

# University of Wollongong

## Modern Slavery Statement 2020

Please note, this is a text only version of the University of Wollongong's Modern Slavery Statement for 2020, prepared to ensure it is accessible to low vision or non-sighted readers. You may also wish to access a version with graphic elements, available on the University of Wollongong website: [www.uow.edu.au](http://www.uow.edu.au).

### 1. Introduction

This Modern Slavery Statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth) (MSA). The University of Wollongong (UOW) recognises that safeguarding human rights across all our business operations and supply chains is of great importance. The intention of this Statement is to set out the steps that the University and its subsidiary reporting entities have taken to reduce the risks of modern slavery, during the reporting period of 1 January 2020 to 31 December 2020.

This is a joint statement which covers the University of Wollongong ("University or UOW") (ABN 61 060 567 686); and UOWGE Ltd trading as UOW Global Enterprises ("UOWGE") (ACN 628 635 067), UOW's subsidiary reporting entity.

This Statement includes information about UOW Pulse Ltd ("UOW Pulse") (ABN 28 915 832 337), UOW's subsidiary. UOWGE and UOW Pulse together form UOW's two primary controlled entities.

We have chosen to jointly report as a group, due to a high degree of interconnectedness between our key entities in their supply arrangements and operations. We will be working together as one to undertake consistent actions across our group.

We are fully committed to upholding anti-slavery principles across the operations and supply chains of our entire group, and we have adopted the following position statement in relation to taking action against modern slavery:

"The University of Wollongong is committed to combatting modern slavery practices in our supply chains and our business operations, and promoting practices to identify and reduce the risk of such practices when working within our local and international communities."

During 2020, COVID-19 created sudden and drastic disruptions within Australia's economy, workplaces and education sectors. There have been very significant impacts on the University and the higher education sector in general, in particular in relation to resourcing and business disruption. It has been an immensely challenging year for the University and its entities, and the activities reflected in this first Modern Slavery Statement have been completed within the context of this constrained environment.

### 2. Who we are

The University of Wollongong was established in 1975, on the donations of local people with a vision of a brighter future for our region. Since then, we've become one of the world's best modern universities, working with industry, research partners, governments, and communities, to address society's critical economic, environmental, social and medical challenges.

## **Our purpose**

UOW is a leading global university with an outstanding reputation across a broad range of disciplines and research capacities. UOW is comprised of an international network of campuses and regional learning centres. Together with our partners, we make a strong and connected presence in our communities. Our spirit of inquiry drives our research and learning environments and our objective of earning a place in the top 1 per cent of the world's universities.

1 QS World University Rankings 2021

## **Our Operations**

### **Locations**

- 9 Domestic campuses: Wollongong, South Western Sydney, Innovation Campus, Sydney CBD, Shoalhaven, Batemans Bay, Bega, Southern Sydney, Southern Highlands
- 3 International campus locations: Malaysia, Hong Kong, Dubai
- 3 International partnerships: China and Singapore (2)

### **Courses**

- 359 Degrees offered across onshore, offshore and online delivery

### **Students**

- 44,580 Total student enrolments
- 28,419 Total onshore
- 16,161 Total offshore

### **Alumni**

- 160,250 Alumni from 184 different countries
- 156 Countries that are home to our alumni

### **UOW Staff**

- 1,057 Academic Staff FTE
- 1,379 Professional Services Staff FTE
- 2,436 Total FTE

### **UOWGE Staff**

- 1,453 Total FTE

### **UOW Pulse Staff**

- 400 Total FTE

### **Faculties**

- Arts, Social Sciences & Humanities
- Business & Law
- Engineering & Information Sciences
- Science, Medicine & Health

### **Research**

- \$69.8m - Higher Education Research Data Collection (HERDC) income received
- \$37.7m - Research Block Grant allocation
- \$13.1m - In Australian Research Council (ARC) grants
- \$8.1m - In National Health and Medical Research Council (NHMRC) grants
- 31<sup>st</sup> - Research impact ranked 31st in the world by Times Higher Education University Impact Rankings

All of these operations deliver high quality education to over 44,000 students, supported by over 3,000 staff onshore, and over 1,200 staff offshore. Our academic staff engage in both teaching and research, and we have more than 270 academic and research collaborations across the world. Across four faculties, over 350 degrees are offered via onshore, offshore and online delivery. UOW's global reach can be seen through the diversity of its graduates, with 184 different countries represented by over 160,000 alumni.

