

MODERN SLAVERY STATEMENT



THE UNIVERSITY OF
NEWCASTLE
AUSTRALIA

2023

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A MESSAGE FROM THE VICE-CHANCELLOR

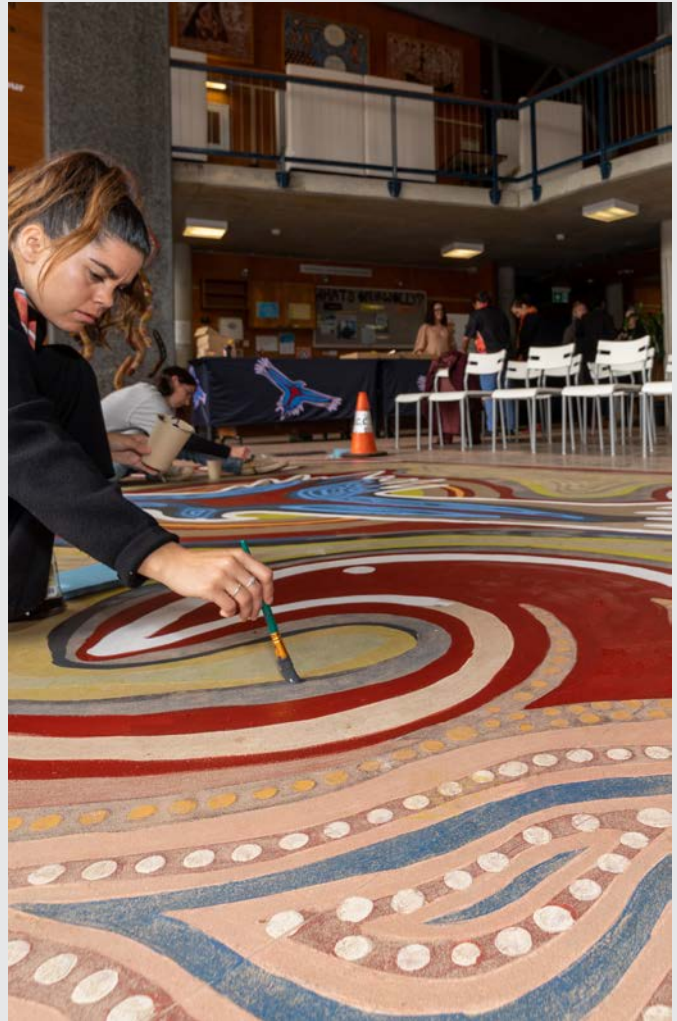
The University of Newcastle is committed to addressing the challenges associated with modern slavery. We understand the important role we play in relation to this significant human rights issue, and we continuously strive to improve our actions and reporting in this area.

In 2023 we significantly increased the membership of our Anti-Slavery Working Group, bringing together a diverse range of representatives from across the University who collaboratively enhance our modern slavery reporting and implement our Modern Slavery Action Plan. We acknowledge that modern slavery is a complex issue that is not confined to our supply chains but permeates all facets of the University's operations, with the potential to affect the most vulnerable members of our community, including student groups, staff and contractors. Accordingly, our Modern Slavery Action Plan for 2024 focusses on key priorities such as increasing awareness of modern slavery, enhancing staff capabilities to identify and address supply chain risks, strengthening supplier partnerships, policy development, and making ethical investments.

One of our major achievements in 2023 was implementation of a mandatory modern slavery component within our procurement process, assisting staff to identify modern slavery risks and improving due diligence associated with new suppliers.

We strongly support the objectives of the Modern Slavery Act and value this opportunity to share our sustained approach.

Professor Alex Zelinsky AO
Vice-Chancellor and President, University of Newcastle
March 2024



ACKNOWLEDGEMENT OF COUNTRY

The University of Newcastle acknowledges the Traditional Custodians of the lands on which our campuses are located - The Worimi nation and the Pambalong clan of the Awabakal nation (Newcastle) Darkinjung people (Central Coast) and the Gadigal clan of the Eora nation (Sydney). We pay respect to Elders past, present and emerging. We also acknowledge and pay respect to the other Aboriginal and Torres Strait Islander nations from which our students, staff and community are drawn.

INTRODUCTION

Modern slavery is a global issue affecting many industries and sectors, including higher education. In Australia, universities have been found to have supply chains that include goods and services from countries where slavery and exploitation are prevalent. This means that they may be at risk of supporting or benefiting from modern slavery practices.

Some of the specific risks in Australian universities include:

Labor exploitation: Universities may use contractors who engage in exploitative labor practices, such as paying workers below minimum wage or forcing them to work in hazardous conditions. Industries such as cleaning can be higher risk.

