



Australian  
National  
University

# Modern Slavery Statement 2022

## PREAMBLE

This statement is made pursuant to section 13 of the *Modern Slavery Act 2018* and is guided by the mandatory criteria under section 16 of the Act.

This is The Australia National University's (ANU) third Modern Slavery Statement and covers the period 1 January 2022 to 31 December 2022. It reflects our commitment to identifying and addressing modern slavery risks in our operations and supply chains. ANU recognises that modern slavery offends against the most fundamental of human rights. It is never acceptable, in any form.

The University recognises that modern slavery occurs in a variety of forms<sup>1</sup> and that it is a global issue. In 2018, the Global Slavery Index estimated that over 40 million people worldwide existed in conditions that amounted to modern slavery, with over 15,000 of those located in Australia.<sup>2</sup> This statement sets out the commitment of ANU to playing its part in eradicating modern slavery. ANU recognises its responsibility to respect human rights as set out in the UN Guiding Principles on Business and Human Rights.<sup>3</sup>

This commitment relates to the University's role as an employer, an educator, a purchaser of goods and services, including those supplied by sub-contracted labour, an investor and a recipient of philanthropic support.

The modern slavery risks inherent in the operations of ANU are identified in Section 3, below. The role that the University, as an educator, can play in highlighting awareness of modern slavery within its sphere of influence is set out in Section 4.

As a Commonwealth entity for the purposes of section 15 of the Act, the ANU approach (based on advice to ANU from the Commonwealth Treasury), is that the ANU statement is not a stand-alone public statement under the Act, but part of the process undertaken by the Commonwealth towards its composite report under section 15.

---

<sup>1</sup> The *Modern Slavery Act 2018* identifies eight forms of modern slavery. These include forced labour, forced marriage, debt bondage and human trafficking. For more detail see *Global Estimates of Modern Slavery (2017)* ILO Geneva.

<sup>2</sup> <https://www.globallslaveryindex.org/2018/findings/country-studies/australia>

<sup>3</sup> UN A/HRC/17/31

## SECTION 1: THE REPORTING ENTITY (Criterion 1)

The Australian National University was founded by an Act of the Commonwealth Parliament in 1946. It is a body corporate established by the *Australian National University Act 1991* (the ANU Act). ANU is considered a “corporate Commonwealth entity” under the *Public Governance, Performance and Accountability Act 2013*.

ANU is one of the leading research universities in the world, consistently ranked in the world’s top 40 institutions. The core activity of the University is advancing and transmitting knowledge, by undertaking teaching and research of the highest quality. Its functions are set out in more detail in section 5 its governing Act.<sup>4</sup>

At 31 March 2022, the University employed 1,810 academic staff and 2,701 professional staff. The number of enrolled students in the second half of 2022 was 20,107 encompassing domestic and international students studying at undergraduate and postgraduate coursework level and as research students. This figure includes students studying in Australia and those located overseas.

## SECTION 2: STRUCTURE, OPERATIONS and SUPPLY CHAINS (Criterion 2)

### STRUCTURE

Under the ANU Act, the governing authority of the University is its Council, which comprises the Chancellor, the Hon Julie Bishop, members appointed by the Commonwealth Minister for Education and members elected from within the ANU community of staff and students.

The Council oversees the strategic direction of the University and ensures that it has effective governance and responsible financial and risk management of its operations. The Council appoints the Vice-Chancellor, presently Professor Brian Schmidt AC, and, save where prevented by the ANU Act, delegates management of the University to the Vice-Chancellor, as principal academic and Chief Executive Officer of the University.

For the purposes of the *Modern Slavery Act 2018*, the Council is the principal governing body of the University.

The University owns and controls **ANU Enterprise Pty Ltd (ANUE)**, which in addition to providing the services of business development and project management to ANU, holds two controlled entities: Australian Scientific Instruments Pty Ltd and The Social Research Centre Pty Ltd.

ANUE, as a consolidated entity, exists to market the research and skills of ANU and provide data collection, data analysis, business development, research consulting and project management services.

ANUE has a board of directors that comprises Deputy Vice-Chancellors of the University, senior members of ANU staff as well as independent members with appropriate skills and experience in business, governance, contract research, accounting and higher education.