### **Our Activities**

Philanthropic support plays a vital role in realising UOW's vision and impact. We receive philanthropic income from partnerships with donors across all segments including alumni, community groups, corporate partners, as well as trusts and foundations. UOW holds an investment portfolio which contributes to our revenue and is overseen by the Finance and Resources Committee of University Council. We aim to offer an excellent student experience, with student success, support services, accommodation options, student programs and wellbeing activities to ensure our students achieve their study and career goals.

### **Our Organisational Structure**

The University Council is the governing authority of the University. The Council acts for and on behalf of the University and controls and manages the University's affairs and concerns.

Responsibilities of Council include:

- approving and overseeing progress against the University's Strategic Plan;
- overseeing and monitoring the University's risk management policies, practices and performance (including commercial undertakings and audit processes) and monitoring regulatory compliance; and
- approving and monitoring systems of control and accountability, including the general overview of controlled entities.

Council is supported by a number of committees in fulfilling its responsibilities. Responsibility for overseeing anti-slavery initiatives rests with the Risk, Audit and Compliance Committee.

### **UOW Global Enterprises**

UOWGE is a subsidiary of the University of Wollongong and is aligned to the University's strategic objectives of international student growth. UOWGE is one of Australia's most unique and successful global providers of tertiary education programs encompassing Vocational, Diploma,

Associate Degree, Bachelors, Masters and PhDs delivered from our own campuses located in key international areas. The UOW Global Enterprises Group comprises:

- University of Wollongong in Dubai (UOWD)
- UOW Malaysia KDU University College; UOW Malaysia KDU Penang University College; UOW Malaysia KDU College (UOW Malaysia KDU)
- UOW College Hong Kong (UOWCHK)
- UOW College Australia (UOWCA)

Employing more than 1,400 staff globally, these institutions spread across Wollongong, Sydney, Dubai, Hong Kong, Kuala Lumpur and Penang. UOWGE provides higher education, vocational, English and professional development programs to 18,000 students undertaking one of over 100 courses or programs.

### **UOW College Australia**

UOWCA is one of Australia's leading colleges. Its success lies in the delivery of English language programs, academic pathway programs, higher education diplomas, and vocational education and training, coupled with an unwavering focus on delivering exceptional student experiences and a passion for lifelong learning. Since 1988, UOWCA has helped more than 32,000 students from over 70 nations continue their education, as well as meet their personal goals.

### **UOW College Hong Kong**

In operation for over 35 years, UOWCHK is an independent Post-Secondary College, offering high quality Associate Degrees, Degrees and UOW Top-Up programs. It is highly regarded for its rigour in quality assurance and holistic education, delivering over 30 programs to 6,000 students each year. UOWCHK is building towards becoming a fully-fledged independent University in Hong Kong, with a strong scholarly teaching and research profile.

### **University of Wollongong in Dubai**

UOWD is arguably Australia's most successful offshore higher education institution. First established in 1993, it is a highly reputable university with approximately 3,500 students from over 100 nationalities studying one of 37 accredited language, undergraduate, master or Higher Degree Research/PhD programs on offer. UOWD is continuously reshaping itself to maintain its position as a primary and sustainable contributor to the education of the future leaders of the United Arab Emirates.

### **UOW Malaysia KDU**

In 2019 UOWGE acquired a substantive majority equity interest in the KDU University Colleges, allowing it to combine UOW's internationally recognised teaching programs and personalised approach to students with KDU's modern campuses and market leading programs. UOW Malaysia KDU will introduce new undergraduate and post graduate programs with a clear strategy to achieving full university status, offering locally accredited programs with Australian equivalency.

