

**MODERN
SLAVERY
STATEMENT**
2020





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1. Introduction

La Trobe University (“the University”), is committed to protecting and respecting human rights, and has a zero-tolerance approach to slavery and human trafficking in all its forms.

This statement, pursuant to Part 2 of the *Modern Slavery Act 2018* sets out the steps the University has taken and will take across our research, teaching and operational activities to address modern slavery.

This is the University’s first annual report on modern slavery, for the reporting period of 1 January to 31 December 2020.



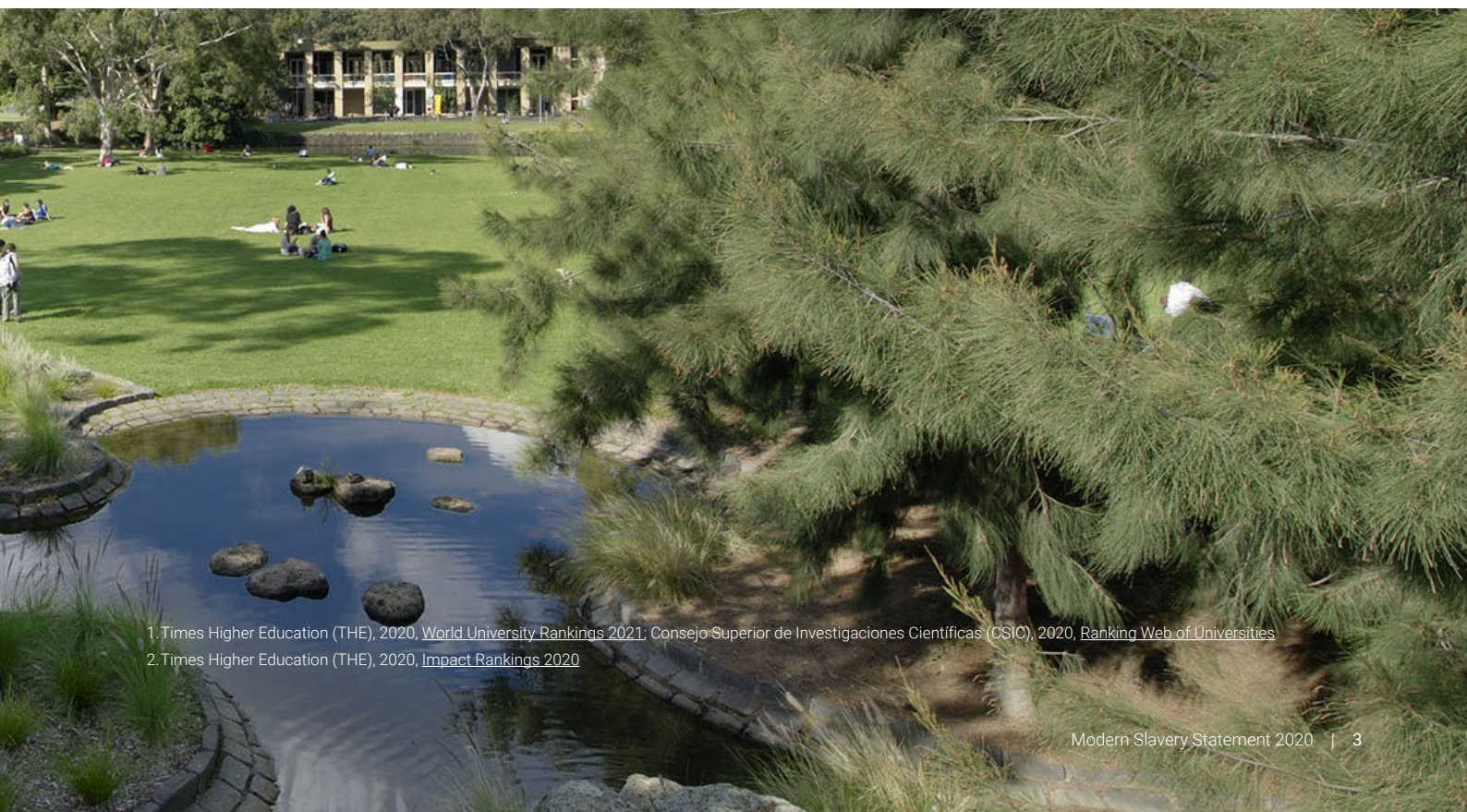
2. About La Trobe University

La Trobe University (the University), founded in 1964, was created to broaden participation in higher education among communities in Melbourne's north and Victoria's regional areas. Since then, the University has grown to rank in the top 1 per cent of universities worldwide¹, while maintaining its mission to be one of Australia's most accessible.

