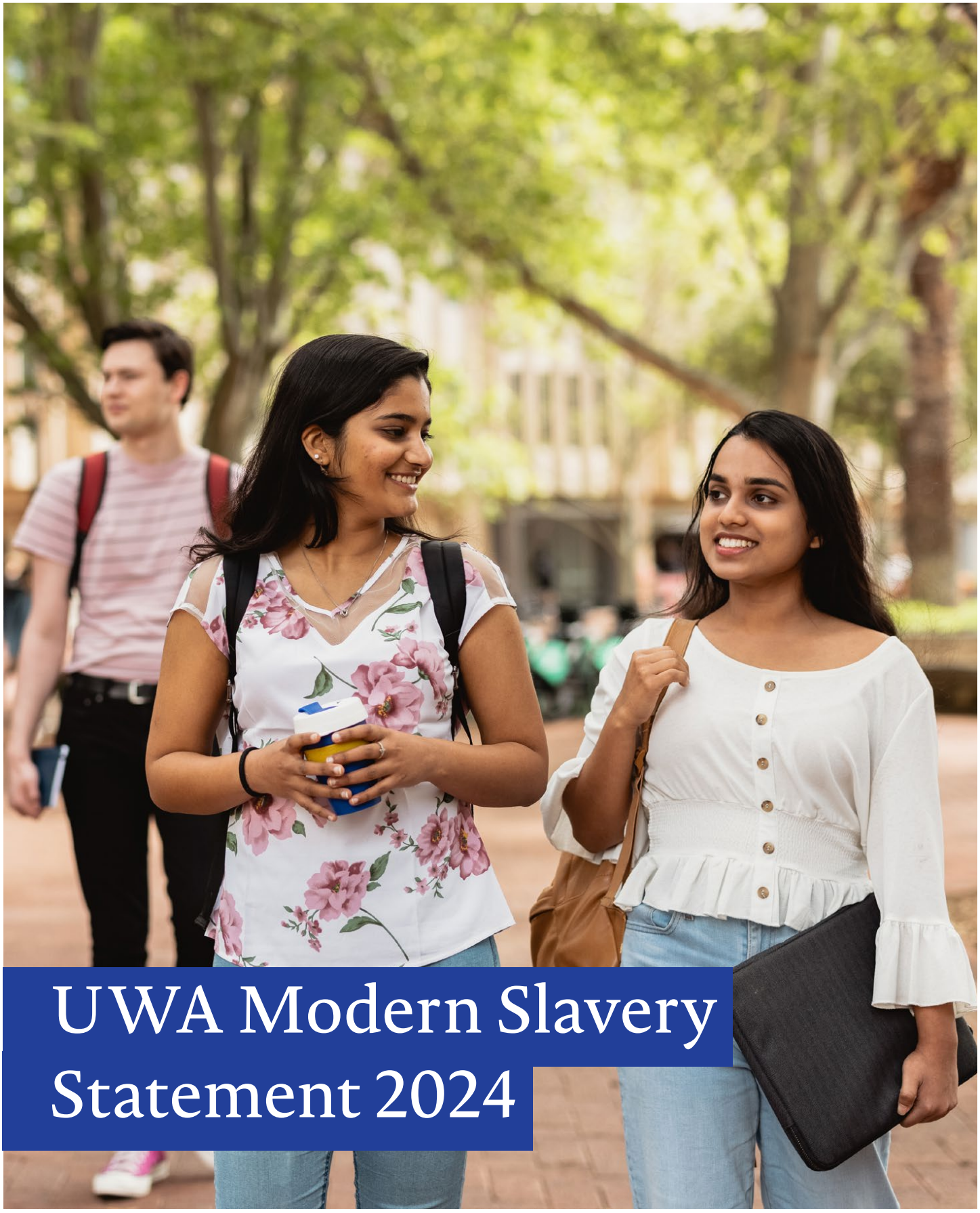

# UWA Modern Slavery Statement 2024

THE UNIVERSITY OF WESTERN AUSTRALIA

ABN 37 882 817 280

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# Introduction

## From the Vice-Chancellor

At The University of Western Australia (UWA), we are committed to upholding ethical standards, including addressing the risks of modern slavery in our operations and supply chains. As a leading university dedicated to world-class education, research, and community engagement, we recognise our responsibility to contribute to a just and equitable society.

Modern slavery undermines human rights and the prosperity of our communities. As an organisation that fosters critical thinking and innovation, we are committed to using our research and professional expertise to develop our understanding of this complex issue. Through collaboration across the Australian higher education landscape and with other like-minded organisations, we aim to strengthen efforts to prevent and mitigate the risks of modern slavery.

UWA takes this responsibility seriously. We continue to refine our policies and practices to ensure transparency and accountability in our supply chains and operations. Through education, research, and engagement, we seek to empower our students, staff, and wider networks to mitigate the risks of modern slavery.

UWA's Modern Slavery Statement provides details of our approach to managing modern slavery risk in our operations and supply chain and I would like to take the opportunity to thank the efforts of staff and students who are activity involved in and responsible for this progress.

The 2024 Modern Slavery Statement is made on behalf of The University of Western Australia and its controlled entities for the calendar year ended 31 December 2024 and was approved by the Senate of the University on 20 June 2025.