Procurement of goods: Universities may purchase goods and services from suppliers who engage in modern slavery practices, such as forced labor, debt bondage, or human trafficking. Such practices may be more difficult to detect if they are further down the supply chain.

Student exploitation: International students may be vulnerable to exploitation and abuse, such as being forced to work long hours for low pay or being housed in substandard accommodation. Domestic students may be vulnerable to working in high risk settings with sub-standard conditions and pay, or be asked to work for free within the university under the guise of volunteer work.

At the University of Newcastle, key modern-slavery risks are identified through the Anti-Slavery Working Group with actions designed to address areas of most risk. While many of the processes developed require further refinement, much has been done to strengthen our ability to detect and prevent modern slavery practices in our operations and supply chains.



THE UNIVERSITY OF NEWCASTLE



**MORE THAN \$100
MILLION**

invested into the Newcastle city
campus over the past five years



**TOP REGIONAL
UNIVERSITY**

One of the top regional
universities in Australia¹



\$200 MILLION

investment in the future of
STEMM



TOP 175

university in the world²



**RANKED EQUAL
173**

in the world³



RANKED 12

in the world for Good Health and
Wellbeing⁴



TOP 5

in the world for Partnering for a
Sustainable Future⁵



RANKED 16

in the world for Affordable and
Clean Energy⁶



3000+

employer connections⁷

STRUCTURE AND OPERATIONS

Since 1965, the University of Newcastle has delivered superior education and world-class research. We are Australia's largest provider of enabling programs, offering a range of alternate entry pathways to university for students from diverse backgrounds.

The University is one of the largest employers in the Hunter Region with staff coming from diverse professional and cultural backgrounds.

The University's principal governing body is the Council. It is responsible for acting in the University's best interest, setting the risk appetite and driving performance through strategy and stewardship.

Council operates in accordance with the University of Newcastle Act 1989 and the University of Newcastle By-law 2017, which set out the powers and functions of the University and how these must be performed.

An Executive Leadership Team defines and focuses the University's strategic direction.

The Executive Leadership Team is a forum for the Executive to share information and provide advice to the Vice-Chancellor on matters of operational significance. It operationalises the strategic plan through business planning processes and prioritisation of operational decisions.



We're ranked in the top 175 of the world's universities by QS World University Rankings. Our degrees are shaped around flexible and transferable skills, work placements and entrepreneurial opportunities.

Across our campuses in Newcastle, the Central Coast, Sydney and Singapore, the University of Newcastle enrolls more than 39,000 students from diverse backgrounds, with a focus on equity and developing the world's next generation of socially-oriented leaders, entrepreneurs and innovators.

We are fully committed to building on our strengths in Indigenous higher education, and providing a supportive space for our Indigenous students and communities.

THE UNIVERSITY OPERATES ACROSS THE FOLLOWING LOCATIONS:

- Callaghan campus (Newcastle) NSW
- NUspace & Honeysuckle (Newcastle City Campus) NSW
- Ourimbah NSW
- Sydney NSW
- Port Macquarie NSW
- Gosford NSW
- John Hunter Hospital (Newcastle) NSW
- Wallsend Hospital (Newcastle) NSW
- Orange NSW
- Tamworth NSW
- Taree NSW
- Armidale NSW
- Moree NSW
- Coffs Harbour NSW
- Muswellbrook NSW
- Singapore

OUR CONTROLLED ENTITIES

THE UNIVERSITY OF NEWCASTLE RESEARCH ASSOCIATES LIMITED (TUNRA)

In 1969, the University formed The University of Newcastle Research Associates (TUNRA) as a vehicle to build and promote applied research opportunities for the University and industry. As a controlled entity of the University, TUNRA plays an important role in the University's strategy by further leveraging research capabilities and assets to create additional value for the institution.

In 2023 TUNRA reported an income of AUD\$13.06M.

NEWCASTLE AUSTRALIA INSTITUTE OF HIGHER EDUCATION PTE LTD

Established as a controlled entity of the University in 2006, UON Singapore has continued to deliver and expand both its full-time and part-time programs. Our strong partnerships with leading local institutions provide our diverse range of local and international students access to a broad variety of professional networks when they graduate. Our researchers work with world-class organisations and institutions in the Singapore region and across the globe on research projects, research seminars, and faculty-specific collaborations.

In 2023 Newcastle Australia Institute of Higher Education reported an income of AUD\$13.91M.

THE UNIVERSITY OPERATES FOUR CONTROLLED ENTITIES

NUSERVICES PTY LTD

NUserVICES is a controlled entity of the University responsible for managing Student Services. The entity operates several cafés and a retail shop at the Ourimbah campus as well as a restaurant at the Callaghan campus.