As the University evolved, this overarching mission has complimented the pursuit of world-class research, with the aim of making a difference to some of the world's most pressing problems. La Trobe is one of Australia's most successful universities in pursuing these multiple missions and in 2020 was ranked fourth in the world for commitment to the United Nation's Sustainable Development Goals.² In short, La Trobe is a place where social inclusion and globally recognised excellence come together for the benefit of students and communities.

La Trobe's academics and researchers achieve national and international recognition. The University's public intellectuals demonstrate an enduring social conscience and influence, while La Trobe alumni achieve extraordinary success and impact in government, industry and not-for-profit organisations.

The University has campuses in Melbourne (Bundoora and CBD), Bendigo, Albury-Wodonga, Mildura, Shepparton and Sydney.



1. Times Higher Education (THE), 2020, [World University Rankings 2021](#); Consejo Superior de Investigaciones Científicas (CSIC), 2020, [Ranking Web of Universities](#)

2. Times Higher Education (THE), 2020, [Impact Rankings 2020](#)

3. The University's structure, operations and supply chains

3.1 Structure

The University is a statutory body corporate constituted in accordance with the *La Trobe University Act 2009 (Vic)*.

The University's governing body, the Council, has the general direction and superintendence of the University and may exercise all the powers, functions and duties of the University. The Senior Executive Group is the University's principal management committee and provides advice to the Vice-Chancellor on matters relating to strategy, planning, resourcing and operations.

The University is divided into two colleges: Science Health and Engineering; and Arts, Social Sciences and Commerce.

Unitemps La Trobe Ltd

The University owns and controls Unitemps La Trobe Ltd (ABN 78 618 827 615). Unitemps La Trobe Ltd is a public company limited by guarantee and is a wholly owned subsidiary of the University. It was incorporated in Australia on 1 May 2017 for the purpose of building an in-house recruitment firm that offers students a wide variety of paid work opportunities and work experience across the University's campuses.

Unitemps La Trobe Ltd's consolidated revenue was \$820,506 for the reporting period 1 January 2020 to 31 December 2020. As the 2020 consolidated revenue is under the \$100 million threshold of the Modern Slavery Act, Unitemps La Trobe Ltd is not a reporting entity.

The University resolved on 30 September 2020 to no longer use the services of Unitemps La Trobe Ltd.

Students that had previously been engaged through Unitemps are now hired through one of the University's contracted recruitment agencies.

LTU Services Ltd

La Trobe University owns LTU Services Ltd (ABN 62 642 748 463). LTU Services Ltd is a company that was established in late 2020 for education services. The entity has not operated and has no assets nor revenue for the purposes of reporting in this statement.

Limos Therapeutics Pty Ltd

Limos Therapeutics Pty Ltd (ABN 11 629 356 083) is a 100% fully owned entity registered by La Trobe University in October 2018. Limos was established for the purposes of intellectual property, however it did not proceed and the entity was voluntarily deregistered in September 2020. No transactions occurred during the time the company was active.

3.2 Operations

The University's core activities are teaching and research.

It aims to support our community's:

- economic prosperity
- health and wellbeing
- progress towards gender equality
- recognition and acceptance of different cultures, and
- environmental sustainability.

The University operates independently within Australia and has campuses in Melbourne's CBD, Bundoora, Bendigo, Shepparton, Albury-Wodonga, Mildura and Sydney. The Sydney campus is outsourced to Navitas Ltd, who provide vocational and language pathway programs for the University, as well as undergraduate and postgraduate degrees.

In 2020, the University taught approximately 38,000 students and employed approximately 2,800 staff, with a consolidated revenue of \$786,184,000.

All University employees are subject to the La Trobe University Collective Agreement 2018 which sets out:

- core terms
- employment under the agreement
- leave entitlements
- academic staff standards, workloads, promotion, quality assurance, overseas teaching, outside studies program/ industry placements, and coordination responsibility payments, and
- professional staff classifications, hours of work, overtime, higher duties allowances and workloads.

