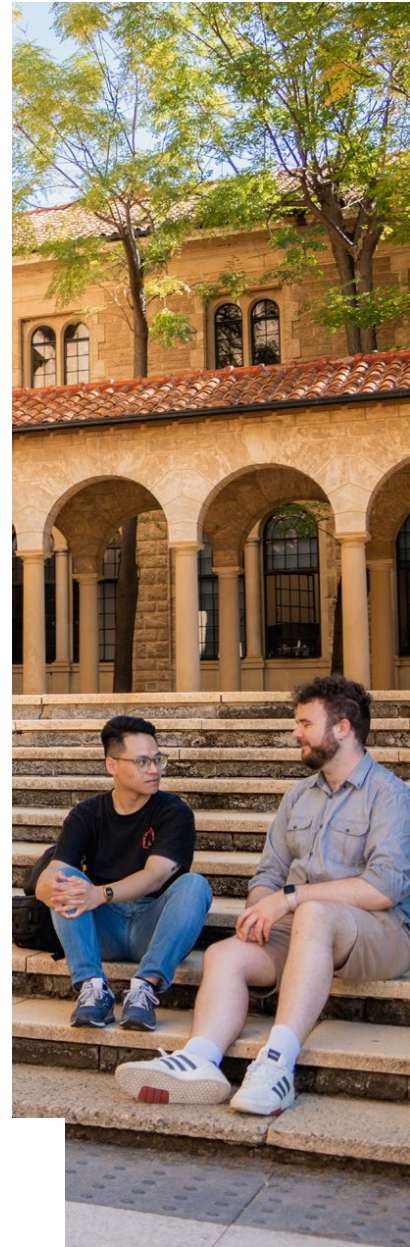




THE UNIVERSITY OF  
**WESTERN  
AUSTRALIA**



# **UWA Modern Slavery Statement 2023**



*The University of Western Australia acknowledges that its campuses are situated on Noongar land, and that Noongar people remain the spiritual and cultural custodians of their land, and continue to practise their values, languages, beliefs and knowledge.*

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# Opening Statement from the Vice-Chancellor



Modern Slavery is a complex, global human rights issue that continues to be impacted by an ever-changing geopolitical landscape.

As a globally recognised education leader, The University of Western Australia acknowledges the important role our organisation, and that all universities play, in influencing real and positive change for the communities in which we serve.

In alignment with our University Mission, the advancement of our communities through research, learning and teaching, serves as an important guide in which we seek to embed in all aspects of our current and future activities.

As a reporting entity under the requirements of the Act, we recognise our responsibility to address all forms of modern slavery associated with our operations and to influence our networks to support future reforms.

In 2023, our Statement provides information on our activities and approach to mitigate these risks across employment, students and wider engagements.

I thank and acknowledge the ongoing efforts of all staff and students in recognising modern slavery risks and taking appropriate steps to address them.

A handwritten signature in black ink, appearing to read 'Amit Chakma'.

**Professor Amit Chakma**  
Vice-Chancellor

UWA Senate approved this Statement on 24 June 2024.

# Executive Summary

The University of Western Australia (UWA) is committed to its responsibility to staff, students, suppliers and community to ensure that modern slavery risks are identified and addressed within our operations and supply chains. This Statement reflects that commitment and reports on the steps undertaken to assess and address the risks of modern slavery within our operations and supply chain for the period 1 January 2023 to 31 December 2023 and future commitments in relation to mitigating modern slavery risks.

We have undertaken an assessment of our policies and practices through consultation across UWA, in addition to an analysis of our supply chain. While the risk of modern slavery within our operations and supply chains is deemed to be low, we will continue efforts to enhance and improve our policies, practices and culture in relation to modern slavery across UWA.

## **APPROACH TO REVIEW AND DEVELOPMENT OF OUR STATEMENT**

The UWA Modern Slavery Working Group (Working Group), which is comprised of representatives from key operational areas, was established to lead the planning and implementation of programs and processes to identify and address the risk of modern slavery. The Working Group operates under the direction of the Office of the Chief Financial Officer within the Executive.