**Professor Amit Chakma**
Vice-Chancellor

## Acknowledgement of Country

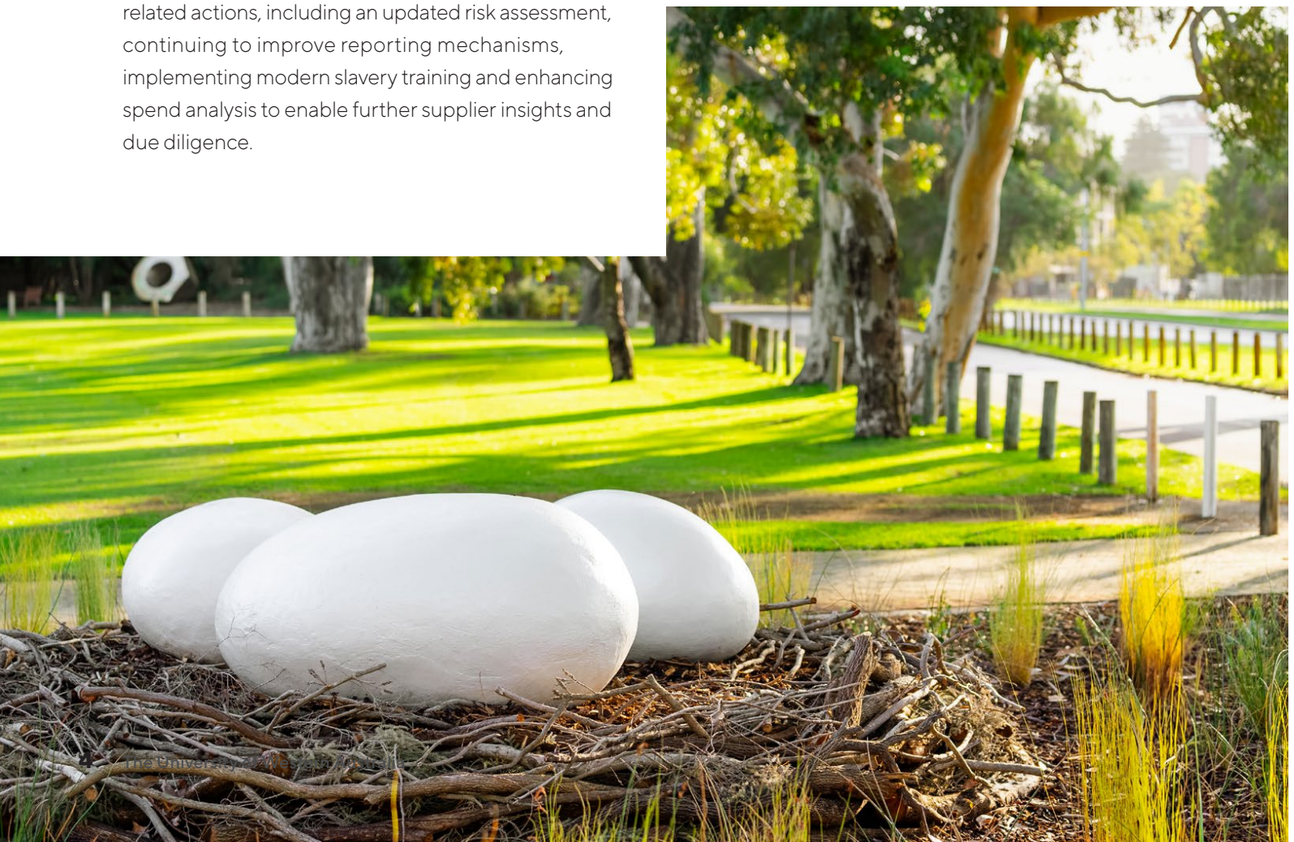
The University of Western Australia acknowledges that its campuses are situated on Noongar land, and that Noongar people remain the spiritual and cultural custodians of their land, and continue to practise their values, languages, beliefs and knowledge.

# Executive Summary

The University of Western Australia (UWA) is committed to its responsibility to staff, students, suppliers and community to ensure that modern slavery risks are identified and addressed across operations and supply chains. This Modern Slavery Statement (Statement) reflects that commitment and reports on the steps undertaken to identify, assess and address the risks of modern slavery for the period 1 January 2024 to 31 December 2024 and future commitments in relation to mitigating modern slavery risks.

During 2024 UWA's modern slavery mitigation focus was on improving its understanding of related risks, delivering against the commitments made in the 2023 Modern Slavery Statement, including the development of a student peer workforce model, implementing a reporting mechanism for students and related communications, plus exploring ways to advance modern slavery mitigation and expanding related engagement and collaborations. For 2025, mitigation efforts will be focused on finalising the Modern Slavery Plan and delivering against the related actions, including an updated risk assessment, continuing to improve reporting mechanisms, implementing modern slavery training and enhancing spend analysis to enable further supplier insights and due diligence.

The risk of modern slavery within UWA's operations and supply chains remains low, due to strong compliance with legislative and policy frameworks and the predominance of Australian-based suppliers, but the University remains committed to continually strengthening its policies, practices, and culture to further mitigate modern slavery risks. UWA recognises that its operations may be subject to the risk of modern slavery, particularly in relation to current and future students, staff and investments. The University acknowledges the work yet to be done to fully interrogate and mitigate these risks and to remediate any occurrences of modern slavery should they be identified. UWA collaborates with the Australian Universities Procurement Network (AUPN) and has an established Modern Slavery Research Cluster which assist with identifying and mitigating the risk.



# About The University of Western Australia

## GOVERNANCE

Established pursuant to the *University of Western Australia Act 1911* as Western Australia's first university in 1911 and founded with a mission to 'advance the prosperity and welfare of our communities'.