As a result of the COVID-19 pandemic, the University suffered a significant financial detriment. Working with the National Tertiary Education Union, the University established the National Jobs Protection Framework to protect employee job losses. The University also worked closely with key suppliers to ensure continuity of supplies throughout the pandemic.

3.3 Supply chains

The University has a large supplier footprint, with more than 4,500 vendors.

It procures a diverse range of first-tier goods and services, including (but not limited to):

- technology (information services)
- telecommunications
- infrastructure and facilities management
- security
- cleaning
- construction
- marketing and media
- energy
- human resources and labour hire
- finance operations
- fundraising and investment
- library services
- travel services
- laboratory supplies
- catering
- printing.

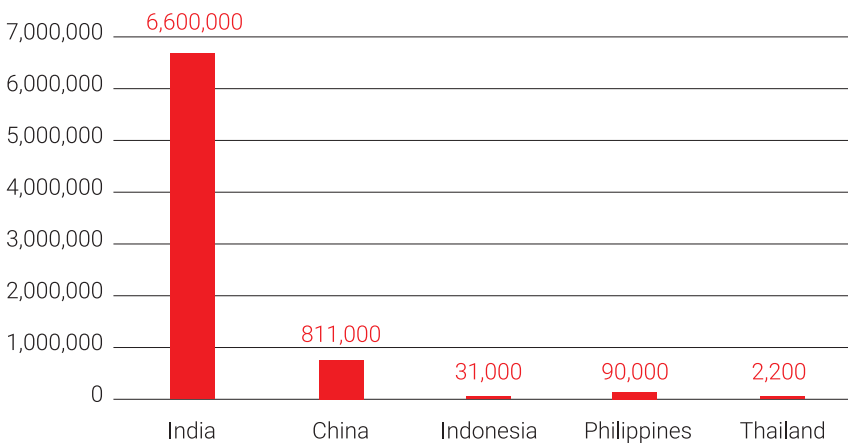
The predominant sources of these first-tier goods and services are from Australian-based companies, and contributors to these first-tier supply chains are also mostly Australian-based companies.

Higher Ed Services, a non-for-profit company owned by Universities Australia, has established an Australian University Procurement Network (AUPN) to significantly improve strategic procurement practices in Australian universities. The AUPN uses a collaborative approach and focuses on sharing expertise and business intelligence, including how to manage the risks of modern slavery within universities' operations and supply chains.

La Trobe University used the AUPN Modern Slavery Risk Tool which was developed using spend data from 28 Australian Universities to identify common suppliers and risk levels based on category type and country risk. The AUPN category taxonomy³ has been used to categorise merchants within the Modern Slavery Risk Tool using the ABN as the merchant identifier.

- In 2020, the University had 713 high-risk suppliers⁴ across various categories, including desktop hardware, laboratory supplies, cleaning, research equipment and expenses, catering, animal research supplies, printing, events, office supplies, AV hardware and labour hire.
- In 2020, the University spent a total \$49M with high-risk suppliers, from which \$9.7M was with suppliers from high-risk countries. The majority of the spend on first-tier suppliers in high-risk countries included professional and consulting fees with our education agents and partners, and also included promotional activities.

High risk country spend



3. The AUPN category Taxonomy is a collaborative initiative of AUPN to support additional benchmarking across the University sector

4. Risk Ratings used in the Modern Slavery Discovery Tool are sourced from the modern slavery index: <https://www.globalslaveryindex.org>

4. The risks of modern slavery practices in the University's operations and supply chains

The University uses several tools to identify risk areas in supply chains and assess processes. These include the *Global Slavery Index*, the *OECD Due Diligence Guidance for Responsible Business Conduct* and the *AUPN Modern Slavery Risk Tool*.

The University recognises there may be some goods and services purchased from suppliers and supply chains that fall into any of the top five imported products at risk of modern slavery (electronics, garments, fish, rice and cocoa). Modern slavery could potentially exist in the operations and supply chains of many suppliers (and in their supply chains) that the University conducts business with throughout the world.

The University has policies and processes in place requiring staff and suppliers to purchase through socially responsible suppliers. The University chooses to partner with socially responsible suppliers that comply with and appropriately address Social Procurement Principles within their supply chains to identify and minimise modern slavery practices.

