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# ACKNOWLEDGEMENT OF TRADITIONAL OWNERS of the land on which our campuses are located

The University of Melbourne acknowledges the Traditional Owners of the unceded land on which we work, learn and live: the Wurundjeri Woi-wurrung and Bunurong peoples (Burnley, Fishermans Bend, Parkville, Southbank and Werribee campuses), the Yorta Yorta Nation (Dookie and Shepparton campuses), and the Dja Dja Wurrung people (Creswick campus).

The University also acknowledges and is grateful to the Traditional Owners, Elders and Knowledge Holders of all Indigenous nations and clans who have been instrumental in our reconciliation journey.

We recognise the unique place held by Aboriginal and Torres Strait Islander peoples as the original owners and custodians of the lands and waterways across the Australian continent, with histories of continuous connection dating back more than 60,000 years. We also acknowledge their enduring cultural practices of caring for Country.

We pay respect to Elders past, present and future, and acknowledge the importance of Indigenous knowledge in the Academy. As a community of researchers, teachers, professional staff and students we are privileged to work and learn every day with Indigenous colleagues and partners.

## INTRODUCTION

This statement has been prepared pursuant to the *Modern Slavery Act 2018* (Cth) and outlines actions taken by the University of Melbourne to identify, assess and address modern slavery risks in its operations and supply chains over the period of 1 January 2022 to 31 December 2022.

# VICE-CHANCELLOR'S MESSAGE

The University of Melbourne acknowledges that modern slavery is a significant global human rights issue, and we remain dedicated to supporting and respecting individual dignity and human rights across the full breadth of our operations.

As an institution that exists to serve society, the University takes seriously its responsibility to identify and prevent exploitative practices of any kind, and to promote social responsibility across all activity areas, including operations, teaching and learning, research, and engagement activities. As an educational establishment, we also recognise our role in advancing public understanding of modern slavery risk, and acknowledge the need to provide supports for members of our community who may be at risk of exploitative practices, including international students.

In 2022, the University continued to strengthen its systems and processes to identify potential modern slavery risks, and undertook a range of risk reduction measures, including by raising awareness among students, staff, external suppliers, and our broader community.

This statement was approved by University Council on Wednesday 21 June 2023.



**Professor Duncan Maskell** 

Thomas

Vice-Chancellor

## STATEMENT

# 1. REPORTING ENTITY AND STRUCTURE

The University of Melbourne (ABN 84 002 705 224) was founded in 1853 and established by an Act of the Victorian Parliament. It is a body politic and corporate and continues in existence under the *University of Melbourne Act 2009* (Vic) which establishes the University's governing body, the Council, and its core functions. This Act empowers the University to enact subordinate legislation and act by way of resolution of its governing body, or by the decision of its authorised officers. The University has 10 faculties¹ and is led and managed by the Vice-Chancellor and University Executive.

1 In November 2022 the University announced that the Faculty of Veterinary and Agricultural Sciences would be disestablished and the two schools that make up the faculty, the Melbourne Veterinary School and School of Agriculture, would be integrated into the Faculty of Science. This change took effect from 1 January 2023.

## **Entities owned or controlled by the University**

The University's extensive network includes joint venture partners, subsidiary companies, affiliated bodies (eg research hospitals) and non-academic University departments. This statement is made on behalf of the University and the following entities it owns or controls:

- Australia India Institute Private Limited (India)
- · Australian Music Examinations Board (Vic) Ltd
- · Doherty Clinical Trials Ltd
- · Goulburn Valley Equine Hospital Pty Limited
- · Melbourne Business School Ltd
- Melbourne Teaching Health Clinics Ltd
- · Melbourne University Publishing Ltd
- · Nossal Institute Ltd
- UMELB Pte. Ltd. (Singapore)
- · UOM Commercial Ltd
- UM Commercialisation Pty Ltd
- UoM International Holdings Pty Ltd

## **Key facts**

\$2.7bn operating income

\$1.13bn third party spend

52,712 students\*

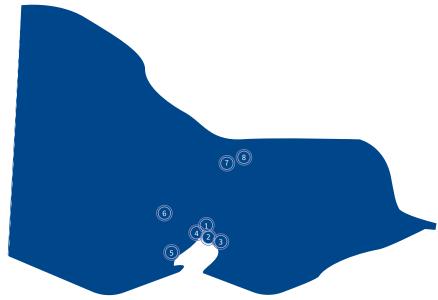
9809 staff\*\*

#### **Campus locations**

University operations are located in Victoria, Australia. We operate eight campuses across Victoria, with the majority of operations occurring in metropolitan Melbourne.

