



THE UNIVERSITY OF
MELBOURNE

MODERN SLAVERY STATEMENT 2021



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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, Parkville, Southbank and Werribee campuses), the Yorta Yorta people (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 other 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 custodians of the lands and waterways across the Australian continent, with histories of continuous connection dating back more than 60,000 years.

We pay respect to Elders, past and present, 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 across the University. They are instrumental in our reconciliation journey and generous in providing their knowledge, leadership and support.

We acknowledge and pay respect to them, to our Aboriginal and Torres Strait Islander students, to the Traditional Owners, Elders and collaborators of the University of Melbourne, and the Aboriginal and Torres Strait Islander peoples who visit our campuses from across Australia and the world.

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 our operations and supply chains over the period of 1 January 2021 to 31 December 2021.

VICE-CHANCELLOR'S MESSAGE

The University of Melbourne remains committed to supporting and respecting human rights across all our endeavours.

Following on from the University's 2020 Modern Slavery Statement, we remain committed to strengthening our knowledge of potential modern slavery risks within our operations and supply chains, and acting to remove such risks. Accordingly, University Council approved the 2021 Modern Slavery Statement on Thursday 16 June 2022.

We acknowledge that modern slavery is a significant global human rights issue and we are committed to identifying and preventing instances of modern slavery in all its forms.

As an educational establishment, the University also acknowledges its responsibility to raise awareness among staff, students and external suppliers about the risk modern slavery presents.



A handwritten signature in black ink, which appears to read 'D. Maskell'.

Duncan Maskell
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. The 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 faculties and is led and managed by the Vice-Chancellor and University Executive.

The University's extensive network includes joint venture partners, subsidiary companies, affiliated bodies (eg research hospitals) and non-academic University departments.

Entities owned or controlled by the University

- Australia India Institute Private Limited (India)
- Australian Music Examinations Board (Vic) Ltd
- Goulburn Valley Equine Hospital Pty Limited
- Melbourne Business School Ltd Group
- 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 Limited

This statement has been made on behalf of the above entities.

Key facts

\$2.7bn
operating
income

54,411
students*

\$973 million
third party
spend

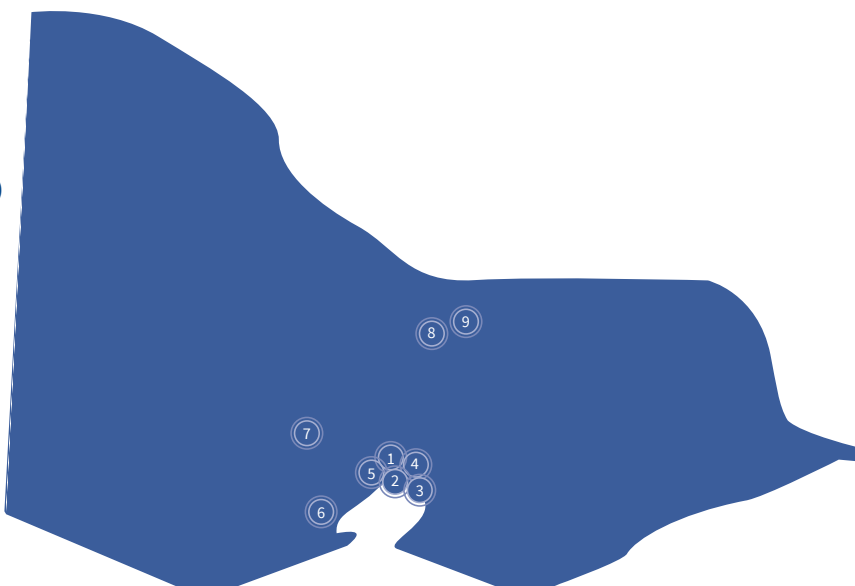
9451
staff**

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

Campus locations

Our operations are located in Victoria, Australia. The University of Melbourne operates nine campuses across Victoria, with the majority of operations occurring in metropolitan Melbourne. Campus locations are:

- 1 **Parkville** (main campus)
- 2 **Southbank** (music, visual and performing arts)
- 3 **Burnley** (horticulture and agricultural science)
- 4 **Hawthorn** (a commercial operation leasing space to tenants)
- 5 **Fishermans Bend** (heavy engineering and infrastructure, under development)
- 6 **Werribee** (veterinary medicine immersion)
- 7 **Creswick** (environmental and forest science)
- 8 **Shepparton** (rural health)
- 9 **Dookie** (agricultural science)



2. OPERATIONS AND SUPPLY CHAIN

As a world-leading higher education provider and the largest research university in Australia, the institution's core activities are focused on teaching and research, with students at the heart of the University. Made up of faculties, graduate schools and research institutes, the University's Academic Divisions lead delivery of teaching, learning, research and engagement.

