

The University of Sydney

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Modern Slavery Statement 2020



THE UNIVERSITY OF
SYDNEY



Acknowledgement of Country

The University of Sydney's Camperdown campus sits on the lands of the Gadigal people with campuses, teaching and research facilities on the lands of the Gamaraygal, Dharug, Wangal, Darkinyung, Burramadagal, Dharawal, Gandangara, Gamilaraay, Barkindji, Bundjalung, Wiradjuri, Ngunawal, Gureng Gureng, and Gagadju peoples.

We pay respect to the Elders and communities of these lands, past, present and emerging, who for thousands of years have shared and exchanged knowledge across innumerable generations, for the benefit of all.



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The University of Sydney (ABN 15 211 513 464) is a statutory corporation established in New South Wales pursuant to the University of Sydney Act 1989 (NSW). Our principal address is The University of Sydney, NSW, 2006. We are registered with the Australian Charities and Not-For-Profits Commission. Our CRICOS (Commonwealth Register of Institutions and Courses for Overseas Students) number is 00026A. This Statement identifies the steps The University of Sydney, as a single reporting entity, has taken for the year ended 31 December 2020.

INTRODUCTION (CRITERION 1)

This is the University of Sydney's first Modern Slavery Statement, pursuant to its obligations under s13 of the Australian Modern Slavery Act 2018 (the Act). The statement has been approved by the Senate of the University at its meeting on 19 May 2021.

This statement outlines our commitment and approach to identifying and addressing modern slavery risks in our supply chain, operations, and investments, including those of the entities we control. Each section addresses actions taken in response to the mandatory reporting criteria of the Act during the year ended 31 December 2020.

The term modern slavery describes serious forms of exploitation including human trafficking, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour. It occurs when coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery breaches the most fundamental freedoms and human rights of individuals and is never acceptable in any of its forms.



OUR COMMITMENT

We are committed to respecting human rights and taking meaningful action to address modern slavery. We all have a moral and ethical obligation to play our part in eradicating modern slavery practices. As a higher education institution occupying a unique space at the intersection of public and private enterprise, we recognise the important role the University, and the sector, can play in the global effort to eradicate modern slavery.



CONSULTATION WITH CONTROLLED ENTITIES (CRITERION 6)

This statement is made on behalf of the University of Sydney and our controlled entities including:

- **Westmead IVF Pty Ltd** – an Australian company operated by the University of Sydney since 2014 and trading as Westmead Fertility Centre, it provides affordable access to fertility treatments, underpinned by the latest research and innovation.
- **Suzhou Xi Su Business Consulting Co. (Centre in China)** – a Chinese company which operates a multi-functional centre in China. It was established in 2016 as a foreign owned entity, to support our operations and functions in China. It is a wholly owned subsidiary of A14 Holdings Pty Ltd.
- **A14 Holdings Pty Ltd** – the holding company for the Centre in China (Suzhou Xi Su Business Consulting Co.) and has no substantive operations.

Both Westmead IVF Pty Ltd and Suzhou Xi Su Business Consulting Co. have been engaged and consulted on the preparation of this statement.

The executive teams of both entities have also been engaged and consulted on our [Modern Slavery Policy](#) and risk framework. The entities were also supported to undertake modern slavery risk analysis (including supply chain analytics), and where necessary, contract remediation and process improvement to address modern slavery risks.

A SNAPSHOT OF OUR 2020 PROGRESS

Incorporating the UN Guiding Principles on Business and Human Rights, our 2020 efforts focused on understanding risks and developing a clear policy and due diligence framework for identifying and addressing modern slavery.



Understanding the impact and risk of causing, contributing to or being directly linked to modern slavery

- Mapping our value chain including our suppliers, operational, research and teaching partners
- Establishing a modern slavery risk framework
- Developing a modern slavery supply chain risk register
- Developing a multi-year strategy for addressing risks and monitoring progress



Reviewing and resetting our policy and legal settings

- Developing and implementing our Modern Slavery Policy
- Updating key University policies and procedures to include modern slavery provisions
- Strengthening our contracts and templates to include modern slavery provisions



Building capacity and staff awareness

- Launching an anti-slavery awareness training module for all staff
- Delivering tailored training workshops to high risk priority areas
- Delivering workshops to our controlled entities



Supporting our students

- Launching our bespoke anti-slavery awareness training module for students
- Providing on-campus student support and referral services through our Safer Communities Office



Sharing lessons learned and collaborating with others

- Collaborating with the Australian Universities Procurement Network
- Partnering with Anti-Slavery Australia

FROM THE CHANCELLOR AND VICE-CHANCELLOR

As Australia's first university – founded in 1850 – the University of Sydney has a proud history of global leadership in education and research and inspiring people from all backgrounds to contribute to positive real-world change.

Modern slavery is a complex global problem, breaching the most fundamental freedoms and human rights of individuals. There is a continuum of exploitation around the world and modern slavery exists at its extreme end. While many believe it to be abolished, modern slavery exists in every country in the world, including in Australia.

As a higher education institution dedicated to the education and empowerment of future generations, addressing modern slavery goes to the moral heart of what we stand for as an institution. Whether it's through our world-leading research, our education offerings, or by striving for an ethical supply chain in our operations, we are committed to protecting human rights and contributing to the global effort to eradicate modern slavery.

The complex nature of modern slavery means a sustained and collective effort is needed to truly effect change. Our vision at the University of Sydney is for each and every one of us to play a part. A critical first step, for individuals and organisations alike, is to become informed. For our first modern slavery statement, gaining a deep understanding of the potential modern slavery risks across our supply chain, operations and investments has been paramount. Our modern slavery risk framework has enabled us to identify key areas across our supply chain, operations, and investments to be prioritised for risk based due diligence and preventative action.

Equally important has been raising awareness amongst our University community. In 2020 we launched our Anti-Slavery Awareness training module for all staff. Developed in partnership with Anti-Slavery Australia, the module has been completed by more than 2000 staff. Similarly, our bespoke Anti-Slavery Student Awareness module launched in 2021 will provide more than 61,000 students with tailored information on how to identify modern slavery risks often faced by young people in Australia and where to seek support.

The recent launch of our Modern Slavery Policy (2020) embeds our commitment to addressing modern slavery into our operations and outlines the mechanisms that hold us and our partners to account. The policy establishes binding compliance standards for ongoing due diligence, reporting and governance and a mechanism for internal and external parties to report incidents or concerns regarding modern slavery. We are committed to using our influence and leverage to set expectations with our partners and suppliers and these expectations have been incorporated into our contract templates. These foundational steps will provide the basis for continuous improvement as we monitor and track our progress against set outcomes and KPIs.

These are important first steps. However, we recognise many of the risks and factors which contribute to modern slavery extend far beyond the control and reach of any one entity. And while we cannot ourselves eradicate global modern slavery practices, we are committed to taking meaningful action and being open and honest about the risks we uncover, as we recognise this is crucially important to piecing together the global picture of the scope and scale of this issue.

We have only just begun our journey, and there is still much to be done, learned and understood, however we are committed to staying the course and playing our part in eradicating modern slavery once and for all.



A handwritten signature in black ink that reads "Belinda Hutchinson".

Belinda Hutchinson AC
Chancellor



A handwritten signature in black ink that reads "Stephen Garton".

Stephen Garton AM
Vice Chancellor and Principal

WHO WE ARE (CRITERION 2)

In creating Australia's first university, our founders recognised the power of education to change society. We hold that belief just as strongly today.

