



# Modern Slavery Statement

June 2022

# From our Vice-Chancellor

---

**Freedom from slavery is a fundamental human right. Swinburne University of Technology deplores all forms of slavery and forced labour. We believe that universities should play a significant role in helping end modern slavery.**

At Swinburne, we are committed to people and technology working together to build a better world. This commitment is central to our Horizon 2025 strategy. Building a better world requires that we take the necessary steps to identify and abolish any form of modern slavery within the university's, our suppliers', and our partner organisations' operations.

In 2021, we retained our focus on addressing the risk of modern slavery across our supply chain by working collaboratively with our suppliers and sector peers. We implemented a significant change to our procurement policies and procedures to include a focus on modern slavery risk, trained more than 350 of our staff, and adopted a new modern slavery risk tool (FRDM Inc) in collaboration with 34 other universities. Importantly, in 2021 we continued to undertake supplier modern slavery due diligence and commenced a deep review of our cleaning provider's labour practices.

We also acknowledge the opportunity to influence companies to create positive change through our investments. Addressing human rights issues and modern slavery, in addition to climate change and sustainable development, are areas of focus with regards to our university's investments.

At Swinburne University of Technology, we have fostered and are proud of our inclusive and supportive culture. We drive positive social outcomes through our teaching, research, partnerships, and operations.

There is no place for modern slavery in the operations or supply chains of any part of Swinburne and we do not accept any form of slavery or forced labour. I look forward to Swinburne continuing to play an important role in addressing the significant issue of modern slavery.



**Professor Pascale G Quester**  
Vice-Chancellor and President



# This statement covers the period 1 January to 31 December 2021

This statement was approved by the University Council of Swinburne University of Technology on 23rd May 2022.



**Professor Pascale Quester**  
Vice Chancellor & President  
24th May 2022

## Acknowledgment of Country

We respectfully acknowledge the Wurundjeri People of the Kulin Nation, who are the Traditional Owners of the land on which Swinburne's Australian campuses are located in Melbourne's east and outer-east, and pay our respect to their Elders past, present and emerging.

We are honoured to recognise our connection to Wurundjeri Country, history, culture, and spirituality through these locations, and strive to ensure that we operate in a manner that respects and honours the Elders and Ancestors of these lands.

We also respectfully acknowledge Swinburne's Aboriginal and Torres Strait Islander staff, students, alumni, partners and visitors.

We also acknowledge and respect the Traditional Owners of lands across Australia, their Elders, Ancestors, cultures, and heritage, and recognise the continuing sovereignties of all Aboriginal and Torres Strait Islander Nations.

## Reporting entity

The parent entity is Swinburne University of Technology (ABN 13 628 586 699), which is registered as an incorporated charitable institution with the Australian Charities and Not-for-profits Commission (ACNC). No other entity owns a share of Swinburne University of Technology.

Swinburne has the following controlled entities:

- Capsular Technologies Pty Ltd
- National Institute of Circus Arts Ltd (NICA)
- Swinburne Business Consulting Nanjing Co. Ltd
- Swinburne Intellectual Property Trust
- Swinburne International (Holdings) Pty Ltd
- Swinburne Student Amenities Association Ltd (trading as Swinburne Student Life)
- Swinburne Ventures Limited

Consolidated revenue for Swinburne and its controlled entities for the period  
**1 January to 31 December 2021**

**\$752 million**

# About Swinburne University of Technology

## Swinburne University of Technology aspires to be the prototype of a new and different university – one that is truly of Technology, Innovation and Entrepreneurship, and proud of it.

Swinburne is a dual-sector institution, defined and inspired by technology and innovation and renowned for our strong industry and community engagement. Our next chapter, *Horizon 2025*, is a strategy that leverages our strengths and underpins our focus to play a distinct role in contributing to society's increasing need for transformative technology and the human capital and talent to leverage it.

Central to *Horizon 2025* are four moon shots – bold and ambitious objectives designed to embolden and energise our staff and partners to make a real difference in the world. Our moon shots are:

1. Every Swinburne learner gets a work experience
2. Every Swinburne graduate gets a job
3. Every Swinburne partner gets a tech solution
4. Swinburne is the prototype of global best practice.

The achievement of our 2025 moon shots depends on our capacity to work collectively, always, as *One Swinburne*.

We are proud of Swinburne's technology DNA and our national and global standing. Building on our strengths is positioning us well to embrace the opportunities of a technology-rich future. We are committed to realising the Swinburne vision of people and technology working together to build a better world.

Swinburne has an international reputation for quality research that connects science

and technology with industry and the community. Our standing in prestigious world academic rankings reflects our commitment to high-quality teaching, research and graduate outcomes.

As a dual-sector university, Swinburne offers higher education and vocational education. We offer courses in a broad range of disciplines, including science, information technology, engineering, exercise and sport science, health sciences, occupational therapy, nursing, psychology, law, arts and humanities, aviation, built environment and architecture, business, design, education, English language and study skills, film and television, games and animation, and media and communications.