In this statement, the University has focused on its operations in the areas of teaching, specifically its Future Students department within the Student and Scholarly Services (SASS) area, and research.

RESEARCH

The University of Melbourne's Research, Innovation and Commercialisation (RIC) function operates within the portfolio of the Chief Operating Officer. It provides a suite of expert professional services to enable academics to achieve global research excellence and translation of their discoveries into real-world innovation and impact.

RIC manages research funding and reviews, negotiates, and arranges the signing of the University's research-related contracts, engaging with a broad range of governmental, corporate and individual partners.

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

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

Sections 3 and 4 of this statement address in further detail the steps taken by the University of Melbourne in identifying, assessing and addressing modern slavery risks in its sphere of research.

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

STUDENTS

The division of Student and Scholarly Services (SASS) provides end-to-end student support. In addition, faculties and schools provide support for work integrated learning (WIL) and other teaching and learning support services, including co-curriculum and student experience activities.

Primary vehicles of support and information are provided by the following teams/divisions:

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

To strengthen response, the University will investigate where latent risk may exist and standardise communications and support for students engaging in WIL. This will be undertaken by faculties and schools for students in paid employment, particularly international students who may be unfamiliar with their rights in the Australian employment context.

Supply chain risk management regarding overseas recruitment agents is on the University's current action plan.