### **UOW Pulse**

UOW Pulse is UOW's agile campus services subsidiary, geared to provide a vibrant campus experience to complement and support the academic activities of the University, through the provision of products and services that meet the social, cultural, sporting, health and recreational needs of the University community. UOW Pulse's core functions encompass student engagement, sport and recreation, retail, food and beverage, children's services, events and

catering, student clubs and social activities.

UOW Pulse employs approximately 400 staff in Australia.

### **3. Consultation during the reporting period and in preparing this statement**

The complexity of addressing modern slavery requires a coordinated and integrated approach across UOW, UOWGE and UOW Pulse as our primary controlled entities, achieved through strategic engagement and the commitment of our people.

Initiatives to address modern slavery have, during the reporting period, been driven by key internal stakeholders within a core Modern Slavery Working Group (involving Governance and Legal, Business Improvement and Assurance, and Financial Services Division; UOWGE Ltd representatives; UOW Pulse Ltd representatives). Additionally, strategic engagement across our business functions has occurred, including discussions with key staff in research, strategic planning and communications units, and with key governance bodies, including University Council, the Finance and Resources Committee of Council, the Risk, Audit and Compliance Committee of Council and the Vice-Chancellor's Advisory Group. We have also fostered collaborative relationships with external stakeholders, such as BlueScope Australia (a key organisation in the Illawarra region and research collaborator), who have been addressing modern slavery risks for a number of years, providing a wealth of information and lessons learnt to the Working Group. We have also engaged with Unchained Solutions Pty Ltd, a specialised anti-slavery consultancy with significant overseas and lived experience. Our Procurement team has begun engaging with key suppliers on modern slavery risks as supply contracts have come up for renewal.

Consultation with our primary controlled entities (as described in Section 1), has been integrated into our modern slavery response, through the membership of representatives from these entities in the UOW Modern Slavery Working Group, meeting on a bi-monthly basis during the reporting period, and involvement in specific initiatives undertaken as part of our modern slavery response (as described in Section 6). By taking a collaborative approach, and effectively building consultation into all of our key processes and initiatives, our modern slavery response is comprehensive by design and responsive to both the common and divergent challenges faced.

This statement was developed collaboratively by members of the Modern Slavery Working Group, including representatives from UOW's primary controlled entities. It has been reviewed and considered by the University Council and the boards of both UOWGE and UOW Pulse.

### **4. Our supply chains**

We expect suppliers of goods and services to the University to undergo a due diligence process before enabling them to become a key supplier. We aim to engage with our suppliers to raise awareness of modern slavery risk through open discussion, and encourage compliance and improvements where identified.

The University of Wollongong procures goods and services across a number of key areas, including information technology (IT), and facilities management, covering construction, utilities, cleaning, security and waste management.

Other key functional areas are the acquisition of capital equipment, telecommunications, marketing, consultancies, general office and laboratory supplies. UOW procures core business infrastructure for all onshore entities including UOW College Australia and UOW Pulse. This relates to goods and services such as software and hardware, utilities, travel, insurance and construction.

The major categories of goods and services that UOW procures are:

- Computer and IT technology
- Construction
- Equipment
- Education
- Cleaning
- Recruitment-labour hire
- Insurance
- Utilities
- Consultants
- Security
- Office supplies
- Lab supplies

Our relationship with suppliers varies depending on the type of services being sourced and the process undertaken to award the supply contract.

The University has a diverse supplier base, with approximately 6,000 recorded suppliers, however less than 5% of the supplier base have been identified as ongoing “key” suppliers, engaged through a formal process. Based on our knowledge of our largest suppliers, we estimate that out of our large supplier base, the University has under 100 procurement contracts in place that are potentially high-value and high-risk supply arrangements, which include IT contracts (software, hardware), facilities management arrangements, utilities, and general office and laboratory supplies.