In developing this Statement, UWA recognises that various facets of our operations may be subject to the risk of modern slavery and accordingly, has engaged with our operational areas to identify current mitigations in place and future actions to address those risks. These facets of our operations include current and future students, staff, investments, supply chain, and subsidiaries.

This Statement recognises areas of risk within our supply chain which have been assessed through targeted analysis encompassing geographical location and spend analytics of high-risk supply categories, such as Facilities Management (incorporating construction), Information and Communication Technologies and Equipment and Consumables. The Statement has benefitted from our collaboration with the Australian Universities Procurement Network (AUPN) and the UWA Modern Slavery Research Cluster.

Through this engagement, collaboration and analysis, UWA has assessed that our overall modern slavery risk rating remained low in 2023. We do, however, acknowledge the work yet to be done to fully interrogate and mitigate these risks and to remediate any occurrences of modern slavery should they be identified.

# Our University Structure, Operations and Supply Chains

## ABOUT UWA

Established in 1911 as Western Australia's first university, The University of Western Australia (UWA) was also the first free university in the British Empire. As one of Australia's leading research-intensive universities UWA operates more than 40 intensive research centres and 22 schools, offering students tertiary degrees in 12 areas of study, in addition to having a broad range of successful industry partnerships. In 2023 UWA educated more than 28,000 students from over 100 countries. UWA is a member of the internationally recognised Australian Group of Eight universities, a network of high-quality, research-intensive universities with a particular focus on student experience.

## OUR GOVERNANCE

### Senate

The *University of Western Australia Act 1911 (WA)* gives the Senate powers to act in the interests of UWA through the making of statutes, regulations, and by-laws and through the management of income and expenditure. It provides powers of delegation for the Senate, so that day-to-day management can be delegated to officers employed by UWA. UWA is responsible to the State Minister for Education for the proper conduct of its business under the State legislation, and to the Commonwealth Minister for Education for the delivery of our teaching and research programs, and for the provision of adequate infrastructure to support those programs.

### Executive

The Senate appoints the Vice-Chancellor and works in partnership with the incumbent in this role to maximise UWA's capacity and performance, and to ensure our fiscal viability. The Vice-Chancellor is delegated operational responsibility of UWA. The Vice-Chancellor appoints an executive group to assist with responsibilities for the academic, financial, administrative and other business of UWA.

## OUR OPERATIONS

As a higher education institution, UWA's core activities of teaching, research and community engagement are highly dependent on the calibre and integrity of its people. UWA has a responsibility to ensure that its workforce and student body are provided with safeguards and mechanisms to mitigate modern slavery risks.

### Education

Responsibility for the quality and delivery of education at UWA primarily lies with our schools. They design and deliver courses and units and are accountable for quality of teaching and student satisfaction with their educational experience. The Deputy Vice-Chancellor (Education) leads UWA's academic programs and education mission.

### Research and Innovation

Responsibility for the quality and delivery of research at UWA lies with our schools, institutes and centres. They foster collaborative and multidisciplinary research teams that resolve real world challenges that are critical to the planet and its people. The Deputy Vice-Chancellor (Research) leads UWA's research mission and programs.

## Global Partnerships

UWA is passionate about its partnerships and creating positive change for the wider community. It embodies this through support for a wide range of initiatives in key development areas of art, culture, sport, education and philanthropy. The Vice Chancellor leads the University's global partnership engagement, supported by the Pro Vice Chancellor (Global Engagement).

## OUR SUPPLY CHAIN

Our procurement activities apply to the acquisition of goods and services, whether purchased or leased, for all business units, across all sources of funding. These activities are guided by our procurement principles of probity, fair competition, value for money, sustainable procurement and risk managed procurement. Procurement activities are informed by the Finance Policy and the Procurement Financial Control Document. Purchases that are assessed to be high-risk undergo a formal tender process irrespective of the total dollar value of the resulting contract.

UWA non-employee related annual spend for 2023 was \$462 million, across over 5,500 vendors through active contracts, purchase orders or credit

card expenditure ranging from one-off research equipment purchases to high value, multi-year contracts. UWA classifies its external spend across six key category areas to support the varied business needs of its College of Schools as well as the operational business units.