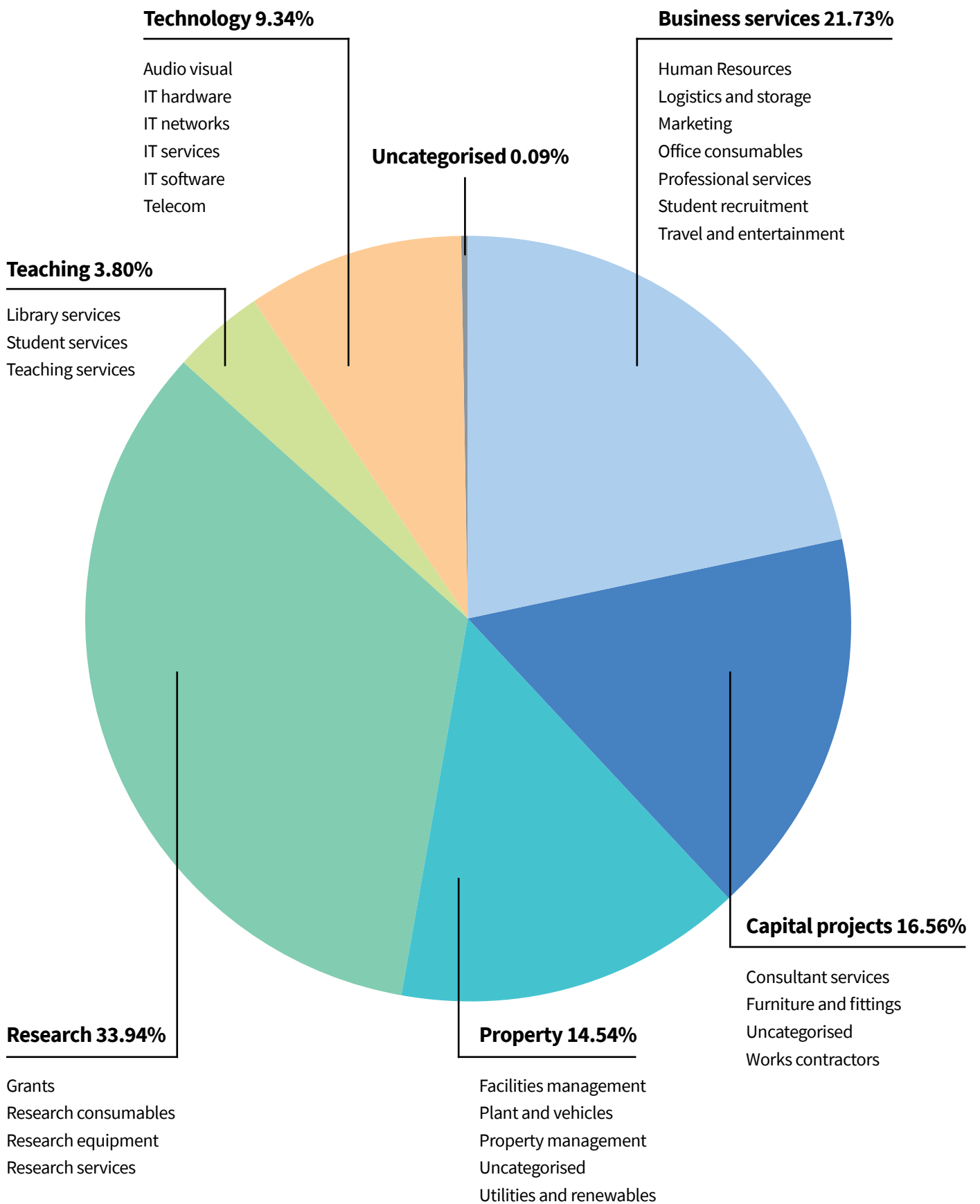
Controlled entities

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

SUPPLY CHAIN

The University of Melbourne's supply chain is diverse and complex. It reflects the broad range of activities undertaken by the University and includes products and services from construction through to research equipment, corporate services and facilities management.