We are a leading Australian research-intensive University, consistently ranked in the world's top 50 universities. We educate students from around the world at teaching and research facilities primarily across Sydney and New South Wales. Our largest campus is located at Camperdown/ Darlington in Sydney, encompassing 72 hectares of teaching and research, facilities, and social infrastructure.

We are a statutory corporation pursuant to the University of Sydney Act 1989 (NSW), and were established by the Parliament of New South Wales in 1850. We are governed by a Senate, which is composed of 15 Fellows and chaired by the Chancellor.

The Vice-Chancellor is the principal administrative officer of the University and manages a number of portfolios, each responsible for a specific suite of activities and strategic functions, both academic (Provost, Education, Research, Indigenous Strategy) and administrative (Operations, External Relations, Strategy and Advancement).



OUR PRINCIPAL ACTIVITIES AND OPERATIONS (CRITERION 2)

Consistent with the University of Sydney Act, we undertake a broad range of functions and activities and we rely on a broad and deep value chain.

We have over 8500 staff across academic and administrative functions, and a range of casual employees and affiliated individuals (including clinical, adjunct, conjoint and honorary title holders) who assist us to perform specific teaching and research activities. Our operations are predominantly based in Australia, however we deliver education and research activities across the globe.



Education

We offer the widest range of academic programs of any university in Australia across **six faculties** and **three University schools**



Engagement

We actively engage with industry, as well as our alumni and community, to provide a range of professional, technical and vocational services

900+

award courses

800+

student placement partners

300

student mobility partners



Student support

We provide a range of support services to over **61,000 students**



Research

We are a comprehensive research-intensive university and collaborate with a wide variety of Australian and global partners across 22 fields of research



Recruitment

We undertake student recruitment activities both in Australia and overseas

138

research and teaching centres

555

research partners



Fundraising

We undertake fundraising activities to support our objectives



Facilities

Our **10 campuses** provide world-class facilities for education and research, as well as cultural, social and community engagement (including museums, galleries, theatres, libraries and sporting facilities)



University partnerships

We have 20 priority university partners across North America, Asia and Europe

OUR PRINCIPAL ACTIVITIES AND OPERATIONS CONTINUED

We have hundreds of internal units and divisions which operate under various names and include centres, foundations, alumni associations and clinics. Some of our flagship multidisciplinary centres include the Charles Perkins Centre, Brain and Mind Centre and the Sydney Policy Lab, while some of our cultural institutions include The Seymour Centre and our newly opened Chau Chak Wing Museum.

We are directly responsible for providing a number of these activities described on page 7, but also partner with a range of stakeholders including:

- research partners, industry, teaching hospitals, community partners, and student placement providers, to deliver our core research and teaching objectives; and
- student organisations (including their clubs and societies), residential colleges and third-party residential facilities, to enable us to deliver the necessary social infrastructure and services critical to supporting a vibrant and inclusive university experience.

Other operations and activities (Criterion 2)

We lease property to tenants, including retail shops, commercial and other facilities on our campuses. Many retail operations on campus are separately administered by the student union, the University of Sydney Union (USU), and Sydney University Sport and Fitness (SUSF), pursuant to an overarching licence with the University.

We manage endowment funds that are invested in financial assets to meet long-term academic and research goals. These funds consist mainly of bequests and donations that have been gifted to the University for a range of purposes. Most of our funds are managed by external fund managers through short, medium and long-term funds. Our long-term fund represents the bulk of the University's financial asset investments, with around 80% of these funds held in trust for specific purposes.



OUR SUPPLY CHAIN (CRITERION 2)

Our supply chain is diverse and complex, covering more than **280+** product and service types required to support the University's operations.

Our supply chain supports our infrastructure, administrative functions, academic programs and our research teams working on diverse global challenges, from creating cleaner fuels and a faster internet to treatment for chronic illness. We use a centralised online buying system (UniBuy) to provide visibility and transparency over the goods and services we buy.

5000+ suppliers spread across **61** countries with **92%** of direct spending in Australia, followed by USA 2.9% and China 1.4% respectively



IDENTIFYING MODERN SLAVERY RISKS (CRITERION 3)

Consistent with the United Nations Guiding Principles on Business and Human Rights, our due diligence risk framework focuses on identifying risks where the University may be causing, contributing to, or directly linked to modern slavery through our supply chain and operations.

Our modern slavery risk framework

In June 2020, the University Senate approved our modern slavery risk framework. When considering risks, we assess the risks we pose to people either through our own activities or through our contractual relationships with other parties.



We recognise modern slavery is a global complex problem. Many of the risks and factors contributing to modern slavery extend far beyond the control and reach of any one entity. While we cannot ourselves eradicate global modern slavery practices, we are committed to protecting human rights and taking meaningful action when and where we can within the legal, policy, operational and management settings we control, and using our influence and leverage to effect change.

OUR RISK ASSESSMENT METHODOLOGY (CRITERION 3)

We are committed to taking meaningful action with an emphasis on continuous improvement. In practice this means:

1. **Identifying** the risks of causing, contributing, or being directly linked to modern slavery practices through our operations, functions and supply chain. For example, risks linked to our suppliers providing services on our campuses such as cleaning, security and maintenance etc.
2. **Assessing** which risks are in our direct control or sphere of influence, and identifying available mechanisms to address them, such as contractual terms, policy settings and process and procedural improvements.
3. **Taking action** once risks have been assessed by reviewing and amending our legal, policy and operational settings to ensure they adequately address risks and do not contribute, cause or directly link us to modern slavery.
4. **Using our influence** where modern slavery risks arise outside of our direct control and communicating with partners we work with to collectively effect change.

Four-stage risk analysis

Our modern slavery risk framework is supplemented by a four-stage risk analysis, which enables us to identify potential modern slavery risks across our operations and supply chain.



1. Map

We map our value chain including suppliers, research and teaching partners, operational partners and controlled entities across four key risk criteria:

- sector and industry risks
- product risks
- geographical risks
- entity risks



2. Identify

We identify potential risks through desktop research and literature review of published reports and data sets to identify modern slavery risks related to specific goods and services we buy and to countries in which we operate.



3. Assess

We assess risks through detailed supply chain analytics (undertaken by third-party provider FairSupply) and detailed analysis of our existing suppliers to assess the potential risks in our sphere of influence and circle of control.



4. Prioritise

We prioritise our actions (including remedies where modern slavery breaches are suspected or found) based on the level of risk posed and our capacity to influence and effect change, for example through contractual terms, industry collaboration or spending priorities.

MODERN SLAVERY RISKS (CRITERION 3)

Modern slavery risks exist across all sectors and organisations, and the University is no exception. While we have not identified any instances of causing modern slavery, we have identified areas within our operations and supply chain where there is potential for us to be directly linked to the following four types of modern slavery risks.

Forced labour

restrictions of movement, intimidation, threats, including human trafficking

Deceptive recruitment practices

workers promised certain jobs, benefits or conditions

Child labour

where children are engaged in hazardous work

Debt bondage

the payment of excessive recruitment fees or associated costs, and retention of identity documents

In Australia

Construction, cleaning, security and maintenance

These industries have a well-documented history of labour rights breaches, multiple subcontracting arrangements, low skilled/low paid work and a high percentage of vulnerable workers susceptible to deceptive recruitment practices. The services are provided onsite, contributing to heightened University risk, and often outside standard working hours, contributing to low visibility.