Campus locations are:

- Parkville (main campus)
- Southbank (music, visual and performing arts)
- Burnley (horticulture and agricultural science)
- Fishermans Bend (heavy engineering and infrastructure, under development)
- Werribee (veterinary medicine immersion)
- Creswick (environmental and forest science)
- Shepparton (rural health)
- **8** Dookie (agricultural science)



<sup>\*</sup>Equivalent Full Time Student Load (EFTSL) \*\*Total staff full-time equivalent (FTE) including continuing, fixed-term and casual staff

## 2. OPERATIONS AND SUPPLY CHAIN

#### **OPERATIONS**

The University of Melbourne is the largest research university in Australia and a world-leading higher education provider. The University's core activities are teaching and research, and the University's faculties, graduate schools and research institutes lead delivery of teaching, learning, research and engagement.

#### **RESEARCH**

As outlined in the 2021 Modern Slavery Statement, the University of Melbourne's Research, Innovation and Commercialisation (RIC) function operates within the portfolio of the Chief Operating Officer. RIC provides a suite of expert professional services to support academics to achieve global research excellence, and to translate their discoveries into real-world innovation and impact.

RIC manages research funding and reviews, and negotiates and arranges signing of research-related contracts. In doing so, it engages with a broad range of governmental, corporate, and civil society partners.

Many of these partners are owned or operated in foreign jurisdictions, where there may be a higher risk of modern slavery. With respect to research-related engagements, RIC endeavours to understand whether there is:

- Potential to procure goods produced using forced labour or debt bondage, and/or
- Potential to transact with third parties that could, or do, perpetuate modern slavery.

Sections 3 and 4 of this statement outline in further detail steps taken by the University of Melbourne to identify, assess and address modern slavery risks in research activities.

The University also remains committed to supporting research that may help to expose modern slavery risks across the world.

### **STUDENTS**

The University's Student and Scholarly Services (SASS) portfolio provides end-to-end student support. Faculties and graduate schools also provide opportunities for work integrated learning (WIL) and other teaching and learning support services, including co-curriculum and student experience activities.

Information and support services are provided by the following teams within SASS:

- Prospective student services
- Careers and employability
- · Global mobility
- · Campus safety.

#### **CONTROLLED ENTITIES**

The University's controlled entities form part of its overall compliance framework (see Criteria 1. Reporting entity and structure).

Name of controlled entity	Key business activities and operations	Countries outside Australia where controlled entity operates
Australia India Institute Private Limited	Engagement activities relating to the relationship between India and Australia; student recruitment	India
Australian Music Examinations Board (Vic) Ltd	Provision of public examinations in music, speech and drama in Victoria, with around 26,000 examinations typically conducted per annum	None
Goulburn Valley Equine Hospital Pty Ltd	Referral and first opinion equine veterinary practice for elective and emergency cases, with placement opportunities for final year Doctor of Veterinary Medicine students	None
Melbourne Business School Limited	Provision of educational services, academic research and engagement with alumni and organisations	Malaysia
Melbourne Teaching Health Clinics	Provision of clinical placements for students and clinical care for patients attending the clinics	None
Melbourne University Publishing Ltd	Book publishing	None
Nossal Institute Limited	Provision of teaching in the area of public health; specialist applied research consulting to donors (World Bank, ADB, UN Agencies) and research councils (National Health and Medical Research Council, and Australian Research Council)	Cambodia, Fiji, Ghana, India, Indonesia, Laos, Malawi, Myanmar, Papua New Guinea, Solomon Islands, and Tonga
UMELB Pte. Ltd.	Student recruitment	Singapore
UOM Commercial Ltd	Administration of a trust on behalf of the University for the commercialisation of research	None
UM Commercialisation Pty Ltd	Trustee for trust holding University of Melbourne equity in start-up companies	None
UoM International Holdings Pty Ltd	Oversight and governance of the University's offshore entities in China and Germany	China, Germany
Doherty Clinical Trials Ltd	Medical research, including delivery of clinical trials	None