2021 spend against key categories



Key statistics

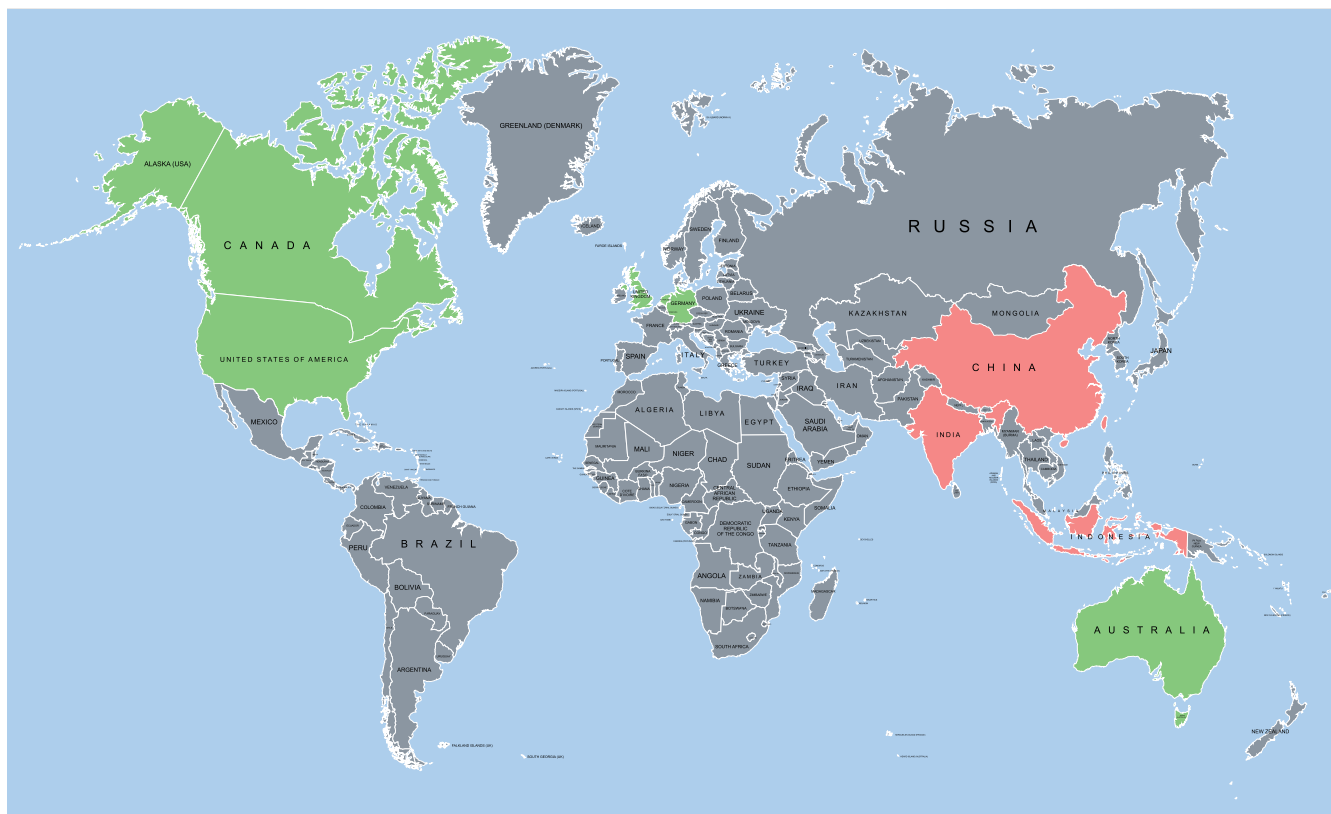
Spent
**AU\$973
million**

With
**9756
suppliers**

Across
**77
countries**

Approximately
**80% of spend with
370
suppliers**

2021 country breakdown spend



Top 10 countries of spend	Country risk level*	% of 2022 spend
Australia	Low	95.80%
United States	Low	1.92%
United Kingdom	Low	0.64%
Netherlands	Low	0.55%
Germany	Low	0.26%
China	High	0.18%
Singapore	Low	0.13%
Canada	Low	0.09%
Indonesia	High	0.08%
India	High	0.05%

* Based on Global Slavery Index

3. MODERN SLAVERY RISKS

The University of Melbourne acknowledges that activities undertaken across its nine campuses through the core business of research, teaching and learning, and across supply chains, may present risks of modern slavery.

Modern slavery risks/examples	
Research	<ul style="list-style-type: none"> Commercial research partnerships <i>Low risk due to majority of partnerships (92%) being in lower risk jurisdictions</i>
Students	<ul style="list-style-type: none"> Student employment Student internships and work experience <i>Low risk due to frameworks and governance already in place, such as Education Agent agreements</i>
Supply chain	<ul style="list-style-type: none"> Category Country of origin (of supplier and/or product) <i>Higher risk. More information in Sections 2 and 3 of this statement</i>

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

The Governance framework and policies outlined in the University of Melbourne's [Modern Slavery Statement 2020](#) oversee University operations, and, where not always making specific reference to modern slavery, highlight the processes in place to address such issues.

OPERATIONAL RISKS

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 the 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 relevant faculty and the Research Due Diligence Advisory Group for decision and advice. The Research Due Diligence Advisory Group is composed of senior representatives of business areas from across the University, and is chaired by the Deputy Vice-Chancellor (Research).

The University is currently in the process of addressing its risk of modern slavery processes in accordance with requirements of the recently introduced *Commonwealth Modern Slavery Act 2018*.

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 fulfils 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 requirements stated in the National Health and Medical Research Council's National Statement on Ethical Conduct in Human Research. 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. The Central Human Research Ethics Committee 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, convened by the Deputy Vice-Chancellor (Research).

Risk review

To fully understand the magnitude of modern slavery risks, the University conducted a comprehensive review in 2021 to determine the risk profile of the University's engagements with foreign research partners.

Foreign jurisdiction partnerships



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

Risk level *	Number of research partnerships *	% of total research partnerships *
Very high	0	0%
High	38 [‡]	7.76%
Moderate	18	3.67%
Low	125	25.51%
Very low	305	62.24%
Unrated	4	0.81%
TOTAL	490	100%

*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.

‡Of the 38 research partnerships with high-risk jurisdictions, 92 per cent of the external partners operate in sectors and industries at low risk of modern slavery, comprising educational and research institutions, intergovernmental and development agencies, or government agencies. The remaining private companies were also deemed low risk, as they are specialised consulting firms in the biomedical and IT sectors.

STUDENTS

The University of Melbourne is committed to combating modern slavery risks, particularly as they relate to students. The University acknowledges the 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 accessible and relevant support services.

The University is currently undertaking an assessment of modern slavery risks across student areas and has identified the higher risk for international students. In addition to the University's existing programs and processes, new initiatives will be introduced in 2022 to inform and provide support to students. These actions will be documented in future statements.

