



# Human Rights Due Diligence Toolkit

*Our approach to addressing modern slavery*

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# Human Rights Due Diligence Framework

## *Our approach to addressing modern slavery*

As an institution founded for public good, respecting human rights is at the heart of our vision for teaching and research that transforms people's lives. We apply human rights due diligence to identify and address modern slavery and related human rights impacts across our operations, supply chain, investments, partnerships and controlled entities.



# How we embed modern slavery and human rights into our policies and governance



## Senate

The University Senate is the principal governing body and approves the University's annual modern slavery reporting to the federal and state government.

## Vice-Chancellor

The Vice-Chancellor and President is the owner of the University's Modern Slavery Policy and the designated Principal Executive Officer responsible for ensuring the University meets its compliance obligations under modern slavery laws.

## University Executive Committees

The University Executive is an advisory committee which provides advice to the Vice-Chancellor and Senate. Together with its subcommittees, it oversees and monitors the University's compliance with the University's Modern Slavery Policy and *Modern Slavery Act 2018* (Cth) and *Modern Slavery Act 2018* (NSW).

## Modern Slavery Unit with the University's Modern Slavery Policy and Office of the Senior Deputy Vice-Chancellor and Provost

The Modern Slavery Unit (MSU) is responsible for embedding a respect for human rights across the University and ensuring the University's compliance with the Commonwealth and NSW Modern Slavery Acts. The team, established in 2022, supports University-wide human rights due diligence and produces the annual modern slavery reports. The MSU also works in partnership with academics, civil society, government, and business to support solution-focused research and education on modern slavery.

## Roles and responsibilities for identifying and addressing risks

As set out in the University's Modern Slavery Policy, implementation of our due diligence framework is shared across the University's Senior Executive and key delivery partners including:

- Faculties and Schools
- Supply Chain
- Research Portfolio
- Education Portfolio, including student support services
- Student Recruitment
- Human Resources
- Campus Services
- Legal and Policy
- Investment and Capital Management

# How we identify and assess modern slavery risks

We identify where the University may cause, contribute to, or be directly linked to modern slavery through our risk assessment methodology:

- 1. Identify modern slavery risks and related human rights impacts
- 2. Assess the saliency of the risks to people

These two steps determine the risks we prioritise and the due diligence actions we take to address them. This process is conducted annually across the University to identify our salient modern slavery risks. It is also implemented on a project-basis, when risks are identified through regular monitoring.

## What is modern slavery?

Modern slavery is when coercion, threats or deception are used to deny a person their freedom and ability to make choices for themselves. It includes some of the most severe violations of human rights, including forced labour, forced marriage, human trafficking and the worst forms of child labour.

## Modern Slavery Indicators

As modern slavery is commonly a hidden crime, the University uses indicators and related human rights impacts to identify situations of serious exploitation that may escalate to modern slavery.



Being paid below minimum wage, or not paid at all



Working excessive hours without proper pay



Having your passport or visa documents taken away



Threats of dismissal, deportation or reporting to immigration



Threats against your family



Under surveillance or monitoring in your workplace or at home



Being asked to repay a "debt" or recruitment fee and having little control over how long you must work or the type of work you need to do to pay it back



Subjected to, or threatened with, physical, sexual or emotional violence



Being coerced or deceived into a situation where the conditions change or you cannot leave



Feeling extreme pressure to marry

## 1. Identifying modern slavery risks

We draw on diverse sources, including human rights experts, government sanctions and engagement with affected stakeholders, to identify modern slavery and related human rights impacts in our operations, supply chain, investments, partnerships and controlled entities.