In 2023 NUserVICES reported an income of AUD\$2.84M.

NEWCASTLE UNIVERSITY SPORT (NUSPORT)

NUsport manages the only Fitness Australia Quality Accredited Business in the region - The Forum.

Through its programs, facilities and network of affiliated clubs, NUsport is uniquely positioned to enhance the physical and mental wellbeing of the University's students, staff and wider community. In 2022 NU Sport adopted the University's Procurement Policy.

In 2023 NUsport reported an income of AUD\$6.20M.

COLLABORATION - A SECTOR RESPONSE

AUPN MODERN SLAVERY PROGRAM

The University of Newcastle is a member of the Australasian Universities Procurement Network (AUPN). The AUPN is leading a sector collaboration to support member universities to meet the challenge of human rights transparency and risk management in their supply chains and contribute to the fulfillment of Modern Slavery Act 2018 (Cth) reporting requirements.

The AUPN currently has 38 Australian, and three New Zealand, member institutions working together.

By working together, member Universities hope to minimise the duplication of activities and associated costs across individual universities, including risk assessment, implementation of systems and remediation. We also aim to leverage our aggregated buying power will improve our capacity to identify and action any modern slavery risks, and drive more effective changes through our supply chains.

Staff from our University actively participate in working groups within the AUPN's Anti-Slavery Program, in addition to attending scheduled monthly catch-ups for learning opportunities and information sharing.

Anti-slavery Program Membership



OUR VISION
For the Australian and New Zealand universities to be recognised as being at the forefront of delivering procurement impact and excellence internationally

OUR MISSION
Continuously improve operational, strategic and responsible procurement practices through collaboration and knowledge sharing



OUR ACHIEVEMENTS 2023

- Modern Slavery Action Plan developed
- Multiple new members joined the University's Anti-Slavery Working Group increasing expertise, and facilitating improved assessment of modern slavery risks and prevention measures
- Commitment to develop a formal Anti-Slavery Policy (or policies) for University-wide implementation
- Continuous improvement to our Supplier Code of Conduct, Ethical Due Diligence Questionnaire, Domestic Trade Creditor Application Form and Purchase Order Terms and Conditions
- Collaborated through membership with the Australasian Universities Procurement Network providing leverage to better identify modern slavery risks within our supply chain
- Continued use of FRDM software allowing a risk analysis solution with quick access to information about supplier risk, industry alerts and country risk



HUMAN RIGHTS AT THE UNIVERSITY

The University embeds a respect for human rights into key policies and processes. We are committed to ethical practice, widening participation, promoting diversity and fairness, overcoming injustice and increasing success for all. The University's Diversity and Inclusiveness Policy demonstrates the University's commitment to condemn any unwelcome or unfair treatment.

When making decisions on behalf of the University, the 'standard for judgement' lies in the Ethical Framework rather than the personal beliefs of any individual. Principles within the Ethical Framework provide the standard of judgement against which to test the quality of decisions. In realising the University's vision and giving effect to its values we:

- act on the basis of sound reasons, solid evidence and impartial judgement;
- aim to do good and minimise harm;
- aspire to deserve the trust and good opinion of the communities we serve as a university;
- be accountable for our choices;
- do what we say we will do;
- maintain the sustainability of our institution;
- promote safety and wellbeing; and
- respect the intrinsic dignity of people.

The University supports the fair and equitable treatment of people throughout its supply chain via activity that incorporates social, human rights, and environmental considerations into how we do business.

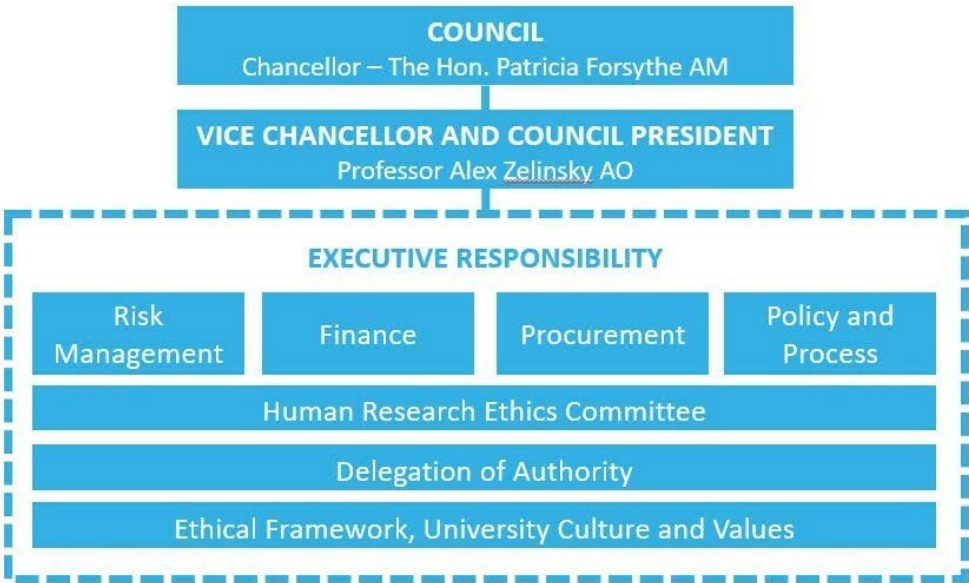
Suppliers are asked to ensure that all reasonable efforts are made to eliminate child labour, forced labour, exploitation of workers and/or associated deceptive practices in recruitment.

