



Charles Sturt
University

Modern
Slavery
Annual
Statement
2023

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 2023

This statement is made pursuant to Section 31 of the Modern Slavery Act 2018 (New South Wales) and Section 16 of the Modern Slavery Act 2018 (Commonwealth) and constitutes our Modern Slavery Statement for the financial year ending 31 December 2023.

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, and human trafficking, all of which have in common the deprivation of a person's liberty by another in order 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 operations.

Reporting entity

Charles Sturt University is the largest regionally based university in Australia, enrolling more than 36,000 on-campus and online students from across Australia and more than 72 countries. We take that role deeply to heart, knowing we provide higher education to so many students, enabling them to reach their goals and positively impact the lives of others.

Our campuses in Albury-Wodonga, Bathurst, Canberra, Dubbo, Goulburn, Orange, Parramatta, Port Macquarie and Wagga Wagga serve the distinct needs of regional communities from northern New South Wales to central Victoria. We also deliver programs internationally in collaboration with leading partner institutions in Asia, as well as through online learning.

As well as being the largest provider of education and research in our regions, we also provide a range of services to our communities. This includes health clinics, veterinary clinics, research consultancies and facilities hire.

Charles Sturt University is a statutory authority constituted under the *Charles Sturt University Act 1989 (NSW)*.

This statement is for Charles Sturt University and its controlled entities, Charles Sturt Campus Services and the Charles Sturt University Foundation Trust.



Charles Sturt
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Structure, operations and supply chains

Operations

In order to achieve our strategic goals, Charles Sturt University purchases a wide range of goods, services and works. In these situations, we are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. The university also receives financial support in various forms (payment, donations and gifts) from third parties to undertake research and deliver education. We actively ensure that these funds are not coming 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 5500 suppliers supporting us to deliver high quality education and research.

We buy a wide range of goods and services, in accordance with public procurement law and our 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 bought through regional suppliers across New South Wales and within frameworks established by collaborative consortia, particularly the Australian Universities Procurement Network (AUPN).

Due to controls and systems the university has in place to manage recruitment and subcontracting, the risk of modern slavery on our campuses is low. We recognise, however, that there are risks in the supply chains of goods and services we procure. Additionally, given the global reach of our university, we recognise that there are potential risks of modern slavery related to our 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. We aim to work collaboratively with other universities, procurement bodies such as the Buy NSW and AUPN, civil society organisations and government agencies to share information and mitigate risks.

Criteria c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls

We have worked to identify the largest suppliers to the university and those with the highest potential risk. These have been identified as:

- Audiovisual, IT and multimedia supplies
- Catering supplies
- Janitorial and domestic supplies and services
- Stationery supplies
- Clothing, uniforms and similar merchandise

The risk of modern slavery within these categories has been identified by the potential countries of origin of the goods or services provided, the sourcing of the raw materials for the goods and the labour services required to manufacture and ship the goods.

The university has identified risks in the procurements made by information technology, uniform providers and student clubs.

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 the various investments the university uses. The potential risks in these areas have been identified as twofold: labour, and other resources used in the generation of funds or investment returns. Both could be coming from at risk countries or at risk industries.

Criteria d) Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes

Charles Sturt University actively engages with its purchasing consortia, Buy NSW and the professional development group, Australian Universities Procurement Network (AUPN) to support the inclusion of modern slavery and corporate social responsibility questions and statements as part of the collaborative procurement activity.

For in-house tendering or contracting our standard terms and conditions and supplier on-boarding processes have been improved to ensure the potential for modern slavery are considered.

We will raise awareness to all our staff by covering modern slavery as part of our induction to procurement governance. We are currently updating our induction process to include this. The university is also looking to improve ongoing awareness and to improve understanding by developing further training and information for staff.

We will identify those 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 achieved 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.

The university has created Responsible Investment Guidelines and works with investment managers to ensure compliance with them.

The university is developing mechanisms for reporting. 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.

Criteria e) Describe how the reporting entity assesses the effectiveness of such actions

Charles Sturt University has a Procurement Policy that determines how purchases should be made when spending university funds.

Charles Sturt University expresses its commitment to the continuous review of the supply chains it uses, working towards greater transparency and awareness of the people working within them.

All new staff joining the university are to 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 lead Modern Slavery Working Party. In 2022 the sector partnered with FRDM to develop surveys to measure suppliers adherence to the Modern Slavery Act 2018.

This is a challenge that is best addressed through the ongoing and proactive engagement with both suppliers, Buy NSW and AUPN sharing experiences and refining best practice.

We will review the conclusions and feedback as we progress with a view to applying the feedback where it will enhance the existing approach being taken by the university.





Criteria f) describe the process of consultation with:

- (i) any entities that the reporting entity owns or controls; and
- (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement

The university has two wholly owned entities – the Charles Sturt University Foundation Trust and Charles Sturt Campus Services. These entities 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 their guidelines to bring them into line with the university's funding and donations guidelines used in research.

Criteria g) any other relevant information

This statement has been developed following the university's governance framework. Staff from the Procure to Pay, Finance and Legal teams developed the Statement in consultation with Research, People and Culture and the University Secretary. The University Council approved the statement on modern slavery on the 8 June 2023, setting out the university's commitment and zero-tolerance approach. The statement is available on the [university website](#).



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