as well as a comprehensive IT infrastructure to enable online learning and to serve our community. We continue to invest in our physical and online facilities to provide world class research and teaching environments.

INVESTMENT



UOW makes a range of investments designed to support its operations over time, having regard to environmental, social and governance considerations.

Our supply chains

The UOW supply chain is diverse and complex, reflecting the diverse range and broad geographical scope of operations. However, while the University has approximately 7,000 recorded suppliers, less than 5% of these are ongoing key suppliers, engaged through a formal tender (or similar) process. Additionally, the majority of our goods and services come from suppliers and contractors based in Australia.

Procurement at UOW is guided by our Purchasing and Procurement Policy, which seeks to give primacy to obtaining value for money, ethical procurement, anti-slavery principles, environmental sustainability principles and our commitment to increasing Aboriginal and Torres Strait Islander supplier diversity.

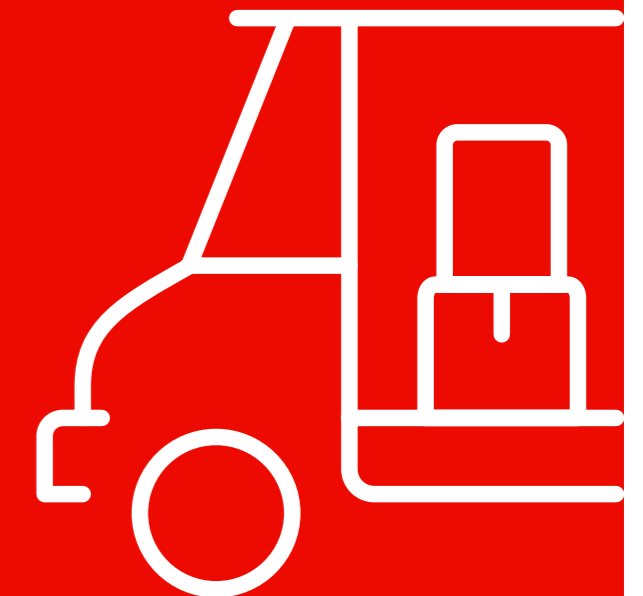
UOW undertakes core business procurement for all UOW entities based in Australia, including UOW College Australia and UOW Pulse. This relates to goods and services such as software and hardware, utilities, travel, insurance and construction.

UOW Pulse manages procurement relating to its unique functions, including the purchase of food and beverages, and the acquisition of equipment, uniforms and merchandise as part of its retail offerings.

Procurement for UOWGE's overseas entities is managed locally in each location. Significant expenditure on items and services such as information technology; stationery, library and printing supplies; travel and entertainment; maintenance and equipment supplies; and marketing are common across all three overseas locations, as well as unique supply items specific to each location.

The major categories of goods and services that UOW procures are:

- Cleaning
- Computer and IT technology
- Construction
- Consultants
- Education
- Equipment
- Insurance
- Lab supplies
- Office supplies
- Recruitment-labour hire
- Security
- Utilities





5 Modern slavery risks

UOW is committed to ongoing analysis of our supply chains and operations, to transparency and to continuous improvement in our efforts to identify risks of modern slavery. This commitment is embodied in our Modern Slavery Framework.

Our operations as a group are international and broad ranging, as are our procurement practices. We acknowledge that risks of modern slavery may exist in almost all aspects of our operations and in any procurement we undertake, particularly given the nature of modern, global supply chains. We engage a range of measures to identify risk, including due diligence measures, supplier surveying, supplier engagement and contract reviews.

Our supply chains

A key area of identified risk continues to be procurement of goods and services, both in Australia and in the various international locations in which our group operates. Regardless of the location in which procurement occurs, the multi-tiered and complex nature of global supply chains means there is often risk that modern slavery has played a role in the production or supply of goods.

In particular, we have identified that certain categories of goods carry a higher level of risk either because of the way raw materials are sourced, because of the prevailing conditions in countries of production with regard to worker and human rights, or because of the exploitative practices engaged by certain industries. Examples of goods in this category of higher risk include office and lab supplies, IT hardware, construction materials, clothing and promotional goods.

With respect to the supply of services, we have identified certain sectors such as security, maintenance, cleaning and construction pose a higher level of risk. Certain labour practices commonly engaged in these sectors, such as subcontracting and sham contracting, coupled with the nature of the workforce, means workers are at risk of exploitation and practices which amount to modern slavery, including debt bondage, forced labour and deceptive recruitment. We have also identified that risk of modern slavery in certain industries is not only a risk from a procurement perspective, but also a particular risk for our students, given they often work in industries or on employment terms that expose them to higher risks of exploitation.