Food and retail on campus

The underpayment of workers is particularly prevalent in retail and hospitality. While underpayment and wage theft do not constitute modern slavery, these are exploitation risks which students may experience while working at sub-leased outlets. Food and retail on campus is sourced and sold by the University Student Union.

Overseas

Laboratory and teaching consumables

Lab and teaching consumables are predominately manufactured in less economically developed countries (mainly in Asia). There are documented instances of malpractice related to factory conditions, and low-skilled and low-paid work often by vulnerable workers.

IT services

Although most direct suppliers are based in Australia, work is often sent offshore to less economically developed countries with little visibility over labour conditions.

IT hardware

The electronics industry is prone to labour malpractice and has had significant global media attention due to poor working conditions at factories and mines, and its reliance on low skilled, low paid and vulnerable labour.

University apparel and merchandise

The apparel industry (particularly cotton) is well-known to have child labour and forced labour involved in the harvesting of the raw materials and the manufacturing of the finished product. University apparel is sourced and sold by the University of Sydney Union through a licensing agreement.

Outsourcing to third-party providers

Outsourcing to third-party providers overseas may present risks, especially where we may not have full visibility of undisclosed subcontracting or third-party providers offering ancillary services to international students (e.g. financial loans, migration advice which may lead to risks of debt bondage).

Research activities

Certain research activities can present potential risks of modern slavery due to the nature of the research undertaken. For example, clinical trials using human tissue, research projects in countries with known or widely reported human rights violations, state-sponsored forced labour and weak rule of law, or projects relying on high-risk goods (e.g. lab consumables).

MODERN SLAVERY AND EXPLOITATION RISKS EXPERIENCED BY STUDENTS

While exploitation is not the same as modern slavery, we know that it can be a precursor to, and may be present in some cases of modern slavery. As noted in the Commonwealth Government's inquiry into establishing a Modern Slavery Act in Australia,¹ students are not only vulnerable to exploitation such as wage theft and underpayment, but also to the worst forms of exploitation and modern slavery, such as:

- **debt bondage**, where students may be forced to provide labour or services as security or repayment of an inflated student debt/or cost of living debt in their home country
- **forced labour**, where students are placed in circumstances where they do not feel free to stop working or to leave a place of work because of coercion, threat or deception.

Our consultation with Anti-Slavery Australia and other civil society organisations has also identified **forced marriage** as a risk faced by students. This includes where a student may be unable to attend or complete university studies due to forced marriage either in Australia or overseas.

A range of factors drive and enable this exploitation. For international students, their vulnerability may be increased by a lack of awareness and understanding of Australian laws and where they can go to seek support. Research by the University of Sydney on why international student workers in Australia tolerate underpayment shows us that international students can maintain a peer frame of reference, receiving incorrect information on working rights

and acceptable conditions from fellow international students. This, combined with multiple vulnerabilities common to many temporary migrants, means that they may be effectively locked into a labour market separate from the one that legal institutions were intended to create and maintain.²

As shown by studies by the Fair Work Ombudsmen in 2017 and the Migrant Worker Justice Initiative in 2020, international students are reluctant to seek help for problems at work because of a perception of culpability, as they believe they may have broken the law by agreeing to wages less than the legal minimum.³ Research also indicates that educational institutions are well placed to provide information to international students on workplace rights and to influence opportunities for widening their peer interactions.⁴

Recent media coverage has also exposed international student exploitation in the workplace, particularly in casual jobs in the hospitality and cleaning industries.⁵ Once in Australia, students can also borrow and pay large amounts of money to recruiters in Australia on the false promise of long-term skilled visa or permanent work putting them at risk of debt bondage.⁶

The global COVID-19 pandemic has heightened the risk of exploitation of students increasingly desperate for income in a difficult labour market with stressed businesses looking for ways to cut costs. This may leave students vulnerable not only to being underpaid, but potentially to worse forms of exploitation, particularly if they believe they have little choice but to tolerate unsafe and poor working conditions.





ACTIONS TO ASSESS AND ADDRESS RISKS (CRITERION 4)

At the University of Sydney, we all have a responsibility to identify and address modern slavery risks.

Modern slavery governance

Aligning with our principles for taking action, our modern slavery governance is embedded into the University's existing governance arrangements. Our efforts are centrally coordinated and managed by a designated Modern Slavery Project Team who facilitate implementation via thematic working groups.

Senate

The University Senate and the University Chancellor approve the Modern Slavery Framework, our approach to addressing modern slavery and the annual Modern Slavery Statement.

Vice-Chancellor

The Vice-Chancellor and Principal is the University's principal executive officer, and the designated owner of our Modern Slavery Policy. The Vice-Principal (Operations) is the Modern Slavery Policy administrator.

Both the Vice-Chancellor and Vice-Principal (Operations) are co-sponsors of the Modern Slavery Project

University Executive Committees

The University Executive makes recommendations to the Vice-Chancellor for University-wide planning, decision-making and oversight. It reports to Senate on the prosecution and management of initiatives under the University's strategic plan, and on the academic and financial health of the University. Together with its sub-committees, it oversees and monitors the University's compliance with the Modern Slavery Act. It receives six monthly reports on our implementation progress.

Program Management and Delivery

The Modern Slavery Project Team (two full-time staff) manage the University-wide response to modern slavery reporting obligations and reports to the Vice-Chancellor and Principal and the Vice-Principal (Operations).

The team is responsible for developing and implementing the University's modern slavery program, coordinating efforts across the University to implement our approach, administering online reporting and producing our annual statement.

Implementation

Implementation across the University is undertaken through thematic working groups including:

- Supply chain (Procurement Services)
- Human Resources and Culture
- Research portfolio
- Campus Services
- Education portfolio
- Office of General Counsel

OUR ACTIONS (CRITERION 4)

Our actions focus on risk-based due diligence that is fit for purpose, balanced, and embedded into our business-as-usual practices.





MODERN SLAVERY POLICY

The University's [Modern Slavery Policy](#) sets out our commitment to addressing modern slavery.

It underpins our efforts to embed human rights considerations into our business as-usual practices by setting out:

- our commitment, principles and compliance framework;
- standards of behaviour expected of all staff, affiliates, suppliers, and partners; and
- roles and responsibilities for implementing the policy and reporting against key performance indicators.

The Policy also establishes binding compliance standards for ongoing due diligence, reporting and governance and a mechanism for internal and external parties to report incidents or concerns regarding modern slavery.

We are committed to using our influence and leverage to set expectations with our partners and suppliers and these expectations will be incorporated into all our supplier and partner contracts.

We have developed template modern slavery clauses for partnerships, collaborations and joint ventures modeled on the Australian Government's recommended modern slavery clauses and adapted for our purposes.

ASSESSING AND ADDRESSING RISKS IN OUR SUPPLY CHAIN (CRITERION 4)

Given the diverse and complex nature of our procurement activities and business operations, we are not immune to potential modern slavery risks in our supply chain.

To understand and identify potential risks, we undertook detailed supply chain analysis of our tier-one suppliers (i.e. those contracted to the University and critical to our operations) and the University's procurement spending. The analysis identified our high-risk and high-priority spending categories.

Supply chain risk overview

49%

of spending was on categories with potential links to modern slavery risks

Spent across six high risk categories



This was supplemented by detailed risk screening undertaken by third-party provider FairSupply Analytics. This included screening the supply chains of over 5000 of our suppliers.

The analysis identified our top 50 suppliers across our top 10 risk industry categories based on the University's aggregated spend. Risk was determined based on the industry, amount spent and the geographical location of the products or services. This screening enabled us to identify spending categories to be prioritised for risk prevention and remediation action (including appropriate category specific Request for Tender (RFT) questions).