University investments are governed by an Environmental, Social and Corporate Governance (ESG) Framework.

The University Council is responsible and accountable to ensure compliance with policies and processes, which are then formally delegated through the Executive structure.

The University of Newcastle's Human Research Ethics Committee (HREC) has responsibility for reviewing the ethical acceptability of human research and ensuring compliance with regulatory and legislative requirements, as well as University policies relating to human research.

Risk mitigation is led by the Delegation of Authority which ensures that only those with appropriate delegation can make changes to any processes.



SUPPLY CHAIN

RISKS AND IMPACTS

ORIGIN OF COUNTRY RISK TO OUR SUPPLY CHAIN

The University of Newcastle acknowledges that it is likely to be exposed to some level of modern slavery risk in its supply chains - millions of people in the Asia Pacific are engaged in forced labour as an example of our potential exposure.

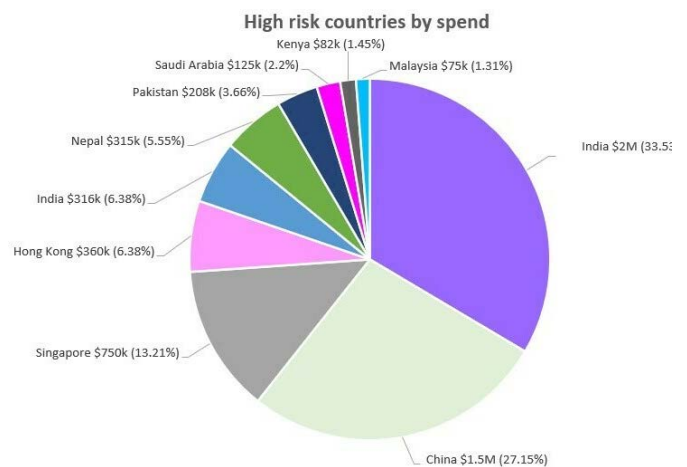
Based on our analysis, 95% of the University spend on third party goods and services is with suppliers based in low-risk countries, as defined by Global Slavery Index. This includes the Australian-based suppliers and suppliers from non-Australian countries that are categorised as low risk.

The majority of the University's suppliers have Australian-based subsidiaries with whom we deal directly. As a result, a high percentage of our direct sourcing is conducted within Australia.



Of the \$58.5 million spent internationally, just \$17,500 was spent in a country categorised as **extreme risk** as defined by Global Slavery Index - that being \$17,500 spent on one education agency in the United Arab Emirates.

\$6 million was spent in countries categorised as **high risk** as defined by Global Slavery Index. Approximately 3/4 of this was spent across three countries - **China, India and Singapore**.



RISKS AND IMPACTS

PRODUCT RISK IN OUR SUPPLY CHAIN

- 3167 SUPPLIERS
- 83% OF GOODS AND SERVICES PURCHASED IN AUSTRALIA
- 95% OF SPEND IN LOW-RISK COUNTRIES



PRODUCTS IN THE EXTREME-RISK CATEGORY INCLUDE:

- Tech laptops and mobile phones - \$52m spend
- Clothing and apparel - \$782k spend

Only \$4m of this spent internationally.
No international spend on clothing and apparel.

PRODUCTS IN THE HIGH-RISK CATEGORY INCLUDE:

- Construction services \$50m spend
- Cleaning \$15m spend

Only \$6k of this spent internationally.
No international spend on cleaning services.

MITIGATION

APPROACH TO MANAGING RISKS

The University employs a range of controls to manage any potential or actual risks of modern slavery within both its operations and supply chain.

Policy and Procedure

The policies and procedures are available to all staff and relevant training is provided where responsible parties are directly involved and accountable.