When tendering for new suppliers, the University has robust tender documentation that enquires about the potential supplier's modern slavery governance procedures. This helps us to assess and understand the potential risks of modern slavery in prospective suppliers' supply chains. Levels of risk are assessed depending on the industry type, where products are manufactured and whether modern slavery could potentially exist in the supplier's supply chains.

The University and our suppliers source goods from all around the world including high risk countries. The University relies on suppliers' due diligence processes and quality standards when purchasing and sourcing goods and materials. There is a risk of modern slavery practices occurring in all supply chains where goods and services are produced by overseas suppliers, particularly those countries with low skill labour.

University staff travel all over the world. And, while we recognise that modern slavery is hard to detect, the hotels they stay at or local businesses they visit or purchase from may also be at risk of modern slavery practices, especially in high-risk countries.

5. Addressing modern slavery

5.1 Completed actions

The University has strengthened its approach to preventing modern slavery, protecting human rights and contributing to responsible business through the following initiatives:

- The University established the University Modern Slavery Working Group. This working group reports directly to the Senior Executive Group on how the University is implementing the Modern Slavery Act.
- The University is a member of the Australian Universities Procurement Network (AUPN), which is a collaborative network of 39 institution members across the university sector. These members contribute to the AUPN network and benefit from the work carried out by the AUPN Modern Slavery Working Group, which includes the development of risk assessment tools, templates and educational resources for suppliers. The AUPN have engaged with the Cleaning Accountability Framework (CAF) to understand their certification scheme for the cleaning industry and consider future collaboration. CAF's mission is to improve labour practices in the cleaning industry.
- In 2008, the University, through its La Trobe Business School, became a signatory to the United Nations Principles for Responsible Management

Education (PRME). The La Trobe Business School engages with and supports local businesses and peer institutions. It also plays a visible role in PRME Chapters, PRME Regional Meetings and with Global Compact Local Networks.

- The University developed a "Modern Slavery Fact Sheet" to educate all new vendors on modern slavery and the legislative requirement of the University to report on risks of modern slavery in operations and supply chains.
- The University added modern slavery induction requirements and educational resources to the University's Contractor Management System (RAPID). This included refresher training and regular supplier information updates via toolbox meetings.
- The University updated its Procurement Request for Tender questionnaire and onboarding process, so suppliers must provide: details of their modern slavery practices and policies; proof of ethical manufacturing; and details of their suppliers.
- The University updated its contracts and leases to include the Modern Slavery Act obligations it places on its suppliers. This includes undertaking reasonable steps to: ensure modern slavery does not exist in their business or supply chains; communicate incidents of modern slavery to the University; and provide the University with the ability to terminate contracts or leases where these clauses are breached.

- The University introduced a Supplier Relationship Management Framework. Under this framework, contract owners are expected to hold regular monthly engagements, quarterly business reviews and an annual performance review with their key contracted suppliers. These meetings provide the perfect platform to enquire: whether suppliers are using new subcontractors; whether 2nd- and 3rd-tier suppliers have changed; and if the supplier is implementing strategies to raise awareness of and identify any modern slavery in their supply chains.
- The University identified and focused on 3 high risk operations of the sector where the University has high spend:
 - Construction and maintenance services
 - Security Services; and
 - Cleaning Services.

The review focused on the tender processes, risk and probity assessments, international interference due diligence checks, identifying risk of modern slavery practices in their supply chains and reviewing ethical purchasing/modern slavery policies provided.

5. Addressing modern slavery (continued)

The University has policies, procedures and guidelines supporting our action on modern slavery and these are available to all staff and to external suppliers on our staff and public facing websites. They include:

- **Procurement Policy and Procurement Guidelines.** The Procurement Policy and Guidelines set out our principles and processes for the acquisition of goods and services and outlines our social procurement approach. Modern slavery principles have been incorporated into this policy and guidelines.
- **Visa Sponsorship Policy.** This policy sets out the responsibilities of both the University and its migration agents. Casual staff, part-time staff and contractors are hired through vetted recruitment agencies that meet our selection criteria, policies and standards.
- **Recruitment Policy.** This policy sets out the University's overarching principles to guide managers in the recruitment process. The principles include fairness, merit, diversity, equal employment opportunity, the University's Code of Conduct, conflict of interest and privacy.
- **Autonomous Sanctions Policy.** This policy sets out the University's approach and commitment to maintaining compliance with the United Nations Security Council sanctions regimes and autonomous sanctions regime.