SUPPLY CHAIN

The University recognises the potential to be directly linked to instances of modern slavery via multiple tiers of its supply chain through products, services or operations.

Supply chain risks are predominately category or country based. 95.80 per cent of the University's supply chain spend is with Australian-based companies, with a total of 99.39 per cent of spend with low-risk countries.

The University also acknowledges direct relationships with thousands of suppliers and, in addition, with numerous others throughout its extended supply chain. Consequently, the University manages high-risk suppliers through Supplier Management of Tier 1.

During the current reporting period, the University continued its analysis across high-risk categories in its supply chains and operations to further identify modern slavery-related risks, and established a risk register of key suppliers and categories identified and documented.

The University recognises that there is an ongoing lack of visibility in certain overseas markets with the potential to add risks of modern slavery. This is especially the case with

secondary supply chain tiers (and beyond) that source materials used to deliver goods and/or services to the University.

During the category risk assessment, the University identified lower risk categories such as services performed in-house in Melbourne, Victoria. Currently higher risk areas are categories requiring raw materials sourced from countries defined as High Risk by the [Global Slavery Index 2018](#) and outlined in the table on page 7.

The University understands the potential risks (often hidden) that are posed by modern slavery throughout its supply chains. The University is committed to continuing focusing efforts on addressing such risks, with existing controls and systems in place to limit risks across all University of Melbourne campuses.

The University's collaborative approach in working with partners and the [Australian Universities Procurement Network \(AUPN\)](#), delivers a collective and enhanced sector-based response to identifying and addressing modern slavery risks.

The University is committed to continuing engagement with all stakeholders to review operations, ensuring that the risk of modern slavery is addressed and that mitigating measures are continually implemented and enhanced, now and into the future.

Controlled entities

Most of the University of Melbourne's 11 controlled entities are not operationally involved in sectors that have known modern slavery risks. Consultation results identified supply chains as the highest risk for controlled entities, with nine of the controlled entities engaging suppliers that are categorised as high-risk industries and/or geographical locations. As only four have an annual supplier spend of over \$200,000, the University will incorporate and address the supply chains of controlled entities in future statements.

4. ACTIONS TAKEN TO ASSESS AND ADDRESS RISK

RESEARCH

As a result of its review of research partnerships outlined above, the University of Melbourne gained a better understanding of the modern slavery risks in connection with its research-related activity. In 2022, the research office will incorporate consideration of modern slavery risk into due diligence assessment processes. Following launch of the AUPN modern slavery risk-based tool, the University will use modern slavery ratings of its partners as a baseline check in standard due diligence assessment processes.

Through these detailed partner assessments, in the next reporting period the University will form an accurate picture of the potential risks posed by modern slavery to its research activities. This will serve as the basis for defining an approach to engaging with University partners when an elevated risk of modern slavery is identified.

STUDENTS

The University combats modern slavery risk through adherence to relevant national compliance frameworks such as the Education Services for Overseas Students (ESOS) Framework and the Department of Home Affairs Simplified Student Visa Framework.

Internally, the University's ESOS Governance Group is responsible for providing expert advice and recommendations to the Academic Registrar on matters relating to ESOS compliance obligations and related strategies to support and improve the student experience.

The ESOS Practice Leaders Network assists the University in complying with the framework by working collaboratively to provide leadership, operational coordination and insight, and fosters innovative thinking around process improvement, both procedural and system-based, to ensure a satisfactory student experience.

When students commence at the University of Melbourne, they are provided with information about relevant support services, and participate in targeted information sessions in areas such as careers and employability.

Specifically, the University's Safer Community Program provides support and information to students who are subject to exploitative employment practices and to those who experience sexual misconduct, discrimination or other concerning behaviours.

The University's Financial Aid team provides support and information for students who experience financial hardship because of exploitative employment practices or are indirectly impacted by such practices overseas.

Careers and employability advice and support is provided through a range of University services, including:

- Information on employment rights included in online training modules that prepare students for employment and other learning experiences
- Welcome Day sessions for incoming study exchange and study abroad students, including information on workers' rights and entitlements in Australia
- Experiential Learning Community of Practice to raise awareness and share practices across the University to minimise risk to students in employment
- Career workshops hosted at the University's Study Hubs in China with tailored content relevant to China and Australia
- Induction covering rights, obligations and code of conduct delivered to students employed at the University under the University of Melbourne Enterprise Bargaining Agreement.