## **SUPPLY CHAIN**

The University of Melbourne's supply chain is diverse and complex, reflecting the wide range of activities undertaken by the University. It includes products and services from industries such as construction, research, and teaching and learning, through to corporate services and facilities management.

## **Key facts**

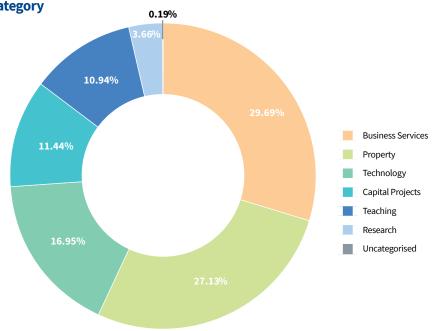
\$1.13bn spend

**10,815** suppliers

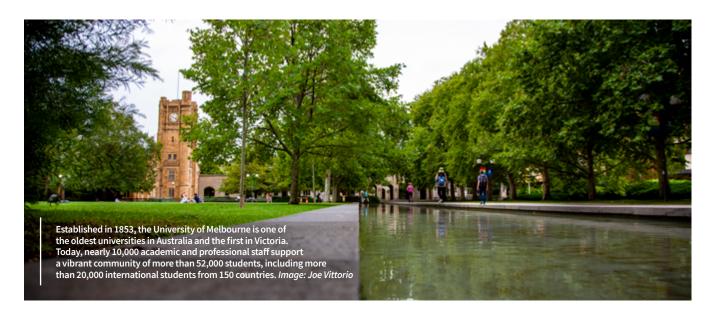
64 countries

**80%** of spend with 448 suppliers

2022 third party spend by category



Business services	Property	Technology	Capital projects	Teaching	Research
Human Resources	Facilities management	Audio visual	Consultant services	Library services	Grants
Logistics and storage	Plant and vehicles	IT hardware	Furniture and fittings	Student services	Research consumables
Marketing	Property management	IT networks	Works contractors	Teaching services	Research equipment
Office consumables	Utilities and	IT services			Research services
Professional services	renewables	IT software			
Student recruitment		Telecom			
Travel and entertainment					



## 3. MODERN SLAVERY RISKS

The University of Melbourne is committed to taking all necessary steps to identify, assess, address and mitigate modern slavery risks.

The University's governance framework and policies, as outlined in the first Modern Slavery Statement 2020, provide guidance and oversight for University of Melbourne operations. In addition, a new supplier onboarding process was implemented in February 2022. The University has a Risk Management Framework and Compliance Management Framework in place to help identify and mitigate modern slavery risks in its operations and supply chain. The Supplier Code of Conduct, which all suppliers are expected to adhere to, sets out minimum standards of behaviour including in the areas of human rights, labour, environmental impact and anti-corruption.

In 2022, an expanded, cross-functional Modern Slavery Working Group and Executive Steering Committee, consisting of representatives from across the University, refined its scope of activity to identify critical deliverables for 2022, facilitating a future program of activity and engaging stakeholders including students, suppliers, senior executives, University governance groups and committees. Members of the group assisted in the identification and assessment of modern slavery risks across the University's operations and supply chain.

### **OPERATIONAL RISKS**

#### **RESEARCH**

As outlined in the 2021 statement, the following is a summary of operational risks and review processes in the sphere of research.

The majority of research agreements are reviewed by the University's research office and assessed for contractual risks. Assessment includes a review of both the research activity and the research partner for reputational or compliance risks, including consideration of the Corruption Perceptions Index score of the partner's primary jurisdiction. Such assessments are in addition to the reviews also conducted by individual University researchers at the beginning of projects.