### **UOW GE**

UOW College Australia’s procurement processes and therefore supply chain is managed by UOW. UOWGE’s overseas entities’ supply chains (UOWD, UOW Malaysia KDU and UOWCHK) are managed locally and include the following supply chain sectors with suppliers with an annual spend of over AUD\$10,000 per annum:

Education, utilities, information technology, insurance, marketing, travel and hotels, events and entertainment, sports services, consultancy services, maintenance and repair services, equipment and stationery supplies, security services, training, library and book supplies, printing, phone systems, uniforms and apparel, building and design services, subscriptions, hostel arrangement services, cleaning services, vehicle supplies, water supplies, internet services, medical services and website development.

### **UOW PULSE**

UOW Pulse utilises UOW’s core purchasing systems and preferred supplier lists. It manages the supply chains relating to its unique functions and purchases from key players in the Australian food and beverage industry, many of whom are required to comply with modern slavery requirements. UOW Pulse also purchases equipment, uniforms and merchandise as part of its retail offerings.

## 5. Modern slavery risks

By its nature, modern slavery can be hidden, but it is a daily fact of life for millions of people across the globe. UOW and its entities are committed to a continuous process of risk identification and analysis to ensure we understand, and so can address, the role played by organisations such as ours in perpetuating modern slavery.

While risks of modern slavery practices actually occurring on our campuses should be low, given the nature of our industry, local regulations and our core functions of teaching and research, UOW entities have identified that procurement of goods and services, and the supply chains therein, are the greatest areas of risk. Particular complexities arise because UOW and in particular UOWGE have campuses, partnerships, operations, teaching and research collaborations occurring in a range of countries. However, risks of modern slavery practices still may exist across various areas of our operations.

### Supply chain

One of the greatest risks for UOW entities where we are primarily end-consumers, is in the supply of goods and services. We have a global presence that relies on procurement from local sources in a diverse range of countries and appreciate that even Australian-based suppliers are part of a complex, global network of sourcing raw materials, human labour management, manufacturing and logistics pathways. Wherever UOW entities operate, and from wherever we source goods and services, the reality of our modern, global economy means there are risks we are using the products of modern slavery.

Our process of mapping and assessing risks in our supply chain is ongoing, but research and mapping undertaken to date has identified that key risks for UOW entities may exist in the following areas:

- Garments (uniforms and promotional items) and other promotional goods, particularly in the case of UOW Pulse which is also a retailer of such goods to our University community
- Property and construction services and construction goods, such as bricks and timber
- Electronic equipment, such as laptops, computers and mobile phones
- Facilities management, including cleaning, waste management services, food and catering services
- Consumables used by professional and academic staff (including office and laboratory supplies)
- Recruitment/labour hire

We have surveyed 200 suppliers across our entities using our risk assessment model (see Section 6) and a small percentage of suppliers have emerged as requiring more in-depth analysis, which we will seek to conduct in 2021.

### Our people

A framework of protections against modern slavery for direct employees of UOW entities are in place, including workplace agreements, local employment laws, policies addressing bullying, harassment & discrimination and processes for whistleblowing and complaints. However, some services, such as facilities management, are often the subject of contracting and subcontracting, and risks of modern slavery may arise as a result. Further, our global presence and range of arrangements for teaching and research partnerships highlights the importance of ensuring



protections are in place for all those contributing to our organisation. We recognise the complex and often hidden nature of modern slavery, and the importance of ensuring our people are well equipped to identify and mitigate against risks of it occurring during the course of our operations wherever and however they are being conducted.

### **Our students**

We appreciate that our students may in fact be victims of or otherwise impacted by modern slavery, noting the global reach of our operations and the likely underestimated prevalence of modern slavery, even in developed countries. We are committed to ensuring our existing mechanisms for supporting students encompass and respond to the particular challenges of modern slavery. As a teaching institution, we can leverage our educational expertise to promote anti-slavery via our course offerings.