Another critical area of risk that has been identified is supplier practices. While Australian based suppliers are subject to a known regulatory framework, which provides a level of assurance and protection to workers against modern slavery practices, we see particular risk in our engagements with offshore suppliers and suppliers who use subcontractors in other countries. In those circumstances we've identified risks in respect of knowledge of supply chains and differing levels of legal protection in relation to wages and safety for workers.

Our operations

Our analysis of risk is broad ranging and wholistic, extending beyond procurement practices, suppliers and supply chains. We see risk arising in a range of our operations, including in relation to our students, our collaborations and our investments and fundraising.

OUR STUDENTS

Our activities in 2023 brought the risk to our students to the fore, with our Safe and Respectful Communities Team receiving reports of modern slavery and providing support to victims, in Australia. In Australia, we know the risk of forced marriage is most prevalent, but have also identified debt bondage, forced labour, deceptive recruitment and other workplace exploitation falling short of being considered modern slavery as key risks facing our student population. This is because of the industries they often work and the insecure basis on which they are often employed (e.g. casual, gig economy) but also because, particularly in the case of international students, they may have a range of vulnerabilities including lack of local support, lack of knowledge of laws and worker protections and lower levels of English proficiency.

RESEARCH & OTHER INTERNATIONAL COLLABORATIONS

Collaborations for the purposes of research, teaching and learning are a critical part of UOW's operations. Our approach to due diligence, risk analysis and the formation of relationships is becoming increasingly comprehensive and sophisticated. However, we recognise that there is risk, particularly in respect of international collaborations, that modern slavery may be present in this aspect of our operations.

INVESTMENTS AND FUNDRAISING

Investing and fundraising activities are part of UOW's financial operations. While those activities are governed by clear policy and risk frameworks, the range of relationships this entails means they have been identified an area of risk in our operations.



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Our actions

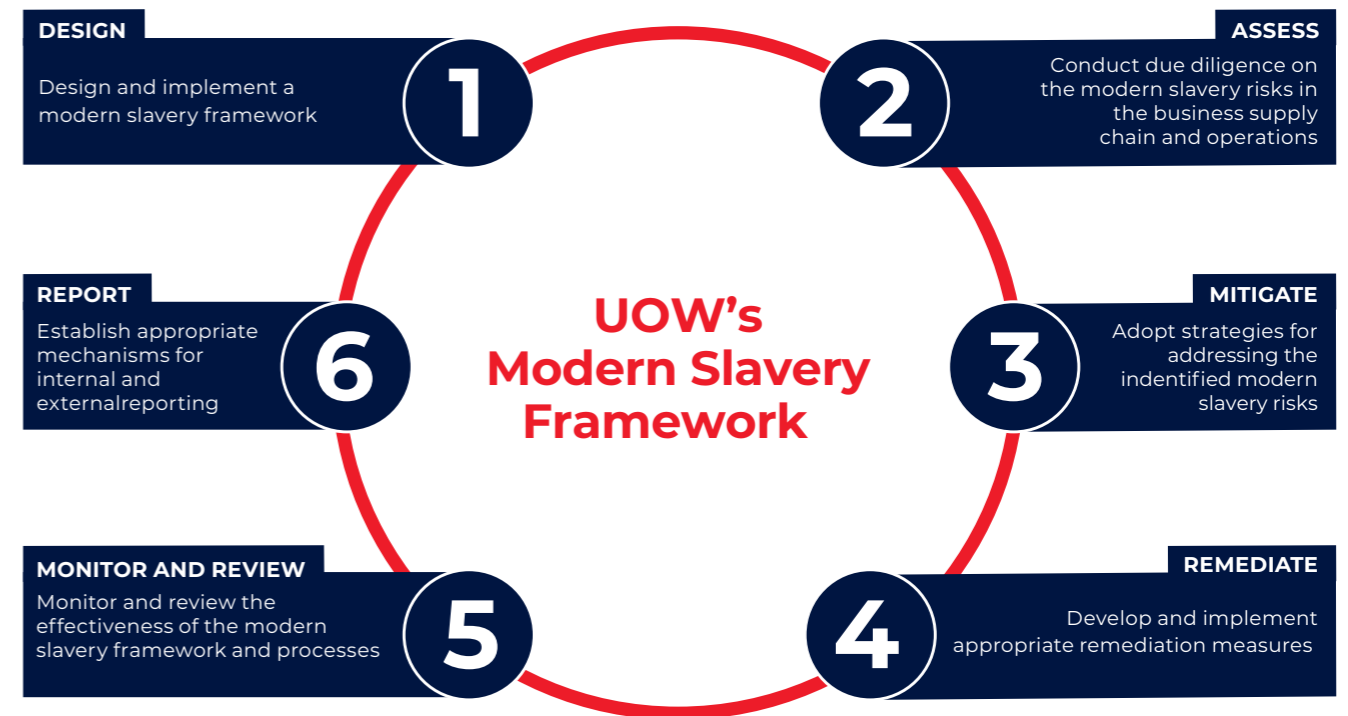
In 2023 we took steps to embed the processes and policies implemented in previous years aimed at identifying and addressing risks of modern slavery in our supply chains, while our focus for new initiatives shifted to the risks of modern slavery faced by our student population.