ANU has also established a wholly-owned and controlled entity for the purposes of operating in China: **ANU International Holdings Pty Ltd (ANUIH)**. ANUIH is the 100% owner of

---

<sup>4</sup> <https://www.legislation.gov.au/Details/C2014C00377>

Beijing ANU International Business Consulting Co Ltd, a wholly-owned foreign entity (WFOE) incorporated in China in 2022. Beijing ANU International Business Consulting was established to conduct student support and recruitment activities in China and has two directors drawn from the University's senior staff.

## **OPERATIONS**

The main campus of ANU is in Canberra, ACT. ANU operates from three other sites within the ACT and has two other campus locations in NT and NSW. During the reporting period, in Australia ANU had offices located in Sydney, Melbourne (closed in January 2023) and Perth, whilst outside of Australia offices were located in Beijing and Washington DC. Ninety-Six (96%) of ANU staff are employed within the ACT, and all ANU staff are employed within Australia.

ANU has 15 student residences located on or near its Acton campus in Canberra, not including the new Yukeembruk student accommodation facility, which was completed in December 2022 and officially opened to students in February 2023. These residences operate in a variety of ways. Only one of them is owned and operated by ANU and has been closed for the full reporting period. Two of them are affiliated and owned and staffed independently of ANU. The remaining 12 are all in private sector ownership with a variety of staffing models; in two instances ANU is the staff employer, in five instances Unilodge is the staff employer, whilst the remainder are a hybrid model of both ANU and Unilodge employees, where the Head and Deputy Head of Residence are ANU staff.

With the exception of University House, which was damaged by the severe hail storms in 2020 and is under repair, all residences remained operational during 2022. COVID-safe operations and protocols were enforced for the purposes of ensuring that students remained safe. On average, across the period, occupancy was approximately 83% during 2022.

On its main campus, ANU has a number of commercial tenants that operate retail premises within the Kambri precinct and food outlets across the wider campus. There were 45 retailers operating from the ANU campus during the reporting period.

## **SUPPLY CHAINS**

ANU is a major procurer of a wide range of services, goods and capital works necessary to support the functions of the University. Procurement at ANU is guided by our Procurement Policy and Procurement Procedure.

The University has in excess of 5,600 vendors (excluding staff and students) incorporated both domestically and internationally, however the majority of ANU supplier spend occurs with Australian-based companies. The major exception to this is in relation to IT hardware.



The breakdown of ANU supply chain spend is spread across many areas, but can be summarised into the following broad categories:

**Property & Facilities:**

- Construction
- Cleaning
- Security
- Catering
- Energy

**Business Services:**

- Investment Services
- Marketing and Media
- Travel
- Information Technology Services
- Research & Teaching
- Laboratory and Animal Care Supplies
- Library Supplies

**SECTION 3: RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS & SUPPLY CHAINS (Criterion 3)**

**OPERATIONS**

ANU understands that modern slavery has the potential to occur in its core areas of operation, teaching and research. Some of this risk is inherent in the supply of goods and services and it is reported on in the supply chain section below. However there are a number of risks that fall outside these areas and that are unique to ANU as a leading research-intensive university.

Teaching activities, broadly defined, include the recruitment of students domestically and

internationally. Students can conceivably be at risk during the recruitment process, if they are induced into paying fees to agents to assist them with their application or fees for visa services in excess of the Australian Government imposed fee. Further risks to students can occur around their relationship with fee and stipend sponsors, if they are induced to enter into arrangements that offer very low levels of financial support in exchange for admission sponsorship.

Research and education activities can be supported by financial or in-kind gifts offered to ANU by third parties and, in cases where these are offered to ANU, our actions are guided by the principles and requirements of the Gifts and Fundraising Policy. These resources may potentially have been accumulated as the proceeds of activities that constitute modern slavery.

Many students, both domestic and international, support their university study by obtaining employment. In some instances, degree pathways require a period of employment in a relevant industry. In other instances, work-related learning opportunities are arranged by ANU, as either assessed parts of the degree program or general work experience. In all of these situations there is the potential for students to be vulnerable to very low wage employment and to poor or otherwise exploitative working conditions.

ANU recognises that risks also exist in respect of the conditions of employment offered by its commercial tenants or the external operators of student residences.

ANU holds an investment portfolio. There is a risk that these investments, if not appropriately managed, may support business activities that in varying degrees of directness engage in practices of modern slavery.