### **Our investments**

We recognise, as with the procurement of goods and services, that our investments present both potential risks and potential opportunities. While there is risk with managed portfolios that investments are contributing to modern slavery practices, there too is scope to further leverage our power as an investor to drive change and improvements in addressing modern slavery.

### **Our donors**

We seek to involve our wider community to contribute towards our scholarships, and social and research projects through bequests and donations. We should ensure that contributions are not linked to modern slavery practices, which may require adequate due diligence to obtain a good understanding of our donors.

### **Our research**

We collaborate heavily with industry partners to fund commercial research and seek grant funding. We should have opportunities to determine whether our research partners are equally committed to similar anti-slavery practices and standards as those applied by UOW entities.

## **6. Addressing risks**

We have aimed to address our largest identified risk areas as a priority in our first reporting period, and therefore the focus areas for UOW entities in 2020 have been our supply chain, developing a modern slavery framework to embed modern slavery as a new compliance activity, and raising educational awareness throughout senior management.

UOW obtained in-house legal advice at the commencement of our journey to provide guidance on meeting new legislative requirements for 2020 reporting and we continue to align all our work back to our compliance requirements whilst seeking to embed anti-slavery practices within existing processes. The UOW group's key activities for 2020 are set out in the following pages.

### **Modern slavery framework**

A UOW modern slavery framework has been developed to provide a clear, holistic model of UOW's approach to modern slavery that is aligned to the United Nations Sustainable Development Goals (SDGs)<sup>1</sup> with one of our priority goals being Goal 8<sup>2</sup>: decent work and economic growth.

---

<sup>1</sup> Sustainable Development Goals; [undp.org/content/undp/en/home/sustainable-development-goals.html](https://undp.org/content/undp/en/home/sustainable-development-goals.html)

<sup>2</sup> Target 8.7 of the SDG goals calls for taking immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and eliminate the worst forms of child labour.



The UOW modern slavery framework has been informed by materials such as the Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities and the “Global Slavery Index” (Walk Free Foundation) on modern slavery. This framework ensures policy, processes, governance, review and improvement opportunities are in place to minimise the risk of modern slavery in our business operations and supply chains and to report on our progress year-to-year.

1. Design – Design and implement a modern slavery framework
2. Assess – Conduct due diligence on the modern slavery risks in the business supply chain and operations
3. Mitigate – Adopt strategies for addressing the identified modern slavery risks
4. Remediate – Develop and implement appropriate remediation measures
5. Monitor and Review – Monitor and review the effectiveness of the modern slavery framework and processes
6. Report – Establish appropriate mechanisms for internal and external reporting

Adapted from “Modern Slavery Act: What businesses in Australia need to know”, by Abigail McGregor, August 2020i, [nortonrosefulbright.com/en/knowledge/publications/06a565ee/modern-slavery-act-what-businesses-in-australia-need-to-know](https://nortonrosefulbright.com/en/knowledge/publications/06a565ee/modern-slavery-act-what-businesses-in-australia-need-to-know). Reprinted with permission.

### **Supplier risk assessment model**

We identified that the greatest risk of modern slavery within UOW group’s business is in relation to our suppliers and that the majority of goods and services we procure come from suppliers and contractors based in Australia. Given our diverse supplier base and in order to prioritise our efforts towards the highest risk suppliers, we implemented a Supplier Risk Assessment Model that includes: segmentation by spend, preliminary mapping of supply chains and operations via a Supplier Questionnaire, desk-based research of key suppliers, and discussions with expert advisers. In 2020 we finalised and distributed our Supplier Questionnaire to 200 identified key suppliers across the UOW group based on the developed screening criteria. Our risk assessment process will ultimately categorise suppliers into three priority groups, based on the perceived level of modern slavery risk. Appropriate remedial actions will be explored in consultation with our priority one or high-risk suppliers.