When higher risks are identified at the review stage, a comprehensive due diligence assessment is conducted on the research partner and project. If the risks identified in the assessment can be successfully managed, the agreement is signed by an appropriate officer of the University, as defined in the Delegations Framework. This provides an additional level of oversight. If the risks identified are unable to be managed within tolerance, the project is escalated to the Faculty and the Research Due Diligence Advisory Group for consideration and advice. The Research Due Diligence Advisory Group is composed of senior representatives from business areas across the University and is chaired by the Deputy Vice-Chancellor (Research).

Human ethics approval is required for all research conducted with or about people, and their data and tissue. The purpose of the University's ethics review process is to facilitate research that fulfills the principles of human research ethics: research merit and integrity, justice, beneficence, and respect.

The University's human research ethics committees are convened in line with the requirements stated in the National Health and Medical Research Council's (NMHRC) National Statement on Ethical Conduct in Human Research ('National Statement'). Committee members use the National Statement to identify common ethical issues and to justify decisions made during review.

Administration of the University's human ethics review processes is supported by the Ethics Shared Service within the Office of Research Ethics and Integrity (OREI). The Central Human Research Ethics Committee (CHREC) has oversight of all matters pertaining to ethics review of human research at the University and reports to the Research Ethics and Integrity Strategy Committee (REISC), convened by the Deputy Vice-Chancellor (Research).

#### **RISK REVIEW**

To fully understand the magnitude of modern slavery risks in the area of research, the University conducted a comprehensive review in 2022 to determine the risk profile of University engagements with foreign research partners.

### Foreign jurisdiction partnerships

**386**foreign jurisdiction
University of Melbourne
partnerships

6% located in high-risk jurisdictions

94% located in low-risk jurisdictions

#### Risk level based on prevalence of modern slavery in jurisdiction of research partner

Risk level	Number of research partnerships in 2022 *	% of total research partnerships *
Very high	0	0%
High	23 <sup>‡</sup>	6%
Moderate	24	6%
Low	78	20%
Very low	257	67%
Unrated	4	1%
TOTAL	386	100%

<sup>\*</sup> Partnership refers to a foreign partner collaborating with the University on a research project. For projects with multiple partners, each partner is treated as a discrete partnership, but subsidiary agreements are not treated as a new partnership. The risk of modern slavery for each jurisdiction is based on the 2018 Global Slavery Index estimated prevalence. Unrated risk refers to countries that do not have a country risk rating in the Global Slavery Index.

#### **STUDENTS**

The University of Melbourne remains determined to mitigating modern slavery risks, particularly as they relate to students. The University acknowledges potential risk to students when they engage in paid employment, voluntary work and learning experiences, both here and overseas, as well as in other settings which may foster exploitation. The University's duty of care is to ensure students are informed of the risks and provided with accessible and relevant support services.

In assessing risk across cohorts and student activities, the University identified student employment, placements and internships as areas at greatest risk of modern slavery. International students were again identified as being at higher risk, as outlined in the 2021 statement. The University also acknowledges the intersections of modern slavery risk with other compliance obligations and its latent existence in some student processes which need to be uncovered and addressed.

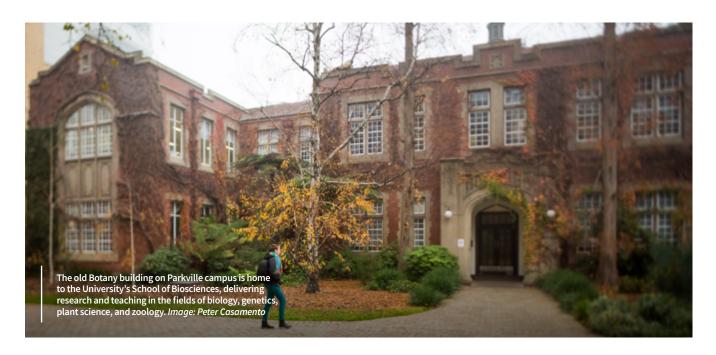
#### **CONTROLLED ENTITIES**

Five out of the University's 12 controlled entities operate outside Australia. Of these, only one entity, Nossal Institute Limited, reported any operational activity in countries where Global Estimates of Modern Slavery show most forced labour exploitation to occur, namely in Cambodia, Pakistan and Papua New Guinea.