## **SUPPLY CHAINS**

The University is aware that its supply chain may potentially indicate instances of modern slavery, particularly with respect to the provision of hardware manufactured offshore in countries with large amounts of low-skilled labour, where modern slavery has been identified as occurring or likely to occur.

The University, through its active participation in the **Australian University Procurement Network (AUPN)** Modern Slavery working group, is aware of key risks in global supply chains, for example, the supply of surgical gloves, building materials and computer chip manufacturing.

ANU also recognises that modern slavery may occur within its domestically based supply chains with the highest risk sectors being information technology, food service provision, cleaning and maintenance, and building construction.

## **SECTION 4: ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS (Criterion 4)**

A culture of continuous improvement underpins our approach to ensuring that ANU understands our modern slavery risks, that key staff are equipped with the training and awareness to effectively identify and respond to modern slavery risks, and that we embed key modern slavery principles into our contracts. Our students are also informed and aware of the grievance and support services that are available to them should they feel they are being exploited.

## OPERATIONS

During the year ANU amended the standard ANU recruitment agent agreement contract to include express provisions on modern slavery.

ANU has a clear policy statement that its international recruitment partners should not charge fees for their services on behalf of ANU. This policy statement includes information for students on how to complain to ANU about the activities of its recruitment partners. ANU reserves the right to terminate the contracts of recruitment partners that breach its operating code.

Student sponsors are also only included on the ANU approved student sponsor list for student admission if the stipend that they offer exceeds the ANU minimum threshold. Students who undertake work-related learning that is supported by ANU, either as a required part of their degree program or as work experience, do so within the academic governance framework. Employers are vetted for their suitability and made aware of the conditions of employment for students required by ANU.

Commercial tenancies on the ANU campus fall within the remit of the Deputy Vice-Chancellor (International & Corporate) via the Facilities & Services Division (Corporate). Extensive due diligence is conducted on potential commercial tenants prior to acceptance by the Commercial Services team. The Commercial Services team also monitors adherence to the terms of the lease for incumbent tenants, working with ANU Legal as required. Unacceptable employment practices such as offering working conditions that amount to modern slavery would result in the University reporting the matter to the Fair Work Commission.

Where student residences are operated by third parties, ANU expects working conditions for employees, sub-contracted staff and independent contractors to be of a legally and ethically acceptable standard. If this were found not to be the case, ANU would take a risk-based approach in seeking a remedy, terminating the commercial arrangement if that was the only option that presented itself after discussion.

ANU Advancement Portfolio is responsible for soliciting and stewarding financial and other gifts made to the University. It determines the source of gifts that may be sensitive or precedent setting and their appropriateness for ANU. This judgement includes considering risks of connection to modern slavery.

The ANU Council determines the investment strategy for the University portfolio. In July 2013 ANU adopted a Socially Responsible Investment (SRI) Policy. Council approved the 2022 SRI Policy Report in March 2023. The SRI Policy restricts within the investment portfolio the percentage of revenue that can be derived from coal, gambling, pornography and tobacco. Further, the Policy states that the University will aim to avoid investment opportunities that can be considered likely to cause substantial social injury.

ANU has a requirement that all asset managers must undertake due diligence on companies they invest in on behalf of the University. During the reporting period, the Investment Office reviewed the most recent modern slavery reports from the external asset managers. With the exception of 0.10% of the Long Term Investment Pool (LTIP) investments, a residual Private Equity investment that is set to mature and not be replaced, all managers submitted documentation of their compliance with the *Modern Slavery Act 2018*. The 0.10% Private Equity investment was made prior to the adoption of the *Modern Slavery Act 2018*.

## **SUPPLY CHAINS**

Throughout this reporting period the University Procurement and Contracts Office (UPCO), which is responsible for supply chain due diligence, progressed many initiatives to address supply chain risks.

### **Standard contracting provisions**

All ANU legal precedents now contain appropriate and up-to-date modern slavery provisions. During 2022 the University released new online guides for both Procurement and Contract Management. These guides have detailed instructions for using the most up-to-date templates and contract precedents to ensure all new ANU agreements contain appropriate modern slavery provisions and protections.

Additionally, when enacting extensions of existing agreements, contracts are reviewed and modern slavery clauses are added where not previously included.