POLICY/ PROCEDURE	PURPOSE
Code of Conduct	Sets behavioural expectations including ethical obligations.
Enterprise Agreements (EA's)	The University has two EA's to ensure lawful workplace obligations are met (Professional Staff and Academic Staff).
Procurement Policy	Contains ethical and moral obligations that must be met when procuring goods and services on behalf of the University.
Complaint Management Policy and Procedure	Establishes how the University will manage and assess formal complaints and grievances.
Ethical Framework	To guide and support decision-making at all levels. It is intended to be a 'compass' for navigating the University's complex ethical landscape.
Engagement of Contractors and Consultants Procedure	The procedure sets out risk mitigation strategies when engaging contractors and consultants.
Risk Management Framework	This policy document sets out the university's commitment to managing risk and outlines key roles and responsibilities.
Support for Students Policy	Outlines mechanisms for ensuring that students are aware of relevant support services.

Probity Principles

University staff are required to consider the following through all stages of the procurement process:

- Open competitive process
- Fairness, consistency and transparency
- Identification and resolution of conflicts of interest
- Accountable decision making
- Monitoring and evaluating performance

Contract Clauses

The University has embedded Modern Slavery compliance into its standard contracts.

Following is an excerpt of a modern slavery clause in contracts for the procurement of goods and/or services.

Compliance

The Supplier must ensure that:

- (a) in performing its obligations in connection with this document, the Supplier and its Representatives:
 - (i) do not engage in any conduct or omission which may contravene any Modern Slavery Laws; and
 - (ii) comply with any University Policies relating to modern slavery;
- (b) it does all things required or necessary to mitigate or reduce modern slavery risks in its operations and supply chains and stay in compliance with all applicable Modern Slavery Laws; and
- (c) the terms of the contractual commitment entered into with any personnel engaged by the Supplier to provide goods or services in connection with this Agreement, permit termination of commitments where the Supplier has reasonable grounds to believe there has been or is likely to be a breach of any applicable Modern Slavery Laws.

Obligations

The Supplier must:

- (a) promptly notify the University if it becomes aware of a possible, potential, suspected or actual breach by it or its Representatives of any Modern Slavery Laws;
 - (b) cooperate in good faith with the University in investigating the circumstances relevant to any possible, potential, suspected or actual breach of any Modern Slavery Laws, whether or not notification has been given under clause (a);
 - (c) give assistance and access to the agreements and the Supplier Representative as the University may reasonably require under clause 43.3 and must provide (at the Supplier's cost) all reasonable assistance (including the provision of information) to the University to allow the University to comply with its obligations under the Modern Slavery Laws;
 - (d) establish and maintain policies and procedures to ensure that the Supplier and the Supplier Representative comply with the obligations set out in this clause 43.
- The Supplier must ensure that its policies and procedures as contemplated in this clause (d) contain requirements that training will be provided to the Supplier Representative, as the case may be, in relation to the matters addressed by those policies and procedures; and
- (e) require its suppliers to implement their own binding guidelines for ethical behaviour and compliance with Modern Slavery Laws.

Suspected breach

If the University has reasonable grounds to suspect a past, present or potential breach by a Supplier or its Representatives of any applicable Modern Slavery Laws or any University policies relating to modern slavery, in connection with this Agreement, the University may give notice to the Supplier requiring an explanation, copies of agreements, and access (for the purposes of interview by internal or external lawyers) to the Supplier's Representatives.

Engaging consultants

Standard contracts for consultants include Modern Slavery clauses:

1.1 Warranties

The Consultant warrants that it and its Personnel:

- (a) have the full knowledge of and resources needed to comply with Modern Slavery Laws;
- (b) have not been convicted of an offence involving slavery or human trafficking;
- (c) will comply with the Modern Slavery Laws; and
- (d) will do everything needed to assist the University to comply with the Modern Slavery Laws, including providing the University with all information it requires to fulfil its reporting obligations under those laws.

1.2 Modern Slavery Breaches

(a) In performing this Contract, the Consultant must:

- (i) not violate a Modern Slavery Law; or
 - (ii) place the University in breach or potential breach of a Modern Slavery Law;
 - (iii) have in place policies and procedures and undertake due diligence to ensure the Consultant's compliance with the Modern Slavery Laws and ensure that its Personnel do likewise; and
 - (iv) ensure that all relevant subcontracts and supply contracts include terms no less onerous than those included in this clause.
- (b) If the Consultant becomes aware of anything that does or could put a party or its Personnel in breach of a Modern Slavery Law, it must immediately:
- (i) notify the University in writing of all relevant facts;
 - (ii) respond promptly to all questions asked and requests for information made by or on behalf of the University in respect of the Consultant's compliance with its obligations under this clause and the Modern Slavery Laws; and
 - (iii) provide the University with all assistance required by the University to ensure compliance with Modern Slavery Laws and to minimise the effects of the event.
- (c) If directed to do so by the University, a senior executive of the Consultant in a position to know all relevant facts must immediately execute and provide to the University a statutory declaration confirming the Consultant's compliance with this clause.