UWA is committed to transparency across our processes and policies, to drive up standards and highlight issues across our supply chain. UWA recognises the need for continuous improvement in the identification of risks beyond tier 1 suppliers, the influence exerted in the actions we take and the development of our people and culture to further understand and address modern slavery in our procurement.

UWA's engagement with the Australian University Procurement Network (AUPN) and the initiatives developed by the AUPN Modern Slavery Working Group serve to inform UWA's approach to dealing with modern slavery independently, but also from an industry platform, leveraging the collective procurement spend of approximately \$16 billion annually across 38 participating universities.





# Elements of Modern Slavery Relevant to the Tertiary Education Sector

## DEFINITION OF MODERN SLAVERY

Modern slavery is an umbrella term used to collectively refer to human trafficking, slavery, and slavery-like practices. It involves serious exploitation of people for personal or commercial gain. Modern slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom. Australia has agreed with the United Nations to attempt to abolish modern slavery by 2030. Exploitative practices, including human trafficking, slavery, servitude, forced labour, debt bondage and forced marriage, are all considered modern slavery and are serious crimes under Australian law.

## GLOBAL MODERN SLAVERY PROFILE 2023

In 2023, the Global Slavery Index (GSI) estimated that approximately 50 million individuals were caught in modern slavery worldwide. Among these victims, 54% were female, and 12 million were children. It is understood that 16 million of these modern slavery victims were exploited within private sector supply chains. Despite the low prevalence of slavery in G20 countries, their responsibility cannot be overlooked. It is estimated by GSI that \$468 billion worth of G20 imported goods are at risk of being tainted by modern slavery.

## APPLICABILITY TO UNIVERSITIES

For universities, identifying and addressing modern slavery involves several key elements:

1. **Education and Awareness:** Universities can incorporate discussions about modern slavery into their curricula. For example, including it in the core syllabus of areas such as medicine and business can empower graduates to identify and respond to cases of modern slavery in their workplaces.
2. **Research and Knowledge Building:** Universities can play a crucial role in conducting research on modern slavery. By generating knowledge and awareness, they contribute to the fight against this global issue.
3. **Supply Chain Transparency:** Universities should examine their supply chains to identify any potential risks related to modern slavery. This includes assessing suppliers, contractors, and other partners to ensure ethical practices.
4. **Reporting Accountability:** Compliance with legal requirements, such as the *Modern Slavery Act*, involves producing annual statements that outline actions taken to address modern slavery risks. These statements demonstrate a commitment to transparency and accountability.

Collectively, Australian universities can contribute significantly to eradicating modern slavery and promoting human rights globally.

# Areas of Risk in Our Operations and Supply Chains

Utilising the data and information available from our supply chain and through our wider consultation processes with our directorates, schools and subsidiaries, UWA would assess our risk of modern slavery in our operations and supply chain at this time to be low. The University recognises three key areas within our operations where applicable risks may be identified.

## OUR STUDENTS

In 2023, 28,424 students were enrolled at UWA, with an equivalent full-time student load of 20,344.

UWA implements a range of policies and procedures upholding the rights and freedoms of all our students in line with national legislation and international commitments. The [University Charter of student rights and responsibilities](#) sets out the fundamental rights and responsibilities of students and their organisations at UWA.

### Work Placement Risk

Integrated learning is an important component of our teaching and learning experience for our students. Student classroom and co-curricular learning is supported via experiential learning opportunities facilitated by UWA through:

- paid and unpaid placements/internships - undertaken for both credit and not-for-credit
- overseas placements with host organisations
- placements undertaken via third party providers
- industry mentoring programs
- industry projects.

Employment opportunities are advertised through a jobs board exclusively for UWA students. Students are able to apply for these opportunities directly

with the employer. UWA deems the risk to be low due to procedures and policies in place to review providers and safeguard against exploitation.

## OUR EMPLOYEES

Universities play a critical role in shaping ethical norms and promoting responsible workplace practices, by prioritising awareness, education, and proactive measures.

