

Modern Slavery Statement for 2021

Federation University Australia

Reporting period: 1 January 2021 to 31 December 2021

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Introduction

This Modern Slavery Statement (**the Statement**) sets out actions taken by Federation University Australia to address its reporting obligations under the *Modern Slavery Act 2018* (Cth) for the reporting (calendar) year 2021 (**the Modern Slavery Act**).

The Modern Slavery Act requires entities based or operating in Australia, which have consolidated revenue equal to or greater than \$AUD100 million during a financial year, to submit a Modern Slavery Statement for that year. The Statement reports on the risks of modern slavery in entities' operations and supply chain, and the actions of entities to assess and address those risks.

Federation University Australia acknowledges that it has a responsibility under the Modern Slavery Act to report on the steps which it has taken with respect to addressing the risks of slavery and human trafficking. Federation University Australia is committed to doing as much as it can to identify, assess and respond to risks of slavery and human trafficking in all University activities and in our supply chain.

This Statement covers the reporting period of 1 January 2021 to 31 December 2021.

Approval and Signing

This Statement was approved by the University Council of Federation University Australia on 24 May 2022.

This Statement was approved in accordance with Section 13 of the Modern Slavery Act by the University Council of Federal University Australia on 24 May 2022 and the University Council of Federation University Australia has authorised Professor Duncan Bentley, Vice-Chancellor and President to sign this Modern Slavery Statement on behalf of Federation University Australia:



.....
Signature

Professor Duncan Bentley

Vice-Chancellor and President

.....
6 June 2022

Definitions

For context, definitions of the terms used in the *Modern Slavery Act 2018* (Cth) and the Walk Free Global Slavery Index 2018 (**Global Slavery Index**) are set out below.

Under the Modern Slavery Act the term 'modern slavery' broadly includes all forms of trafficking in persons, slavery and slavery-like practices. This includes forced labour, forced marriage, the worst forms of child labour, and other conduct that would be an offence under the *Criminal Code Act 1995* (Cth).

Specifically, **Modern Slavery** is defined in the Modern Slavery Act to mean conduct which would constitute:

- an offence under Division 270 or 271 of the Criminal Code; or
- an offence under either of those Divisions if the conduct took place in Australia; or
- trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, entered into in New York City on 15 November 2000 ([2005] ATS 27); or
- the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, entered into at Geneva on 17 June 1999 ([2007] ATS 38).

Human trafficking: is the movement of a person into, out of, or within Australia using coercion, threats or deception for certain exploitive end purposes. These exploitive end purposes are slavery, servitude, forced labour, forced marriage and debt bondage.

Slavery: occurs when a person exercises the rights of ownership over another person. This includes the power to make the victim an object of purchase or to use their labour or services in a substantially unrestricted manner.

Servitude: occurs when the victim does not consider himself or herself free to cease providing their labour or services or to leave their place or area of work because of the use of coercion, threats or deception. To be in a condition of servitude, the victim must also be significantly deprived of his or her personal freedom.

Forced labour: occurs when the victim does not consider himself or herself free to cease providing their labour or services or to leave their place or area of work because of the use of coercion, threats or deception.

Forced Marriage: occurs when the victim gets married without freely and fully consenting because he or she has been coerced, threatened or deceived or because he or she is incapable of understanding the nature and effect of a marriage ceremony.

Debt Bondage: occurs when the victim pledges his or her services or the services of a third person as security for a real or purported debt where the debt is manifestly excessive, or where the reasonable value of the victim's services is not applied to the debt or where the length and nature of the victim's services are not limited or defined.

Part A: The Reporting Entity

Federation University Australia

Part A addresses the Modern Slavery Act's requirement for a modern slavery statement to identify the reporting entity (section 16(1)(a) of the Act).

Federation University Australia is making this Statement as a single reporting entity for the reporting period of 1 January 2021 to 31 December 2021.

About the University

Federation University Australia

The *Federation University Australia Act 2010* (Vic.) is the University's principal governing legislation.

The antecedents of Federation University Australia (**the University**) can be traced back to 1870 with the establishment of the School of Mines in Ballarat. This School of Mines was the third institution of higher learning to be established in Australia and the first such institution to be established in regional Australia.

In 1993 the *University of Ballarat Act 1993* (Vic.) established the University of Ballarat, replacing the former Ballarat College of Advanced Education. The University of Ballarat was one of the few Australian universities to take its name from an Aboriginal word: "Ballarat" means "resting place".