Sector, product and service risk







Vulnerable population risk



Geographic risk



Partner risk

	What risks do we look for?	How do we know it's a risk?
<b>Sector, product and service risk</b> 	<ul style="list-style-type: none"> <li>• Make up of the workforce (temporary, seasonal, unskilled, migrant labour)</li> <li>• Nature of work (hazardous, isolated, out of hours, manual)</li> <li>• Use of third-party recruitment firms and subcontractors, which limits visibility of working conditions</li> </ul>	<ul style="list-style-type: none"> <li>• NSW Anti-Slavery Commissioner Inherent Risk Identification Tool</li> <li>• <a href="#">Open Analysis to Address Slavery in Supply Chains (OAASIS)</a></li> <li>• Electronics Watch</li> <li>• Engagement with suppliers</li> <li>• Engagement with human rights experts</li> <li>• In depth research – see our <a href="#">Modern Slavery Risk Info Sheets</a></li> </ul>
<b>Vulnerable population risk</b> 	<ul style="list-style-type: none"> <li>• People with intersecting disadvantage, based on gender, age, race or ethnicity, religion or disability</li> </ul>	<ul style="list-style-type: none"> <li>• Our <a href="#">modern slavery grievance mechanism</a></li> <li>• Engagement with our staff, students, suppliers, partners and controlled entities</li> <li>• Consultation with our civil society partners</li> </ul>
<b>Geographic risk</b> 	<ul style="list-style-type: none"> <li>• Poor governance</li> <li>• Weak rule of law</li> <li>• Conflict</li> <li>• Migration flows</li> <li>• Socio economic factors, such as poverty</li> </ul>	<ul style="list-style-type: none"> <li>• Global Slavery Index</li> <li>• U.S. Trafficking in Persons Report</li> <li>• Global Rights Index</li> </ul>
<b>Partner risk</b> 	<ul style="list-style-type: none"> <li>• Credible reports of modern slavery or human rights violations</li> <li>• Limited capacity to identify and address adverse human rights impacts</li> </ul>	<ul style="list-style-type: none"> <li>• Know Your Partner &amp; Project Tool, our bespoke risk screening tool, capturing sanctions, human rights and business misconduct concerns</li> </ul>

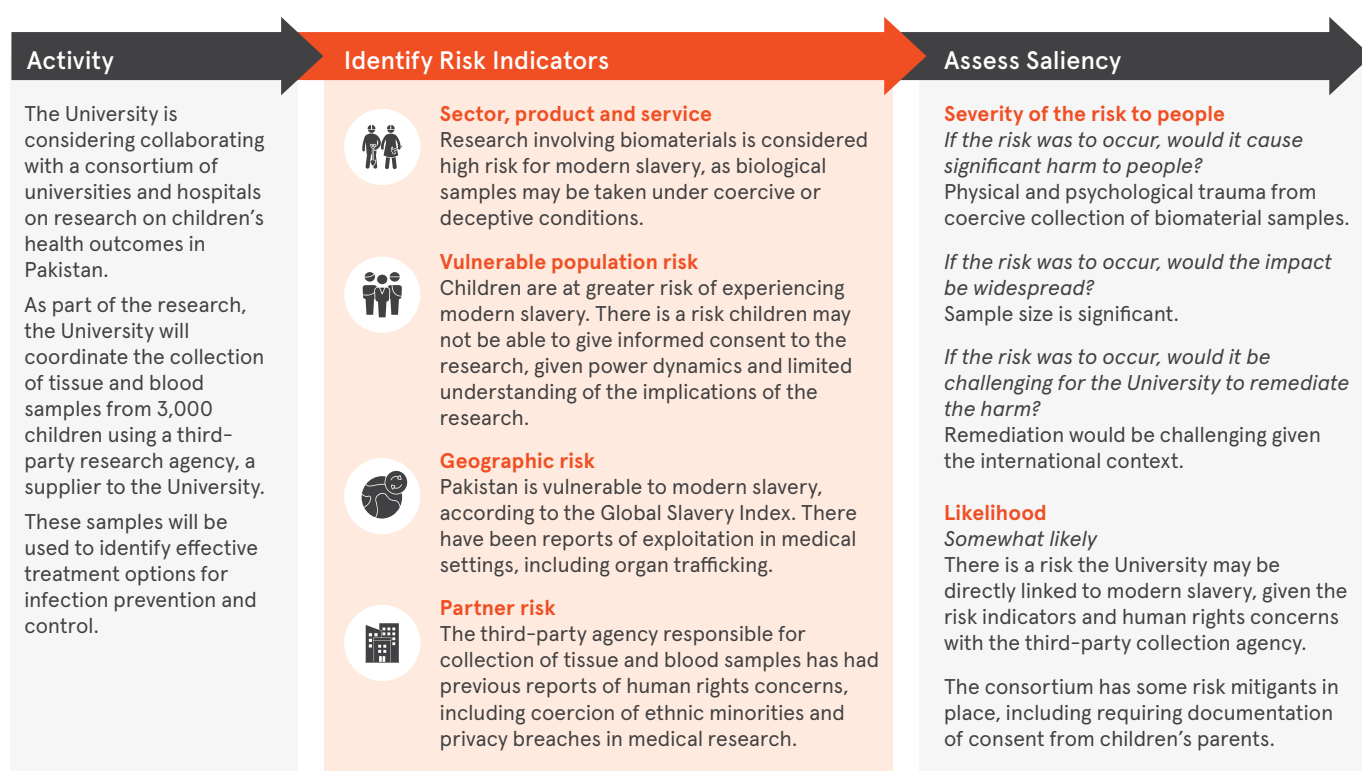
## 2. Assessing the saliency of the risks to people