### **Key achievements in this area**

A Modern Slavery Supplier Questionnaire was created for both current and future UOW suppliers. A user-friendly tool to uncover potential risks of modern slavery within their supply chain.

This Supplier Questionnaire was sent to identified key suppliers based on established screening criteria and level of spend.

UOW revised our new supplier form to include additional demographic and modern slavery risk screening questions.

A Modern Slavery Supplier Risk and Incident Register was developed that captures supplier risk ratings from the Supplier Questionnaire, dates of assessment, proposed further actions and any reported incidents.

### **Our policies and procurement practices**

Revised UOW’s Purchasing and Procurement Policy, Tender Procedures, and Contracts Management Guidelines to uniformly embed anti-slavery principles and establish modern slavery risk as a selection criterion in the assessment of suppliers.

Commencing a new Supplier Code of Conduct to set out UOW's minimum standards for suppliers. We expect our suppliers to meet the expectations in this Code themselves and to share these expectations with their own suppliers so that they are communicated through the supply chain.

Developed our UOW Modern Slavery Position Statement as a commitment from our organisation underpinning our policy positions.

UOWD, UOW Malaysia KDU, UOWCHK and UOW Pulse in the process of implementing changes to their policy documents to mirror UOW.

Commenced work on refining tender documentation and supply contract terms.

### **Training and building awareness**

To ensure a high level of understanding of the risks of modern slavery in our supply chains and our organisation, we have focused our efforts on raising awareness of modern slavery amongst our working group and senior staff, and developing an awareness strategy. Our awareness strategy consists of a grouped model for key audiences:

Group 1 – Modern Slavery Working Group & Senior Management

Group 2 – Targeted procurement staff

Group 3 – General staff via e-learning

Our main focus on training for 2020 has been building capability amongst the Modern Slavery Working Group members (Group 1).

In 2020, UOW collaborated with Unchained Solutions Pty Ltd to receive in-depth training covering the following: key principles of modern slavery, identification of modern slavery risks, organisational best practices in this area and methods of promoting and embedding the principles within large organisations.

It is UOW's intent that in 2021, a customised training package for our procurement staff (Group 2) will be developed providing them the necessary skills to identify risks of modern slavery throughout our supply chain. UOW will also explore suitable online training modules for deployment across the broader UOW group staff base (Group 3).

UOW has cultivated awareness of modern slavery within key governance bodies, garnering strong support from our leaders, and is actively seeking to inform and educate all members of our community about responsibilities and opportunities to address modern slavery.

## **7. Assessing effectiveness**

UOW entities are committed to deepening our understanding of modern slavery and evolving our responses to combat it more successfully with each reporting period to come. Our ability to assess the effectiveness of our actions taken is key to achieving improvements. We aim to assess our performance via the following mechanisms:

### **Regular engagement and feedback between key areas**

Our Modern Slavery Working Group will continue into the 2021 calendar year to ensure ongoing progress on key activities, and to maintain a consistent dialogue and direction across our three-year plan. While the key focus areas in 2020 were supplier management, procurement, policies and promoting introductory awareness across the senior management of UOW entities, as we pivot to implementing a broader staff education strategy in 2021, we will seek greater representation from our Human Resources, Strategic Marketing, and Student & Accommodation Services divisions as well as from our academic staff with expertise in this area. The Working Group terms of reference may be reviewed periodically to ensure its tasks and membership remain relevant and can effectively implement our modern slavery strategy.

The Working Group will continue to provide regular updates to senior management and our committees on key actions and progress, to enable timely input and feedback.

### **Supplier risk assessment framework**

Our Supplier Risk and Incident Register will now become a central capture point for all key data from our Supplier Questionnaire responses and our evaluations of supplier risk. We will use it to continuously monitor suppliers appearing as high priority, and seek to engage in remedial actions in consultation with those suppliers within the specified timeframes, reporting back to the Modern Slavery Working Group. Any significant risks will be further communicated in accordance with our existing organisational risk management frameworks.