The University's commitment to improving the access of Aboriginal and Torres Strait Islander (**Indigenous**) peoples to tertiary education remains resolute today.

In 1998 the University of Ballarat was enlarged through mergers with the Ballarat School of Mines and the Wimmera Institute of TAFE.

In 2013 the University of Ballarat requested that its name be changed to 'Federation University Australia'. This was to reflect the University's broadened focus beyond central and western Victoria. In 2014 the Monash University Gippsland Campus was incorporated into the operations of the University.

Today, Federation University Australia is based on a federated network of campuses in regional Victoria, one campus in Brisbane, partner-provider institutions across Australia and overseas. In addition, it engages in national and international research collaborations. The University aims to provide agile, relevant and work-ready academic, technical and research programs spanning the full breadth of the Australian Qualifications Framework.

Our Purpose

The University's Purpose, as set out in its *Strategic Plan 2021-2025* is "to transform lives and enhance communities". Underpinning that Purpose are the University's Values: Inclusion, Innovation, Excellence, Empowerment and Collaboration.

The University serves the Victorian, Australian, and international communities by providing enriching educational and cultural experiences, by raising public awareness of educational, scientific, and artistic developments, and by promoting academic freedom, freedom of speech and critical and free enquiry. It fosters informed intellectual discourse and public debate within the University, within our communities and in the wider society.

The University provides and maintains a teaching and learning environment of excellent quality, offering world-class higher education (**HE**) and vocational education and training (**VET**) programs. We undertake education, scholarship, pure and applied research, invention and innovation of world-class standards and we apply these for the benefit and well-being of our communities: State, national and international.

We use our expertise and resources to involve the Indigenous peoples of Australia in the University's teaching, learning, research and its other activities directed to the advancement of knowledge and thought. This enables Federation University Australia to contribute to the realisation of Indigenous peoples' aspirations and their safeguarding of rich, ancient cultural heritage.

The University provides educational programs and services in a way that reflects and embodies principles of equity and social justice, and we equip our graduates to excel in their careers and contribute to their communities.

Our Present

Driven by a strong heritage, today the University is known for its focus on educational and social equity, teaching excellence, research distinction, environmental sustainability and, most significantly, regional capacity building.

At the University's campuses in Mount Helen, Ballarat, Berwick, Churchill, Horsham, and Brisbane we offer a range of HE and VET programs to students of all ages and backgrounds. While our regional character informs our priorities, the University remains very focused on serving our other communities and stakeholders, both in Australia, and around the world.

While the University is largely based in the regions, it is national in scope and international in reach.

Our Future

The University intends to continue to provide high-quality, lifelong learning opportunities for its HE, VET, and research students across our federated network of campuses and partner provider institutions.

The University will continue to provide its students with the necessary knowledge, skills, and attributes to engage in meaningful work and community life and we encourage our students to become strong, engaged, and effective local and global citizens.

The University's extensive network of campuses and partnerships is a strength that we will continue to grow and develop. We will continue to conduct research that has a positive, meaningful impact on the communities which we serve, and all our stakeholders: regional, national, and international.

The University's Living Values and the Staff Code of Conduct

The University's Living Values of Inclusion, Innovation, Excellence, Empowerment and Collaboration inform and guide our actions and behaviours.

Our Living Values are underpinned by the principles and requirements of the Staff Code of Conduct (https://policy.federation.edu.au/human_resources/staff_conduct/staff_code_of_conduct/ch1.pdf)

Our Values guide how we engage with our students, our staff members, and our communities. The Staff Code of Conduct is directed at ensuring a culture of fair, respectful, and ethical behaviour at all times and to support the University in discharging its obligations under State and Commonwealth requirements.

The Code of Conduct assists University staff members to safeguard public trust and confidence in their integrity and professionalism by mandating:

- appropriate standards of conduct;
- fairness, impartiality, honesty, and equity in decision making; and
- behaviour that fosters and protects the reputation of the University.

In addition to expecting that all at the University will act with integrity, the University expects that all staff members are aware of, and act according to the laws of the land at all times.

In 2021 the University demonstrated its commitment to addressing the crimes of modern slavery and human trafficking by developing, drafting and promulgating an 'Anti-Modern Slavery and Human Trafficking Policy'. (https://policy.federation.edu.au/finance/procurement/purchasing_and_procurement/ch03.php).