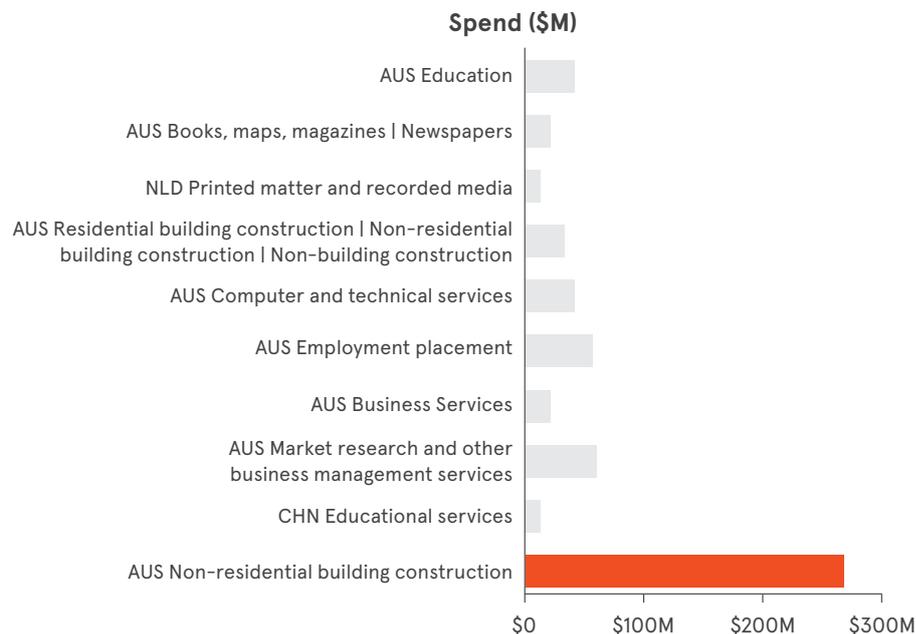


Figure 1: Top 10 spend categories based on the University's aggregated spend

RESETTING OUR PROCUREMENT POLICIES, CONTRACTS AND PROCESSES

Procurement policies reset

Our procurement policies and procedures now include modern slavery provisions, affirm our commitment to addressing modern slavery and state our expectation that our suppliers do the same.

Procurement Policy	Our Procurement Policy and related procedures require purchasers to consider environmental, ethical and legal obligations (including the Modern Slavery Act).
Supplier Business Ethics Statement of Expectations	Our Supplier Business Ethics Statement of Expectations sets out our expectation that our suppliers demonstrate their commitment to identifying and addressing modern slavery.

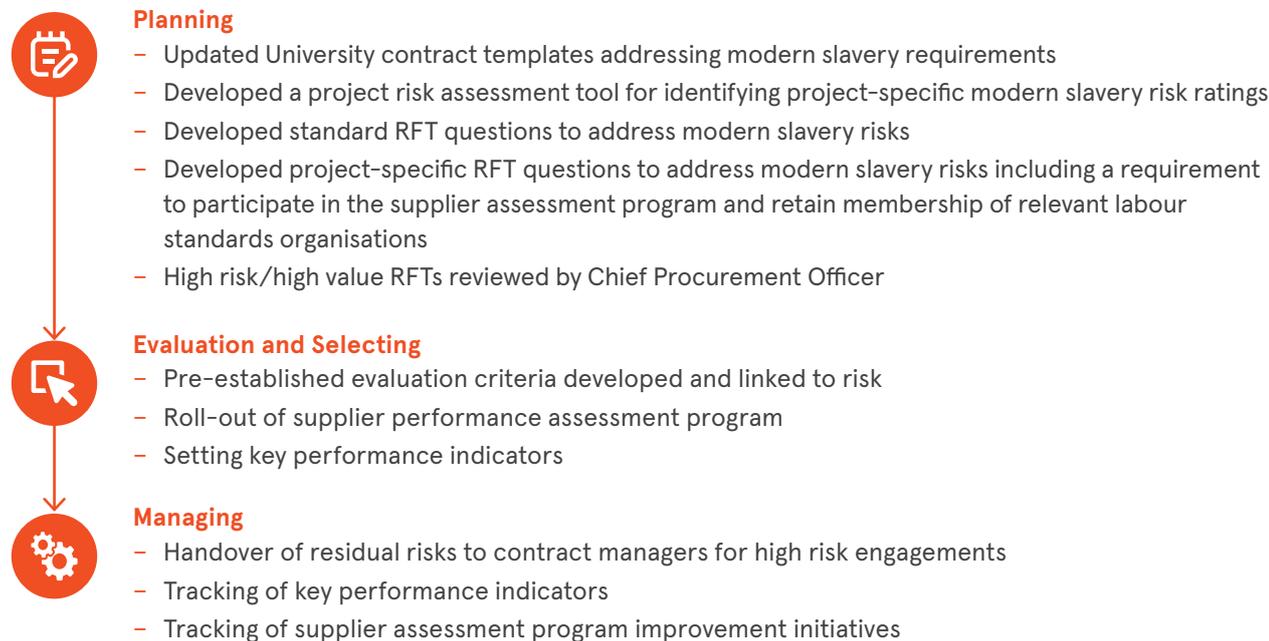
Strengthening our supply chain contracts

Our policies and legal requirements are reflected in our contracts with suppliers and partners. Strengthening our contracts is a key measure for addressing the risks of modern slavery in our value chain.

Procurement contracts	<p>Our full suite of procurement standard contract templates (including for high-risk areas such as facilities management and construction) have been updated to include modern slavery clauses and requiring suppliers to comply with our Statement of Business Ethics.</p> <ul style="list-style-type: none"> - For existing contracts, we have adopted a risk-based approach to prioritising the variation of contracts. - To date, 410 existing high-risk contracts have been identified as high priority for contract renegotiation or variation, of which 86% have been completed. - Contracts with a high risk of modern slavery, including facilities management are actively managed to mitigate the risk of modern slavery. (Refer to Facilities Management Case Study on page 20).
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Strengthening our procurement process

Our end-to-end procurement process, including all tools and templates, has been updated to address modern slavery risks. Our procurement project risk assessment tool rates modern slavery risk to ensure appropriate processes are followed.



ADDRESSING RISK IN FACILITIES MANAGEMENT CASE STUDY

Facilities Management, in particular security and cleaning services have been identified as services at high risk of being directly linked to modern slavery.



When appointing a new facilities management contract provider, the University looked to mitigate the risks of modern slavery through the procurement process and included modern slavery considerations in each step of the tender and post award process.

Procurement phase	Focus	Attestation
Screening	Tenderers were excluded if they had committed an offence under the Public Works and Procurement Act	Tenderers were excluded if a violation of social, labour or environmental conventions was demonstrable
Tendering	Each subcomponent of a rate card was scored and aggregated	Compliance check of tendered rates against industry awards, abnormally low tenders were rejected for failure to comply
Due diligence	<ul style="list-style-type: none"> - Tenderer client referee checks; and - Subcontractor selection checks by subject matter experts 	Financial strength checks
Contract award	Robust modern slavery contractual clauses included in the contract (e.g. audit rights, training requirements for staff)	<p>Service providers warrant that their operations, subcontractors and supply chain do not contravene any modern slavery laws</p> <p>The selected supplier is required to train personnel and subcontractors on the implications of the Modern Slavery Act</p>
Post award	Regular audits carried out in addition to ongoing monitoring including overall performance of the supplier which will be measured against KPIs	Contractor audit identifies any inappropriate work practices e.g. recruitment practices, work and life under duress, impossibility of leaving – and identify any penalties or threats to which workers may be subjected.

