

Evaluating University Efforts to Combat Modern Slavery and Labour Abuses in Supply Chains

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**RMIT BUSINESS AND
HUMAN RIGHTS CENTRE**



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EXECUTIVE SUMMARY



Survey respondents on average rated 3.5 out of 5 as their level of responsibility in terms of compliance with labour laws of contracted cleaning and/or security supply chain.

Positions of survey respondents and interviewees

- Out of the 19 respondents, 8 members were procurement officers which was around 42% of the sample. The next most common position was contract manager, numbering 6 respondents (31.6%). Only 2 respondents were facility managers and 3 members had other positions i.e., CEO, contractor and facilities coordinator.
- Among the 19 respondents, 13 (68%) staff members were responsible for cleaning service tenders, 11 (58%) were in charge of security service tenders, and 4 were not responsible for any cleaning or security service tenders.
- Most interviewees were directly responsible for procurement, sourcing, and tendering. Only 2 interviewees were in more policy-based positions, with no direct responsibility for managing contracts.

Responsibility for compliance with labour laws

- Survey respondents on average rated 3.5 out of 5 as their level of responsibility in terms of compliance with labour laws of contracted cleaning and/or security supply chain. This suggests they perceived themselves to be responsible for the labour conditions of cleaners and/or security guards.
- All interview participants indicated a strong commitment to addressing the labour conditions of cleaners and/or security guards.
- In all cases, addressing labour conditions was a joint effort shared between various personnel through different means: at the point of developing tender documents, when considering tenders, when forming contracts, when managing contracts and overseeing cleaning and security performance, at the point of paying invoices, and so on.



Proper payment

- Survey respondents on average rated their level of confidence that cleaners and/or security guards were being paid correctly at all times at 4, higher than their confidence about work safety and respect.
- Respondents thought it was highly unlikely that incorrect payment was driven by the university, with only 5.26% saying it would be because the university does not pay enough to the contractor. Furthermore, only a few respondents chose 'high workloads and/or lack of training'.
- Most respondents saw the problem lying elsewhere, with almost 58% stating that the most likely reason for incorrect payment would be that the contractor did not pay the correct amount. The next most common reason given was that the contractor sub-contracts work out to another company (42.11%). The next two reasons perceived to be most likely in the event of incorrect payment related to worker fear (42.1%) and that 'the workers do not know their rights' (31.5%).

Level of confidence that cleaners/ security guards feel safe and respected

- Survey respondents indicated confidence that cleaners and/or security guards were working safely at all times on the university campus (on average 3.73 out of 5) and that the cleaners and/or security guards felt respected at the workplace (3.63 out of 5).

Perceived risk of non-compliance with labour laws

- Survey respondents on average rated the risk of non-compliance as 2.26 (out of 5).
- This finding differs from the attitudes of the participants in the interviews. Except for two interviewees, participants generally described a very high level of confidence in the processes and policies deployed to address labour conditions.

How compliance with labour standards is checked and verified

- Most survey respondents indicated that they had regular (at least quarterly) meeting with contractors to check and verify compliance with labour standards (close to 80%). Internal desk-based audit and statutory declarations were the second most used compliance checks (both 37%).
- Survey respondents felt consultation with a united workers union was the least preferable way to verify cleaning and/or security contractors' compliance with labour standards (5%).
- Interviews confirmed that there is no standardised method of ensuring that compliance with labour standards is checked and verified, and that the methods described were relatively recently implemented. They were embryonic and untested processes.
- Despite voicing confidence about the low likelihood of breaches of labour law, interviewees often described a lack of certainty about vital details concerning how to check that workers enjoyed proper conditions.
- In interviews most participants described universities used a mixture of methods to address labour compliance including:
 - Regular meetings with contractors
 - Requirements to not subcontract or to ask permission to subcontracting
 - Requiring tenders to account for legal labour costs
 - Statutory declarations
 - Internal desk-based audits
 - External desk-based audits
 - Biometric scanners and other methods of monitoring attendance and working hours
 - Contracting 'top tier' contractors
 - Grievance mechanisms
- The interviews confirmed the finding of the survey that consultation with the relevant union is rarely adopted by procurement managers, who prefer other methods.