Part B: Structure, Operations and Supply Chains

Part B addresses the Modern Slavery Act's requirement for a modern slavery statement to describe the structure, operations and supply chains of the reporting entity (section 16(1)(b) of the Act).

Structure

The *Federation University Australia Act 2010* (Vic.) created the University as a body corporate and a body politic. The University has two wholly-owned subsidiary entities, both of which are inactive.

Figure 1. Subsidiaries

Entity		Principal place of business	Ownership interest %
The School of Mines and Industries Ballarat Ltd	Inactive	Australia	100%
Brisbane Educational Services Pty Ltd	Inactive	Australia	100%

Operations

The core business of the University is to provide educational programs and to conduct research. The University undertakes these activities at campuses located in Ballarat, Berwick, Gippsland, Western Victoria (Wimmera), and Brisbane. During 2021 it employed a total of 1,659 members of academic and professional staff.

The University also has a network of onshore partner providers for international students in Melbourne, Sydney and Adelaide, as well as offshore partners in Hong Kong, Sri Lanka and China. We work closely with our partner providers to provide a high-quality educational experience leading towards attainment of a recognised educational qualifications. Our onshore partner providers offer undergraduate and postgraduate level qualifications in the fields of Information Technology, Information Systems, Business Management, Commerce and Accounting.

The University has entered into articulation agreements with several Chinese universities, which facilitate students commencing their undergraduate or postgraduate studies at the relevant Chinese university, and then to transfer to a University campus onshore to complete their study programs. These agreements often also provide opportunities for inter-university collaborative research.

The University also employs international agents to recruit international students to study onshore.

Examples of our international partnerships include:

- *Federation University Information Engineering Institute at Hebei University of Science and Technology (HUST)*: the University is one of only six Australian universities to be granted 'approved institute' status in China, which allowed the establishment a major information technology centre at HUST. This Joint Institute is one of only two in that Province, and the only one specialising in information technology (IT). The partnership also provide opportunities for joint research and research grant applications.
- *Zhejiang University of Technology (ZUT) Civil Engineering joint program*: this transnational educational partnership commenced in 2013. The University works closely with ZUT to deliver civil engineering to one of the top industrial universities in China.
- *Nawaloka College of Higher Studies*: this transnational education partner is located in Colombo, Sri Lanka, delivering undergraduate programs in IT and Business disciplines.

During 2021 a total of 13,888 domestic and international onshore HE students were enrolled in one of the following Schools:

- School of Arts
- School of Education
- School of Health
- School of Science, Psychology and Sport
- School of Engineering, IT and Physical Sciences
- Federation Business School

A total of 5,375 students were enrolled in VET programs at Federation TAFE during 2021.

Industry Collaborations

- *IBM Australia:* Under the terms of the University's agreement with IBM Australia Ltd, students are enrolled in the Bachelor of IT (Professional Practice), during which program they also complete an internship at IBM Australia. Many of these students will be employed by IBM Australia after they graduate from the University. Based at the University's Ballarat Technology Park, our long-standing partnership with IBM Australia also provides opportunities for research collaborations at the very cutting edge of technology.
- *CT4:* Our partnership with CT4, a cyber-security specialist in the Asia Pacific region, includes professional placements and work opportunities for both HE and TAFE students. Our higher education students may also engage in research collaborations.
- *World Academy of Sport:* World Academy of Sport delivers programs for athletes, officials, coaches, and people working in high performance-level sport around the world. As their chosen global university partner, Federation University Australia provides a Bachelor of International Sport Management online in Australasia, the Asia-Pacific, UK, Europe, and India. A pathway program for secondary school students through the International Baccalaureate is also offered.

Supply Chain

The University procures a wide range of goods and services in order to deliver its educational and research programs and to pursue other strategic objectives.

The major 'spend' categories for the University are as follows:

- Construction services – building, construction, major repairs, upgrades, restoration;
- Facilities management – cleaning, security, grounds maintenance, plant and equipment maintenance, Fleet services;
- Medical consumables – personal protective equipment such as gowns, masks and gloves, medical devices, laboratory equipment;
- ICT hardware and software – PCs and laptops, printers, peripherals, cabling, software, network services;
- Travel services – accommodation, airfares;
- Utilities – electricity, gas, water, telecommunications;
- Office supplies – general office products, furniture, office machines; and
- Consultancies (various).

