



Charles Sturt
University

Modern
Slavery
Annual
Statement
2024

Our values



Insightful

Understanding people
and the world



Inclusive

Stronger together



Impactful

Outcome driven



Inspiring

Leading for
the future



Charles Sturt
University

Charles Sturt University Modern Slavery Annual Statement 2024

This is Charles Sturt University's Annual Modern Slavery Statement pursuant to section 13 of the Modern Slavery Act 2018 (Cth) and for the financial year ending 31 December 2023. This statement is made on behalf of Charles Sturt University and its controlled entities.

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, underpayment, and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

This document sets out Charles Sturt University's commitment to continuously improving our practices, to ensure that we prevent and do not contribute to acts of modern slavery within our supply chains and operation.

Criteria a) Identify the reporting entity

Reporting entity

Charles Sturt University is a statutory authority constituted under the Charles Sturt University Act 1989 (NSW) and registered with the Australian Charities and Not-for-profits Commission. For the purposes of this statement Charles Sturt University includes the controlled entities Charles Sturt Campus Services and the Charles Sturt University Foundation Trust.



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Structure, operations and supply chains

Structure

Charles Sturt University is the largest regionally based university in Australia, with more than 36,000 on-campus and online students. The University employs 2,087 Full-Time Equivalent (FTE) staff. Our campuses are located in Albury-Wodonga, Bathurst, Canberra, Dubbo, Goulburn, North Sydney, Orange, Parramatta, Port Macquarie and Wagga Wagga. We also deliver programs internationally in collaboration with leading partner institutions in Asia and through online learning.

As the largest provider of education and research in our regions, we also offer a range of services to our communities, including health clinics, veterinary clinics, innovation and commercialisation services, research consultancies and facilities hire.

Charles Sturt University operates two controlled entities: the Charles Sturt University Foundation Trust, which supports and enhances the University's educational, research, and service endeavours through philanthropic fundraising; and Charles Sturt Campus Services, a specialised entity offering cleaning and maintenance services to universities, schools, and commercial enterprises.

The University has identified roles and responsibilities for legislative obligations regarding modern slavery and is working on enhancements to the identification and addressing of risks in its structures and processes.

Operations

The operations of the University are principally focused on the provision of tertiary education and research, including foundational, micro, undergraduate and postgraduate courses and research programs.

The Charles Sturt University Strategy 2030 provides the pathway to achieving its vision - Australia's leading regional university, committed to advancing the careers of our students, inspiring research excellence, and driving regional outcomes with global impact.

The University is investing substantially in several areas: the development of a sector-leading course profile; designing leading-edge learning experiences; supporting student pathways for aspiration, equity and diversity; and research and development to grow three key research institutes over the next five years: Gulbali Institute for Agriculture, Water and Environment; Rural Health Research Institute; and, AI and Cyber Futures Institute.

To achieve these strategic goals, Charles Sturt University purchases a wide range of goods and services. The University is committed to ensuring there is no modern slavery in its supply chains or in any part of our business. The University receives financial support in various forms (investment, payment, donations and gifts) from third parties to undertake research and facilitate education.

Vigilance is maintained to ensure these funds are not sourced from, or associated with, the potential benefits of modern slavery or unethical behaviour.

Supply chains

Charles Sturt University's supply chains are diverse, with more than 3,600 suppliers supporting the delivery of high-quality education and research.

The University purchases a wide range of goods and services, undertaken in accordance with legislative requirements and internal procurement and expenditure policies. These include construction services and supplies, furniture and stationery, electronics (computers, audio visual equipment, phones etc.), food and catering supplies, travel services, laboratory supplies (small and large equipment, chemicals, consumables, pharmaceuticals etc.), books and printing and waste management services.

A large proportion is purchased through regional suppliers across NSW and within frameworks established by collaborative consortia, particularly the Australian Universities Procurement Network (AUPN) and Buy NSW. The frameworks established by these entities govern supply chains and procurement.

High risk supply chains include computer software and hardware, apparel, laboratory equipment, catering, construction, security and cleaning. Due diligence measures that the University undertakes with respect to high-risk supply chains include quarterly meetings with suppliers in high-risk categories; and working with unions, its legal advisors and relevant associations to ensure conditions are appropriate and to limit the risk of underpayment through testing enterprise bargaining agreements.

Cleaning

The University will continue working with its cleaning provider in 2024 to introduce the Cleaning Accountability Framework (CAF) and set key performance indicators (KPIs) for measuring accountabilities.