The University of Western Australia (ABN 37 882 817 280) is a statutory corporation. The principal address is 35 Stirling Highway, Crawley, WA 6009. UWA is registered with the Australian Charities and Not-For-Profits Commission. UWA's CRICOS (Commonwealth Register of Institutions and Courses for Overseas Students) number is 00126G.

### Senate

The *University of Western Australia Act 1911* (WA) gives the Senate powers to act in the interests of UWA through the making of statutes, regulations, and by-laws and through the management of income and expenditure. It provides powers of delegation for the Senate, so that day-to-day management can be delegated to officers employed by UWA. UWA is responsible to the State Minister for Education for the proper conduct of its business under the State legislation, and to the Commonwealth Minister for Education for the delivery of our teaching and research programs, and for the provision of adequate infrastructure to support those programs.

There are 17 members of the Senate.

### Executive

The Senate appoints the Vice-Chancellor and works in partnership with the incumbent in this role to maximise UWA's capacity and performance, and to ensure fiscal viability. The Vice-Chancellor is delegated operational responsibility of UWA. The Vice-Chancellor appoints an executive group to assist with responsibilities for the academic, financial, administrative and other business of UWA.

Six members of the Executive: Vice Chancellor, Senior Deputy Vice-Chancellor, Deputy Vice-Chancellor (Education and Student Experience), Deputy Vice-Chancellor (Research), Deputy Vice-Chancellor (Operations) and the Chief Financial Officer.

## PEOPLE

### Students

**22,695** total

**7,690** international

**121** countries

### Staff

**3,419** Full-time equivalent*

**1,449** Academic

**1,971** Professional

*Headcount: 3,990 (1,765 Academic; 2,225 Professional)

## OPERATIONS

**Education, Research and Partnerships**
Responsibility for the quality and delivery of education at UWA primarily lies within the Schools. The 21 Schools design and deliver over 451 courses and units and are accountable for quality of teaching and student satisfaction with their educational experience. The Deputy Vice-Chancellor (Education and Student Experience) leads UWA's academic programs and education mission.

Responsibility for the quality and delivery of research at UWA lies within the schools, institutes and centres. These areas foster collaborative and multidisciplinary research teams that resolve real world challenges that are critical to the planet and its people. The Deputy Vice-Chancellor (Research) leads UWA's research mission and programs.

UWA is passionate about its partnerships and creating positive change for the wider community. This is embodied through support for a wide range of initiatives in key development areas of art, culture, sport, education and philanthropy.

The Vice Chancellor leads the University's global partnership engagement, supported by the Pro Vice Chancellor (Global Engagement).

**Campuses**
UWA has three key teaching and research locations in addition to other metro and regional sites:

- Perth Campus (main campus)
- UWA Health Campus at the Queen Elizabeth II Medical Centre
- UWA Albany Campus

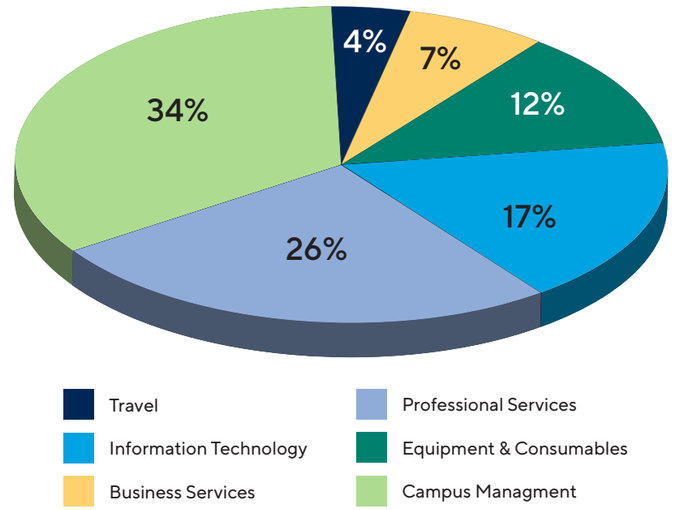
UWA's estate extends over 400,000 square meters (gross floor area) across 23 metropolitan and regional sites and includes two residential colleges, Unihall (765 rooms) and Forrest Hall (43 apartments for Forrest Research Foundation Scholars and Fellows) plus Crawley Village which caters for postgraduate PhD students.

**Investment**
$1.6 billion cash and other financial assets held on investment as of 31 December 2024.

UWA has environmental, social and governance risks and considerations outlined in its Investment Policy Statement (IPS). The IPS incorporates the requirements of UWA under the *Modern Slavery Act 2018* (Cth) and the expectations of UWA's implemented consultant, Mercer Investments (Australia) Limited and investment manager(s) to assess and address this risk and report on the issue in line with the regulations and with the IPS policy. UWA maintains a webpage to inform the community of the University's sustainable investment philosophy.

**Supply Chain**
UWA spent $517 million in 2024 with 5,294 suppliers across 70 sub-categories of goods and services. The University classifies its external spend across six key category areas to support its varied business needs and facilitate the related management: Travel, Information Technology, Business Services, Professional Services, Equipment and Consumables, and Campus Management. UWA leverages the capabilities of the Australasian Universities Procurement Network (AUPN) to support its procurement activities.