Origin Countries for Supply Chain

Analysis of the University's 'point of direct supply' in 2021 showed that 95% of the goods and services obtained by the University possessed Australian-supply origin or were obtained through Australian-based subsidiaries of suppliers from low-risk countries.

Five per cent of direct international purchases were sourced from a number of countries spread across the globe, with the top two supplier countries being the United States of America and the United Kingdom.

Part C: Risks of Modern Slavery Practices in Operations & Supply Chains of the University and Subsidiaries

Part C addresses the Modern Slavery Act's requirement for a modern slavery statement to describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls (section 16(1)(c) of the Act).

Operational and Supply Chain Risks

The University recognises the risk of Modern Slavery in its operations. It acknowledges the heightened risk with respect to the activities of our overseas partners and overseas suppliers due to the University having less visibility of their operations.

According to Global Slavery Index data, the risk of Modern Slavery in Australia appears to be lower than in many other jurisdictions. However, the University recognises that our Australian suppliers provide us with goods and services across all high-risk categories (see table below).

Accordingly, we also recognise that deeper engagement with and closer assessment of those suppliers is necessary. However, we recognise the difficulty in assessing and certifying modern slavery risks within certain high-risk categories and source countries. These difficulties apply to all reporting entities in the absence of viable alternative suppliers.

Our spend, supplier and category risk prioritisation work during 2021 will continue in 2022 and inform our ongoing Modern Slavery risk management and supplier engagement and review program.

The University recognises that the identification, mitigation, and management of Modern Slavery risks are critically important, though challenging, processes which will evolve and improve over time.

Accordingly, the University will focus on continuous improvement in this vital aspect of our supply chain management.

We conducted a high-level risk assessment based on the Global Slavery Index and the Modern Slavery Act. See table below.

High-Level Modern Slavery Risk Assessment

Aspect	Category	Modern Slavery risk factors
Supply Chain	Engineering and construction	Inherent High-Level Risks: these exist in construction and the extended construction materials supply chain. Risks include the employment of lower-skilled and migrant employees, as well as potentially dangerous working conditions.
	Security	Inherent High-Level Risks: Asset security services are associated with the employment of lower skilled and migrant labour.
	IT services and software	Inherent High-Level Risks: these are present in IT equipment manufactured in higher-risk countries overseas., The main forms of risk are most prominently forced and bonded labour. A lower level of inherent risk was identified in the provision of IT services and software delivered in Australia.
	Trade services and maintenance	Inherent High-Level Risks: these exist in the use of lower skilled or migrant labour and in the use of labour hire services. Additional risks within the extended materials supply chain are again associated with the use of lower skilled or migrant employees, as well as potentially dangerous working conditions

	Apparel, uniforms, and merchandise	Inherent High-Level Risks: may exist in the extended and complex apparel, uniforms, and merchandise supply chain. These risks have a higher likelihood of occurrence offshore and include deceptive recruitment practices, forced or bonded, child labour and human trafficking.
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Part D: Actions taken to assess and address risks

Part D addresses the Modern Slavery Act's requirement for a modern slavery statement to describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes (section 16(1)(d) of the Act).

The University's Procurement Framework

The University acknowledges and respects the importance of procurement decisions being made in a transparent as well as a fair manner, allowing those decisions to be understood by others and, if necessary or appropriate, to be justified at a later point.

The University's Procurement Framework provides strategic and operational guidance to staff members who are responsible for purchasing goods and services on its behalf.

This guidance covers the entire value of the University's procurement spend and sets out the auditable processes necessary to comply with the University's Procurement Policy and Procedure (at https://policy.federation.edu.au/finance/procurement/purchasing_and_procurement/ch01.php and https://policy.federation.edu.au/finance/procurement/purchasing_and_procurement/ch2.pdf) respectively.

The University actively seeks out and offers opportunities wherever possible for competitive local and/or regional industries.

The University's procurement objectives are to:

- guide and assist University staff in obtaining best value for money throughout the acquisition of goods and services;
- ensure that the University and its partners and suppliers are not exposed to undue personal or commercial risk; and
- purchase goods and services in an environmentally and socially responsible framework.

Procurement Probity at the University

'Probity' is defined as complete and confirmed integrity, uprightness, and honesty: it evidences ethical behaviour in a particular process or context. Thus, probity is essential to sound procurement processes that accord equal opportunities for all participants.