In 2023, UWA's full-time employee equivalent was 3,240 employed.

Our terms and conditions of employment are set out in employment contracts and Enterprise Agreements. The of Modern Slavery within our direct employee workforce is deemed to be low, due to the effective framework of industrial agreements, policies and practices in place to ensure continued compliance and provide employees with appropriate processes to raise or identify potential risks.

## OUR SUPPLY CHAIN

UWA recognises as a global organisation the important role our university plays in reducing the risk of modern slavery within our operations and supply chain, and in influencing the broader supply chain.

### Geographic Risks

Some countries may have higher risks of modern slavery due to poor governance, weak rule of law, conflict, corruption, displacement, state failure to protect human rights, migration flows and socioeconomic factors like poverty or widespread discrimination.

The largest share of forced labour occurs in business enterprises of all sizes linked to the broader market economy, in sectors including services, manufacturing, construction, agriculture, and mining and quarrying.

Globally, it is recognised that certain spend categories carry higher risks, due to the location and nature of the products or services in which they are developed. UWA sources goods and services from a wide range of Australian and international suppliers. Leveraging the capabilities of the AUPN Modern Slavery Dashboard, it was identified that in 2023 UWA engaged with 5,492 unique suppliers, of which only 9 were categorised as ‘very high risk’ (0.16% of the supplier base). This represents a low risk of modern slavery within our supply chain.

## OUR OPERATIONS

Beyond procurement, it is acknowledged that UWA must consider risks within its own operations. For example, cleaning services, maintenance, and construction activity may involve vulnerable workers. Identifying and addressing these risks will ensure that UWA’s direct actions do not inadvertently contribute to modern slavery.

## OUR INVESTMENTS

UWA has Environmental, Social and Governance (ESG) risks and considerations outlined in its Investment Policy Statement (IPS), which incorporates the requirements of UWA under the Modern Slavery Act 2018 (Cth) and the expectations of our Implemented Consultant and Investment Manager(s) to assess and address this risk and report on the issue in line with the regulations and with the IPS policy. In 2023, the University launched a dedicated webpage to inform our community of [our sustainable investment philosophy](#).



UWA Procurement categories

# Actions Taken to Mitigate Modern Slavery Risks

## OUR MODERN SLAVERY WORKING GROUP

The role of the Modern Slavery Working Group is to provide a governance structure, under the direction of the Office of the Chief Financial Officer, to address the risk of modern slavery in UWA's operations and supply chain. Under this framework the Working Group identified areas across UWA's operations and supply chains with potential exposure to the risk of modern slavery and engaged with representatives from a broad cross-section of UWA to enable adequate understanding and oversight of those risks.

This Working Group and the identified representatives are responsible for the coordination and preparation of this Statement as well as facilitating the future planning and oversight of modern slavery risk mitigations and remedies. The Working Group comprises:

- Finance
- Human Resources
- UWA Modern Slavery Research Cluster (academic representation)
- Student Life
- The University Club of Western Australia
- UWA Sports
- Perth International Arts Festival
- UWA Accommodation.

In 2023 the role and composition of the Working Group was reviewed and updated to ensure a more streamlined approach to statement preparation, along with more effective development, targeting and oversight of modern slavery initiatives going forward.

## STUDENTS

### Recruitment

UWA Future Student Recruitment is a function delivered by the Brand Marketing and Recruitment (BMR) division. BMR consolidates all marketing, communications, admissions and future student related activity and operates within the Office of the Deputy Vice-Chancellor (Operations).

Engagement follows the Australian Privacy Principles (APP) from the Privacy Act 1988 in all interactions with students, parents and agents. This is to protect the identity of the student and the personal information that is provided to the University through an enquiry or study application.

In the recruitment of international students, the University ensures compliance with Education Services for Overseas Students (ESOS) and ESOS National Code, working only with education agents and third parties who have been vetted through a due diligence process.