Security services

Security services were recently tendered, and quality was a key consideration during the evaluation of tender proposals, encompassing accreditation, safety standards, rostering, equipment and an International Organization for Standardization (ISO) accredited staff management system. Monthly meetings between the University's representative and the security company ensure ongoing quality control and prioritise staff proficiency, employee health, wage audits, and adherence to safe work practices alongside service provision.

Computer software and hardware and laboratory equipment

Computer software and hardware and laboratory equipment are primarily purchased through NSW State Government contracts developed with compliant modern slavery practices. Additional measures include supplier engagement documentation and the University's contract management policy requires quarterly meetings with all high-risk vendors to assess compliance with labour standards from the start of the contract.

Procurement Policies and Practices: Prioritising value and sustainability

The University's policy and practice have been shifted to enable local and First Nations supply chains to compete wherever possible. Charles Sturt University uses a quality, service, innovation and price matrix to determine value. The submission of modern slavery statements is mandatory for medium to large enterprises submitting bids or being set up as a new supplier. Vendors with modern slavery statements are tagged in the University's procurement system with statements available for all buyers to view prior to raising an order. A nominal weighted advantage is given to small to medium enterprises who submit a modern slavery statement. Vendor modern slavery statements are reviewed to ensure they have information regarding employee award or enterprise bargaining agreements.

Tender documentation, procurement policy and purchase order terms and conditions all refer to this statement and relevant University contracts include clauses highlighting supplier obligations related to modern slavery. University Governance will be updated in 2024 to explicitly prohibit financial penalties on workers in its supply chains, as well as prohibiting fees imposed on direct employees of the University. This policy will also extend to workers contracted through suppliers and recruitment companies.

Criteria c) The Risks of Modern Slavery Practices in the Operations and Supply Chains of the University and its Controlled Entities

Supply Chains

Key modern slavery risks within our operations and supply chains have been identified in the potential countries of origin of the goods or services provided, and in the sourcing of the raw materials for the goods and the labour services required to manufacture and ship the goods the University purchases. The University has identified risks in the procurement of information technology and uniform providers, and in procurement by student clubs.

Resources Used in the Generation of Funds or Investment Returns

In addition to the supply chain-related operations of the University, there are also potential risks in the sources of funds the University receives for research and related teaching activities, and the returns generated from various investments of the University. Potential risks in these areas are labour and other resources used in the generation of funds or investment returns.

Student working conditions

Universities play a crucial role in educating students about workplace risks, rights, and support services, especially regarding issues like underpayment of wages, sexual harassment, and excessive working hours, which can indicate forced labour. Sectors with a high proportion of young workers, such as retail, hospitality, horticulture, and the gig economy, often witness these issues.

Reporting exploitative conditions can be daunting for students, fearing repercussions on their job or visa status. Students with barriers to accessing information, such as those who are culturally and linguistically diverse or those with disabilities, face additional challenges in understanding their rights and seeking help.

International students, constrained by visa restrictions, high living costs, and accommodation shortages, may be particularly vulnerable to accepting high-risk work and living conditions. This is a relevant risk for the University, due to the cohort of international students across our campuses.

Charles Sturt University's proactive measures to mitigate modern slavery risks within its supply chains and investment practices, as well as its efforts to empower students with the knowledge and support to access their rights, are detailed in Criteria d).

Criteria d) The Actions taken by the University and its Controlled Entities, to assess and address Modern Slavery Risks, including Due Diligence and Remediation Processes

The modern slavery human rights framework is incorporated into university policies, procedures and governance for clubs, affiliations, finance management, finance procedure, learning abroad, philanthropic donations, gifts, research, investment, education agents and partnerships.

The University is committed to identifying and addressing modern slavery risks across its operations and has established and will continue to develop operating principles and behavioural expectations for staff, students, affiliates, partners, and others with whom we engage, including suppliers.

Supply Chains

If modern slavery has occurred Charles Sturt University will partner with the supplier (and greater supply chain) to support remediation payments. If the University were to hold the supplier directly accountable for the remediation, there is increased risk of further loss of income (hours or rates) to former victims because of remedial actions. The University will review all avenues to ensure workers are not disadvantaged through altered supply periods or quantities. Noting the similarity of high-risk categories, there are also likely opportunities for consortium or peer remedial action. University tender documentation has been updated to include advice that suppliers need to make available a mechanism to raise grievances and complaints. The University is also partnering with its procurement system provider for an in-system solution.