ONGOING SUPPLIER DUE DILIGENCE THROUGH ECOVADIS (CRITERION 4)

Our capacity to address supply chain risks is largely contingent on the maturity and awareness of our suppliers, their practices, policy frameworks, and worker engagement practices. We have engaged a third party, EcoVadis, to provide supplier assessments covering a broad range of non-financial factors, including environmental, labour and human rights, ethics and sustainability impacts. EcoVadis is an international provider of supply chain sustainability assessments that works with more than 400 multinational companies and has rated more than 60,000 suppliers worldwide.



EcoVadis will support sourcing personnel in managing supplier risk during tenders, contract managers in their ongoing management of supplier performance and suppliers in understanding the University’s expectations and their rating in comparison with other similar organisations. For each assessment, EcoVadis provides a scorecard out of 100, including recommended remedial actions to improve a company’s compliance. The program has been piloted with a small group of existing suppliers that already have scorecards.



Figure 2: Sample of EcoVadis scorecard results for University suppliers

In 2021 we will continue to engage and support suppliers we have assessed as high-risk to complete an EcoVadis assessment. This will provide valuable insights, build knowledge and enable us to target our mitigation and corrective action plans.

New suppliers will be onboarded to the EcoVadis platform as part of our supplier pre-qualification and contract management process.

In 2021, EcoVadis will also assess the University’s performance and provide an objective evaluation of our approach to addressing modern slavery.

BUILDING THE CAPACITY AND AWARENESS OF OUR PROCUREMENT STAFF (CRITERION 4)

During the second half of 2020, a comprehensive modern slavery engagement and awareness program was rolled-out across the procurement team.

The purpose of the engagement was to build knowledge and capability and enable greater engagement and integration of modern slavery risk mitigation practices into the procurement lifecycle.

Engagement activities and workshops were mapped to the procurement lifecycle, enabling staff to be involved in each phase of risk identification and remediation.

Category-specific sessions were held with Category Managers to assess risk profiles of our supplier base, leading to the creation of the modern slavery supply chain risk register and an opportunity for the team to participate in e-learning provided by the Australian Universities Procurement Network.

The team were then provided with an overview of the modern slavery supply chain risk register to ensure they understood the risk levels and mitigations.

A series of detailed infographics covering the six key areas of the University's procurement (cleaning, construction, IT hardware, IT services, laboratory and teaching consumables, and maintenance and security) and their associated risks of modern slavery were developed and used as educative tools for sourcing and category management teams.



CLEANING

OVERVIEW OF MODERN SLAVERY RISKS IN CLEANING



The industry is known for labour rights breaches, using subcontractors, and the workforce is considered vulnerable. The work is undertaken onsite, after work hours contributing to low visibility.

KEY RISKS

From risk rating	Influence	Priority
<div style="background-color: white; color: #e67e22; padding: 5px; font-weight: bold; font-size: 1.2em;">HIGH</div>	<div style="background-color: white; color: #e67e22; padding: 5px; font-weight: bold; font-size: 1.2em;">MED</div>	<div style="background-color: white; color: #e67e22; padding: 5px; font-weight: bold; font-size: 1.2em;">HIGH</div>
		
<p>Labour rights breaches</p> <ul style="list-style-type: none"> - poor visibility of work practices (undertaken after hours etc) - labour intensive - workers unaware of rights 	<p>Subcontracting</p> <ul style="list-style-type: none"> - known instances where despite formal labour agreements, cleaners were paid below the listed wage, with the subcontractor pocketing the money - a form of wage theft 	<p>Vulnerable workers</p> <ul style="list-style-type: none"> - low skilled workers - migrants and international students
<p>Other risks</p> <ul style="list-style-type: none"> - potential WHS risks - poor regulation 		

HOW WE ADDRESS THESE RISKS

- Supply chain specific questions included in tenders
- Detailed supplier evaluation and ratings (EcoVadis) 
- Robust contract management including compliance audits, site supervision and worker identification, covering pay and conditions
- Establishing KPIs & annual performance management
- Participation in industry specific associations & programs 
- Participation in cleaning accountability framework and requiring prospective companies to be accredited

ASSESSING AND ADDRESSING RISKS IN OUR RESEARCH ACTIVITIES (CRITERION 4)

Our international research effort extends across 22 fields of research, 500+ institutional partners and 130+ research centres.

While we have not identified instances of modern slavery practices linked to our research activities, the complex and global nature of modern slavery means our research activities are not immune to being linked to these risks. From using lab consumables made with potential forced labour, to undertaking much-needed research in countries with weak rule of law or relying on third-party providers for data collection, modern slavery risks can occur beyond the reach and control of any organisation.

Modern slavery risks in our research

Detailed analysis has identified certain research activities present potential links to modern slavery risks due to four main factors:



ADDRESSING RISKS IN OUR RESEARCH ACTIVITIES (CRITERION 4)

Strengthening our research agreements

Throughout 2020, we focused our efforts on identifying the risks within our direct control and the levers available to address them. To this end, we have updated several research agreement templates to include modern slavery clauses modelled on Australian Government recommendations as set out below.



Research agreements

Research agreement templates updated to include modern slavery provisions include:

- Multi-institutional Agreement for NHMRC Grants;
- Multi-institutional Agreement for NHMRC Clinical Trials and Cohort Studies Grants;
- Research Collaboration Agreement for NHMRC Investigator Grants;
- Traditional Research Collaboration Agreement with Clinical Trial Groups;
- Research Services Agreement;
- Clinical Trial Agreement (Overseas Local Sponsor); and
- Four ARC Linkage Project Agreements.

Throughout 2021, we will update other research and commercialisation templates.

Policy reset

We have reviewed our legal and policy settings to ensure they reflect our commitment to addressing modern slavery and clearly communicate our expectation of our suppliers and partners to do the same. Through our Research Working Group, we identified a set of research policies, procedures and processes to be reviewed and amended in 2021.



Research policies for review

These policies and procedures will be actively reviewed throughout :

- Research Code of Conduct 2019
- Clinical Trials Policy 2016
- Clinical Trials Procedures 2016
- External Human Ethics Procedures 2013
- Research Agreements Policy 2011





ENGAGING STAFF AND BUILDING AWARENESS

We partnered with Anti-Slavery Australia to develop an online staff awareness training module tailored to support staff to identify and respond to modern slavery risks.

Creating awareness amongst our university community is a critical first step in addressing modern slavery risks. In 2020 we launched our mandatory Anti-Slavery Awareness training module for all staff.

Developed in partnership with Anti-Slavery Australia, the bespoke training module supports staff to identify and respond to modern slavery risks in their day to day functions. Through interactive activities and scenarios, staff are stepped through:

- what modern slavery is and risks within the University's supply chain and operations
- how to respond to those risks to fulfil our mandatory compliance requirements
- resources and support available and other ways they can get involved

At the date of this statement, more than 2000 staff have completed the training.

SUPPORTING STUDENTS TO PREVENT THE RISK OF EXPLOITATION

Students are at heightened risk of experiencing modern slavery both in Australia and overseas due to systematic exploitation, deceptive employment practices of employers and heightened vulnerability caused by COVID-19.

While we cannot control student employment conditions, or their personal and family circumstances, we can ensure students are informed about their rights and provided with the appropriate support services and information to seek help.