#### **SUPPLY CHAIN**

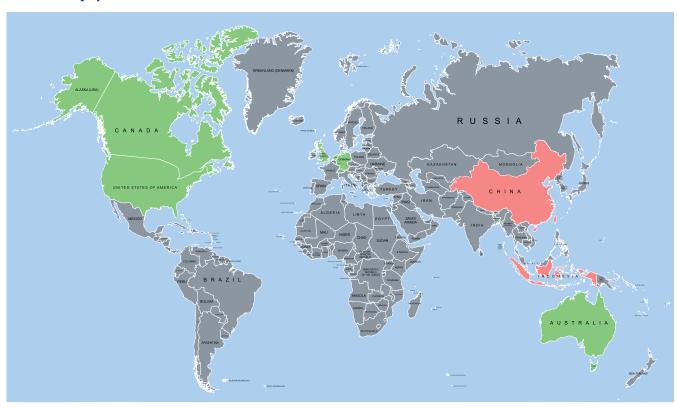
The University recognises the existence of modern slavery risk across its supply chains and, further, that these risks may be elevated in certain supply chains due to factors such as geographical location and/or source locations for materials and products the University procures. There is an identified lack of visibility in certain overseas markets which may present increased risk of modern slavery, especially in secondary (and further) supply chain tiers, and in source materials used in the University's goods and services.

More than 96 per cent of the University's supply chain spend is with Australian-based companies, or companies operating in low-risk countries, as determined by OECD. The University has direct relationships with thousands of suppliers, and thousands more beyond this in its extended supply chain.



Of the 23 research partnerships with high-risk jurisdictions, 96 per cent of the external partners operate in sectors and industries at low risk of modern slavery, including educational and research institutions, intergovernmental and development agencies, or government agencies. The one remaining private company was also deemed low risk as a specialised agricultural enterprise in the biomedical sector.

## 2022 country spend breakdown



Top 10 countries of spend	Country risk level*	% of 2022 spend
Australia	Low	96.31%
United States	Low	1.78%
United Kingdom	Low	0.58%
Netherlands	Low	0.49%
Germany	Low	0.36%
Singapore	Low	0.14%
China	High	0.12%
Canada	Low	0.08%
Indonesia	High	0.08%
Switzerland	Low	0.05%

<sup>\*</sup> Based on Global Slavery Index

## High risk supplier Level 1 category spend breakdown

**31%** of total spend falls into high-risk categories

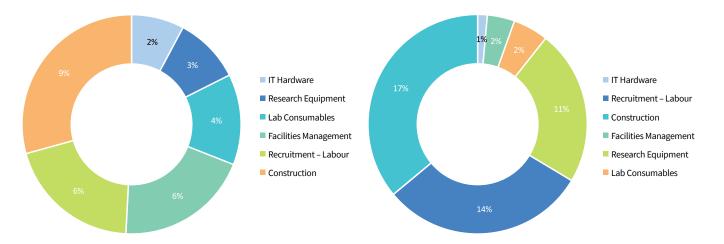
21% of total suppliers are deemed high risk

222 suppliers are in higher-risk categories

High-risk categories contributed to 31 per cent (\$355 million) of the University's total third party spend and 21 per cent of the University's total number of suppliers. This is a decrease of 0.23 per cent compared with 2021. The University's approach to managing high-risk suppliers continues to be through Supplier Management of Tier 1, as the majority of this spend is with large, Australian-based companies (outlined in table above). In 2022, 49.5 per cent of suppliers (222 out of 448) accounted for 80 per cent of the University's total spend. These 222 suppliers belonged to higher risk categories.

## High risk categories: % of total spend

## High risk categories: % spend of total suppliers



## **CONTROLLED ENTITIES**

Supply chains continue to present the highest level of modern slavery risk for the University's controlled entities. Only one controlled entity, Nossal Institute Limited, indicated possible engagement with a supplier in a top 10 country with high prevalence of modern slavery according to Global Estimates of Modern Slavery (Cambodia).