Swinburne's close ties with industry provide students with opportunities for valuable workplace experiences. Industry representatives inform, shape and challenge our curricula. During 2021, as part of our *Horizon 2025* approach, we announced that every Swinburne learner gets a work experience (moon shot 1). All Swinburne learners, in higher and vocational education, will experience high quality industry-based practical learning, across all course stages through to completion. We continue to lead the sector in our approach to work placements and industry links with a consistent and comprehensive Work Integrated Learning program. Swinburne maintains a strong commitment to quality student outcomes and to teaching and learning experiences.

Swinburne researchers have a reputation for high-quality, award-winning research with particular strengths in computer science and information technology, design, media and innovation, engineering, infrastructure, materials science, astronomy, physics, social impact research, health sciences, neurosciences and mental health.

Swinburne's research hubs and institutes foster interdisciplinary collaboration and deeper research

connections with industry, business and community – connections that maximise Swinburne's impact. Our hubs and institutes provide leadership in space and aerospace technology, sustainable energy development, medical technology, data science, health and social innovation, smart cities and advanced manufacturing and design. Underpinned by leading digital technology platforms, our researchers are collaborating with industry through embedded partnerships to drive innovation and create impact.

Swinburne has three campuses located in the eastern suburbs of Melbourne at Hawthorn, Croydon and Wantirna. We have a fourth campus in Sarawak, Malaysia, as well as the National Institute of Circus Arts located in Prahran, Melbourne. Swinburne also has locations in Sydney and Vietnam, each offering a small suite of sought-after Swinburne courses. We have an office in Nanjing, China – further connecting us to some of the fastest-growing regions in the world.

We offer a range of qualifications online through Swinburne Online and Open Universities Australia. Swinburne Online began in 2012 through a successful joint venture partnership with Seek Ltd to create educational opportunities for students wishing to study off campus.

Swinburne holds an investment portfolio that is managed by a third-party specialist investment adviser under the direction of the Council and relevant sub-committees, and in line with the university's Responsible Investment Charter.

Swinburne's total student headcount in 2021 was 42,069 across higher education and 18,231 across vocational education. At the end of 2021, Swinburne had more than 4,000 employees, comprising full-time, part-time and fixed term and casual staff.

## Our commitment to sustainability and reconciliation

Swinburne recognises the importance of preparing tomorrow's leaders and decision makers to contribute to a sustainable future. Our commitment to sustainability remains one of our core values. We are committed to fostering positive social, educational and environmentally sustainable change. We take a universal approach to sustainability, considering the physical and virtual environment we operate in, as well as our people, practices, and research.

Swinburne has made several commitments and taken action to support a sustainable future. In 2018, Swinburne committed to the United Nation's Sustainable Development Goals (SDGs). Joining organisations from around the globe, Swinburne committed to the 17 SDGs that aim to 'transform our world' through ending poverty, protecting the planet, and ensuring prosperity for all on the road to 2030. SDG 8.7 calls for an end to modern slavery by 2030.

Swinburne's 2020–2023 Reconciliation Action Plan (RAP) has been endorsed as an Elevate RAP by Reconciliation Australia, signifying Swinburne's strong commitment to reconciliation.

Swinburne was one of the first universities in Australia to implement a responsible investment charter, ensuring environmental and social impacts are prioritised in our university's investment choices. Regular reporting on performance to the charter is delivered by our investment manager to our governing bodies, who provide oversight and governance on Swinburne's investments.

In December 2019, Swinburne committed to becoming carbon neutral by 2025. In January 2020, we became the first university in Victoria to sign the Global Climate Emergency Letter in recognition of the need for a drastic societal shift to combat the growing threat of climate change. Since then, Swinburne has developed a Net Zero Pathway Plan that sets out a roadmap of key projects to reduce our carbon footprint. Several initiatives have already been delivered, including a 100% renewable electricity arrangement and new sustainable procurement framework. In combination, initiatives deployed to date have reduced the university's net carbon footprint by approximately 50%, with planning and initiatives underway to reduce this further as well as increasing our maturity in carbon reporting.

[www.swinburne.edu.au/about/strategy-initiatives/sustainability-environment/](http://www.swinburne.edu.au/about/strategy-initiatives/sustainability-environment/)

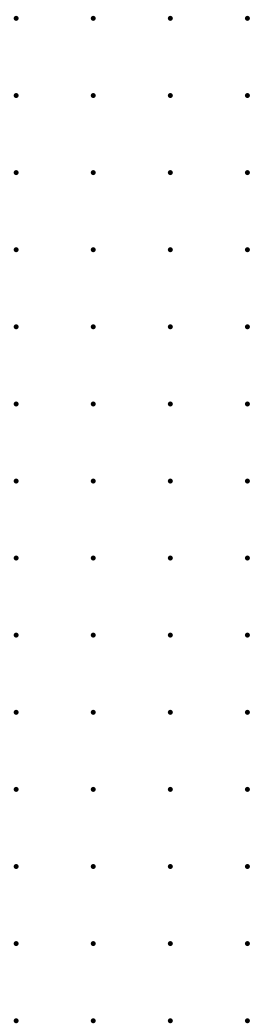
## Our risk and governance frameworks

Under the *Swinburne University of Technology Act 2010*, Council maintains responsibility and oversight of the university's Risk Management Policy and Framework through its Audit and Risk Committee. The Vice-Chancellor, Professor Pascale Quester, is the President and Chief Executive Officer of the university and is responsible for the conduct of the university's affairs in all matters. The Council, Audit & Risk Committee, Executive and senior leaders support the desired risk culture by demonstrating consistent mindsets and behaviours.