In line with the UN Guiding Principles on Business and Human Rights, our risk assessment focuses on the potential impact of the modern slavery risk to people. These risks can often converge with risks to the organisation, as adverse human rights impacts may lead to litigation, reputational damage, disruption to operations and increased costs for remediation.

Using a human rights due diligence approach, saliency is assessed based on the severity of the risk to people and the likelihood of the risk to occur.

Assessment	Criteria
<b>What is the severity of the risk to people?</b>	
If the risk was to occur, would it cause significant harm to people?	<ul style="list-style-type: none"> <li>High likelihood of modern slavery; and/or</li> <li>Long term psychological and/or physical trauma</li> </ul>
If the risk was to occur, would the impact be widespread?	<ul style="list-style-type: none"> <li>Number of people impacted; and/or</li> <li>Impact across multiple sites (e.g. factories); and/or</li> <li>Impacts are unavoidable given they are systemic in the location or sector</li> </ul>
If the risk was to occur, would it be challenging to remedy the harm?	<ul style="list-style-type: none"> <li>Remedy is unlikely to restore the person to their circumstances before the harm; and/or</li> <li>There is limited leverage to remedy the harm</li> </ul>
<b>How likely is the risk to occur?</b>	
Unlikely	<ul style="list-style-type: none"> <li>There is strong due diligence in place to manage the risk</li> <li>There are risks associated with the location or sector but no human rights impacts have been identified directly involving the activity</li> </ul>
Somewhat likely	<ul style="list-style-type: none"> <li>There are some due diligence controls in place to manage the risk</li> <li>The activity itself is directly linked to modern slavery or related human rights impacts</li> </ul>
Very likely	<ul style="list-style-type: none"> <li>There are little to no due diligence controls in place to manage the risk</li> <li>It is plausible that the activity itself could cause or contribute to modern slavery</li> <li>Modern slavery risks are highly prevalent in the location or sector that they may be unavoidable if the activity proceeds</li> </ul>

### Example of our due diligence framework in action: Assessing risks in research



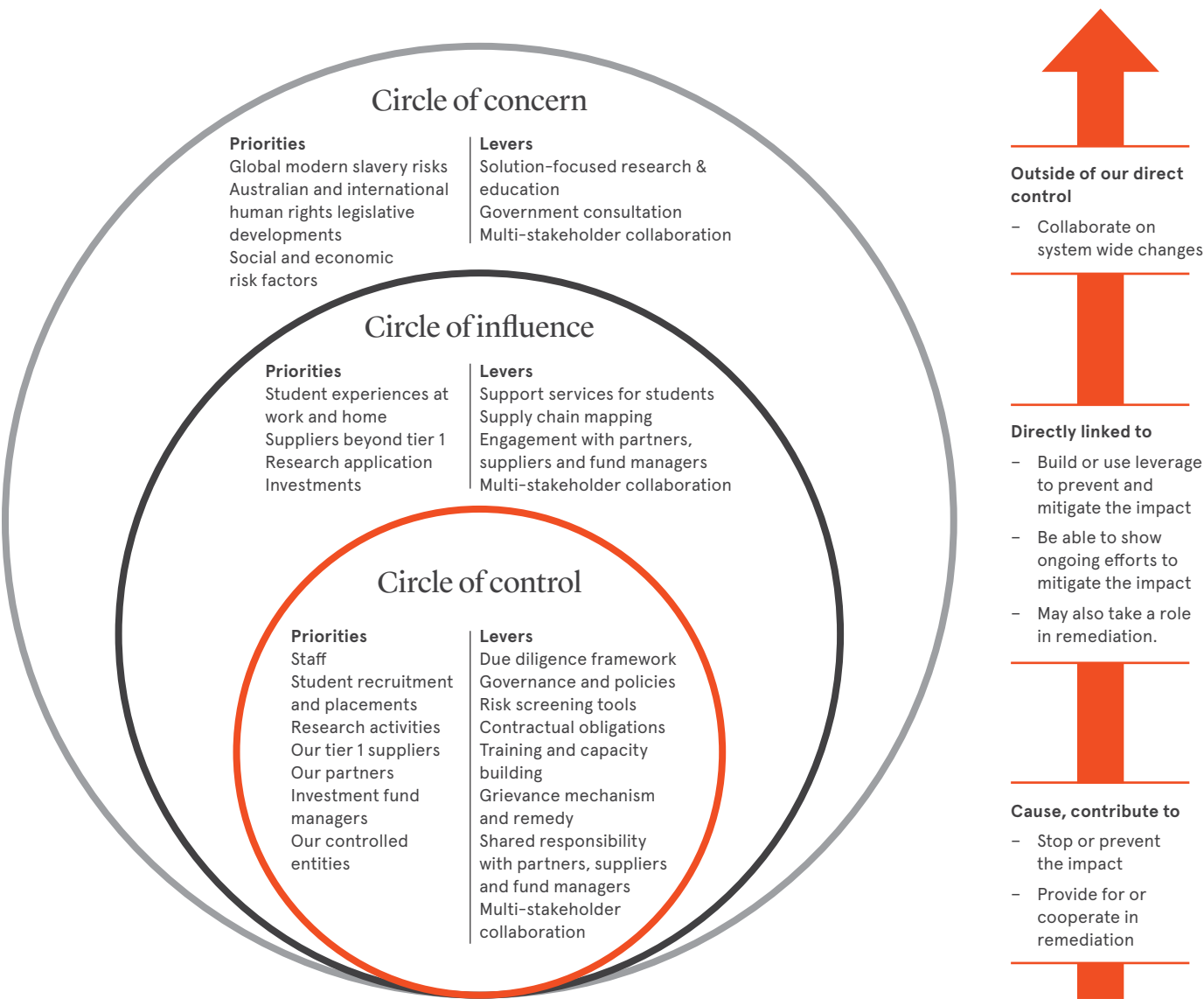
# How we prioritise our actions to address modern slavery risks