- **Protected Disclosure Policy.** This policy informs how the University manages the welfare of persons entitled to be protected under the *Public Interest Disclosures Act 2012* (formerly the *Whistleblowers Protection Act 2001*) and the kinds of disclosures that can be made.
- **Gift Acceptance Policy.** This policy governs the soliciting and acceptance of gifts made to the University. The Alumni and Advancement Office is responsible for determining the source of a gift and its likely impact. They also register the receipt of the gift, acknowledge the donor and manage the ongoing relationship with the donor.
- **Fundraising Policy.** This policy applies to all groups and individuals who fundraise in the name of the University (excluding student fundraising). The Alumni and Advancement Office is responsible for the co-ordination, assignment and management of donations, donors and prospective donors to the University.
- **Donor Rights Policy.** This policy merits the respect and trust of those who contribute to the University.

5.2 Next steps

During 2021, the University Modern Slavery Working Group will conduct a review of a further three selected high-risk categories.

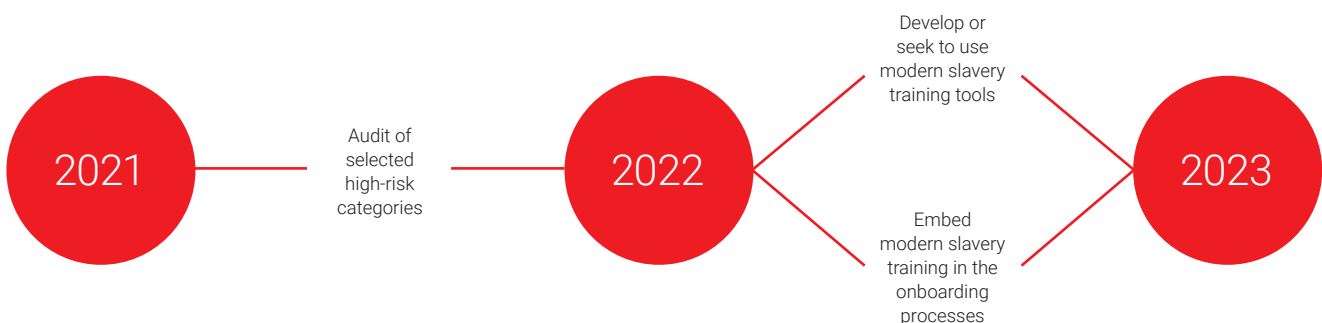
A questionnaire will be sent to the selected high-risk category suppliers and, depending on the awareness level of the selected vendors, meetings or discussions will be arranged to educate and raise their awareness of the Modern Slavery Act and its requirements.

During 2022–23, the University will develop or seek to use modern slavery training tools to train all staff across the University and embed the training in the onboarding processes.

In 2021, the University will develop and publish a public-facing website that lists the University's commitments to the United Nations Global Compact. The expectation is that University suppliers must comply with social, environmental and ethical standards within their own businesses and in their supply chains. The website will also host the University's annual modern slavery statement.

COVID-19

The pandemic has compounded uncertainty within supply chains and created further risks of exposure to modern slavery, bribery, corruption, money-laundering and other financial crime. In 2020, the University worked with key suppliers to renegotiate contracts where required and continue to work on educating suppliers on how to ensure their supply chains continue to represent minimal discernible risks of modern slavery.



6. How the University assesses the effectiveness of its actions

Due diligence is an ongoing process for all areas of University business. While every staff member is responsible for managing risks, each business unit is responsible for due diligence in their own unit's processes. The University's Procurement, Finance, Risk Management, Research, and Infrastructure and Operations teams have due diligence processes in place and carry out regular reviews on their processes.

The Finance team engage external auditors to conduct annual audits of finance processes and also to carry out internal audits. The University may engage KPMG as a part of the current internal audit program to undertake internal audits in areas of high-risk or concern. The Infrastructure and Operations team audit compliance of contractors. The Procurement team carry out due diligence through the tender process, onboarding of new suppliers and the Relationship Supplier Management Framework.