Swinburne's approach to managing risk is based upon the international risk management standard ISO 31000:2018 Risk Management Guidelines and the Victorian Government Risk Management Framework. The Enterprise Risk Management Framework defines the

university's risk operating model, responsibilities, methodology, and monitoring and reporting obligations. Enterprise and operational risk assessments are undertaken on an annual basis as part of the strategic planning process. Swinburne has a zero tolerance for deliberate breaches of our moral and ethical values.

Corporate governance at the university is the set of values, principles, and processes by which the university is directed and controlled. The university's corporate governance underpins the behaviours and practices expected of Council, each member of Council, all staff, and the university in carrying out their responsibilities. The aim of the university's corporate governance is to ensure that good, ethical decisions are made by the right person.



## Our supply chain

Swinburne procures goods and services from a broad range of industries that support the running of our physical campuses (such as cleaning, security, maintenance), enable the effective delivery of teaching and research (such as IT software, library subscriptions,

laboratory consumables) and generally supports the running of the university (such as advertising, recruitment, office supplies).

In 2021, the university engaged 5,983 suppliers (of which 2,711 were transacted with via corporate card)

to supply 34,806 transactions of goods or services (of which 9,533 of these transactions were purchased via corporate card). **Table 1** highlights the proportion of spend across the different areas of spend by the university (i.e., spend categories).

**Table 1: Proportion of total spend by spend area**

Spend area	Proportion of total spend (%)
Marketing and media	16%
IT software	13%
Lecturer and teaching services	12%
Corporate professional services	10%
Buildings and grounds	9%
Human resources	7%
Library services	7%
Laboratories and research	5%
Utilities and renewables	4%
IT hardware	4%
Construction, refurbishment and works	3%
Property management	3%
Student services	2%
Telecommunications	2%
IT professional services	2%
Audio visual	1%
Office supplies	1%

In 2021, 92.6% of Swinburne's supply chain spend was with Australian-based suppliers, including a considerable proportion located in the local areas

surrounding the university's Melbourne campuses. Internationally, Swinburne has supply arrangements with businesses located across Europe, North America,

and Asia. **Table 2** outlines the location of the university's suppliers outside Australia.

**Table 2: Most common locations of International suppliers**

Supplier country/region	Number of suppliers	Predominant spend areas
United States of America	138	Thesis examination & marking services, electronic library supplies, software (support, teaching & research)
United Kingdom	89	Thesis examination & marking services, books & other printed material, support software, electronic library supplies
India	55	Consulting services, student recruitment (international), marketing & communications services
China	39	Student recruitment (international), spare parts & accessories, thesis examination & marking services
Vietnam	31	Student recruitment (international), marketing & communications services
Malaysia	28	Lecturers & honoriums, student recruitment (international), property rent
Germany	28	Electronic library supplies, laboratory consumables, thesis examination & marking services
Canada	25	Thesis examination & marking services, course development & expert advice services
Singapore	25	Student recruitment (international), recruitment advertising
Hong Kong	24	Student recruitment (international)
New Zealand	24	Thesis examination & marking services, support software
Ireland	18	Advertising, support software

Typically, Swinburne establishes and maintains long-term relationships with high value and/or strategic suppliers. Swinburne aims to cultivate partnerships

with suppliers where we may collaborate on strategically aligned areas including research or educational outcomes. Suppliers of low-value and low-risk

goods or services may be based on either an ongoing or ad hoc yet transactional relationship.

## Understanding our modern slavery risks

### Swinburne recognises and supports that freedom from slavery is a fundamental human right.

We recognise our moral obligation to respect human rights in our operations, across our supply chain and in our investments. We support the UN Guiding Principles on Business and Human Rights (UN Guiding Principles), which are the recognised global standard for preventing and addressing business-related human rights harm.

### Operational risks

Most Swinburne employees have terms and conditions of employment in one of the university's enterprise agreements. Staff are represented in the enterprise bargaining process by the National Tertiary Education Union and Australian Education Union. Not all employees of the university choose to be a member of a union and membership is not compulsory. Australian-based employees who are not covered by an enterprise agreement are covered by modern awards. Swinburne supports freedom of association and employee representation and continues to have positive and regular interactions and communications

Swinburne is compliant with local labour laws and regulations. We do not impose any penalties or other negative consequences on employees wishing to cease their employment. Employees leave their jobs without barriers or fear of consequences. On the rare occasions that we need to source labour from outside Australia (particularly to provide services within those geographies), we do so in a way that is compliant with the local labour laws and regulations and, to the extent appropriate, provide comparable terms and conditions to Swinburne's Australian employees.