Our due diligence actions are informed by where there is the greatest risk to people and where we can drive meaningful change.

**Our circle of control** is where we have the most responsibility and influence to use our management controls to address modern slavery and related human rights impacts.

**Our circle of influence** is where we can work with our suppliers, partners and other key collaborators to address risks connected to the University.

**Our circle of concern** is where our research, education and partnerships can contribute to shared solutions to tackling the global challenge of modern slavery.



## Example of our due diligence framework in action: *Addressing modern slavery risks in research*

*\* This example is intended solely for illustrative purposes and does not represent any specific research project.*

The University is considering collaborating with a consortium of universities and hospitals on research on children's health outcomes in Pakistan. As part of the research, the University will coordinate the collection of tissue and blood samples from 3,000 children by a third-party research agency, a direct supplier to the University. There have been previous reports of human rights issues concerning the agency.

### Circle of control

- Engage our direct supplier that is coordinating the biomaterial collection.
- Leverage our relationship with the supplier and our contractual obligations, to put in place risk mitigants or responsibly find an alternative collection agency.
- Follow University policies and procedures regarding ethical standards in biomaterials research.

### Circle of influence

- Work with the research consortium to ensure child safeguards are in place.
- Share our modern slavery grievance mechanism with all researchers in the consortium.
- Develop modern slavery risk information sheets for academics and research support staff.

### Circle of concern

- Collaborate with other universities to share resources and lessons learnt on addressing modern slavery risks in research.

# How we respond to modern slavery

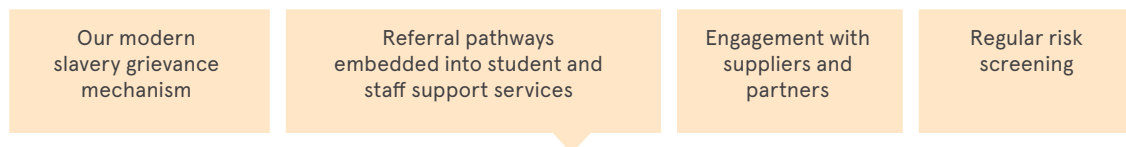
We encourage staff, affiliates, students, suppliers, partners and members of the public to report modern slavery connected to the University, including:

- modern slavery they have experienced or witnessed
- cases of serious exploitation, that may escalate into modern slavery
- modern slavery they suspect may happen in the future