Addressing modern slavery risk associated with supply chains of controlled entities will be a focus for the University in 2023. This will involve greater emphasis on training for procurement stakeholders to ensure they have a comprehensive understanding of modern slavery risks, and of their roles and responsibilities in managing such risks.



## 4. ACTIONS TAKEN TO ASSESS AND ADDRESS RISK

#### **RESEARCH**

The University's approach to identifying and mitigating modern slavery risk in research-related activities has matured since the 2021 statement. In 2022, following launch of the Australian Universities Procurement Network (AUPN) modern slavery risk-based tool, the University used modern slavery ratings of its research partners as a baseline check within standard due diligence assessment processes. This helped form an accurate picture of potential modern slavery risks in the University's research activities, and served as the basis for defining an approach to engaging with University partners when elevated risk was identified.

Following a review of University research partnerships, it was determined that exposure to modern slavery risks was similar across 2021 and 2022. All research partner organisations based in jurisdictions with a high prevalence of modern slavery appeared to belong to low-risk industries, indicating that such partnerships would be unlikely to perpetuate modern slavery.

#### **STUDENTS**

During the reporting period, the University undertook the following actions to assess and address modern slavery risk in its student-focused operations:

- Strengthened careers and employment support services and communications relating to internal student recruitment. This included:
  - Providing extensive training on work rights and exploitation as part of induction into the Students@Work casual employment and internship programs
  - Ensuring Students@Work positions are appropriately remunerated and structured against enterprise agreement award requirements, including hours of operation and level of duties
- Trained Student Peer Leaders to deliver a variety of student-facing career and global mobility workshops, with appropriate peer-level referral and reference to work rights and workplace exploitation
- Inclusion of Fair Work information in targeted careers and employment services, such as the Careers in Asia series and Employability Week, to improve awareness of risk for specific cohorts (eg international students)
- Instituted mandatory requirements to publish wage information and relevant Fair Work legislation in communications and events with external employers who may employ University of Melbourne students
- Continued monitoring of hiring practices and management of issues and complaints about unusual or exploitative practices, with a focus on student welfare
- Boosted resourcing for the University's Safer Community Program and enhanced visibility of support services offered for students who may be at risk of modern slavery when engaged in sex work
- Increased after-hours counselling services for international students
- Implemented new Child Safety Standards, with consideration given to intersections with modern slavery risk
- Increased institutional focus on how students' studies may be impacted by work and personal circumstances, and whether these circumstances have any relationship to modern slavery.

### **Future student support activities**

New and ongoing initiatives to inform and provide support to students will continue to be implemented by the University, and will be documented in future statements. These actions will include:

- Continuing to embed Fair Work information in all employer job postings
- Providing students with appropriate resources and referrals regarding exploitation in any industry or community-facing programs (eg Melbourne Plus, Micro Industry Internships)
- Strengthening controls relating to remuneration of students engaged in casual work at the University, and ensuring remuneration is in line with enterprise agreement requirements
- Delivery of 'Workplace Preparation' training for students undertaking internships and placements, and establishment of a clear mechanism to ban known or connected employers engaging in exploitative practices
- Leveraging of existing programs offered by student associations to provide employment-related support and welfare services (eg UMSU Legal Service)

In terms of support for specific student cohorts, the University:

- Has identified international students under the age of 18 as particularly vulnerable, and will strengthen its provision of information about their work rights and lawful employment practices
- Will enhance programmatic career support targeted at international students, including information on visa restrictions and work rights
- Will seek further understanding of the relationship between scams involving international students where they have acted under duress and its characterisation as 'modern slavery'
- Will continue to review the University's use of student volunteers to ensure compliance with the enterprise agreement and University policies.

