FY2020-21 Planning	FY2022 Compliance	FY2023 Researching and Engaging	FY2024 onwards Implementing and Evaluating
STEP	-		
1 Understanding Modern Slavery Act and implications.	Embedding modern slavery due diligence in Workplace Health Safety, Wellbeing and Strategic Procurement.	Launch University-wide modern slavery working group.	Investigate systems to capture modern slavery risks.
2 Industry collaboration with the Australian Universities Procurement Network (AUPN).	Training of key personnel undertaking sourcing activities.	WSU's review of exposure and baseline (Tier 1 suppliers).	Continuous review and improvement across processes, controls, systems and people.
Formulated modern slavery strategy and compliance checklist.	9 Published the University and Controlled Entities Modern Slavery Prevention Policy.	Roll out anti-slavery clauses across all upstream Contracts (Phase 2).	Expand internal staff training and engagement.
4 Established modern slavery grievance mechanisms into existing reporting.	Developed Supplier Code of Conduct.	Continue Industry collaboration with AUPN.	Deep dive of Tier 1 suppliers and undertake review of Tier 2 suppliers.
5 FRDM, a technology tool to identify modern slavery risks implemented as part of the AUPN initiative.	7 Undertook continuous review of investments to assess modern slavery risks.	Review risks of modern slavery during Supplier Prequalification.	Deep dive assessment into identified high risk categories.
	6 Mitigation of modern slavery through contractual changes in downstream contracts and select upstream contract templates (Phase 1).	Review adequacy of existing complaint mechanisms.	Develop Modern Slavery Remediation Plan.