Most important in considering tenders

- All survey 19 respondents said it is a requirement for tenders to provide evidence of compliance with labour laws in tendering process.
- Both 'degree of similar experience' and 'ability to service sites' were considered the most important factors when considering tenders (7 out of 10). The second rank was given to price, which scored 6.95. 'Stated commitment to ethical business practices' came in fourth in overall importance (5.74).
- While it may not be viewed as the most important factor, in interviews, participants described ethics and compliance with the law as non-negotiable factors.

Improvement of working conditions

- Survey respondents on average rated their knowledge of federal and state labour laws and modern slavery laws at 3.68, which indicates that respondents believe they have a good knowledge of federal and state labour laws and modern slavery laws. In interviews, however, they often voiced concern about their capacity to accurately calculate award wages and conditions in a detailed fashion.
- Survey respondents believed universities (57.9%) and contractors (52.6%) have the most power to improve working conditions. Interestingly, this challenged perceptions about who was responsible for breaches of labour laws, where universities were rated as having low contribution.
- Almost 37% of survey participants responded that unions have the power to improve working conditions. This contradicts the views indicated by survey respondents that unions are not seen as a method for checking labour conditions.

CAF certification process

- Survey respondents did not perceive themselves to have high knowledge of CAF and CAF certification processes (the average rating was 2.58).
- Most respondents believed it is likely that the university they work for would invest in CAF certification scheme to ensure proper payment and an exploitation free workplace (an average rating of 3.79 out of 5).
- On average, respondents rated their confidence in CAF at 3.12 out of 5. While it can be said that respondents had confidence on CAF, this level of confidence could be improved.
- In interviews, the most enthusiasm was shown for CAFs labour pricing tool.
- Interviewees often voiced concern that CAF would not act in a timely manner.
- Concerns around the impact of CAF on the relationship with suppliers were also raised by interviewees.





INTRODUCTION

In 2021, the Cleaning Accountability Framework (CAF) launched a pilot project in the Australian university sector to address the needs of universities and the other stakeholders to improve the conditions of cleaners and security guards who keep their workplaces, lecture theatres, and facilities clean and safe. This report fulfilled the purpose of gathering baseline information about the level of knowledge amongst those responsible for procurement of cleaning and security, their priorities, their perceptions of their ability to address labour conditions at the point of tender and in contract management, and other matters concerning their power to oversee the ethics of procurement. The data reported in this report is based on a survey conducted at the beginning of the pilot, in the latter part of 2021, with 24 university staff members in some way responsible for the procurement of cleaning and security. This survey will be repeated near the end of the pilot to help CAF assess the impact and success of the pilot project. It is also based on in-depth interviews with personnel from eight universities.

This report brings together and compares the findings of a baseline survey and interviews. First, the report provides an overview of survey data, discussing the sample size, subjects, and information of the survey. The next section describes the survey data with tables and graphics, delving into the opinions of interviewees. Finally, the report considers the findings of a regression analysis conducted to analyse the causation between questions.

SURVEY METHODOLOGY

Under a pilot study, 24 staff members who oversee contracts with cleaning companies across Australian universities responded to an online survey. All information collected in this survey was confidential and de-identified. The personal information was identified by a unique code to allow for data comparison on inputs over a period of time. The survey included data on respondents' position, their responsibility for cleaning and/or security services tenders, whether they oversee the performance of cleaning and/or security contractors, whether they oversee compliance with labour laws of the contracted supply chain, the tendering processes, whether they oversee risks of non-compliance with labour laws, how they approach safety and dignity in the workplace, proper payment, and improvement of working conditions, their knowledge of federal and state labour laws and modern slavery laws, and how they perceive the importance of the CAF certification process.

Initial contact with procurement officers was established through the Australian Universities Procurement Network (AUPN), representing the Australian and New Zealand higher education sector, who work together to improve excellence in procurement practices and the skills of procurement professionals. CAF then distributed the survey, with instructions that the survey was confidential and results would be de-identified. The de-identified data was then passed onto Associate Professor Shelley Marshall for analysis.



INTERVIEW METHODOLOGY

Interviews were conducted by Associate Professor Shelley Marshall with personnel at eight universities. A list of possible interviewees was provided by CAF, who had received it from the Australian Universities Procurement Network. Possible interviewees were contacted via email and asked if they would be interested in participating. Interviewees were provided with a confidentiality agreement in accordance with ethics approval 2020-23237-13027. Where written consent was not provided before the interview it was recorded orally. All interviews occurred online (using Microsoft Teams), in keeping with COVID-19 protocols, and recorded. Interview data was de-identified and remains so in this report, and efforts have been made to ensure both individual interviewees and their universities cannot be identified.