We have policies and procedures in place to ensure a safe, equitable and supportive working environment for our staff and students. The university's People, Culture and Integrity Policy sets out the university's commitment to building a positive culture, promoting integrity and supporting university members, community and industry partners. Ethical conduct is expected, encouraged, and supported with no tolerance for corrupt conduct, fraudulent activities, and maladministration. The policy requires that responsible persons must be free from a conflict of interest,

bias and inappropriate influence when making decisions and dealing with other persons or organisations on behalf of the university. These policies are supported by the Complaints, Reviews, Appeals and Misconduct framework for students and staff.

The university is committed to providing an environment for work and study that is free from bullying, violence, sexual harassment and assault, discrimination, and harassment and vilification. The university is also committed to the safety of children and has zero tolerance for child abuse.

The university's position on improper conduct (including fraud and corruption, criminal offences, substantial risk to health and safety of a person) is guided by the principles of:

- upholding the highest standards of legal, ethical and moral behaviour,
- ensuring the organisational culture and embedded risk controls effectively deter improper conduct,
- building willingness to report wrongdoing,
- ensuring compliance with public interest disclosure or whistle-blower legislation (including the Public Interest Disclosure Act and the Corporations Act),
- protections for individuals who disclose improper conduct, and
- natural justice.

Swinburne researchers are committed to the highest ethical, professional, and scholarly standards. Our research adheres to the Australian Code for the Responsible Conduct of Research. We are committed to ensuring that all research is conducted responsibly with honesty, integrity and respect for human research participants, animals, and the environment. Research may be undertaken in partnership with a variety of Australian and international external parties that may include start-ups, small to medium enterprises, not-for-profit enterprises, multinationals, and government bodies. Due diligence is carried out on potential research partners to assess ethical and sustainable business practices that align with Swinburne's own integrity standards. Foreign interference requirements are adhered to, supported by assessment and reporting processes.

Swinburne has an independent disclosure service (called Stipline) for employees and third parties to report suspected or actual illegal or improper activity. Information outlining how to access this service and the process for managing claims is found within Swinburne's Improper Conduct and

Whistleblowing Guidelines. Disclosers may disclose anonymously if they wish.

### Investment portfolio risk

Through investments in public and private companies, we can have an impact on the environment and communities worldwide. We believe we have an opportunity to influence those companies to create positive change. Our areas of focus within our Responsible Investment Charter are:

- climate change,
- human rights and modern slavery, and
- sustainable development.

Swinburne requires our investment fund manager (currently Mercer) to undertake an annual review of Swinburne's portfolio performance against the Responsible Investment Charter and best practice. 2021's review confirmed that Swinburne's investments are aligned with all commitments within the Charter. The portfolio scored better than relevant benchmarks across all monitored ESG metrics, and for most metrics demonstrated year-on-year improvement. As part of Swinburne's total portfolio, 20.3% is invested in sustainability solutions aligned with the SDGs. Similarly, Swinburne's aggregate portfolio continues to significantly outperform the benchmark Universe ESG rating by 30%.

Importantly, the assessment confirmed the portfolio has no exposure to companies with red flag incidents in relation to modern slavery (aligned to UN Global Compact principles on forced labour and child labour).

Swinburne's investment manager reports at least annually to the Swinburne Finance and Operations Committee, and Council, on regular assessments undertaken to confirm this position.

### Supply chain risks

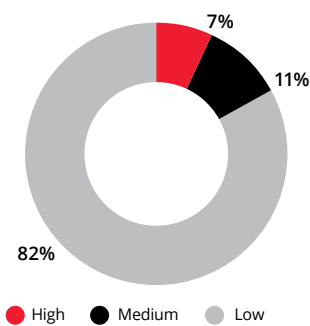
In February 2022, Swinburne launched a new supply chain transparency and modern slavery risk solution, FRDM, in collaboration with the university sector (see further details on page 10). Using FRDM, a risk assessment was conducted on Swinburne's procurement spend to determine where the risks of modern slavery may be higher across our supply chain. FRDM is the world's first supply chain mapping technology delivering a predictive bill of materials (BOM)

based on a library of product genomes which trace human rights abuse deep in supply chains. It provides the university with visibility to end-to-end risks of modern slavery across primary inputs, products, countries, industries, and suppliers.