Providing support and building awareness amongst our students

Training and awareness raising

- Our online anti-slavery awareness module for all students provides key information on how to identify risks and where students can go to access support. At the date of this statement, more than 3700 students have completed the training.
- The module is supplemented by an information campaign on student-facing websites providing information on worker rights, legal support services and links to specialised support services such as My Blue Sky and Anti-Slavery Australia. So far, there have been 1000+ site visits.

Support services

- Our Safer Communities Office provides a safe and trusted place for students to seek support on campus. Student Liaison Officers provide free and confidential advice, assist in referrals, risk assessment and safety planning. They also link students to counselling services and refer them to free legal support services.
- Staff in key student support roles have been trained to identify indicators of modern slavery and exploitation and refer students to appropriate legal support and counselling services.

Engagement with Student Organisations

- We engaged with student representative organisations and the staff of student unions to raise awareness amongst student bodies of modern slavery risks.
- Throughout 2021 we will be negotiating amendments to affiliation agreements to reflect University expectations and commitments to support our approach to modern slavery.



Strengthening our agreements and contracts

Recruitment agency agreements

- Our template recruitment agency agreements have been updated to include modern slavery clauses. This coincided with our renewal process with 93 contracts (100% of student recruitment contracts) updated to date, including an ongoing agreement with a key partner in India.

International agreements

- We have updated our full suite of international agreement templates with partner universities to include an exploitation clause, which deals with both modern slavery and sexual exploitation including:
 - Student Exchange Agreement,
 - Study Abroad Agreement, Study Abroad Provider Agreement and
 - Joint Study Abroad and Exchange Agreement.

Updated retail leases and licenses

- We have updated our retail licence precedent to address potential underpayments on campus, including by adding clauses requiring compliance with applicable awards, employment laws and corresponding audit clauses; and modern slavery provisions.
- This precedent is used for various tenancies, including cafés and shops located on campus. These changes have also been incorporated into USU and SUSF retail licence precedents to be used between the student organisations and their respective (sub)licensees.

Our Staff and Student Sexual Misconduct policies were also updated to incorporate the requirements of the Department of Foreign Affairs and Trade (DFAT) Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy, aimed at reducing child sexual exploitation and abuse. These provisions apply to all our DFAT-funded activities including our participation in the Australia Awards Scholarship Program and the New Colombo Plan Mobility Program. In addition, we undertook a range of awareness raising initiatives to support the PSEAH Policy, including incorporating it into our mandatory staff training modules.

ASSESSING AND ADDRESSING MODERN SLAVERY RISKS IN OUR INVESTMENTS (CRITERION 4)

Modern slavery risks in our investments were assessed as part of our annual Environmental Social and corporate Governance (ESG) review, undertaken by third-party provider Mercer.

The University's listed equity holdings were analysed for any allegation of Modern Slavery using ISS Datadesk's Norms Based Research Controversy Screen. The holdings were screened based on cases related to the areas of Forced Labour and Child Labour as well as Human Rights and Working Conditions.

Mercer's definition of companies with acute modern slavery risk are those tied to red flagged cases. Based on our analysis, there are no listed equity holdings with acute modern slavery risks within the University's portfolio. The assessment did not include fixed income and private market investments.

As at the end of December 2020, 59% of the University's investment managers (29 managers) had explicit policies regarding human rights and modern slavery and/or also had published Modern Slavery Statements. These managers are stewards of 58% of the University's investment portfolios.

Total number of managers 49



Of the remaining managers, five manage cash, domestic sovereign bonds or derivatives. These positions represent over 19% of the value of the funds.

Fifteen managers specialising in debt or equity assets do not so far have explicit policies regarding human rights/modern slavery or make Modern Slavery statements. Of these, six are Australian headquartered and manage approximately 10% of the funds. None of these managers have revenues large enough to be captured by the Australian Modern Slavery Act, however we plan to engage with these managers in 2021 to encourage a greater focus on identifying potential modern slavery risks and practices.

Eight of the remaining nine managers are headquartered in the United States. These managers are responsible for approximately 13% of the University's portfolios and are predominantly managing private equity funds of funds.

IMPACT OF COVID-19 (EXTRA REQUIREMENT)

As is the case on campuses around the world, the operations of Australian universities continue to be heavily impacted by COVID-19.

The University acted swiftly to respond to the emergence of the COVID-19 virus, standing up its pandemic response team in January, and rapidly moving all of our teaching online and sending our staff and students home to work and study remotely in March, in accordance with instructions from health authorities.

We also moved quickly to implement our long-standing financial shock recovery plan to carefully manage the financial fallout from a significant decline in student enrolments. This required serious austerity measures: major savings in such areas as infrastructure spending, repairs and maintenance, research equipment, travel, and recruitment of new staff.

The pandemic also drew our attention to the way in which COVID-19 is impacting vulnerable individuals and communities around the world, including young people and students.⁷ With this in view, supporting students' wellbeing and mental health has been a critical focus for the entirety of the University's COVID-19 response. The University invested significantly in an extensive suite of support measures, including financial assistance (such as a travel ban hardship fund), social and mental health support. We also partnered with Anti-Slavery Australia to develop and launch an anti-slavery awareness module to provide students with key information on support services available.

Disruptions to our modern slavery program

While the impacts of COVID-19 meant we had to adjust delivery of our modern slavery program, we made necessary changes early on, allowing for the majority of our planned activities to be delivered over the course of the academic year. Social distancing necessitated undertaking some activities online rather than face-to-face.

Prior to the global COVID-19 pandemic, our Modern Slavery Strategy encompassed plans for direct supplier engagement, with a major supplier stakeholder engagement workshop at the University. Instead, we adopted a risk-based approach to supplier engagement, focusing on high-risk, high-value suppliers in the first instance.

Certain high-risk categories were identified as priority areas requiring attention during the pandemic, most notably the procurement of personal protective equipment and cleaning services, particularly for student accommodation and other high-contact sites on campuses. The modern slavery team provided specialist advice to procurement category managers to integrate safeguards into changing procurement needs, including updating our risk assessments to factor in the impact of the pandemic on the vulnerability of workers in our supply chain.



EVALUATING EFFECTIVENESS (CRITERION 5)

The focus of our first year of reporting has been to map and identify potential modern slavery risks and put in place appropriate mechanisms and preventative steps to reduce the likelihood of those risks materialising.

We have monitored and tracked our progress against our 2020 Modern Slavery Implementation Strategy. The strategy provides a clear link between our deliverables, activities, key performance indicators and longer-term outcomes. The strategy will continue guide our actions and priorities over the coming years.

Our Strategy

Our vision is to make a meaningful contribution to the global effort to eradicate modern slavery

Our objectives are to meet our legal reporting obligations and community expectations on addressing modern slavery

For our 2020 Modern Slavery Statement we focussed on prioritising actions in our circle of control...

Our 2020 priorities



Understanding our impact and risk
Understanding our impact and risk of causing, contributing to, or being directly linked to modern slavery



Resetting our policy and legal settings
Drafting and implementing updates to our policies, processes, templates and contract terms to demonstrate our commitment to addressing modern slavery



Building staff awareness and rolling out training
Building staff awareness and understanding of modern slavery risks through communications and training in high priority areas



Supporting our students
Providing students with information and training on modern slavery and access to support services



Collaborating with others
Collaborating with the University sector, NGO's and business community to share lessons learned and best practice



and look to build on our efforts throughout 2021 by...