Probity is integrated into all procurement planning and execution at the University. Risk management of probity in our procurement processes involves a high level of control (risk mitigation) over those processes.

Underpinning the University's procurement activities are five essential probity principles, specifically:

- open competitive processes;
- fairness, consistency, and transparency of processes;
- identification and resolution of conflicts of interest;
- accountability in relation to decision-making; and
- monitoring and evaluating performance.

Federation University Australia understands that integrity and honesty in procurement activities is essential in order to:

- ensure conformity to processes designed to achieve value for money;
- provide accountability;
- ensure that all bids will be assessed against the same criteria;

- preserve public and participant confidence in University processes; and
- improve defensibility of decisions to potential legal challenge or other external scrutiny.

Moreover, the University acknowledges that the benefits of probity include:

- avoidance of corrupt practices;
- avoidance of conflicts of interest;
- better outcomes against stated objectives;
- improvements in organisational and attitudinal change;
- reassurance to the community and those wishing to do business with the University that its processes and outcomes can be trusted;
- the opportunity to assess the objectivity and independence of decision-making; and
- minimisation of the potential for litigation.

Working with the Australian Universities Procurement Network

As a member of the Australian University Procurement Network (**AUPN**), Federation University Australia is part of the AUPN's Modern Slavery Network.

AUPN is leading a sector collaboration to support all member universities to meet the challenge of human rights, transparency and risk management in their supply chains. It plays a key role in supporting its members' reporting under the terms of the Modern Slavery Act.

The AUPN has set up a Modern Slavery Working Group (**MSWG**) which focuses on consultation and collaboration within the higher education sector.

The AUPN members and their suppliers benefit from the improved operational efficiencies of the collaboration and gain improved effectiveness in mitigating risk and improving social performance within supply chains.

Federation University Australia endorses the work of the MSWG and takes support and guidance from it.

The Modern Slavery Project (the MSWG's Program of Works) aims to deliver the following:

- a collection and aggregation of sector procurement data;
- a solution that allows members to identify risk, focus resources and inform action, supported by a third-party technology enablement solution;
- a sector approach/action plan for addressing, mitigating and/ or remediating identified risks;
- flexible templates and guidance; and
- continuous improvement.

Templates and Guidance

The MSWG has developed the following templates and guidance available to all AUPN members via a dedicated online AUPN portal:

- A Supplier Assessment Questionnaire/Response Schedule;
- Standard/Template contract clauses;
- Supplier Code of Conduct Guidelines; and
- Supplier Engagement Terms of Reference and Communication approach.

The University has adopted and incorporated these templates and guidelines into our approach to identify and addressing Modern Slavery risks under the University's Procurement Framework and Partner Organisation audits.

Furthermore, standard template contract clauses have been inserted into the University's suite of template agreements, covering areas ranging from procurement to research collaborations.

Technology and Data Gathering

As part of the Discovery Phase, a Modern Slavery Risk Dashboard was developed and made available to all AUPN members in January 2020. Australian universities have submitted 2018 to 2020 spend data into the dashboard and Modern Slavery Program. Data continues to be gathered from other universities.

The Dashboard is a key development in the AUPN's Modern Slavery Program, providing indications of universities' risks across two different lenses:

1. potential risks of Modern Slavery applied against spend categories using the AUPN taxonomy, and
2. potential risks of Modern Slavery applied against country locations using supplier head office location.

Those risks have been determined through publicly available Modern Slavery risk (e.g., Global Slavery Index) together with some assumptions generally deemed to be 'reasonable'. The Dashboard provides only an indicative view of where risks may exist and the AUPN will aim to continue to evolve risk ratings over time as the analytics matures.

The aggregated data reflects the broad supply chains of the university sector. Analysis of the spend data provided covers over AUD \$14.6 billion annualised spend across more than 183,800 individual suppliers. Suppliers with the highest spend are in the construction, ICT and research markets.

The MSWG undertook a two-stage tender process to appoint a third-party technology solution to further support its members to gather and interrogate expenditure supplier data, identify risk, focus resources and inform action. The company 'FRDM' was selected to provide the technology solution that will support collaboration of AUPN members to gather and interrogate supplier data, identify risk, focus resources, inform action, and measure effectiveness.

Communications to Universities and Stakeholders

The MSWG provides monthly progress updates on its Modern Slavery Program and regular project status uploads into the AUPN portal. Monthly virtual sessions for AUPN members provide a vehicle for feedback, discussion, and education on the progress of the Modern Slavery Program.