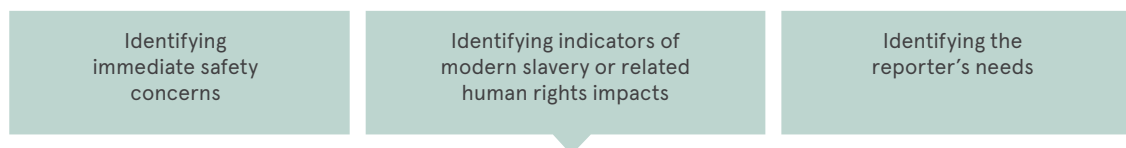
Reports can be made anonymously via the University's dedicated modern slavery grievance mechanism, an online reporting form. The University is committed to responding to modern slavery reports with the trauma-informed principles of safety, trustworthiness, choice and empowerment.

## Our response to reports of modern slavery

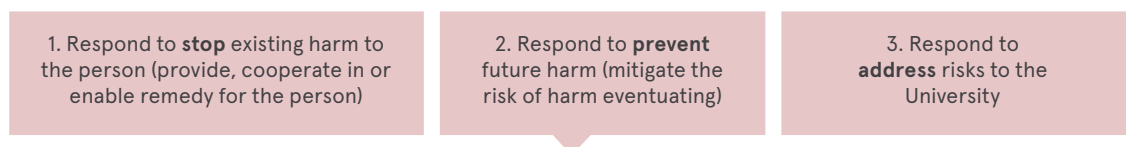
Modern slavery or related human rights report raised via our...



We assess the impact to the person through...



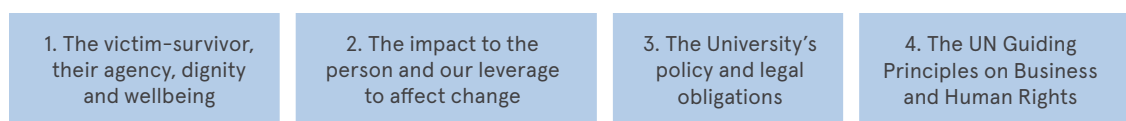
We take action to...



We are committed to remediating modern slavery...



We are informed by...



# How we evaluate the effectiveness of our actions

## Our Theory of Change

Our vision is to have a meaningful impact on the global challenge of modern slavery.

We will achieve this if we...

### OUTCOMES



Find modern slavery in the University's operations and supply chains and address it

Contribute to solution-focused modern slavery research, education and partnerships

which will only be possible if we...

### OBJECTIVES



1. Embed human rights due diligence University-wide

2. Equip our staff and students to identify and report modern slavery

3. Contribute to multi-stakeholder collaboration to influence change

4. Enable our academics to inform evidence-based practice on human rights

which will require us to deliver....

### ACTIVITIES



- Modern Slavery policy and governance framework
- Due diligence framework
- Annual saliency risk assessment
- Risk-based due diligence plans
- Worker-driven monitoring
- Modern Slavery Statement

- University-wide mandatory staff training
- Risk-based staff training
- Student engagement and training
- Student support services
- Risk identification tools and resources
- Grievance mechanism

- University sector collaboration
- Engagement with government, business and civil society
- Enabling people with lived experience to contribute to solutions
- Shared responsibility with our suppliers and partners
- Shared resources and tools
- UN Global Compact membership

- Modern Slavery Academic Network
- Facilitate engagement opportunities with government, business and civil society
- Evidence-based tools
- Policy relevant research
- Public events

which we will evaluate using....

### IMPACT INDICATORS



#### Our Impact Measurement Framework

%/# of modern slavery risks and impacts to the University that were addressed

#/% of collaborators who report engagement with the University of Sydney has improved their approach to modern slavery and related human rights impacts

Indicators on the effectiveness of our due diligence across our supply chain, research, partnerships, investments and controlled entities

Indicators on the effectiveness of our staff and student training

Indicators on contributions by our anti-slavery experts to policy, business and community initiatives on human rights

which will be guided by....

Our key stakeholders: Staff, students, partners, community and people with lived experience

The UN Guiding Principles on Business and Human Rights

Commonwealth and NSW modern slavery obligations and guidance

Our values: Trust, Accountability, Excellence

Sydney in 2032 Strategy

# Our Impact Measurement Framework




**OUTCOME: Find modern slavery in the University's operations and supply chains and address it**


Evaluated by...



**#/% of modern slavery risks and impacts to the University that were addressed**

Which will be measured by our effectiveness in achieving our objectives...