Modern slavery framework

In 2023, our work continues to be driven by a dedicated Modern Slavery Working Group and guided by our overarching modern slavery framework.

Our Modern Slavery Working Group draws its membership from our group entities, UOWGE & UOW Pulse, and from several key areas of the University, including Governance and Policy, Finance, Legal, People and Culture, International Student Support and the Safe and Respectful Communities team. While there has been a core membership since the Working Group was formed, each year we consider whether additional members are needed to ensure effective action in respect of that years' priorities and productive engagement across our operations.

We are committed to continuous improvement in our approach to addressing modern slavery, which is reflected in the iterative nature of our Modern Slavery Framework. While initially conceptualised with supply chain risks in mind, it has proved an effective tool to drive change more broadly across different aspects of our operations. In 2023, our University Code of Conduct was updated to make explicit reference to modern slavery and make clear that Staff are expected to uphold anti-slavery principles across the operations and supply chains of the University's entire group.



Adapted from "Modern Slavery Act: What businesses in Australia need to know", by Abigail McGregor, August 2020, [nortonrosefulbright.com/en/knowledge/publications/06a565ee/modern-slavery-act-what-businesses-in-australia-need-to-know](https://www.nortonrosefulbright.com/en/knowledge/publications/06a565ee/modern-slavery-act-what-businesses-in-australia-need-to-know) Reprinted with permission.

Procurement practices & policies

In 2023, we continued to build on the substantial work undertaken across 2021 and 2022 to improve our procurement practices and policies. In 2021, this involved a significant range of changes to the University's procurement practices, documentation and policies, including the development of a new Supplier Code of Conduct, which establishes a clear set of behavioural expectations we have of our suppliers, including compliance with modern slavery laws. This Code was included in UOW's Purchasing and Procurement Policy (which also guides UOW Pulse procurement) and adopted by UOWGE. We also undertook a detailed revision of our tender and quote documentation, to ensure our expectations around modern slavery are clear from our first engagement with potential suppliers and replaced UOW's standard supply agreements and purchasing terms to further strengthen our ability to gather information from suppliers and to take remedial action.

In 2022, our focus was on ensuring the rationale for and content of these changes were clearly understood by all UOW staff involved in procurement and embedded in our day to day procurement practices. Our internal communications and intranet pages were updated, including with specific guidance material on the new standard supply agreement and purchasing terms. Additionally, internal training delivered to University staff involved with procurement was revised and updated to include content on modern slavery and the range of changes made to our policies, guidelines, purchasing documents and formal agreements. The changes have also been translated into more bespoke contractual arrangements the University enters into, covering arrangements which involve incidental supply or activities potentially involving risks of modern slavery other than procurement. For example, the University has negotiated contractual safeguards regarding modern slavery in agreements associated with research and events management and, perhaps more significantly, initiated conversations around modern slavery with our collaborators in these spaces.

Building on this work, in 2023, we engaged an external consultant to review the purchasing and procurement practices of the University. As a result of this review, the Purchasing and Procurement Policy was updated, and a centralised communication channel was introduced to provide an avenue for internal and external stakeholder communications. The channel enables the sharing of feedback about suppliers engaged by various parts of the University, and enables, for example, staff to notify Financial Services of unsatisfactory service from suppliers or raise concerns about supplier conduct, including any issues that might suggest unethical or modern slavery practices are employed.