Australasian University Procurement Network - Anti-Slavery Program

The University collaborates with the sector through the Anti-Slavery Program within the Australasian Universities Procurement Network (AUPN). The AUPN supports 38 Australian and three New Zealand member universities to meet the challenge of human rights transparency and risk management in their supply chains and contribute to the fulfillment of Australian members' reporting requirements to the Modern Slavery Act 2018 (Cth).

The sector approach provides member universities with an efficient and effective means of identifying and actioning modern slavery risks through their supply chains.

The sector-wide program aims to deliver:

- a collection and aggregation of sector procurement data;
- a solution that allows members to identify risk, focus resources and inform action – supported by a third-party technology enablement solution (FRDM);
- aggregated buying power that can be leveraged;
- a sector approach/action plan for addressing, mitigating and/or remediating identified risks;
- access to Academics and engagement with other organisations and industry leaders;
- flexible templates and guidance; and
- continuous improvement.

Volunteering by students

Students can volunteer on campus as a Uni Crew Volunteer, welcoming new students or assisting at graduation ceremonies and other events. Systems are in place to ensure no person at the University engages these student volunteers to do work as a substitute for providing paid work complying with National Employment Standards.

Students can also be referred to well-regarded organisations and opportunities in the community that have been vetted for appropriate standards and practices.

RESPONSIBLE INVESTING

OUR APPROACH

The University of Newcastle is committed to responsible investment. Our investment strategy is governed by an Environmental, Social and Corporate Governance (ESG) Framework outlined within our Investment Policy. This Framework sets out the University's overall philosophy, commitment and methodology for addressing environmental, social and governance factors within its investment portfolio.

All amounts invested are invested in a manner consistent with this Framework and in accordance with the University's Ethical Framework and Environmental Sustainability Plan.

The University seeks to understand any material ESG risks embedded in its investments and manage them accordingly.

Mercer is the University's fund manager and undertakes activities to ensure compliance and progress with the ESG objectives set by University's Finance Committee.

Mercer's approach to assessing and addressing modern slavery risks includes:

- avoiding causing or contributing to modern slavery through its investment activities;
- seeking to assess and address modern slavery risk linked to its investment practices, through its appointed investment managers and in the portfolio; and
- providing appropriate access to remedy if there are any instances where Mercer's investments or linked entities are found to have caused or contributed to modern slavery (Mercer state that they expect to apply their influence to encourage proper access to remedy).

During the latest ESG review completed by Mercer, no modern slavery breaches were identified in the University's investments.

Mercer additionally analyses its listed equity and corporate credit funds for any red flag incidents in relation to modern slavery (as aligned to the Principles of the UN Global Compact regarding forced labour and child labour). There were no holdings with red flag incidents for any of the Mercer funds in 2023, although there was a holding with an amber flag (Carrefour) which represents approximately 0.02% of the total Equities Portfolio. Amber flags are not considered high severity but are monitored as a "watch list".



PREVENTION

THE UNIVERSITY TAKES A MULTILAYERED APPROACH TO PREVENT ANY BREACHES OF THE MODERN SLAVERY ACT TO ENSURE WE CONTRIBUTE POSITIVELY TO THE ERADICATION GLOBALLY.



OBJECTIVES

Building collaborative partnerships
Risk based engagement
Recognising power to influence
Supplier onboarding
Collaboration and stakeholder engagement

Open and direct communication
Awareness raising
Impacting sphere of influence

Mapping supply chain risks
Monitoring supplier chain
Benefits from supply chain risk management software

Policy and processes
Timely response
Mitigation and remediation

DUE DILIGENCE

Due Diligence is a cornerstone of the University's Risk Framework and is incorporated into all we do across the business. The University considers how it may cause, contribute to, or be directly linked to modern slavery practices and its ongoing risk management process of human rights diligence aims to identify, prevent and mitigate adverse impacts.