	<b>Objective 1: Embed human rights due diligence University-wide</b>	
	We will measure...	We will demonstrate this through...
<b>GRIEVANCE MECHANISM</b>	#/% of reports with modern slavery indicators to the University that were addressed.	<ul style="list-style-type: none"> <li>– Reports via our grievance mechanism and other channels.</li> <li>– Feedback from affected stakeholders on response and remedy.</li> </ul>
<b>SUPPLY CHAIN</b>	#/% of procurement projects over \$250k identified as inherent high risk for modern slavery.	– Screening using the Know Your Partner & Project Tool.*
	#/% of inherent high risk procurement projects where the University reduced the residual risk.	– Implementation of our high risk due diligence process.
<b>RESEARCH</b>	#/% of teams engaging with external entities screening projects and partners for human rights impacts.	– Screening using the Know Your Partner & Project Tool.*
	Case studies on high risk research projects where the University reduced the residual risk, through implementation of mitigants.	<ul style="list-style-type: none"> <li>– Development of risk-based due diligence actions.</li> <li>– Engagement with researchers and research support staff on implementation of mitigants.</li> </ul>
<b>INVESTMENTS</b>	% of the University's investment portfolio screened for human rights violations.	– Quarterly screening of our publicly listed portfolio and annual screening of our private equity portfolio using our Know Your Partner & Project database.*
<b>CONTROLLED ENTITIES</b>	#/% of due diligence actions implemented by our controlled entities to mitigate identified salient modern slavery risks.	<ul style="list-style-type: none"> <li>– Annual saliency risk assessment.</li> <li>– Implementation of risk-based due diligence plans.</li> </ul>

	<b>Objective 2: Equip our staff and students to identify and report modern slavery</b>	
	We will measure...	We will demonstrate this through...
<b>ENGAGEMENT &amp; TRAINING</b>	#/% of staff in high risk roles that demonstrate increased awareness of how to identify and report modern slavery risks. <i>Includes Procurement, Research and Controlled Entities.</i>	– Pre and post training surveys.
	#/% of students and student-facing staff engaged that demonstrate increased awareness of modern slavery and increased confidence in seeking or referring to support.	– Pre and post training surveys.



## OUTCOME: Contribute to solution-focused modern slavery research, education and partnerships


Evaluated by...



#/% of partners and collaborators who report engagement with the University of Sydney improved their approach to modern slavery and related human rights impacts.

Which will be measured by our effectiveness in achieving our objectives...

	Objective 3: Contribute to multi-stakeholder collaboration to influence change	
	We will measure...	We will demonstrate this through...
<b>SUPPLIER ENGAGEMENT</b>	Case studies on supplier engagement on modern slavery risks.	<ul style="list-style-type: none"> <li>Engagement with procurement and suppliers on changes to their approach to modern slavery, following engagement.</li> </ul>
<b>INVESTMENT FUND MANAGER ENGAGEMENT</b>	#/% of managers with high risk holdings engaged on modern slavery risk.	<ul style="list-style-type: none"> <li>Analysis of our portfolio for sector-specific risks.</li> <li>Engagement with fund managers.</li> </ul>
	#/% of managers with high risk holdings that demonstrate a maturity in their approach to managing modern slavery risks, following engagement.	<ul style="list-style-type: none"> <li>Fund managers' progress on our Human Rights Maturity Framework.</li> </ul>
<b>EXTERNAL ENGAGEMENT</b>	# of contributions by the Modern Slavery Unit to policy development, business practice or community initiatives on human rights.	<ul style="list-style-type: none"> <li>Partnerships and collaborations with government, business and civil society.</li> <li>Feedback from partners.</li> </ul>

	Objective 4: Enable our academics to inform evidence-base practice on human rights	
	We will measure...	We will demonstrate this through...
<b>ACADEMIC ENGAGEMENT</b>	# of academics actively participating in our Modern Slavery Academic Network.	<ul style="list-style-type: none"> <li>Participation in one or more initiative annually (e.g. government consultation, event).</li> </ul>
	#/% of anti-slavery academics that have contributed to policy development, business practice or community initiatives on human rights.	<ul style="list-style-type: none"> <li>Annual engagement survey with Modern Slavery Academic Network.</li> <li>Feedback from partners.</li> </ul>

\* *The Know Your Partner & Project Tool* was developed by the University of Sydney to screen prospective partners and projects for human rights violations, sanctions, legal action and business misconduct. It brings together publicly available, reputable sources to identify risks in over 20,000 entities, individuals and locations.