UWA's staff and agents advise students appropriately of their rights and obligations and respond promptly to and investigate complaints or concerns students raise. UWA's engagement network with other Australian institutions such as the Australian Universities International Directors Forum and industry associations such as the International Education Association of Australia (IEAA) allows for broader awareness and identification of any industry concerns of modern slavery.

## Onboarding and Orientation

The divisions of **Student Wellbeing and Engagement** and **International Student Experience and Global Learning** sit within the Directorate of Student Life, within the portfolio of the Deputy Vice Chancellor, (Education). Both teams are responsible for designing and delivering educational training and workshops to raise domestic and international students' awareness of modern slavery. Students are made aware of potential risks related to places of employment, sexual exploitation and residential living arrangements; alongside how to report concerns and seek support.

Information sessions are included in pre-departure sessions for international students and included in onboarding and orientation sessions for all students.

The University ensures compliance with Education Services for Overseas Students (ESOS) and ESOS National Code when onboarding and orienting students.

## Student Internships, Placements and Unpaid Work:

UWA has completed a review and updates to Work Integrated Learning (WIL) supported placements and internship provision process. The review has streamlined the ability for staff to assess placements and monitor agreements with host organisations, third party providers and external organisations who are providing internships through a single common software and the creation of single template agreements and submission forms. These changes ensure students are entering placements that meet requirements of the Fair Work Act and are placed in safe and fair places of work.

## Awareness and Advocacy

UWA has developed and published a [dedicated modern slavery page](#) on its public facing website, with information on:

- modern slavery and modern slavery in Australia
- actions UWA has taken and plans to take, including the annual statement

- student specific risks of modern slavery
- the signs of modern slavery
- the rights of individuals and how to seek support and/or make a report.

## OUR EMPLOYEES

UWA's terms and conditions of employment are set out in employment contracts and Enterprise Agreements. These industrial instruments meet all relevant legislative and common law obligations and are provided to all employees when they are engaged by UWA. The engagement of employees at UWA complies with the *Fair Work Act 2009* (Cth) and all other relevant legislation.

The majority of UWA employees' employment is governed by one of our Enterprise Agreements. These Enterprise Agreements provide the minimum terms and conditions of employment, for the individuals covered by them. Each of the Enterprise Agreements have been approved by the Fair Work Commission.

Senior employees have individual employment contracts which are drafted in compliance with current legislation. Non-employee staff are engaged under letters of appointment that are also drafted in compliance with current legislation.

UWA has a suite of policies, procedures and practices in place which assist in managing human rights, promoting diversity and ensuring compliance with relevant legislation.

UWA has a comprehensive people-focused policy suite that provides protection for:

- prospective staff (during recruitment and selection); and
- staff during their employment.

These policies are designed to ensure a safe working environment, protection from mistreatment at work and aim to provide a workplace free of intimidation, threats, actual or threatened physical and/or sexual violence, forced

labour and abusive working conditions. Policies are available to staff through UWA's Policy Library. Failure to comply with UWA policies may result in disciplinary action. There are also a range of mechanisms in place for staff to make enquiries or complaints regarding their employment, without fear of prejudice or adverse consequence.

UWA has a dedicated Human Resources team to assist employees with enquiries or complaints. The University's Integrity and Standards Unit assists non-employee staff with enquiries or complaints. If staff remain unsatisfied or do not feel comfortable to approach Human Resources or the Integrity Standards Unit, they are able to lodge a dispute or grievance under the Enterprise Agreements or the relevant policy (for staff engaged under other industrial instrument) or make a confidential disclosure to a University Disclosure Officer.

In managing modern slavery risks in the workplace, UWA:

- Ensures staff are aware of their obligations to comply with our policies;
- Ensures that all legal obligations are complied with at every stage of the employment life cycle from recruitment and on-boarding to the end of the relationship;
- Does not charge staff for the costs associated with their recruitment or engagement; and
- Ensures staff have the appropriate working rights to work in the country within which they are working.

UWA is committed to continuous improvement and will conduct reviews of relevant policies to ensure ongoing compliance with the relevant legislation and minimise risks of Modern Slavery in its workplace. This was completed through a review of all employment policies. UWA will continue to review and update its policies to incorporate any changes to the legislation as needed.