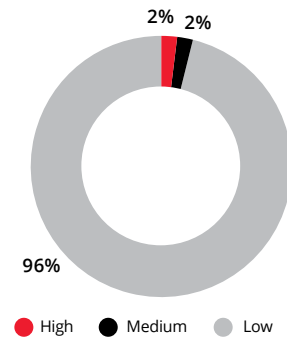
The tool works by breaking down each of the university's purchases to its component and material inputs, pulling from international trade databases to build product genomes. FRDM's algorithm uses this database to derive a probabilistic point of origin for raw materials and intermediary components that compose the finished products purchased. The risk database, composed from multiple different sources (e.g., United States Department of State, Trafficking in Persons Report, Global Slavery Index, ILO, country unemployment rates etc.), inform severity of risk across the production points for different purchases.

The insights from FRDM highlight that in 2021 Swinburne procured from 184 unique suppliers (representing 6.8% of total suppliers) who are identified as being of a higher risk of modern slavery due to the type of industry, product and its components, and the global nature of their supply chains (see **Graph 2**). The insights also suggest Swinburne procures from 78 industries that are determined to be high risk (see **Graph 3**).

**Graph 2: Supplier risk level**



**Graph 3: Industry risk level**



Key areas of the university's spend identified as a higher risk of modern slavery are listed in **Table 3**.

**Table 3: High-risk spend areas**

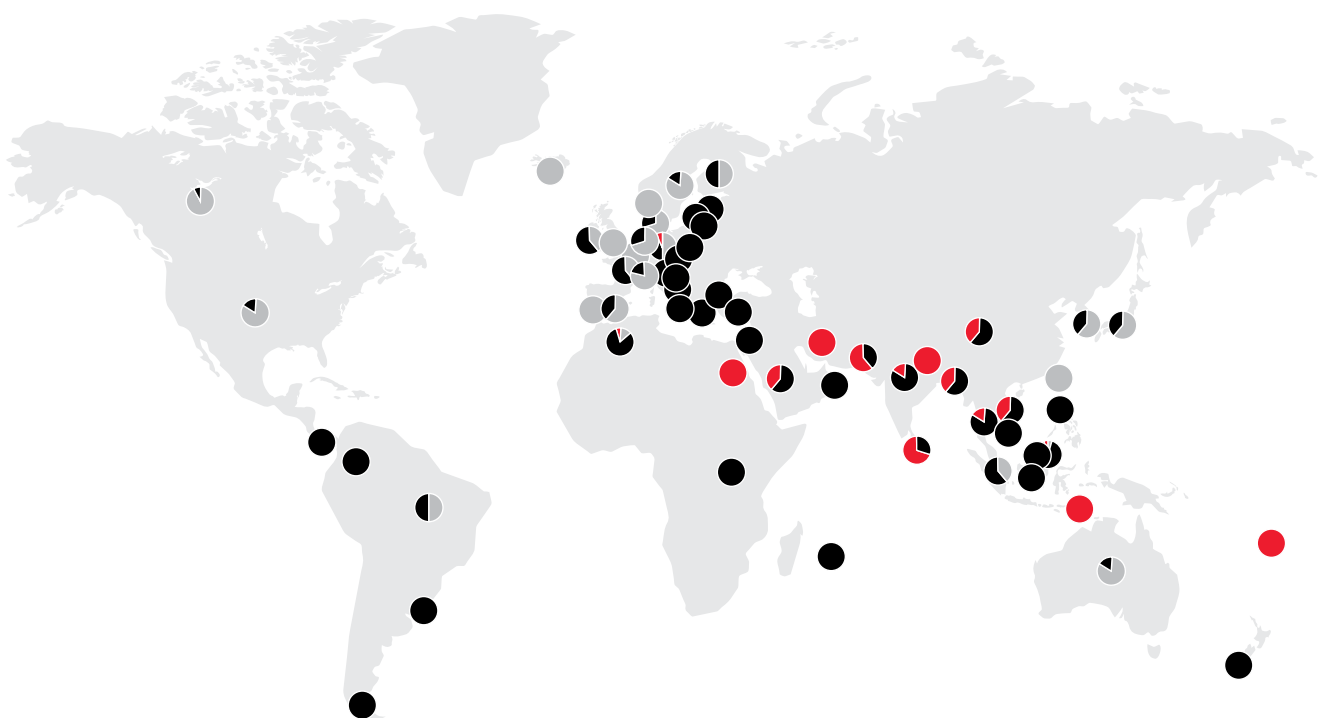
Goods	Services
Computers & computer peripheral equipment	Commercial cleaning
Equipment (scientific, engineering, telecommunications, AV, medical, electronics)	Construction
IT network infrastructure	Catering
Stationery and kitchen supplies	Hotels and motels
Laboratory supplies	
Merchandise and apparel	
Mobile devices and accessories	

Swinburne procures goods directly from overseas countries, albeit the proportion of these overseas suppliers is small relative to the number of total suppliers (7.4%). Of these, suppliers based across the Asian region are presenting with higher risks of modern slavery as demonstrated in

**Graph 4 and Table 4**. With a focus on local procurement, Swinburne's spend with suppliers based in high-risk locations outside of Australia are predominantly for student (international) recruitment services and educational support services (e.g. Thesis examination and marking services).