Our 2021 priorities



Integrating modern slavery considerations into our strategic settings
Integrating our commitment to addressing modern slavery in our values, culture and strategic planning



Continuing our reform of legal, policy and operational settings
Continuing to implement and embed remaining changes to our policy and legal settings including our oversight and decision making processes



Embedding awareness and capacity across the University
Training staff across our faculties, schools, and remaining units and equipping them to identify, respond to and manage modern slavery risks



Supporting our partners to adopt our Due Diligence Framework
Supporting our Controlled Entities and Joint Ventures to undertake modern slavery due diligence



Building on our research expertise to deliver world leading research
Harnessing our research expertise to contribute to the global effort on identifying and addressing modern slavery risks



This will ensure we meet our reporting obligations and demonstrate...

Our outcomes

1

We understand our modern slavery risks and effectively target our actions to address identified risks and a plan for continuous improvement

2

Human rights protections are embedded into key policies, processes and contracts, holding us and our partners to account

3

Staff are equipped with awareness and training to effectively identify and respond to modern slavery risks

4

Students are informed of modern slavery risks and aware of support services available to reduce their risk of exploitation

5

Our research makes a meaningful contribution to the sector and global effort to better identify and address modern slavery

PLAN FOR CONTINUOUS IMPROVEMENT (CRITERION 5)

Over 2021, we will continue to apply our modern slavery framework and principles as part of our ongoing risk assessment process. We will monitor and track our progress against our set outcomes.

Outcomes	Measures
We understand our modern slavery risks, effectively target our actions to address risks and have a plan for continuous improvement	<ol style="list-style-type: none"> Ongoing supplier assessments <ul style="list-style-type: none"> Percentage of suppliers in high-risk categories assessed as part of the supplier assessment program Percentage of current suppliers declining to participate in the supplier assessment program Roll-out of new procurement requirements for new suppliers <ul style="list-style-type: none"> Number of new and existing suppliers screened Roll-out of research projects modern slavery risk assessment <ul style="list-style-type: none"> Number of research projects assessed for modern slavery risks
Human rights protections are embedded into key policies, processes, and contracts, holding us and our partners to account	<ol style="list-style-type: none"> Senate and University Executive oversight <ul style="list-style-type: none"> Half yearly reporting from Principal Officers to the University Executive and the Senate Strengthening new contracts and templates <ul style="list-style-type: none"> number of supplier contracts and other agreements amended to include modern slavery clauses Monitoring suppliers' performance <ul style="list-style-type: none"> percentage of suppliers completing improvement actions arising from the supplier assessment program percentage tracking of the participation of the University's suppliers in training provided by the supplier assessment program Roll-out of online modern slavery grievance mechanism <ul style="list-style-type: none"> number of reports or incidents lodged
Staff are equipped with awareness and training to effectively identify and respond to modern slavery risks	<ol style="list-style-type: none"> Anti-slavery awareness module for staff <ul style="list-style-type: none"> number of ongoing staff who completed mandatory training number of new staff who completed mandatory training tracking knowledge and engagement with pre and post training survey Targeted staff training or workshops <ul style="list-style-type: none"> number of staff who completed targeted training or workshops
Students are informed of modern slavery risks and aware of support services available to reduce their risk of exploitation	<ol style="list-style-type: none"> Anti-slavery awareness module for students <ul style="list-style-type: none"> number of continuing students completed training number of new students completed training tracking knowledge and engagement with pre and post training survey Modern slavery student information campaign <ul style="list-style-type: none"> number of modern slavery student information web pages views
Our research makes a meaningful contribution to the sector and global effort to better identify and address modern slavery	<ol style="list-style-type: none"> Engagements and contributions to the sector <ul style="list-style-type: none"> engagements with Australian Universities Procurement Network (AUPN) engagements with the Group of Eight universities completed planned activities under agreement with Anti-Slavery Australia number of collaborative engagements with University of Edinburgh

CONSULTATION AND ENGAGEMENT (CRITERION 6)

During the reporting period, we rolled out a comprehensive awareness and engagement program to our senior executive and management team with the aim of fostering a shared commitment to addressing modern slavery risks and working collectively.

Senior Executive engagement

Modern Slavery was discussed at over a dozen senior executive meetings in 2020, including:

- Senate Committees x 2
- Academic Board x 1
- University Executive presentations x 10

Working groups

Working groups have been set up across key areas of the University to inform the development and delivery of modern slavery initiatives in areas including:

- Supply chain (Procurement Services)
- Research portfolio
- Education portfolio
- Human Resources and Culture
- Campus Services
- Office of General Counsel

Our Student Organisations

The presidents and executive teams of student organisations have been briefed and engaged over a series of meetings to discuss approaches to identifying and addressing risks, as well as training and communications available to their teams. These include:

- University of Sydney Union (USU)
- Sydney Uni Sport & Fitness (SUSF)
- Students' Representative Council
- Sydney University Postgraduate Representative Association

Engaging our partners

In 2020, we wrote to 25 key research partners highlighting the terms of our [Modern Slavery Policy](#) and our commitment to working collaboratively to identify and address modern slavery risks. During 2021 we will continue to liaise with our partners to highlight our expectations.

Partnerships and Collaborations

We partnered with **Anti-Slavery Australia** to develop University specific training and awareness material for our staff and students and deliver tailored workshops and training to our various academic, research and management committees.

We are collaborating with the higher education sector and externally to share knowledge and information and align our approach based on

best practice, to share insights, learnings and tools and improve standards. This has included collaborations with the following;

- Australian Universities Procurement Network,
- University of New South Wales,
- Australian Broadcasting Corporation, and
- University of Edinburgh.

In 2021, we will be exploring opportunities to work collaboratively with civil society organisations and multi-stakeholder initiatives to strengthen our awareness and responsiveness to modern slavery and to take action to address risks in high-risk areas.



OTHER RELEVANT INFORMATION (CRITERION 7)

Contributing to the global understanding of modern slavery through our research

Our role as an institution of higher education means we must go further than compliance alone. As a leading university, we are uniquely placed to contribute to the global understanding and effort to address modern slavery through world leading research. Our researchers are applying academic and research expertise to help inform the world's understanding of modern slavery and what we can all do collectively to eliminate it.

Open Analysis to Address Slavery in Supply chains (OASIS)

By using virtual reality as the medium of communication, the [Oasis Project](#) (School of Physics) sets out to change the mindset and culture of global supply chain operators as well as consumer mindsets so that they no longer reward company inaction on modern slavery.

Modern slavery supply chain metrics are being developed for incorporation into the powerful [Eora economic trade database](#). A proof of concept visualisation of global supply chain data combining bottom-up local data and top-down global data on modern slavery will drive a Virtual Reality environment and convert the material into a range of learning tools.

The materials will be suitable for producers and consumers and use in civil society and school education settings. A unique aspect of the project will be to look at low-cost VR solutions for use in low-income countries to remove barriers to access and increase the audience for this work.

Understanding the impact of COVID-19 on Modern Slavery (School of Physics)

The impact of COVID-19 on victims of modern slavery and vulnerable workers is dire. Modern slavery victims are in danger of infection through unsafe accommodation and at the mercy of 'employers' who no longer need their labour because of supply chain disruption.

This research draws on the work of NGOs, global organisations and the media to illustrate some of the issues in this shifting landscape, with the aim is to help inform a debate on the systemic flaws in global supply of goods and services and what can be done about them.