To minimise the risks associated with unpaid appointments (volunteering, vocational placements

or work experience), UWA is committed to assessing its current practice over the next three years and introduce appropriate mechanisms to ensure a person is a genuine volunteer or intern and would not be entitled to payments or other entitlements under UWA's Enterprise Agreements or policies.

## OUR SUPPLY CHAIN

### Category Level Analysis

UWA undertakes risk-based analysis of its supply categories, as part of ongoing category management activities. Using this approach, and in line with previous reporting cycles, we have identified high-risk industries from which we routinely procure goods and services - construction, electronic services and consumables, scientific equipment and consumables, cleaning and waste services, and security services.

### Procurement Process Mitigations

UWA acknowledges that formal procurement policies and processes have an important role to play in reducing the risk of modern slavery in our operations and supply chain. To support and encourage positive change in the conduct of suppliers, our processes for identifying, engaging, evaluating, and contracting with suppliers all address modern slavery risks and incorporate reasonable and appropriate mitigations.

Specifically, we screen for modern slavery risks in the following areas:

- Supplier identification and pre-qualification, including risk analysis and categorisation
- Competitive evaluation and due diligence, including tender criteria and process templates
- Onboarding and induction, including ongoing relationship management plans
- Contractual frameworks, including legal terms and key performance indicators.

## **Ongoing Australian University Procurement Network (AUPN) Engagement**

UWA participates as a member of the AUPN in their Modern Slavery program, which provides synergy with other universities and makes a larger impact in identifying and addressing modern slavery in our supply chain.

UWA has sought to upskill the procurement team's understanding of modern slavery, the legislation surrounding modern slavery and the ramifications to our supply chain and operations. This has been, and continues to be, achieved by collaboration with the AUPN, through participation in forums, webinars, conferences, and from research of publications, toolkits and assessments provided by independent bodies such as Walk Free, Fair Supply and Unchained Solutions.

## **AUPN Modern Slavery Dashboard**

In 2023 UWA deployed the AUPN Modern Slavery Dashboard, replacing the previously deployed FRDM platform. The dashboard is the AUPN's current selected technology enabler to tackle modern slavery within supply chains. The platform algorithmically identifies modern slavery risks throughout the AUPN member universities' supply chains, enabling UWA to make informed decisions and take action to address modern slavery risk. Via the dashboard and other AUPN resources, UWA has been able to augment its modern slavery mitigation outcomes by accessing:

- Supplier assessments and scoring
- Sub-supplier visibility
- Supplier data cleansing/coding
- Adverse media reporting
- Supplier onboarding tools
- Templates.

The tools and resources made available via the dashboard also support our procurement team in performing the following activities:

- Developing content for the annual modern slavery statements
- Qualifying suppliers for modern slavery risk and other Environmental, Social and Governance (ESG) standards during tender processes
- Managing, scoring, and nesting questionnaires into supplier risk profiles
- Viewing lower tier suppliers where modern slavery risk may be higher and/or previously unidentified
- Gaining market insights on modern slavery via articles and media on risk types tied to AUPN suppliers/industries
- Increasing the capabilities of our team to identify, understand and mitigate modern slavery risks.

## **AUPN Supplier Self-Assessment Questionnaire (SAQ)**

UWA supports the ongoing process of the development of a unified SAQ in the AUPN Modern Slavery Dashboard. While awaiting the roll-out, UWA continues to leverage the dashboard to perform spot checks and risk-based analysis of our suppliers, corresponding with scheduled procurement and category management activities and/or queries from internal and external sources.

# Assessment of the Effectiveness of Our Actions

## OUR STUDENTS

UWA is satisfied that its current policies and procedures have been effective in minimising risks of Modern Slavery to the student body. To date, UWA has not identified any instances of modern slavery and has not received any grievances from any prospective or current students that they may have been subject to modern slavery.

## OUR EMPLOYEES

UWA is satisfied that its current policies and procedures have been effective in minimising risks of Modern Slavery in its workforce. To date, UWA has not yet identified any instances of modern slavery and has not received any grievances from any prospective staff or current staff that they may have been subject to modern slavery.