SUPPLY CHAIN

The University continues to engage with its supply base on modern slavery issues and, during this reporting period, undertook a review of its new supplier onboarding procedures.

Consequently, the University developed a new process for all new supplier requests which are now diverted to the relevant category manager for review and authorisation. In addition, information regarding modern slavery risks is captured by the University's Finance department when creating a new supplier profile.

Actions taken to assess and address modern slavery risks

- High-risk suppliers were notified in writing of the University's commitment, approach and future plans in relation to modern slavery, including the expectation that suppliers commit to the University's Supplier Code of Conduct. The code was developed, in part, as a response to comply with the *Modern Slavery Act 2018* and to take steps to identify, assess and address risks of modern slavery practices in the University's operations and supply chains, including those used in relation to the goods and/or services supplied.
- The University's Whistleblower disclosure and reporting processes, and its Whistleblower policy, were reviewed and enhanced, including establishment of a confidential and secure whistleblowing portal. A link to the whistleblowing portal and the University's Whistleblower Protection Policy has also been added to the University's supplier-facing website.
- Standard modern slavery clause has been included in relevant template procurement agreements, and an alternate clause for use in agreements with high-risk contractors developed, taking into consideration the Commonwealth's modern slavery model clauses.
- Modern slavery online training has been completed by all procurement staff through the Supply Chain Sustainability School.
- Working closely with the Australian Universities Procurement Network, a modern slavery risk-based tool has been implemented to allow for greater visibility of modern slavery risks in the University's supply base.
- Engaging with the University's controlled entities, a survey pertaining to modern slavery practices and risk mitigation was conducted to understand and identify modern slavery risks.
- Updates were provided to University of Melbourne governance boards and senior management to ensure awareness of modern slavery obligations and actions required.



5. EFFECTIVENESS OF UNIVERSITY ACTIONS

The University recognises that review and assessment of actions, to identify and address modern slavery risks in operations and across the supply chain, need to be carried out on an ongoing and evolving basis. The University is committed to continually building on progress made to date, and will establish clear targets and measures to assess effectiveness and to review and improve these measures in future.

At this early stage, the University is developing frameworks and processes to ensure effective review of its actions to assess and address modern slavery risks within its operations and supply chains.

Implementation of the modern slavery risk-based tool will be a future enabler in how the University assesses effectiveness of its actions and will be used to inform the 2022 Modern Slavery Statement.

In 2022, the University will look to develop key performance indicators across its supply chain to assess and measure effectiveness. These will include:

- Percentage of contracts implemented in 2022 with the modern slavery clause inserted
- Development of action plans for top 10 high-risk suppliers
- The number of modern slavery cases identified and remediated through the whistleblowing portal.

2021 is the first year the University has included a research component in its Modern Slavery Statement. Throughout 2022, the University will monitor the number of due diligence assessments completed using a modern slavery check, and the percentage of research partners completing the University's modern slavery questionnaire via the AUPN tool. This will determine effectiveness of the University's approach to ensuring continual improvement.



Students passing through the arches of the Raymond Priestley Building, the University's administrative centre on the Parkville campus. Image: Sharon Walker

6. CONSULTATION WITH CONTROLLED ENTITIES

The Modern Slavery Working Group engaged and consulted with all University of Melbourne controlled entities in developing this Statement.

As part of the consultation process, these entities were provided with information and resources about modern slavery and the legislative requirements under the *Modern Slavery Act 2018* (Cth).

The working group developed a survey to ascertain the risk of modern slavery practices within its controlled entities and to understand the approach to mitigating risks. A key objective of the survey was to gauge awareness of the risks of modern slavery among strategic personnel. A further objective was to understand operational and employment practices of the entities.

The Modern Slavery Survey was completed by all controlled entities. The responses provided useful information on:

- Amount of money spent on goods and services
- Industries where the money is spent (higher risk vs lower risk)
- Geographical location of suppliers.

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

In 2022, the Modern Slavery Working Group will conduct further analysis of survey responses. This will determine where greater engagement with controlled entities is needed, to identify and address areas of concern.

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

'The Spot' is a certified 5 Star Green Star building and home to the University's Faculty of Business and Economics on the Parkville campus. Image: Lee McCrae





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MELBOURNE

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