A dedicated Procurement Manager was also appointed, whose role is to ensure that the University procures goods and services efficiently, cost-effectively, and in compliance with legal and ethical standards. By strategically managing suppliers, contracts, and procurement processes, the procurement manager helps achieve operational and strategic goals while minimising risks and costs. The focus areas for 2023 have been on implementing our procurement policies and procedures, streamlining procurement processes and developing and maintain strong relationships with key suppliers, all of which assist in identifying modern slavery practices.

UOW Pulse, in managing its procurement relating to its particular functions, including the purchase of food and beverages, and the acquisition of equipment, uniforms and merchandise as part of its retail offerings, has implemented a requirement for all new suppliers to complete a Modern Slavery Questionnaire as part of onboarding, allowing an assessment to be made of each new supplier.

Each UOWGE offshore entity currently adopts their own procurement practice and procedures and is working to continually improve these areas. UOW College Hong Kong undertakes random online checks of supplier background and embeds Anti-Slavery Principles in their Procurement and Purchasing procedures, and UOW Dubai undertakes regular reviews of suppliers and requires suppliers to adhere to ethical and professional standards.

Given the particular risks we have identified associated with offshore suppliers and sub-contractors, UOWGE are currently developing a procurement framework that would act as an umbrella framework of standards applicable across all offshore and Australian entities. This would ensure a more consistent approach across offshore locations that better aligns with UOW's Modern Slavery obligations.

The University acknowledges the potential to increase our impact in relation to modern slavery risks across a range of different operations and is committed to expanding its focus accordingly.

Risks of modern slavery in our student population

Through our risk analysis process, we identified our students as a group particularly at risk of being victims of modern slavery. This assessment was made for a range of reasons, including the industries they are often employed in and the basis on which they are employed (e.g. casual, gig economy). Vulnerability can be exacerbated by the cost of living and current housing shortage in the Illawarra and surrounding regions. For international students, this risk can be compounded by a lack of local support, lack of understanding of workplace laws and tenancy rights in Australia and, in some cases, lesser English language proficiency. Building on a range of new initiatives implemented in 2022 aimed at raising awareness of this risk, in 2023 we focused on building opportunities for more regular and in-depth engagement with international students, particularly at those critical early stages of their arrival in Australia, up to the first few week of session. We recognise that, given the added vulnerabilities experienced by international students, the importance of creating opportunities to build connections with peers and support staff at the University cannot be underestimated.

To this end, in 2023, we introduced a dedicated International Student Experience team within the Division of Student Life who refreshed our international student welcome experience to include a rolling student welcome and weekly information sessions. Commencing in December and running up until the end of week 2 of session, weekly information sessions are held that include coverage of a range of issues that broadly includes safety elements such as: physical, cyber and beach safety, as well as exploitative practices including scams, sexual consent and sexual harm sessions. This team also serves as an added first point of contact for any international student having any welfare or wellbeing type challenges that are impacting their study.

Our comprehensive student facing website serves as a key communication tool and source of information. The website was designed to help students understand various forms of modern slavery (and other exploitative practices), to clearly communicate that these practices are unlawful, and to provide information as to how to get appropriate assistance and support in the event they or someone they know has or is experiencing these crimes. These continue to be updated regularly as new resources and information pathways are developed.

Modern Slavery content is also built into our annual RESPECT week, a week of activities and events focusing on our commitment to safety and respect for students and staff at UOW. This event, facilitated by the University's Safe and Respectful Communities team, included discussions relating to modern slavery and other risks of exploitation for students, dissemination of information on modern slavery, promotion of the resources developed and clear advice as to where students could go for information and help. Our SARC team continues to undertake education and training with international student cohorts, particularly those living in UOW accommodation, which includes modern slavery issues such as exploitative work-related practices and forced marriage, for example, and provides information about where students can seek support for these issues should they arise.

To ensure University staff in student facing roles are in a position to effectively support any students reporting modern slavery or apparently at risk of modern slavery, the staff training module developed in 2021, reviewed and updated in 2022 to include relevant guidance and resources, continued to be available and promoted to all student facing staff.