## OUR SUPPLY CHAIN

Leveraging the capabilities of the AUPN Modern Slavery Dashboard, it was identified that in 2023 UWA engaged with 5,492 unique suppliers, of which only 9 were categorised as 'very high risk' (0.16% of the supplier base). A further 23.54% were classified as 'high risk'. These results compared favourably to the 35 AUPN universities, which averaged expenditure of 3.1% classified as 'very high risk' and 39.3% classified as 'high risk'.

### 'Very high risk' classification

The 'very high risk' category was comprised of \$200,000 in expenditure across 9 suppliers, encompassing 5 high risk categories and 4 high or 'very high risk' countries. Only 1 of these suppliers involved expenditure in the \$50,000-\$100,000 bracket:

- Event management in India (\$95,000)
- Laboratory consumables in Taiwan (\$47,000)
- Student recruitment in Pakistan (\$29,000)

### 'High risk' classification

The 'high risk' category expenditure was comprised of 1,293 suppliers totalling approximately \$134m, predominantly in the following supply categories:

- Scientific equipment and consumables (27%)
- Freight (8%)
- Software (5%)
- Accommodation (5%)
- Remaining 103 Level 4 Categories (55%).

Despite 'high risk' expenditure accounting for 23% of the UWA total, it was noted that over 90% of this expenditure took place in 'low risk' geographic locations. It appeared that a significant number of suppliers were flagged for conducting business in Australia, while operating overseas offices in countries listed as 'medium' or 'high risk' for modern slavery. UWA predominantly transacts with suppliers located in Australia, and therefore subject to Australian laws prohibiting modern slavery. Less than 1.7% of UWA's expenditure was directly with suppliers located in geographical areas classified as high or very high risk and is subject to standard due diligence and contracting processes required by UWA policies.



### **Pro-active use of data driven insights**

UWA uses the dashboard to pro-actively monitor supplier and expenditure levels in high-risk areas or categories that will be subject to formal procurement under UWA policies, such as request for tender (RFT) and request for quotation (RFQ) processes. This information is used to consult with UWA stakeholders to ascertain the overall level of risk in engaging with such suppliers, and agree to any necessary mitigating actions reflecting legal, financial, operational and procurement requirements.

In addition, UWA Procurement has utilised the insights available from the data analysis to inform the category and procurement planning process for 2024. For example, a tender for freight services, a university-wide travel review (inclusive of accommodation service providers) and the re-contracting and/or tendering of nominated suppliers in the category of scientific equipment and consumables are planned.

As a small number of suppliers have been identified as 'very high risk', UWA Procurement has engaged in consultations with our HR and Student Services divisions (via their representation in the Working Group), to identify, assess and mitigate the risk of engaging these suppliers as it relates to current or planned procurement activity.

These actions and outcomes provide an example of how UWA Procurement has used the available tools to measure our effectiveness in identifying modern slavery risks in the supply chain, leading to practical mitigations via our established category management framework.



# Actions Planned

## OUR MODERN SLAVERY WORKING GROUP

The Working Group has previously identified that a Modern Slavery Plan will be required to fully address its responsibilities, to be developed in accordance with UWA's commitment to continuous improvement. This will enable UWA to re-prioritise actions to meet the needs of the business and to ensure the focus of the activities align with current and future legislative requirements in modern slavery reporting. During 2023 the Working Group commenced a draft framework which will inform the development of the Modern Slavery Plan.

## STUDENTS

During the next reporting period, the team responsible for Work Integrated Learning are commencing modelling for international internship opportunities and will identify additional measures to address specific risks that might occur as they relate to modern slavery. Similarly, there will be collaborative work to support the Student Life development of a new peer workforce model, so practices and processes are informed by recently completed updates and process changes.

In the coming period, UWA will work to broaden awareness of the risks to students and is introducing new information on reporting options where students can safely and confidentially raise concerns and/or make a formal report. This will include a review of our current reporting process to ensure students have a voice and agency.