**2024 Spend by Category**




| CATEGORY | SUB-CATEGORIES INCLUDE |
|---|---|
| **Travel** | Travel management system and services (including transport and accommodation) |
| **Information Technology** | Audio visual, hardware, software, consulting, network infrastructure, printers and telecommunications |
| **Business Services** | Catering, library services, event management, printing and courier |
| **Professional Services** | Consultancy services, human resource services, marketing, student services and teaching services |
| **Equipment & Consumables** | Research equipment and consumables, facilities and office consumables |
| **Campus Management** | Capital projects, property management, asset management, facilities management, plant and vehicles, utilities and renewables |

## CONTROLLED ENTITIES

1. The University Club of Western Australia Pty Ltd
   ABN 46 100 673 603
   Principal activity - Events and Function Centre (University Club)

2. Perth International Arts Festival Ltd
   ABN 85 631 934 677
   Principal activity – Arts and Culture Events (Perth Festival)

3. UWA Sport Pty Ltd
   ABN 96 605 887 189
   Principal activity – Sports and Recreational Activities (UWA Sport)

4. UWA Accommodation Services Pty Ltd
   ABN 74 144 621 974
   Principal activity – Student Accommodation

5. UWA Accommodation Holdings Pty Ltd
   ABN 30 662 309 382
   Principal activity – Short Term Accommodation

6. Perth Festival Special Projects Ltd
   ABN 79 655 389 469
   A wholly owned subsidiary of Perth International Arts Festival Ltd
   Principal activity - Arts and Culture Events

7. Raine Medical Research Foundation Ltd
   ABN 98 682 675 145
   Established as a controlled entity at the end of 2024
   Principal activity - Fundraising and management of partnering and grants

## APPROACH TO MODERN SLAVERY MITIGATION

UWA is committed to its responsibility to staff, students, and community to ensure that modern slavery risks are identified and addressed within its operations, investments, research, controlled entities and supply chains.

This Statement reflects that commitment and reports on the steps undertaken to identify, assess and address the risks of modern slavery for the period 1 January 2024 to 31 December 2024 and future commitments in relation to mitigating modern slavery risks. The University's approach is based on the 2011 United Nations Guiding Principles on Business and Human Rights[1] and the underlying 'Protect, Respect and Remedy' framework.

The Chief Financial Officer is the University Executive accountable for the development of the UWA Modern Slavery Statement by the Modern Slavery Working Group (Working Group).The Working Group operates under the direction of the Office of the Chief Financial Officer and is chaired on their behalf by the Head of Procurement.

The Working Group's terms of reference were reviewed and updated during 2024 to encompass the following responsibilities:

- Develop and have oversight of UWA's annual Modern Slavery Statement
- Develop and manage UWA's Modern Slavery Plan and related targets
- Manage modern slavery mitigations in accordance with the Modern Slavery Plan
- Review membership and terms of reference for continuous enhancement
- Inform UWA's approach to modern slavery mitigation through benchmarking, collaboration, and research

UWA has an established governance framework, including key policy documents that relate specifically to modern slavery including the Code of Ethics and Code of Conduct, the Corporate Social Responsibility Policy and the Investment Policy.

In developing this Statement, UWA recognises that its operations and supply chains may be subject to the risk of modern slavery and accordingly, has engaged with all relevant operational areas to identify current mitigations in place, actions taken during the reporting period and future actions planned to address those risks.

Controlled entities were consulted in the development of this Statement to identify the level of modern slavery risk in the operations and supply chains of these controlled entities, understand current mitigation strategies underway and those planned to look for opportunities to improve the management of these risks into the future. It is acknowledged that more in-depth and frequent engagements in future reporting periods would be beneficial.

1 2011 United Nations Guiding Principles on Business and Human Rights
ohchr.org/en/publications/reference-publications/guiding-principles-business-and-human-rights

# Identifying Modern Slavery Risks

When identifying modern slavery risks, UWA understands that this relates to the potential for UWA and its subsidiaries to cause, contribute to or be directly linked to modern slavery through its operations and supply chains.

The risk of modern slavery within UWA's operations and supply chains is considered to be low, but the University is committed to continuing efforts to improve policies, practices, approach and communications in relation to modern slavery mitigation across the University.

It is acknowledged that the risk of modern slavery is present throughout the organisation, with the risks being greater within UWA's operations (including staff, students and investments) and supply chain than within education and research. Consequently, UWA's efforts to assess and mitigate modern slavery risks have to date focused on its operations and supply chain. UWA's approach to risk assessment will continue to develop and be refined through the actions of the Working Group.

## Supply Chain

According to Walk Free's Global Slavery Index[2], Australia is exposed to the risk of modern slavery through its imports, including those purchased by UWA such as electronics, garments and solar panels. Whilst UWA's overall risk is low, it is also widely acknowledged that services such as cleaning, catering, maintenance, security and construction, which account for a considerable proportion of UWA's expenditure, have an elevated risk of modern slavery.

UWA non-employee related annual spend for 2024 was $517 million, through contracts, purchase orders, credit cards and reimbursements. UWA's supply chain is diverse and complex ranging from once-off low value consumable purchases to high value, multi-year equipment and maintenance contracts.

UWA sourced goods and services from a wide range of Australian and international suppliers from 79 countries in 2024. 93% of expenditure was with Australian organisations, 2% with organisations in the USA (rated low country risk by the AUPN) and 1% was with organisations in Hong Kong (rated medium country risk by the AUPN). Higher risk countries that UWA purchases goods and services from include Pakistan, India, Timor-Leste, Saudi Arabia and Sri Lanka, however related spend accounted for only 0.3% of the total spend and the related category risk was deemed medium. It is acknowledged that greater visibility of the supply chain would be beneficial to identify modern slavery risks.