One of the key learnings from our engagement with Unchained Solutions Pty Ltd is the need to work in close partnership with our suppliers to together address modern slavery in our supply chains. We will be actively seeking feedback from our suppliers on our Supplier Questionnaire, our revisions to our procurement policies and procedures, and our Supplier Code of Conduct and changes to contractual terms which we are finalising in 2021.

### **Our partnerships and networks**

We will continuously be open to new and better ways of approaching modern slavery risk in our supply chains and operations, and will work collaboratively with our higher education sector peers and networks. UOW is a member of the United Nations Sustainable Development Solutions Network (SDSN), a global initiative to implement the UN's Sustainable Development Goals (SDGs) through education, research, policy analysis, and global cooperation. Membership of the SDSN aligns with UOW's longstanding commitment to research that tackles the world's most pressing challenges, both locally and globally. Our continued relationship with Unchained Solutions Pty Ltd will provide us with access to international best practice insights, training and independent assessment of our progress.

### **Complaints and incident reports**

UOW's Complaints Management Centre and its internal network of complaint handlers across a number of administrative functions and faculties is well-positioned to collect and provide statistical information about any modern slavery incidents received, and offer information about any emerging trends and areas of key risk. Any notable patterns of risk reported through these existing grievance mechanisms can be identified and escalated under existing organisational risk management processes.

### **Procurement policies and contract documentation**

We will continue to refine procurement-related documentation across our UOW entities in a consistent manner, firstly by revising our standard purchasing contract terms and incorporating our Supplier Code of Conduct, and then seeking to negotiate inclusion of these into all supplier contracts. The extent to which we can successfully include these into supplier contracts may provide some insight into the effectiveness of our approach, and the contract negotiation stage may provide an opportunity to initiate dialogue with our suppliers about our approach to modern slavery and seek feedback.

### Training completion

We anticipate that in future reporting periods, there will be an increased focus on staff awareness and training, and as such, training attendance and e-training completion rates and training feedback may be a useful tool for assessing our approach.

### Internal audit and monitoring

UOW uses an enterprise risk management program, Protecht, which monitors the effectiveness of our risk control framework and includes assessment of compliance with legislation. The Working Group will be further assessing the inclusion of modern slavery compliance and the monitoring of key actions by Protecht.

## 8. Next steps

We will continue to design and implement changes across our UOW entities to address each of the areas where modern slavery risks can arise. Each year, we will seek to build on the last, and progressively add new initiatives as existing ones are embedded within our organisation. By the end of 2022, we aim to have developed a comprehensive methodology to examine modern slavery risks across our supply chains and all facets of our operations.

### Addressing reporting criteria

The table below addresses modern slavery reporting criteria

MSA Criterion	Reference in this Statement
Identify the reporting entity	Section 1
Describe the reporting entity's structure, operations and supply chains	Section 2, Section 4
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 5
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 6, Section 3
Describe how the reporting entity assesses the effectiveness of these actions	Section 7
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 3
Any other relevant information	Section 1, Section 3, Section 8

## Approval

This statement for the University of Wollongong and UOWGE Ltd trading as UOW Global Enterprises (as reporting entities), and UOW Pulse Ltd (as a UOW subsidiary) was approved by the University Council of the University of Wollongong on 11 June 2021.

Professor Patricia Davidson  
Vice-Chancellor  
11 June 2021

Contact  
[uow.edu.au](http://uow.edu.au)  
[facebook.com/UOW](https://facebook.com/UOW)  
[twitter.com/UOW](https://twitter.com/UOW)  
[Instagram.com/UOW](https://Instagram.com/UOW)  
+61 2 4221 3555

The University of Wollongong attempts to ensure the information contained in this publication is correct at the time of production (May 2021); however, sections may be amended without notice by the University in response to changing circumstances or for any other reason. Check with the University for any updated information. UNIVERSITY OF WOLLONGONG CRICOS: 00102E