Other actions in the coming period will include:

- Addressing debt bondage with a fees dashboard to be developed with specific supports for students who may already be affected.
- Working with critical areas where mandatory reporting is now required for human trafficking and sexual exploitation.
- Increasing awareness and education of labour exploitation in supply chains with a focus on helping students to understand how they can be ethical consumers.
- Raising awareness of UWA's child safety framework and the particular risks (and UWA responsibilities) for the under 18 student cohort.
- Development of a 'Fees dashboard' identified by Student Life to assist with communications and awareness in relation to debt bondage.
- Actively working with students to ensure they have voice and agency.

# Our Process of Consultation with Controlled Entities

## OUR SUBSIDIARIES

UWA's subsidiaries are:

- **The University Club of Western Australia Pty Ltd**  
Principal Activity – Events and Function Centre
- **Perth International Arts Festival Ltd**  
Principal Activity – Arts and Culture Events
- **UWA Sport Pty Ltd**  
Principal Activity – Sports and Recreational Activities
- **UWA Accommodation Services Pty Ltd**  
Principal Activity – Student Accommodation
- **UWA Accommodation Holdings Pty Ltd**  
Principal Activity – Hotel Operations.

For the purpose of Statement preparation, subsidiaries are asked to provide details of current policies, processes and activities in place to address the risk of modern slavery. All subsidiaries engage with the Working Group and UWA procurement to identify and mitigate supply chain risks.

### **The University Club of Western Australia Pty Ltd (University Club)**

The University Club has identified the international farming of coffee beans as being at risk of potential modern slavery activities. The University Club supplier is however certified as Fair Trade and has given a commitment that products are sourced and manufactured ethically. Where possible The University Club aims to source locally within WA or within Australia minimising the risk of unethical agricultural practices. The University Club also remains in line with industry award and NES conditions to ensure fair treatment of all staff, including non-resident visa holders.

The University Club is committed to promoting equal treatment of all staff and conducts all recruitment and selection processes in a fair and

confidential manner while aligning to the Fair Work Act 2009 (Cth). In relation to sourcing processes, The University Club is committed to utilising the UWA sourcing and contract templates and participating in future supplier Self-Assessment Questionnaires and contributing to the Modern Slavery Plan as coordinated by the Working Group.

### **Perth International Arts Festival Ltd (Perth Festival)**

The Perth Festival's risk assessment of current activity is deemed to be minimal in relation to modern slavery. The Perth Festival acknowledges that in the arts there is risk of non-payment to performers and other artists, however it is vigilant in ensuring that these practices do not happen. The Perth Festival places high value on its people and has a dedicated People team to ensure fairness in all aspects of their activities. This is the only team of its kind at any festival in Australia. The Perth Festival diligently focuses on ensuring that all their staff and artists are paid correctly and at the appropriate rates by undertaking regular contract reviews, confirming salary advice with Live Performance Australia and having a system of checks and balances across its operations.

### **UWA Sport Pty Ltd**

Staff of UWA Sport fall under the appropriate safeguards and agreements applied by UWA. UWA Sport has functions dedicated to People, Culture and Inclusion with oversight on the safety and wellbeing of its staff. While UWA Sport's supply chain includes some high-risk categories such as sporting goods and uniform suppliers, it endeavours to source locally where possible to reduce exposure to modern slavery risks in overseas countries where employment safeguards may not be as stringent. Further, UWA procurement processes and systems are used for large acquisitions and projects.

### **UWA Accommodation Services Pty Ltd**

This subsidiary does not have any staff and is not an operating entity. This entity processes incentives under the National Rental Affordability Scheme Incentive, that UWA receives from the government as part of an accommodation affordability scheme. Operation and management of the property and tenancy management services are performed UWA.

### **UWA Accommodation Holdings Pty Ltd**

This entity facilitates hotel management operations. Its primary activity is the management of an external operator (AAPC Limited and AAPC Properties - together referred to as Accor Pacific) to deliver hotel services and operations to and on behalf of UWA. Accor Pacific (AAPC) is responsible for the hotel operations and publishes its own annual Modern Slavery Statements in accordance with the Modern Slavery Act.







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