The Safe and Respectful Communities (SARC) team is the unit responsible for supporting students who have witnessed or experienced sexual assault, harassment, domestic and family violence, bullying or discrimination. SARC is also leading the University's prevention work in this space. Accordingly, the involvement of specialist staff from that team in these modern slavery initiatives was invaluable, ensuring appropriate framing of information and clear channels for student communication and interaction. This work, and the involvement of the SARC team, proved timely and especially important as, once again, in 2023 the team were able to identify and take remedial action to support student victims of modern slavery related issues (housing and wage exploitation). The team was well placed to provide informed support to these students and provide appropriate referrals to specialist services.

We recognise that international students are particularly vulnerable to deceptive recruitment practices. UOWGE leads the University's international student recruitment, and the Global Recruitment Team are vigilant in monitoring agency conduct and actively trains recruitment agents to ensure they understand their obligations under the Education Standards for Overseas Students (ESOS) Framework and the National Code of Practice. UOWGE are currently working to include in the ESOS induction and training, modern slavery risks, obligations and ethical practices, and to ensure that clauses are included in agent contracts that prohibit any form of exploitation or human rights abuses; and outline the consequences of non-compliance, including termination of the agreement.

Training and awareness building

We continued to promote the general staff awareness training module developed and launched in 2021. It is reviewed and updated for currency and, as noted, was revised in 2022 to include content to assist staff in supporting students at risk. The members of the Modern Slavery Working Group are committed to building their capacity, in terms of understanding modern slavery risks and best practice initiatives to address such risks, and to this end engage with external training and workshops.

7

Assessing effectiveness

We are committed to continuous improvement, refining our approach and developing new initiatives to address risks of modern slavery in our operations and supply chains. A critical part of that commitment is reflection, review and evaluation of our work; a process which has been embedded into our modern slavery framework. The Report of the statutory review of the Modern Slavery Act 2018 (Cth) is also being used a valuable resource to help us benchmark and strengthen UOW's modern slavery response. We assess and evaluate the effectiveness of our actions in several ways.

Annual review and ongoing monitoring

Our Modern Slavery Working Group begins each year with a detailed review of actions completed and in progress, and the development of a program of work for the year ahead. That process of reflection allows us to assess our actions in a holistic way and identify those areas where there is a need for further attention or development, but it also allows to consider specific pieces of work and how they could be built on or improved. It also provides an opportunity for the group members to identify synergies and connections in their respective areas of practice and responsibility, and where new connections may need to be made – including adjustments to the membership of the Working Group.

Throughout the course of each year, progress against the program of work and the effectiveness of existing initiatives are considered and monitored by the Working Group, through regular meetings, ongoing dialogue and formal project management tools. This allows us to refine the scope of the program or adjust our approach on a particular action, and to consistently consider the effectiveness of our efforts.

Reporting and review processes

We also rely on a range of institutional governance mechanisms and procedures to monitor the impact our initiatives are having. Our developing risk management frameworks provide a systematic method for identifying, mitigating and reporting risks, including risks arising in relation to modern slavery, and represent a source of high-level institutional oversight. We additionally engage in a range of audit and compliance monitoring measures.

Continuous Improvement Opportunities

As part of our ongoing monitoring and review processes described above, we have identified several opportunities to grow our effectiveness by building a more sustainable, coordinated and embedded response to managing modern slavery risks at the University. As such, we are implementing a series of priority actions for 2024 and beyond that we believe will better position us to identify, assess and respond to modern slavery risks. Key initiatives and review activities include:

Modern Slavery Policy and Operational Leadership

- **A Modern Slavery Prevention Policy** has been developed that aligns with the University's commitment to social responsibility and creating meaningful change in our business operations and supply chains. The policy will serve to raise awareness amongst our staff and students about slavery-like practices and explicitly prohibit our employees from engaging in, permitting or inducing any form of modern slavery.
- **Appointment of a Chief Integrity Officer (CIO)** whose role has been expanded to include the responsibility to develop and implement the Modern Slavery Policy and support University risk owners to develop effective controls, protocols, processes and procedures to support compliance with the policy. This will provide a central point of operational leadership which we anticipate will enhance overall planning and coordination moving forward.