The risk of modern slavery on the University's campuses is low due to the embedded controls, systems and practices the University has in place to manage recruitment and subcontracting. In compliance with contractual documents and purchase order terms and conditions, subcontracting is not permitted without prior consent. Payment terms are monitored and reported in the University's annual report, which assist to identify vendors have sufficient cashflow for wages. The University's governance structures and contract terms ensure that financial penalties are prohibited, and short-term contracts and sudden changes in workload are avoided.

Charles Sturt University recognises, however, that there are risks in the supply chains of goods and services we procure. Additionally, given the global reach of the University, it recognises that there are potential risks of modern slavery related to international activities, especially when located in high-risk countries. By its very nature, modern slavery is hard to detect and is often hidden within 'legitimate' industries. Charles Sturt aims to work collaboratively with the NSW Anti-slavery Commissioner, other universities, procurement bodies such as Buy NSW and AUPN, civil society organisations and government agencies to share information and mitigate risks.

Charles Sturt actively engages with its purchasing consortia, Buy NSW, and the professional development group AUPN to support the inclusion of modern slavery and corporate social responsibility questions and statements as part of collaborative procurement activities.

With respect to tendering and contracting activities, Charles Sturt University has amended its standard terms and conditions and made improvements to supplier on-boarding processes to ensure the potential for modern slavery are considered. The University continues to amend contracts, agreement templates and modern slavery clauses to reflect its commitment to addressing modern slavery and to ensure new or renewed contracts are updated with suitable modern slavery clauses.

Charles Sturt University will raise awareness of modern slavery among all staff by incorporating reference to it in induction processes for procurement governance. The University is currently updating its induction process to include this in 2024. The University is also enhancing ongoing awareness and understanding of modern slavery by developing additional training and information resources for relevant staff.

Charles Sturt University will identify supply chains that represent a medium to high risk of modern slavery, human trafficking, forced and bonded labour, and labour rights violations. This will be accomplished by working with both suppliers and members of the sector purchasing consortia and taking appropriate action if we become aware of such activity.

In the area of donations and research funding, the University has policies that require the identification of the source of funds and statements from funders about the sustainability of the activities that the funding is from.

Investment practices

Charles Sturt University has created Responsible Investment Guidelines and works with investment managers to ensure compliance with them.

The University is developing mechanisms for reporting on investment interactions and the analysis and removal of modern slavery risks. The training and communication to be developed will include the flagging and reporting of activities where people believe there is, or could be, a risk of modern slavery.

Empowering students with knowledge and support to access their rights

The University has enhanced awareness-raising and education for all students, including international students, regarding the risks of modern slavery. Web resources for students have been improved and links provided to additional resources and support services for international students.

In addition, international students are informed about modern slavery risks and their rights at work at orientation and during pre-departure briefings (where applicable). Modern slavery has been actively built into the terms of reference for relevant committees, such as the Student Experience Committee for our Navitas partnership.





Criteria f) The University's Assessment of the Effectiveness of its Risk Mitigation Actions

Charles Sturt University is committed to continuously reviewing its supply chains and working towards greater transparency and awareness of the people working for and with us. All commencing University staff must provide documentation to demonstrate their right to work within Australia before commencing employment. Since 2019, the Associate Director, Procure to Pay has participated in university sector wide AUPN led Modern Slavery Working Party. In 2022, the sector partnered with FRDM, an advanced risk assessment and tracking tool, to develop surveys to measure supplier's adherence to the Modern Slavery Act 2018. This challenge is best addressed through the ongoing and proactive engagement with suppliers, Buy NSW and AUPN, sharing experiences and refining best practices. Charles Sturt University will review the conclusions and feedback of stakeholders, with a view to enhancing the existing approach being taken by the University.

Criteria g) The Process of Consultation with Controlled Entities

The University's two wholly owned entities: the Charles Sturt University Foundation Trust and Charles Sturt Campus Services operate under applicable University policies and procedures. In consultation with these entities the University has sought confirmation of their compliance with university policies and procedures. The Charles Sturt University Foundation Trust has improved its guidelines to align them with the University's funding and donations guidelines used in research.

Principal Governing Body Approval of this Statement

This Modern Slavery Statement was approved on 6 June 2024 by the Council of Charles Sturt University.



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