UWA has sought to leverage the capabilities of the Australian Procurement Network (AUPN) Modern Slavery Dashboard to better understand supply chain risk. Through this collaborative spend analysis technology, it was identified that in 2024 UWA engaged 5,294 unique suppliers (2023: 5,492). However, limitations within the detail of UWA's data categorisation meant that a proportion of the suppliers were not accurately included in the risk assessment. To ensure this limitation is addressed, UWA plans to work with Higher Ed Services (HES) (a not-for-profit organisation owned by Universities Australia that facilitates the exchange of ideas and information across the sector) to undertake a process of data analysis and implementation of best-practice benchmarking capability to ensure that the modern slavery risk assessment process will be more comprehensive in future. UWA has nevertheless determined that its key supply chain risk areas include IT hardware, audio visual equipment, laboratory equipment and consumables, construction services, solar panels, merchandise, cleaning, security and catering services and is focused on implementing appropriate modern slavery due diligence in these expenditure categories.

2 Global Slavery Index: walkfree.org/global-slavery-index/



## Operations

As a higher education institution, UWA's core activities of teaching, research and community engagement are highly dependent on its people. UWA has a responsibility to ensure that its workforce and student body are provided with safeguards and mechanisms to mitigate modern slavery risks.

While some initial high-level scoping of modern slavery risk in operations has been undertaken, UWA recognises the need to undertake more detailed risk assessments to fully understand the risk in its operations which will continue to be undertaken in 2025-2026.

### STUDENTS

International student recruitment is acknowledged as a key modern slavery risk in the university sector, and as UWA attracts students from around the world, it takes this responsibility seriously.

Integrated learning is an important component of UWA's learning and teaching experience for students. Student classroom and co-curricular learning is supported via experiential learning opportunities facilitated by UWA through:

- paid and unpaid placements/internships — undertaken for both credit and not-for-credit
- overseas placements with host organisations
- placements undertaken via third party providers
- industry mentoring programs
- international research project work
- global learning / exchange opportunities
- industry projects

Employment opportunities are advertised through a jobs board exclusively for UWA students. Students can apply for these opportunities directly with the employer. UWA deems the risk of modern slavery to be low due to procedures and policies in place to review providers and safeguard against exploitation.

### STAFF

The highest risk in relation to UWA's staff is in relation to casual staff and those on fixed term contracts. This risk is mitigated through UWA's terms and conditions of employment which are set out in employment contracts and Enterprise Agreements.

UWA has an effective framework of industrial agreements, policies and practices in place to ensure continued compliance that protect staff and provide them with appropriate processes to raise or identify potential risks. This includes a Public Complaints Policy and a related publicly available incident reporting tool.

### INVESTMENTS

UWA acknowledges that there is potential for its funds to be invested in organisations that do not adequately assess, understand and address risk of modern slavery in their operations or supply chains. UWA engages the services of Mercer, an independent implemented consultant, to manage its investment portfolio in line with UWA's Investment Policy Statement (IPS) and risks.

### CONTROLLED ENTITIES

Further work is required to undertake a full assessment of modern slavery risk across the University's controlled entities and will be a focus for 2025.

**The University Club of Western Australia Pty Ltd (University Club)**

The University Club has identified the international farming of coffee beans as being at risk of potential modern slavery activities. The University Club supplier is however certified as Fair Trade and has given a commitment that products are sourced and manufactured ethically. Where possible The University Club sources locally within West Australia or Australia minimising the risk of unethical agricultural practices. The University Club also remains in line with industry award and National Employment Standards to ensure fair treatment of all staff, including non-resident visa holders.

**Perth International Arts Festival Ltd (Perth Festival)**
The Perth Festival's risk assessment of current activity is deemed to be minimal in relation to modern slavery. The Perth Festival acknowledges that in the arts there is risk of non-payment to performers and other artists, however it is vigilant in ensuring that these practices do not happen.

**UWA Sport Pty Ltd**
Staff of UWA Sport fall under the appropriate safeguards and agreements applied by UWA. UWA Sport has functions dedicated to People, Culture and Inclusion with oversight on the safety and wellbeing of its staff. While UWA Sport's supply chain includes some high-risk categories such as sporting goods and uniform suppliers, it endeavours to source locally, where possible.

**UWA Accommodation Services Pty Ltd**
This entity does not have any staff and is not an operating entity. This entity processes incentives under the National Rental Affordability Scheme Incentive, that UWA receives from the government as part of an accommodation affordability scheme. Operation and management of the property and tenancy management services are performed UWA.

**UWA Accommodation Holdings Pty Ltd**
This entity facilitates hotel management operations. Its primary activity is the management of an external operator (AAPC Limited and AAPC Properties - together referred to as Accor Pacific) to deliver hotel services and operations to and on behalf of UWA. Accor Pacific (AAPC) is responsible for the hotel operations and publishes its own annual Modern Slavery Statements in accordance with the *Modern Slavery Act*.

**Raine Medical Research Foundation Ltd**
This entity was newly created in late 2024 and has not yet commenced operations.

# Actions taken to Assess and Address Modern Slavery Risks

## Supply Chain

**Policy Framework**
UWA's expenditure is governed by the procurement principles of probity, fairness, value for money, sustainability and risk managed procurement. Procurement activities are informed by the Finance Policy and the Procurement Financial Control Document (FCD). Purchases that are assessed to be high value and / or high-risk undergo a formal procurement process managed by Procurement irrespective of the total value of the resultant contract. During 2024 the Procurement FCD was reviewed and updated to improve spend management and related outcomes.