The Chief Procurement Officers of AUPN members are engaged directly to provide awareness of the Programs' progress and ensure alignment with university strategies. Federation University Australia is an active participant of the AUPN MSWG to ensure the University keeps up to date with sector best practice.

Industries Identified as High Risk and the Procurement Framework

The robust Procurement Framework introduced by the University in 2019 includes guidance on purchasing in an environmentally and socially responsible manner.

'Social Procurement' is the activity that takes into consideration the real, or potential, impacts associated with the production or sale of goods and/or services including: health, safety, human rights, ethical production, social justice, indigenous businesses, fair trade, diversity, access, and purchasing locally and domestically made goods and/or services.

One of the University's key objectives in terms of social procurement is supporting safe and fair workplaces, endeavouring to procure goods and services only from suppliers that comply with industrial laws, and which promote secure employment.

Today, the University's template tendering documents incorporate:

- Corporate Social responsibility compliance documents; and
- a Modern Slavery questionnaire.

Relevant Clauses Inserted into the University's Supplier Contracts, Research, and International Agreements

Federation University Australia has created important obligations with respect to Modern Slavery risks for its contractual partners in the form of template clauses, and these clauses are incorporated into all of its new contracts.

Thus, the clause set out in italics below is included in all Federation University Australia supplier contracts:

'Modern Slavery

The supplier acknowledges and agrees that the supplier must:

- a. Comply with Modern Slavery Legislation to the extent that such legislation is applicable to the supplier;*
- b. In any event, facilitate the University complying with any of the Modern Slavery Legislation applicable to the University, by reporting in a timely manner, and providing all information its supply chain and of its suppliers which the University may acting reasonably require, such reporting and other information being provided no later than 60 days after the expiry of the period to which the reporting relates to, or earlier as required in order for the University to meet its obligations under the applicable Modern Slavery Legislation and;*
- c. Ensure that such reporting is accurate, complete and in such for that the University in its discretion requires.'*

During 2021, new template clauses were added to Research agreements. Below is an example clause:

1. Modern Slavery

1.1 *The Consultant/collaborator acknowledges and agrees that the Consultant/collaborator must:*

- i. comply with the Modern Slavery Legislation to the extent that such legislation is applicable to the Consultant/collaborator;*
- ii. in any event, facilitate the Principal complying with any of the Modern Slavery Legislation applicable to the Principal/University, by reporting in a timely manner and providing all information concerning its supply chain and that of its subconsultants and suppliers which the Principal/University may acting reasonably require, such reporting and other information being provided no later than 60 days after expiry of the period to which the reporting relates to, or earlier where required in order for the Principal/University to meet its obligations under the applicable Modern Slavery Legislation; and*
- iii. ensure that such reporting and other information is accurate, complete and in such form as the Principal/University in its discretion requires.*

Included in each of Federation University Australia's international agreements is the following clause:

'The Provider [the other party] must:

comply with all applicable Laws (including the Regulatory Requirements), University Policies, University Statutes and University Regulations in the provision of the Services;

comply with its obligations under any Group Lease and Third Party Lease to which it is a party;

provide the Services in a manner which supports the University in fulfilling its responsibilities under applicable Laws (including the Regulatory Requirements), University Policies, University Statutes and University Regulations; and

not do (or omit to do) any act which would result in the University failing to comply with any Law (including the Regulatory Requirement), University Policy, University Statute or University Regulation'.

University Policies

The University aims to reduce or mitigate the risk of Modern Slavery through our operations, governance structure and employment practices.

Recruitment practices: the University has mandatory employment screening practices and verification of 'right to work' in Australia for all employees as well as Human Resources policies and procedures that mandate bona fide and merit-based recruitment processes and outcomes.

Employee experience: the University has negotiated a workplace agreement which governs the employer-employee relationship.

There are also notification procedures, 'whistle-blowing' and complaints mechanisms for reporting concerns/complaints; and a Staff Employment Assistance Program through which all employees can access confidential support and guidance.

As indicated earlier, in 2021 the University introduced the Anti-Modern Slavery and Human Trafficking Policy to govern the University's approach to ethical sourcing and the prevention of worker exploitation. (https://policy.federation.edu.au/finance/procurement/purchasing_and_procurement/ch03.php)

Part E: Assessment of the effectiveness of the actions

Part E addresses the Modern Slavery Act's requirement for a modern slavery statement to describe how the reporting entity assesses the effectiveness of such actions (section 16(1)(e) of the Act).