Risk Management Framework:

- **Actively embedding modern slavery risks into the University's Risk Management Framework** to help us mature and build a more sustainable approach to identifying, controlling and monitoring these risks. This will ensure modern slavery risks are better managed within the University's 'business as usual' arrangements rather than sitting off to the side.
- **CIO to work proactively with university 'risk sponsors' and 'control owners'** to promote informed and proactive approaches to identifying, assessing and managing modern slavery risks. Education and training will be central to this work as will incorporating lived experience where possible to ensure our responses are appropriate and responsive.
- **Review of institutional governance mechanisms and procedures** to ensure we have the most appropriate monitoring, oversight and reporting structures in place that allow us to assess the impact our initiatives are having and sit consistently with our Modern Slavery Prevention Policy. This includes reviewing the Terms of Reference for the Modern Slavery Working Group as well as the processes for high level institutional oversight.

Risks of modern slavery in our student population

- We will continue to collaborate with specialist staff in developing our student facing resources, seeking and implementing feedback to ensure information is clearly and effectively communicated. We will continue to review and refine those resources over time, to ensure they maintain currency and relevance, and consider how to further increase awareness and available support.
- Our newly established International Student Experience team will assess and refine its initiatives, building opportunities for more in-depth engagement with international students. It is hoped that through these more targeted information and support pathways, international students will feel a greater sense of safety and comfort to report any concerns they may have about unethical or modern slavery like practices. Although concerning, we consider the receipt of reports of modern slavery from students and our staff's ability to effectively provide support to those students as positive indications as to the effectiveness of our initiatives in relation to students.

Procurement and supply chain

- **Provision of specialist education and training** for staff involved in procurement across the University to enable them to better identify, assess and respond to modern slavery risks.
- **Due diligence processes:** Develop and implement more robust due diligence processes to identify, assess, and address modern slavery risks in the University's operations and supply chains. This could involve revising procurement policies at overseas institutions and revising investment strategies.



8 Consultation and engagement

- **Remediation principles and processes:** In consultation with key stakeholders, develop remediation principles and provide a description of remediation processes enacted or that would be utilised to address modern slavery risks, if identified by the University.

Education and collaboration

- **Collaborations and partnerships:** We recognise the benefit of engaging with practice leaders and experts in the field of modern slavery, and collaborating with others engaged in similar work, ensuring we're aware of best practice and innovative approaches to tackling this complex problem. Learning from others and considering different ideas allows us to critically reflect on work carried out to date and continue to develop and improve our approach.
- **Education and research:** As an institute of research and higher learning, we are well placed to leverage the University's educational and research capabilities to contribute to the broader understanding of modern slavery issues, including integrating modern slavery topics into relevant courses and supporting research projects in this field.

Our group's approach to modern slavery is collaborative by design, ensuring consistency between the work of the University each of its controlled entities, UOWGE and UOW Pulse. Representatives from each entity play a key role in our Modern Slavery Working Group and did so throughout the 2023 reporting period and during the preparation of this statement.

Consultation with our controlled entities is thereby embedded in our work, occurring through our regular Modern Slavery Working Group meetings and through working together to implement our modern slavery response. The Modern Slavery Working Group also engaged with various operational areas of each institution during the reporting period, including procurement staff of each entity.

We work in a coordinated way across the UOW group when implementing and monitoring actions aimed to addressing risks of modern slavery. While each entity's operations has points of difference which need to be taken into account when developing our modern slavery initiatives, we strive to achieve consistency and alignment in our approach. We also share resources and lessons learnt, thereby enabling us to build a stronger and more robust response.

This statement was considered and endorsed by the board of UOW Pulse, reviewed and approved by the board of UOWGE and by the University Council, and signed by the University's Principal Officer and President, Vice-Chancellor Professor John Dewar AO.



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Compliance table

The table below identifies where in this statement each of the mandatory requirements prescribed by section 16 of the *Modern Slavery Act 2018* (Cth) has been addressed.

MSA CRITERION	REFERENCE IN THIS STATEMENT
Identify the reporting entity	Section 3
Describe the reporting entity's structure, operations and supply chains	Section 4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 5
Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Section 6
Describe how the reporting entity assesses the effectiveness of these actions	Section 7
Describe the process of consultation with (i) any entities that the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement	Section 8
Any other relevant information	Sections 2, 3, and 7

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Approval

This statement for the University of Wollongong and UOWGE Ltd trading as UOW Global Enterprises (as reporting entities), and UOW Pulse Ltd (as a UOW subsidiary) was approved by the University Council of the University of Wollongong on 26 June 2024.

Professor John Dewar AO
Interim Vice-Chancellor and President
26 June 2024

CONTACT

uow.info/modern-slavery
modern-slavery@uow.edu.au
+61 2 4221 3555



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