**Graph 4: Geographical spread of suppliers and risk levels**

● High ● Medium ● Low





**Table 4: High-risk suppliers by country**

Supplier country	Number of high-risk suppliers	% of total suppliers
China	19	0.5%
India	13	0.3%
Sri Lanka	13	0.3%
Pakistan	4	0.1%
Thailand	3	0.1%

The industries and countries identified as higher risk continue to be the subject of Swinburne’s detailed analysis that is conducted during strategic procurement tenders and specific category reviews. Many of the spend areas require an analysis of level 2 and beyond suppliers

within complex global supply chains. Strategic procurement projects delivered across Swinburne in 2021 considered and addressed inherent modern slavery risks for the spend area and/or country. While we continue to understand and address risk across our operations,

investments and research activities, our supply chain continued to be the primary focus in this reporting period, given this is where risks of Swinburne’s activities being linked to modern slavery are more prevalent.

## Our actions to assess and address risks of modern slavery

Swinburne recognises its responsibility to act to prevent, mitigate and, where appropriate, remedy modern slavery in our operations. We also accept our obligation to work collaboratively with our direct and indirect suppliers to address the risks or occurrence of modern slavery across our supply chain. In 2021, we undertook several actions and contributed significantly to the Australian Universities Procurement Network (AUPN) Modern Slavery Program’s sector response.

### **Swinburne’s procurement policy and framework**

At Swinburne we take a wholistic view of value for money in our strategic procurement of goods and services. This means that we balance our decisions across a wide variety of criteria, including environmental and social factors, as well as more traditional criteria of quality, timeliness and cost. We avoid setting unrealistic delivery timeframes and we do not drive for lowest prices, understanding the risks that this can present to labour exploitation (including modern slavery) and other negative impacts.

In 2021 Swinburne launched a new procurement framework with a strong focus on sustainability and positive social outcomes, including modern slavery. The framework consists of policy, procedure, guidance materials, templates, and tools that strive to deliver a balance of commercial and social value through any procurement that the university undertakes. The new framework rollout was supported by communications and training. The training, attended by over 350 Swinburne staff, included an overview of modern slavery, where risks might exist across Swinburne’s operations and

supply chain, and how to address or mitigate risks.

The new procurement framework firmly embeds due diligence measures across the university procurement processes to understand the risk of modern slavery across new engagements and our existing supply base. Project planning, evaluation and decision-making stages of strategic and tactical procurement projects include a focus on modern slavery. A modern slavery risk questionnaire is included in procurement (tendering) projects where the risk of modern slavery exists.

### **Swinburne’s contract terms**

As a key control, Swinburne has updated our standard contract templates with clauses addressing modern slavery risk. Based on the contract clause bank developed by the AUPN Modern Slavery Program, these terms and conditions outline the supplier’s obligation to investigate modern slavery in its operations and supply chains, assess and address risks, take meaningful actions including due diligence and remediation, and have necessary processes and systems in place. They also include an obligation for suppliers to include similar clauses in their contracts with suppliers, supporting our intent to create positive impact through the end-to-end supply chain beyond our direct suppliers. These new clauses are being embedded in new supply arrangements and in existing supplier contracts as they are renewed.

### **Supplier due diligence**

To mitigate the risk of modern slavery in key service contracts, the following is undertaken by the procurement team:

- tender evaluation requiring suppliers to demonstrate policies, processes, and/or systems to reduce the risk of modern slavery and actions to mitigate or address modern slavery risks,
- periodic assessment of wages paid at market rates, including auditing of employee payslips, and
- executing contracts with obligations specific to reducing labour exploitation and modern slavery.

During 2021, recognising where risks might be highest across Swinburne’s supply chain, deeper modern slavery reviews were undertaken across solar panels, merchandising, some IT equipment, and cleaning. The latter review included a wage audit of a selection of payslips from employees servicing Swinburne’s cleaning contract using a third-party payroll specialist. The review identified a small number of recommendations which are currently being worked through in collaboration with the cleaning supplier. Swinburne will also be undertaking a survey directly with employees of the cleaning supplier to further validate appropriate labour practices. A full summary of this outcome will be outlined in the 2022 statement.

Swinburne is currently a participating university in the Cleaning Accountability Framework’s (CAF) university program (see further details below).

The university’s investment in FRDM will enable greater supply chain visibility, support improved due diligence actions, and provide additional indicators to measure effectiveness from 2022 onwards.

## Raising Swinburne's awareness and understanding of modern slavery

As an educational institution, Swinburne recognises the importance of raising awareness and educating our students and staff on the critical human rights issue of modern slavery.

Throughout 2021, we continued to deliver presentations to senior stakeholders, staff and students on modern slavery. These provided information on the issue of modern slavery and its prevalence, the actions being undertaken by Swinburne to assess and address the risks, and, importantly, what individuals can do in both their personal and work life

to help. More than 350 staff also received training on modern slavery through the rollout of the new procurement framework.