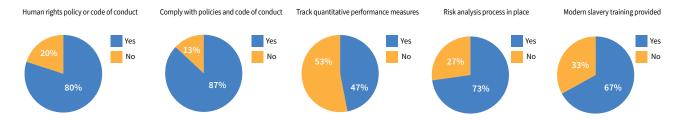
### **SUPPLY CHAIN**

Building on actions undertaken in 2021, during the reporting period the University continued to address modern slavery risks in its supply chain by:

- Piloting a due diligence review of suppliers in the construction category and convening introductory briefing meetings on modern slavery risk with suppliers who were awarded business in Q4 2022 (more detail on page 12)
- Conducting a survey of high-risk suppliers to determine steps they have taken to address modern slavery risk, including through relevant training (breakdown included on page 12)
- Continuing to work with the AUPN, with representation in the AUPN Data and Modern Slavery Working Groups, to ensure a sector-based, best practice approach
- Continuing to work with FRDM via the AUPN on their supplier risk tool to leverage data that will inform plans for 2023 and beyond
- Creating and promoting a knowledge base article on modern slavery for all staff members to access
- Drafting guidance on defining and assessing risks in supply chains for the University's Procurement team to integrate into their 2023 category plans
- Completing Modern Slavery online training for all Procurement staff and the Modern Slavery Working Group, through the Australian Border Force online training modules
- Establishing an Executive Steering Committee for the Modern Slavery Working Group to be able to escalate issues and concerns to
- Providing updates to University governance boards and senior management of the University's modern slavery obligations and actions undertaken.

## High-risk supplier questionnaire: statistics and insights

In Q4 2022, a questionnaire was sent to suppliers categorised as high-risk across the University's spend portfolio. Based on the AUPN's self-assessment questionnaire, this exercise was designed to help enhance the University's understanding of progress being made across its supply base.



Of the 71 per cent of suppliers who responded:

- 80% have a human rights policy or code of conduct in place
- 47% track quantitative performance measures on an annual basis to assess human rights performance and improvement over time
- 73% have risk analysis processes in place
- 67% provided training to staff on modern slavery.

This information will form part of the University's 2023 Modern Slavery Action Plan which will include ongoing actions to work with high risk suppliers and improve the integrity of supply chains over time.



#### CASE STUDY: REVIEW OF SUPPLIERS IN CONSTRUCTION CATEGORY

All suppliers in the construction category who were awarded business to the value of \$400,000 or more in Q4 2022 were invited to an introductory meeting to discuss approaches to mitigating modern slavery risk. These suppliers completed a short questionnaire (using the high-risk supplier questionnaire outlined above) to gauge level of understanding and maturity on this topic.

#### **CONSTRUCTION**



Results of these reviews will inform the University's 2023 Modern Slavery Action Plan and will help drive continuous improvement in raising awareness of modern slavery risk among University staff, embedding frequently asked questions into the University's sourcing approach, and working with suppliers to enhance modern slavery compliance measures.

# 5. EFFECTIVENESS OF UNIVERSITY ACTIONS

#### **RESEARCH**

The University is committed to building on the foundations documented in its 2021 statement by setting clear key performance indicators and tracking deliverables against targets over the course of the next reporting year.

The University will collaborate with the AUPN Working Group to utilise the AUPN modern slavery risk-based tool more effectively, while simultaneously developing alternative checks within due diligence assessments to capture potential modern slavery risks. At the research partnerships level, the University will continue to review foreign grants and research agreements for modern slavery risk, compiling deidentified case studies and developing alternative methodologies within due diligence assessment processes for rating modern slavery risks. The Research, Innovation and Commercialisation (RIC) function will also deliver Australian Border Force Modern Slavery training to research services staff, with a target of 80 per cent of contracts and grants officers completing the training in 2023. These measures will enhance officers' modern slavery risk literacy, measure effectiveness, and inform actions for 2023–24.

#### **STUDENTS**

The University will expand use of its existing case management system to capture modern slavery cases that affect students. This will enable the University to track the nature of cases and understand where further action may be required to sharpen risk management and/or provision of information or services. Effectiveness of University actions will be assessed through student feedback and regular evaluation of services and processes. The University will also ensure that actions to address risks relating to student placements and internships are subject to periodic review.

#### **SUPPLY CHAIN**

In 2022, more staff completed modern slavery training than in the previous year, and a number of resources were created to help raise visibility of actions being taken across the University (see pages 11–12). The University continued to monitor its high-risk suppliers and identified the construction category as an area of focus for 2023.