**Category Level Analysis**
UWA undertakes an annual risk-based analysis of its supply categories that includes modern slavery risk, as part of ongoing category management activities. Using this approach high-risk industries from which UWA routinely purchase goods and services (including construction, electronics, scientific equipment and consumables, cleaning, catering, construction and security services) and high-risk countries have been identified.

**Procurement Process Mitigations**
UWA acknowledges that formal procurement policies and processes have an important role to play in reducing the risk of modern slavery in operations and supply chain. To support and encourage positive change in the conduct of UWA's suppliers, processes for identifying, engaging, evaluating, and contracting with suppliers address modern slavery risks and incorporate reasonable and appropriate mitigations. Specifically, Procurement screen for modern slavery risks during all evaluation processes they undertake (which is procurement processes over $250,000 and high-risk purchases under this threshold), by means of related evaluation criteria.

A full review of UWA's procurement contract templates was undertaken during 2024 and specific modern slavery clauses were incorporated into each template (i.e. the goods and services contract, purchase order terms and conditions and the consulting services contract). These clauses require suppliers to use reasonable endeavours to comply with the requirements of the Modern Slavery Act and take reasonable steps to ensure that there is no modern slavery in their supply chains. Suppliers are required to provide evidence to UWA's reasonable satisfaction on request to validate compliance and upon request must permit UWA's nominated representative to undertake verification activities. Suppliers are also required to use reasonable endeavours to include a similar clause in all contracts they enter into with their subcontractors and suppliers in connection with the agreement. Plus, suppliers must notify UWA as soon as they become aware of any actual or suspected modern slavery in a supply chain which has a connection with the agreement.

**Training**
UWA continues to increase the Procurement team's understanding of modern slavery, the legislation surrounding modern slavery and the potential impact on supply chain and operations. This is facilitated through participation in forums, webinars, conferences, and from publications, toolkits and assessments provided by independent bodies such as Walk Free and Fair Supply. Work is underway to roll out further training and awareness across those responsible in procurement activities.

**Collaboration**
UWA's engagement with the Australian University Procurement Network (AUPN) and the initiatives developed by the AUPN Modern Slavery Working Group continue to inform UWA's approach to modern slavery mitigation. UWA is also able to benefit from related spend analysis initiatives, benchmarking exercises, shared best practice information and events, joint supplier assessment questionnaire (SAQ) initiatives for high-risk categories and access valuable support and guidance.

## Operations

UWA has implemented a new reporting tool on their public website for anyone to report an incident of inappropriate behaviour by, or toward, a member of the University community, including current, former or prospective students or staff as well as community members. Modern slavery is incorporated as a specific reportable field, and it is possible to make an anonymous report or without identifying anyone else involved. To date no reports of any modern slavery related issues have been submitted via this portal.

In 2024 UWA agreed an action plan to adopt the national principles for child safe organisations which include annual risk assessments, training and communications which will be implemented by the end of 2025.

### STUDENTS

UWA implemented a range of policies and procedures upholding the rights and freedoms of all students in line with national legislation and international commitments. The University Charter of student rights and responsibilities sets out the fundamental rights and responsibilities of students and their organisations at UWA.

**Recruitment**
UWA Future Student Recruitment is a function delivered by the Brand Marketing and Recruitment (BMR) division. BMR consolidates all marketing, communications, admissions and future student related activity and operates within the Office of the Deputy Vice-Chancellor (Operations).

Engagement follows the Australian Privacy Principles (APP) from the Privacy Act 1988 in all interactions with students, parents and agents. This is to protect the identity of the student and the personal information that is provided to the University through an enquiry or study application.

In the recruitment of international students, the University ensures compliance with Education Services for Overseas Students (ESOS) and the ESOS National Code, working only with education agents and third parties who have been vetted though a due diligence process. UWA's staff and agents advise students appropriately of their rights and obligations and respond promptly to and investigate complaints or concerns students raise.

UWA's engagement network with other Australian institutions such as the Australian Universities International Directors Forum and industry associations such as the International Education Association of Australia (IEAA) allows for broader awareness and identification of any industry concerns of modern slavery.

**Onboarding and Orientation**
The divisions of Student Wellbeing and Engagement and International Student Experience and Global Learning are in the Directorate of Student Life, within the portfolio of the Deputy Vice Chancellor, (Education and Student Experience). These teams are responsible for designing and delivering education to raise domestic and international students' awareness of modern slavery. Students are made aware of potential risks related to places of employment, sexual exploitation and residential living arrangements as well as how to report concerns and seek support.

Information sessions are included in pre-departure sessions for international students and included in onboarding and orientation sessions for all students.

The University ensures compliance with Education Services for Overseas Students (ESOS) and ESOS National Code when onboarding and orienting students.

**Student Internships, Placements and Unpaid Work**
UWA completed a review of its Work Integrated Learning (WIL) supported placements and internship provision process in 2024 that involved understanding the process for allocating placements including the collection of placement details, host feedback and enrolment processes at UWA. Following the review, UWA applied recommendations to streamline the process to a singular process for all students no matter the unit of enrolment or course of study and subsequently delivered a roadshow to stakeholders to advise changes and materials for student advisors to better inform students who approached advising offices when asking about WIL opportunities.