The University is developing a variety of methods to assess the effectiveness of our actions in identifying and addressing the risks of Modern Slavery. This has been and will remain a key focus of our continuous improvement program to address the risks of Modern Slavery.

In 2021, a Modern Slavery Reporting Group (**MSRG**) was formally established in order to support the University in responding to the requirements of the *Modern Slavery Act 2018* (Cth), with its terms of reference approved by the Vice-Chancellor's Senior Team.

The MSRG is responsible for developing and drafting an annual Modern Slavery Statement for endorsement by the Vice-Chancellor's Senior Team and approval by the University's Council. The MSRG coordinates and reports relevant activities undertaken by the University during the previous calendar year. Furthermore, the MSRG:

- considers and monitors the risks of Modern Slavery in our operations and supply chains;
- reviews the actions taken to date by the University to identify and mitigate the risks of Modern Slavery;
- assesses the effectiveness of those actions; and
- reports on developments and initiatives proposed by the AUPN and other key stakeholders and experts.

Key areas of focus for the MSRG for 2022 will be:

- *Governance*: further strengthening our supply chain governance through updates to policy, procedures, audits, and contract documents relevant to modern slavery risk.
- *Education and training programs*: embedding changes into the University operations through targeted training and education on modern slavery risks.
- *Enhanced supplier analysis and engagement*: conducting more detailed risk assessment of our supply chains in addition to the AUPN analysis and engagement with identified higher risk suppliers.

A key method of assessing the effectiveness of our actions aimed at mitigating the risk of Modern Slavery is to monitor and enforce monitoring compliance by our contractual partners. This can be done in connection with our Australian-based suppliers and partners.

Since the introduction of the Modern Slavery declaration for bidders and the Modern Slavery compliance clause, all suppliers and new contracts require our suppliers and partners to comply with the Modern Slavery Act.

Monitoring of the University's International Education partners and their management of modern slavery and human rights harms has been embedded into the Audit Checklist used by International Quality Assurance for annual review. This will enable the University to ascertain partner compliance with Regulatory Requirements.

The MSRG has initiated the process for introducing an educational compliance module to raise the awareness of Modern Slavery obligations for our staff. An educational module is currently under review with introduction planned for 2022.

Part F: Consultation Processes

Part F addresses the Modern Slavery Act's requirement for a modern slavery statement to describe the process of consultation with (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a joint statement—the entity giving the statement (section 16(1)(f) Act).

In preparing this Statement we have consulted key stakeholders at the University, including close engagement with our internal procurement, international, legal and risk management and assurance teams. The Modern Slavery Reporting Group comprises representatives from Governance and Strategy, International, Quality Assurance, Research and Innovation, and Procurement. We have also consulted members of the Vice-Chancellor's Senior Team and obtained external legal advice.

The University's two subsidiaries are not active entities and accordingly no consultation was required in that regard in developing this Statement.

Part G: Other Relevant Information

Part G addresses the Modern Slavery Act's requirement for a modern slavery statement to include any other information that the reporting entity, or the entity giving the statement, considers relevant (section 16(1)(g) of the Act).

During 2021 Federation University Australia was significantly affected by the COVID-19 pandemic and the closure of international borders. Major disruption was caused to the delivery of our programs, our supply chains, our current and future students, and to our staff members. We expect that the impact of this disruption to continue for some time.

In particular, the University's ability to closely monitor or scrutinise the practices of our suppliers and international partners in high-risk countries during 2021 was hampered by sensitive geo-political factors and COVID-19-related international border closures.

Part H: Looking Ahead

In 2022 we aim to further strengthen our governance in addressing the risks of Modern Slavery through:

- developing and implementing a communications strategy to raise awareness within the University of our Anti-Human Slavery and Anti-Trafficking Policy;
- rolling out the internal training program developed in 2021;
- developing and implementing a anti-modern slavery training program for our major trade suppliers, with records being kept to confirm attendance/participation in the program; and
- engaging closely with the Australian Universities Procurement Network (AUPN) and utilising the AUPN's analysis tools.

Federation University Australia will continue reporting enhanced strategic measures and practices aimed at addressing and mitigating the risk of Modern Slavery in our future reports to the Minister for Home Affairs.