Measuring the human rights performance of financial services entities

The recently launched [Financial Services Human Rights Database](#) (Sydney Law School) provides an authoritative online database and annual benchmarking reporting on the human rights performance of financial services entities like banks, funds management, insurance, and superannuation funds.

On the website, users will easily compare and understand financial services from a human rights perspective and source information on ethical financial services.

The [655i](#) benchmark model measures the performance of financial services entities against six human rights categories across five domains where financial institutions impact human rights, using five factors to assess risk, outcomes and impacts, with indicators (proxies) to measure factor performance within a domain.

Unlike the current method of seeking information on institutions separately, the database contributes to the global effort of addressing modern slavery by compiling all publicly available information into a single searchable database. The aim is to make the database publicly available at no charge to users.

OUR ONGOING COMMITMENT

We are committed to respecting human rights and taking meaningful action to address modern slavery. We will continue to draw on the excellence of our academic, research and administrative staff and engage with our partners and suppliers to collectively effect change.

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The table below identifies where each criterion is addressed within the different sections of the statement.

Modern Slavery Act Criteria	Locations within the Modern Slavery Statement 2020
1. Identify the reporting entity	Cover page and Introduction (p. 2)
2. Describe the reporting entity's structure, operations and supply chain	Who we are (p. 6), Our Principal Activities and Operations (p. 7) and Our supply chain (p. 9)
3. Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity and any entities it owns or controls	Modern slavery risks (p. 12) and Modern slavery and exploitation risks experienced by students (p. 13)
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Identifying modern slavery risks (p. 10), Actions to assess and address risks (p. 15), Our actions (p. 16), Assessing and addressing risks in our supply chain (p. 18), Ongoing supplier due diligence through Ecovadis (p. 21), Assessing and addressing risks in our research activities (p. 23), Supporting students to prevent the risk of exploitation (p. 26) and Assessing and addressing modern slavery risks in our investments (p. 28)
5. Describe how the reporting entity assesses the effectiveness of these actions	Evaluating effectiveness (p. 30) and Plan for continuous improvement (p. 31)
6. Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Consultation with controlled entities (p. 3), Modern slavery governance (p. 15) and Consultation and engagement (p. 32)
7. Provide any other relevant information	Introduction (p. 2), Our commitment (p. 2), A snapshot of our 2020 progress (p. 4), From the Chancellor and Vice-Chancellor (p. 5), Contributing to the global understanding of modern slavery through our research (p. 34) and Our ongoing commitment (p. 35)

GLOSSARY

affiliate	refers to clinical title holders; adjunct, conjoint and honorary appointees; consultants and contractors to the University; holders of offices in University entities, members of Boards of University Foundations, members of University Committees; and any other persons appointed or engaged by the University to perform duties or functions on its behalf.
ARC	Australian Research Council
AUPN	Australian Universities Procurement Network
child labour	includes the worst type of child labour situations where children are: (a) exploited through slavery or similar practices, including for sexual exploitation; (b) engaged in hazardous work which may harm their health or safety; or (c) used to produce or traffic drugs.
controlled entity	a person, group of persons or body over which the University has control.
debt bondage	where the victim's services are pledged as security for a debt (owed by the victim or by another person) and: (i) the debt is manifestly excessive; (ii) the victim's services are not applied to liquidate the debt; or (iii) the length and nature of the services are not limited and defined.
deceptive recruiting for labour or services	where the victim is deceived about whether they will be exploited through a type of modern slavery.
DFAT	Department of Foreign Affairs and Trade
forced labour	where the victim is either not free to stop working or not free to leave their place of work.
forced marriage	where: (i) coercion, threats or deception are used to make a victim marry; or (ii) the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.
ISS	Institutional Shareholder Services
modern slavery	<p>describes situations where coercion, threats or deception are used to exploit people and undermine or deprive them of their freedom. Consistently with the Modern Slavery Act and divisions 270 and 271 of the Criminal Code 1995 (Cth) this includes:</p> <ul style="list-style-type: none"> (i) trafficking in persons, (ii) slavery, (iii) servitude, (iv) forced labour, (v) forced marriage, (vi) debt bondage, (vii) deceptive recruiting for labour or services and (viii) the worst forms of child labour. <p>The term "modern slavery" is only used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal and harmful and may be present in some situations of modern slavery. These practices may escalate into modern slavery if not addressed.</p>
Modern Slavery Act	means the <u>Modern Slavery Act 2018</u> (Cth).
NHMRC	National Health and Medical Research Council

OAASIS	Open Analysis to Address Slavery in Supply chains
partner	means any organisation or person who is collaborating with the University; or participating in a joint venture or research initiative with, or on behalf of, the University.
Principal Officer	means any of Vice-Chancellor and Principal; Senior Deputy Vice-Chancellor; Deputy Vice-Chancellor; Vice-Principal; General Counsel.
PSEAH	Preventing Sexual Exploitation, Abuse and Harassment Policy (DFAT)
RFT	Request for tender
servitude	is where the victim's personal freedom is significantly restricted, and they are not free to stop working or leave their place of work.
slavery	is where the offender exercises powers of ownership over the victim including: (i) the power to make the person an object of purchase; and (ii) the power to use their labour in an unrestricted way.
supplier	means an organisation or person who supplies the University with goods or services, and includes their officers, directors, subcontractors, agents, related entities and consultants.
SUSF	Sydney Uni Sport & Fitness
trafficking in persons	the recruitment, harbouring and movement of a person by means of coercion, threat, deception, fraud, and abduction for the purposes of exploitation through modern slavery. Exploitation includes: (i) the prostitution of others or other forms of sexual exploitation; (ii) forced labour or services; (iii) slavery or practices similar to slavery; (iv) servitude; or (v) the removal of organs.
USU	University of Sydney Union

End notes

¹Commonwealth of Australia, Joint Standing Committee on Foreign Affairs, Defence and Trade 2017, [Hidden in Plain Sight An inquiry into establishing a Modern Slavery Act](#), COA, Canberra

²Clibborn, S 2018, The University of Sydney Business School, Australia, ['Multiple frames of reference: Why international student workers in Australia tolerate underpayment'](#), Economic and Industrial Democracy, 1–19,

³Reilly, A, Howe, J, Berg, L, Farbenblum, B & Tan, G 2017, [International Students and the Fair Work Ombudsman](#), The University of Adelaide; Farbenblum, B & Berg, L 2020, [International Students and Wage Theft in Australia](#), Migrant Worker Justice Initiative, University of New South Wales and University of Technology, Sydney, Australia

⁴Clibborn, S & Wright, C 2018, The University of Sydney Business School, Australia, [Employer theft of temporary migrant workers' wages in Australia: Why has the state failed to act?](#), The Economic and Labour Relations Review, 2018, Vol. 29(2) 207–227

⁵Howe, J 2021, ['Viral video shows student demanding her \\$10 an hour – and our universities have a problem'](#), Sydney Morning Herald, February 3

⁶Australian Human Rights Commission and KPMG 2020, [Property, construction and modern slavery practical responses for managing risk to people](#), KPMG, Australia

⁷Morris, A, Hastings, C, Wilson, S, Mitchell, E, Ramia, G and Overgaard, C 2020, [The Experience of International Students Before and During COVID-19: Housing, work, study, and wellbeing](#), University of Technology Sydney: Institute for Public Policy and Governance; Murray, J and Malik, A 2020, The OAASIS Project, School of Physics, University of Sydney, [Modern Slavery and COVID-19: Are we really all in the same \(life\)boat?](#)



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sydney.edu.au/about-us/vision-and-values/modern-slavery