Financial investments

The University employs an external financial management fund that provides a transparent means of accessing an environmental, social and governance (ESG) enhanced portfolio of Australian shares. The share portfolio is weighted to companies that demonstrate positive ESG characteristics after negatively screening for companies with core business in tobacco, alcohol, gambling, pornography, controversial and non-controversial weapons, and coal mining.

Onboarding infrastructure and operations contractors

The University uses a contractor management system (Rapid) to register and induct all new contractors commencing work with the University. New contractors are required to provide all compliance documentation and complete a preferred supplier questionnaire. The University reviews the registration information and either approves the contractor or may request further information to demonstrate the contractor's compliance. The quality management process requires companies to re-register every five years and re-do their inductions every two years.



7. The process of consultation with University entities

The Directors of Unitemps La Trobe Ltd are employees of the University and are therefore subject to all La Trobe University policies.

The Working Group consulted with the Company Secretary and were advised that on 30 September 2020, the University resolved to no longer use the services of Unitemps La Trobe Ltd. Students that had previously been engaged through Unitemps La Trobe Ltd are now hired through one of the University's contracted external recruitment agencies.

The Working Group also consulted with a director and company Secretary of LTU Services Ltd and Limos Therapeutics Pty Ltd regarding the structure and status of these two entities. LTU Services Ltd has no revenue in 2020 and Limos Therapeutics Pty Ltd is not required to report under the Modern Slavery Act as it had a consolidated revenue of less than \$100M.



8. Other relevant information

Biosciences Research Centre

Biosciences Research Centre (BRC) is a joint operation with the State of Victoria which constructed and now manages and operates a biosciences research centre on the University's Bundoora campus. The centre is run in partnership with the Department of Economic Development, Jobs, Transport and Resources (DEDJTR), which was formerly known as the Department of Environment and Primary Industries (DEPI).

The BRC is:

- jointly owned by La Trobe University and DEDJTR based on 25 per cent and 75 per cent ownership interest respectively
- used by both parties to undertake joint collaborative research projects, as well as their own projects
- jointly controlled through equal voting rights and equal consent of key decisions.

La Trobe University leases the land on which the building is located to BRC Co., an incorporated joint venture company to act on behalf of the joint operations. The lease is for 25 years (2012–2037) at a nominal sum of \$1 per annum. BRC engaged an independent firm, Plenary Research Pty Ltd, to construct, operate and maintain the BRC for 25 years.

The agreement set out the University's minimum required payments, which would contribute \$50m (net present value to 10 October 2007) to DEDJTR over the 25-year project agreement (which represented the University's 25 per cent share of the cost to design, construct and operate AgriBio for 25 years). The University accounted for its 25 per cent ownership interest in the building as a leased asset at amortised cost. Amortisation is charged on a straight-line basis over the expected lease term of 25 years (incorporating the residual value of the building after the expiration of 25 years). The University's 25 per cent share of the lease obligation is accounted for as a lease liability.

The Victorian Government announced machinery of Government changes effective 1 January 2019, which meant that the current Department of Economic Development, Jobs, Transport and Resources (DEDJTR) will transition into two new departments – the Department of Jobs, Precincts and Regions (DJPR) and the Department of Transport (DoT). The University makes capital and operating contributions to the state through DJPR. The capital contributions are used to make repayments on the lease. The operating contributions relate to the University's share of the operating costs of the BRC facility.



9. Approval

This Statement was approved by the University Council on 3 May 2021 [Council Ref no. 504].

A handwritten signature in black ink, appearing to read 'John Dewar', written in a cursive style.

Professor John Dewar AO
Vice-Chancellor and President
La Trobe University

Dated: 11 May 2021



Acknowledgement of Country

La Trobe University acknowledges that our campuses are located on the lands of many traditional custodians in Victoria. We recognise their ongoing connection to the land and value their unique contribution to the University and wider Australian society.

We are committed to providing opportunities for Indigenous Australians, both as individuals and communities through teaching and learning, research and community partnerships across all of our campuses.

La Trobe University pays our respect to Indigenous Elders, past, present and emerging and will continue to incorporate Indigenous knowledge systems and protocols as part of our ongoing strategic and operational business.

Contact

La Trobe University
Victoria 3086 Australia

General enquiries

T +61 3 9479 1111

F +61 3 9478 5814