### **Modern Slavery Awareness Training**

In early 2022, UPCO rolled out Modern Slavery Awareness Training within the dedicated procurement units across ANU. These dedicated procurement areas are Information Technology Services, Facilities & Services, and Finance & Business Services. Onboarding for new procurement and contract hires within these dedicated procurement areas now includes the requirement to complete modern slavery training within the first three months of being hired. After completion a one-on-one session is scheduled to discuss the course with our Performance and Governance Manager. This meeting is used to ensure each participant has attained an understanding of the content, to clarify any questions, and to discuss the implications of modern slavery on the ANU community particularly in relation to the procurements or contracts they manage.

After the successful roll-out of Modern Slavery Training to our Procurement and Contract teams, UPCO introduced this training to the wider ANU purchasing community at our monthly Procurement Community of Interest meetings.

### **Australian Universities Procurement Network (AUPN) Modern Slavery Program**

ANU is a member of the Australian Universities Procurement Network (AUPN), which represent the Australian and New Zealand higher education sector, and have had an academic staff member on the AUPN Advisory Board since its formation.

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* reporting requirements. By working together, we hope to minimise the duplication of activities and associated costs across individual universities, including risk assessment, implementation of systems and remediation. We also hope that leveraging 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.



ANU participates in the AUPN Modern Slavery Program through a series of meetings:

- Monthly Modern Slavery Forum
- Monthly Modern Slavery Working Group.

### **FRDM – supply chain technology**

FRDM is a supply chain technology company that will algorithmically identify modern slavery risks throughout universities' supply chains, enabling each university (or the sector collectively) to make informed decisions and take action to address modern slavery risk.

After the implementation of the FRDM tool during 2021, 2022 was the first year ANU was able to proactively monitor risks and alerts at a supplier, product, industry and country level. To support FRDM, UPCO created an internal process to ensure all relevant FRDM risk alerts were reviewed regularly in conjunction with the Chief Procurement Officer. This involved active monitoring and liaison with relevant stakeholders and taking a risk-based approach to determine the appropriate course of action.

Having access and visibility via FRDM ensures UPCO makes informed decisions and takes action to address modern slavery risk in a timely manner. ANU received country and industry level risk alerts in 2022 and these were quickly investigated and managed.

In 2022 ANU received zero supplier level alerts.

### **SECTION 5: ASSESSMENT OF THE EFFECTIVENESS OF ACTIONS (Criterion 5)**

ANU continued to implement and embed a number of enabling processes and activities to play our part in eradicating modern slavery in the community during 2022. As part of this approach we continued to leverage and learn from our own internal expert group as well as from our relationship with the AUPN and its member network. We will continue to monitor and oversee the effectiveness of these actions through our internal governance and oversight mechanisms.

### **SECTION 6: CONSULTATION (Criterion 6)**

During the reporting period, ANU consulted with its controlled entities to raise awareness and gain an understanding of their approach to addressing modern slavery risks.

ANUE, as the consolidated (parent) entity, has overarching governance, performance and reporting responsibility of each of its subsidiaries as part of its obligations (through a stand-alone board, constitution and charter) to ANU. Notwithstanding this, each company (including subsidiaries) has its own respective board and constitution ensuring statutory obligations and duties are complied with. ANUE participates in the UPCO Community of Interest meetings to remain informed and up to date in relation to policies and procedures regarding procurement and modern slavery risk.

## SECTION 7: OTHER INFORMATION (Criterion 7)

Refer to Sections 1 and 2.

### COMPLIANCE

The table below identifies where in this statement each of the mandatory requirements prescribed by section 16 (1) of the *Modern Slavery Act 2018* has been addressed.

<b>MODERN SLAVERY ACT: Section 16 (1) CRITERION</b>	<b>REFERENCE IN THIS STATEMENT</b>
(a) Identify the reporting entity	Section 2
(b) Describe the reporting entity's structure, operations and supply chains	Section 3
(c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 4
(d) Describe the actions taken by the reporting entity and any entity it owns or controls to assess and address those risks, including due diligence and remediation processes	Section 5
(e) Describe how the reporting entity assesses the effectiveness of these actions	Section 6
(f) Describe the process of consultation with (i) any entities that the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement	Section 7
(g) Any other relevant information	Sections 1 and 2

### APPROVAL

This report was reviewed and endorsed by the Senior Management Group, the Audit & Risk Management Committee, and the Finance Committee before being approved on 2 June 2023 by the University Council, ahead of the 30 June 2023 deadline.



The Hon Julie Bishop

Chancellor

2 June 2023