The University also established a process to regularly review effectiveness of its actions to address modern slavery risks in supply chains, and commenced work on developing frameworks to support this.

Greater implementation of the modern slavery risk-based tool will also help the University to measure effectiveness of its actions. This work is ongoing and will be documented in future statements.

### **CONTROLLED ENTITIES**

Based on feedback provided by the University's controlled entities, a set of measures is proposed for implementation in 2023 (outlined in section 6) to enable the University to measure effectiveness of its actions to mitigate modern slavery risk.

# 6. CONSULTATION WITH CONTROLLED ENTITIES

All University of Melbourne controlled entities were consulted in development of this statement, including via a modern slavery survey. The purpose of this survey was to ascertain risk of modern slavery practices within the University's controlled entities, and to understand each entity's approach to mitigating such risks.

The 2022 survey replicated the approach taken in 2021. This consolidated understanding of modern slavery risks and assessed any year-on-year trends relating to risk across all activities, operations and supply chains.

As part of this engagement process, controlled entities were provided with information and resources about modern slavery and their legislative obligations under the *Modern Slavery Act 2018* (Cth). Personalised and tailored support was provided to each entity upon request by senior personnel in the University's Risk and Assurance team.

Responses helped to build a baseline picture of:

- Amount of money spent on goods and services
- Industries where most money is spent (and risk levels associated with these industries)
- · Geographical locations of suppliers
- Whether risks for controlled entities had already been identified through the University-wide risk assessment process (eg IT hardware and other office consumables).

A pilot engagement process was introduced for a controlled entity that was newly formed in 2022, with a view for this to be rolled out more broadly in 2023. This included a requirement that modern slavery training be completed prior to the entity formally assessing its modern slavery risks.

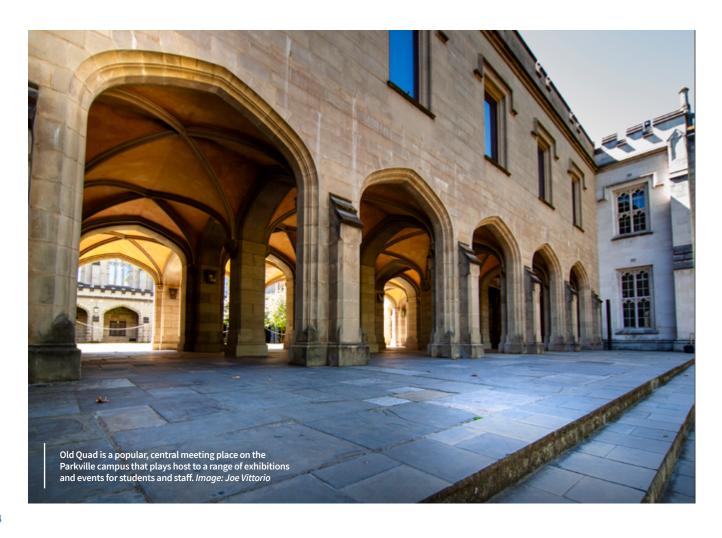
All entities were asked to rate the risk of modern slavery within their operations and supply chain, and describe actions taken to identify, address and monitor these risks.

A focus for 2023 will be on developing and implementing a continuous improvement plan in relation to understanding modern slavery risks for controlled entities, and how to effectively target these risks. This will be informed by survey responses received in 2021 and 2022.

Measures are likely to include:

- Compulsory modern slavery training for senior executive and management staff
- Bi-annual check-ins with entities to build awareness and understanding of University policies and processes, and to provide tailored support in relation to each entity's application of them
- Appointment of representatives from controlled entities to the Modern Slavery Working Group
- Close collaboration with controlled entities to target and mitigate risk where operational activity has been identified in countries with high prevalence of modern slavery risk (Nossal Institute Ltd).

The working group will continue to engage with all controlled entities to ensure that robust policies and practices are in place to mitigate modern slavery risks.



# 7. ANY OTHER RELEVANT INFORMATION

The University considers that the responses given in sections 1–6 of this statement sufficiently address the criteria for content set out in the *Commonwealth Modern Slavery Act 2018*.