University Policy and Procedures

- FRDM - offers a risk assessment solution relevant to the University's supply chain for products, countries, industries, and suppliers. It allows the University to stay on top of risk through data visualisations, reports, and alerts.
- Policy / Process - continuous reviews of policy and procedure ensures alignment with outcomes relevant to modern slavery obligations.
- Enterprise Agreements - ensure our staff are not impacted by Modern Slavery, unfair work practices, conditions or environments.
- Code of Conduct - ensures compliance with ethical standards, legal obligations and other University expectations and commitments.

Suppliers

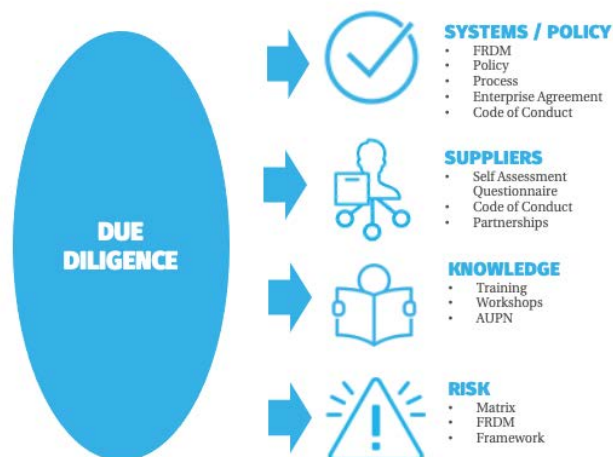
- Self-Assessment Questionnaires - allows suppliers to identify any real or potential breaches of Modern Slavery Act.
- Code of Conduct for Suppliers - helps to ensure they abide by the University's expectations.
- Partnerships - the University works with its suppliers to identify any breaches and continues to work with them to mitigate any risks collaboratively.

Knowledge

- Training - staff can undertake training to equip them to identify and respond to modern slavery risk.
- Training - modern slavery training is offered to all staff who procure goods on behalf of the University.
- International students are informed of modern slavery related risks and are aware of support services available to reduce their risk of exploitation.
- AUPN - collaborative engagement occurs to address any potential or real risks.

Risk

- Risk Profiles - modern slavery compliance risk is outlined within the Operational Risk Profile for Strategic Procurement. Risk events and associated controls to be identified and documented across all Divisions and Colleges as relevant.
- FRDM - allows greater visibility of end-to-end supply chains to identify possible risks.



SUPPLIER CODE OF CONDUCT

The University is committed to understanding and managing social, ethical and environmental issues along its supply chain in a responsible manner. The Supplier Code of Conduct outlines the minimum terms and conditions of doing business with the University.

The Supplier Code of Conduct is mandatory for all suppliers, including:

- construction vendors;
- ICT vendors;
- research vendors and partners including those subject to a Funding Agreement; and
- all procurement vendors.

The University requires these suppliers to comply with the standards set out in the Code and to work with the University to assess and manage compliance in their supply chain.

The Code is based on the University's own Ethical Framework and the Ethical Trading Initiative (ETI) Base Code.

Contractors working for the University, have reporting channels available under the University's Public Interest Disclosure Policy, and the NSW Independent Commission Against Corruption (ICAC) in instances of actual or suspected fraud, corruption, misconduct or maladministration.



SOME KEY FEATURES OF THE SUPPLIER CODE OF CONDUCT

Employment is freely chosen

Freedom of association and the right to collective bargaining are respected

Working conditions are safe and hygienic

Child labour is not used

Living wages are paid

Working hours are not excessive

No harsh or inhumane treatment is used

SUPPLIER ANALYSIS - CONTROLLED ENTITY

SUPPORT FOR INTERNATIONAL STUDENTS

The University of Newcastle recognises that international students face increased risks of exploitation in various aspects like employment, accommodation, and situations involving debt bondage. To address these concerns and mitigate the vulnerabilities faced by our international students, the International Student Support (ISS) Team has implemented a comprehensive Orientation and Onboarding Program, consisting of five thorough pre-arrival modules which students coming to Australia to study are required to complete before their arrival. Additionally, the University's Student Wellbeing Team developed an 'International Student Survival Guide' in booklet form, that will be provided to arriving students from Semester 1, 2024.

These initiatives aim to provide international students with information to help them understand safe and respectful relationships, avoid arrangements where employment and accommodation leases are linked, avoid cash-in-hand work, understand the Australian regulatory framework governing employment and Awards and their rights as an Australian worker. They are made aware of sources of help such as the internal and external support services available to them, legal services available, and how to contact the Fair Work Ombudsman and International Student Ombudsman.

ISS also partner with the Careers Service, Campus Care and external agencies to support international students who may want to raise issues, be connected with services, or potentially make formal reports related to Modern Slavery practices or situations. Further specialist support is available to students through the International House Drop-In Centre, Wellbeing Services (counselling and prevention) and other resources such as the Chaplaincy Service.