Representatives across Procurement, Legal, Risk and Governance, Research and other operational teams have been engaged on this issue to mobilise cross-university collaboration.

## Collaboration as a university sector

The Australian University Procurement Network (AUPN), the peak body for strategic procurement across the higher education sector in Australia and New Zealand, is taking an active approach to addressing this critical human rights issue. Recognising the opportunity for universities to work together to leverage buying power and resources, a modern slavery working group was established in August 2019 to drive a sector-wide approach. The vision is to enable coordinated effort in identifying risks and the occurrence of modern slavery across the sector's supply chains and to collaborate with our suppliers on remediation and mitigation. The program aims to improve human rights transparency across the sector's supply chains and reduce the inefficiency of individual universities taking similar actions across the same suppliers.

Swinburne's Director of Sustainability and Procurement is co-chair of this program. Working group members contribute their time and effort on a voluntary basis, with each AUPN member university contributing towards the program through a portion of membership fees. This funding goes towards engagement of specialised subject matter expertise, as well as execution of specific programs. It is envisaged that both the AUPN members and their suppliers will benefit from the improved operational efficiencies of the collaboration and gain improved effectiveness in mitigating risk and improving social performance in supply chains.

The program delivered several key initiatives in 2021.

### Academic Advisory Board

An Academic Advisory Board was established in July 2020 and in 2021 this consisted of nine academics from six universities with experience and expertise in modern slavery, aiming to enrich the sector approach. Meetings were held across 2021 and topics of discussion included 2021 program priorities, risk assessment tool selection and implementation, university modern slavery statements review, and the sector's approach to grievance mechanisms and

remediation. Key insights gathered from the sessions were applied into the AUPN's program approach and guidance materials for universities.

### Supply chain and modern slavery risk tool

Following a detailed procurement process across 2020, FRDM was selected in 2021 as the sector's modern slavery risk and supply chain transparency tool. FRDM is a supply chain solution that algorithmically identifies modern slavery risks throughout a company's supply chain, enabling informed decisions and action to address modern slavery risk. Thirty-four Australian and New Zealand universities, including Swinburne, signed on to implement FRDM, with 2021 focused on system implementation activities of data cleansing, configuration and provisioning, testing, training, and communications. The FRDM tool was launched in February 2022 and more than 200 university staff across the sector, including representatives from the university have undertaken training in the new tool.

FRDM will give universities the ability to view potential risks of modern slavery beyond tier 1 (direct) suppliers, get notified of any media alerts relevant to their supply chain, manage and score supplier responses to the FRDM modern slavery risk questionnaire, and assist in the preparation of annual modern slavery statements. From the sector point of view, the tool will enable coordinated action on supplier questionnaires and deeper dives into industries presenting a higher risk of modern slavery. A new University Modern Slavery Forum is being established to focus on the prioritisation and leading of actions enabled by the visibility offered through FRDM. The AUPN expects to lead on some critical sector-wide issues, and support universities to act individually or with other universities.

The aggregated data in the tool reflects the large breadth and scale of our combined supply chains across the sector and the crossover of suppliers being used by multiple universities. Improvements in the quality of data will continue to be a

focus in 2022 to enrich the insights that are delivered through the tool.

### Cleaning Accountability Framework program support

The objective of the Cleaning Accountability Framework (CAF) is to end labour exploitation and improve work standards through education and advocacy. CAF engaged the AUPN in February 2021 to assist with the rollout of a program to cover contract cleaning & security at university campuses which was the subject of a grant awarded to CAF. The program will include a compliance framework and assessment methodology, procurement tools (e.g., pricing schedule), and guidance information and resources. A pilot will be conducted with approximately three universities during 2023.

In 2021 the AUPN supported CAF through facilitating presentations to the sector, disseminating project information, facilitating an awareness survey of university procurement teams, and generating interest with universities to participate. Currently CAF is working with around ten universities on the program.

### Templates and guidance

Templates and guidance documents have been developed by the program and made available to all AUPN members, including a risk questionnaire, contract clauses, supplier code of conduct guidelines, and modern slavery statement guidelines. In 2021, guidance on effective grievance mechanisms and remediation was developed and distributed to AUPN members. This guidance material aims to provide member universities with information on grievance mechanisms, remediation, and a university's role in preventing and mitigating modern slavery within their supply chains. The use of this guide goes beyond procurement/supply chain considerations to provide guidance on grievance mechanisms and remediation more broadly across a university. As such, the guide recommends AUPN members

engage with other relevant teams within their university who may have responsibility for university grievance or complaints mechanisms.

### Support and guidance from external experts

ArcBlue, procurement consultants with expertise in social and sustainable procurement, have continued to support the AUPN Modern Slavery Program in 2021. ArcBlue coordinated the aggregation and cleansing of spend data from universities and supported the FRDM tool implementation. ArcBlue also manage the online AUPN portal where program content is shared to

member universities. Modern slavery specialists Pillar Two were engaged on an ad hoc basis to provide modern slavery subject matter expertise.