The new process requires all placement documentation to be entered and received prior to confirmation of placement and applications being received by a placement host. This measure ensures the placement is assessed as acceptable for placement and does not better suit a paid employment position or breach fair work rules. In addition, placement check points are mandatory including feedback from the host organisation, and these checks trigger review by staff to ensure placement health and expectations are met. If these checks were to fail there is room for modern slavery risk and therefore whilst not directly a result of concern of modern slavery, the measures affected by the review do reduce exposure to risks that might otherwise be present.

Student Life developed a new peer workforce model that will be implemented in 2025.

**Awareness and Advocacy**

UWA has developed and published a dedicated modern slavery page on its website, with information on:

- modern slavery and modern slavery in Australia
- actions UWA has taken and plans to take, including the annual statement
- student specific risks of modern slavery
- the signs of modern slavery
- the rights of individuals are and how to seek support and/or make a report

The UWA Modern Slavery Research Cluster is an interdisciplinary network of researchers from across the University. Their work includes teaching, research and engagement. For example, in 2024 they hosted a visit from former UK Independent Anti-Slavery Commissioner, Professor Dame Sara Thornton who gave a public lecture at UWA an engaged with staff, students, businesses and policy makers. The Research Cluster is also represented on the UWA Modern Slavery Working Group.

UWA hosted a Modern Slavery Panel Discussion in August 2024. This student led session engaged participants through an expert panel discussion about modern slavery and its prevalence, different forms and resources and support services available. The panel included UWA Modern Slavery researchers, industry and sustainability professionals and reflected on UWA's research and institutional commitments around modern slavery.

**Student Support**

Student Life undertook to develop a fees calculator to act on the potential risks of debt bondage. This responded to an awareness of the risk in relation to levels of debt international students may incur prior to arrival and about students from certain countries using unregulated education loan providers. The calculator has been developed to make average fees clear and includes frequently asked questions and guidance on appropriate fee levels. The tuition fee calculator is live on UWA's website.

## STAFF

UWA's terms and conditions of employment are set out in employment contracts and Enterprise Agreements. These industrial instruments meet all relevant legislative and common law obligations and are provided to all employees when they are engaged by UWA. The engagement of employees at UWA complies with the *Fair Work Act 2009* (Cth) and all other relevant legislation.

The majority of UWA employees' employment is governed by one of the four Enterprise Agreements. These Enterprise Agreements provide the minimum terms and conditions of employment for the individuals covered by them. Each of the Enterprise Agreements have been approved by the Fair Work Commission.

Some senior employees have individual employment contracts which are drafted in compliance with current legislation. Letters of appointment for adjuncts and other non-employees are drafted in accordance with relevant legislation, including the *Work Health and Safety Act 2020 (WA), Equal Opportunity Act 1984 (WA*), and, where applicable, institutional policies and Commonwealth privacy requirements.

UWA has a suite of policies, procedures and practices in place that assist in the promotion of equal opportunity, foster diversity and inclusion, and ensure compliance with anti-discrimination and human rights legislation from recruitment through to retirement.

These policies are designed to ensure a safe working environment, protection from mistreatment at work and aim to provide a workplace free of intimidation, threats, actual or threatened physical and/or sexual violence, forced labour and abusive working conditions. Policies are available to staff through UWA's Policy Library. Failure to comply with UWA policies may result in disciplinary action. There are also a range of mechanisms in place for staff to make enquiries or complaints regarding their employment, without fear of prejudice or adverse consequence.

UWA has a dedicated People and Culture team to assist employees with enquiries or complaints. The University's Integrity and Standards Unit assists non-employee staff with enquiries or complaints. If staff remain unsatisfied or do not feel comfortable approaching People and Culture or the Integrity Standards Unit, they are able to lodge a dispute or grievance in line with their Enterprise Agreements or the relevant policy (for staff engaged under other industrial instrument) or make a confidential disclosure to a University Disclosure Officer.

In managing modern slavery risks in the workplace, UWA:

- Ensures staff are aware of their obligations to comply with policies
- Ensures that all legal obligations are complied with at every stage of the employment life cycle from recruitment and on-boarding to the end of the relationship
- Does not charge staff for the costs associated with their recruitment or engagement (apart from occasionally items like securing a National Police Clearance)
- Ensures staff have the appropriate working rights to work in the country within which they are working.

UWA is committed to continuous improvement and conducts regular reviews of policies to ensure ongoing compliance with the relevant legislation and minimise risks of modern slavery in its workplace.

To minimise the risks associated with unpaid appointments (volunteering, vocational placements or work experience), UWA is committed to assessing its current practice over the next three years and introduce appropriate mechanisms to ensure a person is a genuine volunteer or intern and would not be entitled to payments or other entitlements under UWA's Enterprise Agreements or policies.

## INVESTMENTS

In accordance with the University's Investment Policy Statement (IPS), UWA expects its implemented consultant and investment manager(s) to assess and address modern slavery risk as they would any other risk and to comply with reasonable requests for information from UWA. Investment managers are expected to manage and report on modern slavery in line with local regulations, as well as in line with UWA's IPS.

Mercer reports to the University annually on modern slavery combined with other environmental, social and governance (ESG) measures. Mercer is required to monitor and screen UWA's investment portfolio for any modern slavery risks or red or amber flag indicators and provide details of any risk mitigations in related reports to the Investment Committee. The University also requires Mercer and their investment managers to actively engage with any companies that are found to have red flag exposures.