As a member of the Australian Universities Procurement Network (AUPN), the University is currently engaged in a multi-stakeholder project addressing international student worker exploitation risk with the Australian Red Cross and Australian Catholic Religious Against Trafficking in Humans. The aim is to develop resources to educate international students on working conditions and to educate student-facing staff on signs of exploitation with the launch of materials planned for early to mid 2025. The University's Anti-Slavery Working Group is identifying staff who have contact with international students to ensure appropriate upskilling and engagement and will disseminate information to relevant staff.



GRIEVANCE MECHANISMS AND REMEDIATION

GRIEVANCE

The University has a strong grievance framework for the reporting of any suspected breaches relating to Modern Slavery incorporating:

- Complaint Management Framework
- Complaint Management Policy and Complaint Management Procedure
- Public Interest Disclosures Policy aligned with Public Interest Disclosures Act 2022
- Breach Reporting Function through Legal and Compliance
- Support mechanisms

REMEDICATION

The University remains committed to providing remediation to any identified potential or actual breaches of the Modern Slavery Act 2018 (Cth) in an open and transparent manner to ensure that appropriate action has been taken to eliminate future breaches.

Remedying or counteracting negative human rights impacts may include apologies, termination of relationship or contract, or efforts to ensure non-repetition and similar future occurrences.

The University will provide for, or cooperate in, remediation where the University has caused or contributed to an adverse impact. It is expected that internal teams responsible for the University complaints/grievance frameworks (eg. Legal and Compliance, Governance) will lead complex remediation.

Where the University is directly linked to modern slavery practice, the next actions will depend on factors such as:

- leverage over the entity concerned;
- how crucial the relationship is;
- severity of the impact (victim focused);
- the risk appetite of the University; and/or
- whether termination of the relationship will potentially create adverse human rights impacts.



ASSESSING EFFECTIVENESS

The University is focused on continuous improvement. An integral component of this cycle is assessing the effectiveness of our actions.

ACTIVITY	PERFORMANCE MEASURE	IN PLACE	UNDER DEVELOPMENT
Modern slavery awareness training	Completion rate - for staff in Procurement and associated roles (and other relevant staff)	X	
Review of all policies relevant to modern slavery	Modern Slavery information is within relevant policy documents and subject to review		X
Modern slavery risk awareness across the University	Risk Profiles for Colleges and Divisions identify modern slavery risk events and associated controls where relevant		X
Risk mitigation - supplier risk	Supplier onboarding undertaken; FRDM /risk scores checked and/or self assessment questionnaires completed		X
Stakeholder engagement	Increased participation in Anti-Slavery Working Group - new members/teams represented & increased collaboration with controlled entities		X
Clauses and provisions in contracts	Incorporating specific Modern Slavery clauses into all contractual templates	X	
Modern slavery embedded into procurement processes	Procurement workflows and records reflecting appropriate steps	X	
Sector benchmarking and collaboration	Participation in AUPN and engagement with NSW Anti-Slavery Commissioner	X	
Supplier code of conduct	Embedded in process	X	
Grievance mechanisms	Complaints Management Framework includes multiple safe avenues for concerns to be raised by stakeholders	X	
Regular reporting - supplier information and risk	Upload university data to FRDM for inclusion in supplier reports for sector produced via AUPN Anti-Slavery Program	X	
Supplier onboarding	Proportion of questionnaires returned. Reasons for non-completed questionnaires. Follow-up undertaken where potential concerns identified.		X
Effective functioning of Anti-Slavery Working Group	Membership includes a cross section of staff - attendance at meetings and completion of action plan items	X	
Review NSW Anti-Slavery Commissioner's Guide on Reasonable Steps	Consider implementation of steps and strategies that can be implemented at the University		X

LOOKING AHEAD

IMPROVING OUR RESPONSE TO MODERN SLAVERY WILL INVOLVE:

- further scoping of high risk products and industries;
- making sure all the right people are involved;
- ensuring goods and services align with workers' pay and assessing volunteer roles;
- promoting grievance mechanisms;
- working with suppliers;
- embedding modern slavery response across business practice;
- engaging with senior leadership and other stakeholders; and
- promoting and enhancing University-wide awareness.

VERSION HISTORY

VERSION	EDIT	DATE	APPROVED BY
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This statement was approved by the University Council and signed by:



Professor Alex Zelinsky AO | Vice-Chancellor and President
May 2024

We value all feedback. Please forward any comments on this statement or requests for additional information to strategicprocurement@newcastle.edu.au

This statement has been endorsed by the University of Newcastle's Council.



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