### Engagement and communications

One of the program’s key objectives is to raise awareness, educate and stimulate action across the university sector, external stakeholders and suppliers. Virtual presentations were run across 2021 to update the AUPN community on progress and invite discussion or feedback on key elements of the program. Program progress updates are published monthly via email and on the AUPN community portal.

The program engaged externally during 2021 to seek insights from other sectors and collaboration programs that can enrich the AUPN program. Groups engaged include Fairtrade ANZ, Anti-Slavery Australia, Be Slavery Free, University Western Australia Modern Slavery Research Cluster, London Universities Procurement Consortium (LPUC), and the Properties Council of Australia (PCA).

The program presented to multiple external organisations and groups to raise awareness of the AUPN program. These include the UN Sustainable Development Goal Network Tasmania, The Faculty, CPA South Australia, Red Cross Anti-Trafficking Network, and the Australian Catholic Anti-Slavery Network.

## Measuring our effectiveness

The influence and purpose of a university in society creates an opportunity for Swinburne to take a leadership role, together with the wider university sector, in addressing this issue. Swinburne recognises that our approach to this critical issue will continue to evolve over time and that measuring our effectiveness is essential to prioritise our efforts for the periods ahead.

We will measure our effectiveness through:

- Ongoing contribution into reviews of Swinburne’s risk assessment framework and processes to ensure appropriate and up-to-date consideration of human rights issues across our operations and supply chain,
- Periodic reviews of the risk profile of Swinburne’s existing supplier base with attention to the progress made to reduce supplier risk profiles through action and review (for example, responses to questionnaires), and
- Monitoring of progress against Swinburne modern slavery key performance indicators, including the number of:

#### Key Performance Indicators

Swinburne staff and students made aware of the modern slavery issue through communications and training

Swinburne market reviews (e.g., tenders) that have incorporated an assessment of supplier operations and supply chain modern slavery risks

Swinburne supplier contracts that include modern slavery clauses

High-risk suppliers engaged in response to risk alerts or undertaking proactive reviews.

Year on Year reduction in the proportion of suppliers indicated as being of a higher risk of modern slavery

Completion by suppliers of the FRDM modern slavery risk questionnaire

#### 2021 Progress

More than 350 Swinburne staff completed training on Swinburne’s new procurement framework which includes modern slavery information and guidance

At least 10 strategic procurement tenders run have included a review of supplier modern slavery policies, prevention actions, and labour law compliance

49 new services agreements including modern slavery clauses were agreed and executed

4 deeper modern slavery assessments were conducted across cleaning, merchandise, solar panels, and equipment

\*will be measured from 2022 onwards using FRDM

\*will be measured from 2022 onwards using FRDM

## Priorities for the future

Swinburne recognises that continuous learning and improvement is an important component of any journey to eliminate modern slavery. Priorities for 2022 will include:

- Embedding the use of the FRDM tool within Swinburne’s procurement processes, utilising its’ insights during tenders and highlighting areas for deeper assessment of higher risk spend areas. The FRDM assessments will indicate whether the level of a supplier’s modern slavery risk is acceptable or if further analysis is required, including the use of clarification questions and supplier research,

- Engaging suppliers to secure participation in the rollout of modern slavery questionnaires across selected high risk spend areas,
- Collaboration with the university sector to support key issues or risks that the AUPN Modern Slavery Program acts on,
- Engaging with university Governance and Legal teams to review the appropriateness of Swinburne’s complaints procedures and services to support modern slavery grievances,
- Delivery of presentations, communications, and training sessions to raise awareness and build capacity

across the university around modern slavery, and

- Improving the maturity of Swinburne’s spend data to enrich the risk insights gained through the FRDM tool.

## Consultation with our controlled entities

The activities we have undertaken to date to assess and address the risks in the supply chain of Swinburne covers all controlled entities.

## Further information on the AUPN Program


[www.hes.edu.au/australian-universities-procurement-network](http://www.hes.edu.au/australian-universities-procurement-network)



**Swinburne University of Technology**

 [swinburne.edu.au](http://swinburne.edu.au)

**General Enquiries:**

 +61 3 9214 8000

Hawthorn Campus  
John Street, Hawthorn  
Victoria 3122 Australia



[twitter.com/swinburne](https://twitter.com/swinburne)



[facebook.com/swinburneuniversityoftechnology](https://facebook.com/swinburneuniversityoftechnology)



[youtube.com/user/swinburne](https://youtube.com/user/swinburne)



[instagram.com/swinburne](https://instagram.com/swinburne)



[linkedin.com/school/swinburne-university-of-technology](https://linkedin.com/school/swinburne-university-of-technology)

The information in this report was correct at the time of publishing (June 2022).

ABN: 13 628 586 699  
ISSN: 1477-8242  
CRICOS provider code: 00111D  
RTO 3059  
TEQSA PRV12148 Australian University