Mercer surveys its underlying investment managers annually on their monitoring and management of UN Global Compact (UNGC) and modern slavery red flagged incidents and utilises the results of the survey along with other routine screening assessments, to guide their manager engagement process based on exposure and materiality. As of 31 December 2024, there were no holdings within the University's portfolio with any modern slavery red flags.

### CONTROLLED ENTITIES

The University Club sources its food locally within West Australia or across Australia minimising the risk of unethical agricultural practices. The University Club is committed to utilising the UWA sourcing and contract templates and participating in any future Supplier Self-Assessment Questionnaires (SAQs) supported by the Procurement team and contributing to the Modern Slavery Plan as coordinated by the Working Group. The University Club is committed to promoting equal treatment of all staff and conducts all recruitment and selection processes in a fair and confidential manner while aligning to the *Fair Work Act 2009* (Cth), industry awards and National Employment Standard conditions.

While UWA Sport's supply chain includes some high-risk categories such as sporting goods and uniform suppliers, it endeavours to source locally wherever possible to reduce exposure to modern slavery risks. Furthermore, UWA Sport utilises standard UWA procurement processes and systems for large acquisitions and projects.

The University Club and UWA Sport also confirmed that their high value procurement processes are conducted in conjunction with UWA's Campus Management and / or the Procurement team.

The Perth Festival places high value on its people and has a dedicated People team to ensure fairness in all aspects of their activities. The Perth Festival focuses on ensuring that all their staff and artists are paid correctly and at the appropriate rates by undertaking regular contract reviews, confirming salary advice with Live Performance Australia and having a system of checks and balances across its operations.

It is acknowledged that UWA's controlled entities would benefit from support from the Working Group to understand, assess and address their modern slavery risk.

# Assessing the Effectiveness of Actions

Assessing the effectiveness of the University's approach to modern slavery mitigation involves monitoring operations and supply chains for any signs of exploitation. During this reporting period, UWA did not identify any potential concerns but recognises that addressing modern slavery requires continuous vigilance, improvement, and adaptation.

During 2024 the Working Group undertook a high-level risk assessment in addition to implementing modern slavery due diligence within high value high risk procurement processes and suitable clauses within contracts and progressed the mitigation commitments made in the 2023 Statement among other related initiatives and collaborations. This reflects the importance UWA attaches to its responsibility in relation to modern slavery mitigation and demonstrates a commitment to augmenting the effectiveness of its actions.

A strong and sustainable approach to identifying, assessing, and managing modern slavery risks takes time and dedicated resources. UWA is committed to strengthening identification and assessment processes and expanding the reach and impact of mitigation and remediation strategies.



# Other Relevant Information

For 2025, the University's mitigation efforts will be focused on finalising the Modern Slavery Plan and delivering against the related actions. A third-party expert will be engaged in 2025 to review the plan and provide insights to assist with UWA's approach to modern slavery mitigation.

Furthermore, UWA plans to undertake the following actions during 2025 to further mitigate modern slavery risks:

## Governance

- Continue to assess the appropriateness of the inappropriate behaviour reporting tool and improve its accessibility.
- Expand modern slavery clauses from procurement contracts into all other relevant contracts, particularly those relating to students and research, to sure that all organisations are aware of UWA's related expectations and to facilitate future enhanced due diligence.
- Increase oversight of modern slavery risk across controlled entities.

## Supply Chain

- Enhance due diligence processes undertaken during relevant procurement processes and prior to onboarding new suppliers.
- Improve supply chain visibility by implementing a new spend analysis system via Higher Ed Services (HES), then conduct more extensive supply chain risk assessments to further identify high-risk suppliers.
- Survey high-risk suppliers to determine the steps they have taken to address modern slavery risk.
- Explore ways to achieve greater visibility over supply chains, across higher risk categories, including engaging with key suppliers.
- Continue to establish panels of suppliers to minimise risk by consolidating the number of suppliers engaged, to achieve greater transparency, operational efficiencies and sustainable outcomes.
- Implement a contract management framework and system.
- Implement a quotation system to improve related transparency and compliance.
- Implement a standard approach to contract approvals that incorporates modern slavery considerations.
- Develop and implement a Supplier Code of Conduct.
- Explore the development of a process for remediation specific to modern slavery in supply chains.
- All members of the Procurement team to undertake ethical training via the Chartered Institute of Procurement & Supply.

# Operations

## STUDENTS

- Engage with student related bodies and functions to further explore student concerns in relation to modern slavery and seek information about issues that arise that may indicate risk of modern slavery.
- Implement the 'Cost of Living Project' with a special focus on food security to assist students facing hardship and reduce financial stress.
- Conduct a review of information, education, training and supports offered to all students to ensure vulnerable student cohorts, such as international students, are protected from modern slavery and other forms of exploitation.
- To broaden students' awareness of Legal Services and Support, UWA will work to enhance our partnership with the Australian Federal Policy by hosting on-campus events for students. Furthermore, The Student Legal Advice Centre and community-based specialist legal advice available for students will be promoted.

## STAFF

- Create and promote a knowledge base on modern slavery for all staff members to access.
- Undertake a review of available modern slavery training courses and seek to roll out at a minimum to staff who are interacting directly with students or have frequent purchasing responsibilities.
- Explore how to consider modern slavery in the development of new policies and reviews of existing policies.
- Update and maintain the publicly available modern slavery information on UWA's website.

## INVESTMENTS

- Continue to work with the implemented consultant and investment manager(s) to assess and address related modern slavery risk.

THE UNIVERSITY OF WESTERN AUSTRALIA

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