Most interviews were with two or three staff members from the same university with differing responsibilities in tendering and procurement. For instance, often one was responsible for tenders and the other was responsible for contract management. In other cases, one was responsible for cleaning contracts and the other was responsible for security contracts. Interviews were semi-structured.

The attendance of two or more participants from the one university allowed for a dyadic interviewing style. This involves a pair of participants who share a pre-existing relationship. As opposed to individual interviewing, participants engage in a discussion whereby data can be shared and compared. Usually, the two participants (dyad) can construct their versions of their answer without much probing from the interviewer. If there is an appropriate match between the selected participants, this technique can help gather high quality data, because researcher will be able to hear the similarities and differences in what the participants think about the research topic. Using the dyadic method allowed for only slightly structured interviews revolving around only two questions, rather than more structured interviews entailing multiple questions.

At the beginning of the interview the interviewer explained that she was interested in two questions: first, what challenges are entailed in attempting to ensure that cleaners and security guards receive their full legal entitlements; and second, what the respondents hoped to get out of CAF, or how CAF might contribute to addressing the challenges outlined in response to the first question. This less structured method of interviewing was designed to complement the structured data collection already achieved through a survey of the same universities and largely the same personnel. The method entailed the interviewer intervening only occasionally with follow up questions that mainly requesting clarification, rather than steering the interview. The method allowed the deduction of perspectives that were most important to the interviewees in relation to the over-arching questions.

Two questions guided the interviews: first, what challenges are entailed in attempting to ensure that cleaners and security guards receive their full legal entitlements; and second, what the respondents hoped to get out of CAF, or how CAF might contribute to addressing the challenges outlined in response to the first question



FINDINGS

This section of the report compares the findings from the survey with more nuanced data from the interviews.

POSITION AND RESPONSIBILITY OF THE RESPONDENTS

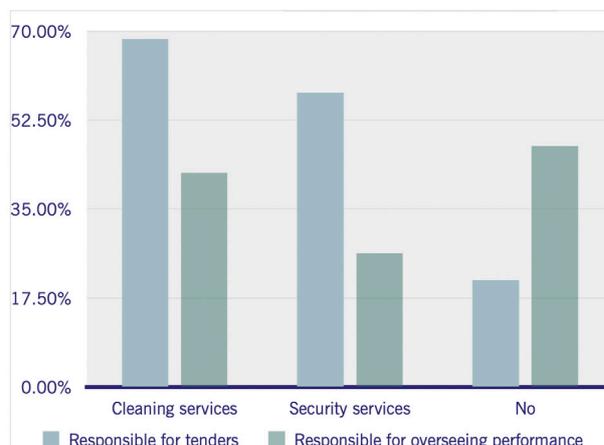
The first survey questions sought to ascertain the position of the survey respondents within the university that employs them and the nature of their responsibility for tenders or procurement.

Position within the university



Survey respondents were asked what their position was in the university. They were given three options or asked to select other and specify if their position was not covered by the options. Out of 19 respondents, 8 members were procurement officers, which was around 42% of the sample. The next most common position was contract manager, numbering 6 respondents (31.6%). Only 2 respondents were facility managers and the remaining 3 members belonged to other positions: CEO, contractor, and facilities coordinator.

Responsibility for tenders and overseeing performance



Survey respondents were asked whether they were responsible for cleaning and/or security services tenders. Among 19 respondents, 13 (68%) staff members were responsible for cleaning service tenders, 11 (58%) were in charge of security service tenders, and other 4 were not responsible for any of cleaning/or security service tenders. Survey respondents were then asked whether they oversaw the performance of cleaning and/or security contractors. Around 42% staff members responded that they were responsible for overseeing the performance of cleaning contractors whereas 26% respondents were in charge of overseeing the performance of security contractors.

This mix of titles and responsibilities was also reflected in the interviews, with most interviewees being directly responsible for procurement, sourcing, and tendering. Only two interviewees were in more policy-based positions, with no direct responsibility for managing contracts. In addition to these characteristics, all but 2 of the interviewees were men (gender identification was not covered by the survey). In most cases interviewees were middle-aged and had been working in the industry for many years, often using phrases like “in my 30 years in the industry”.

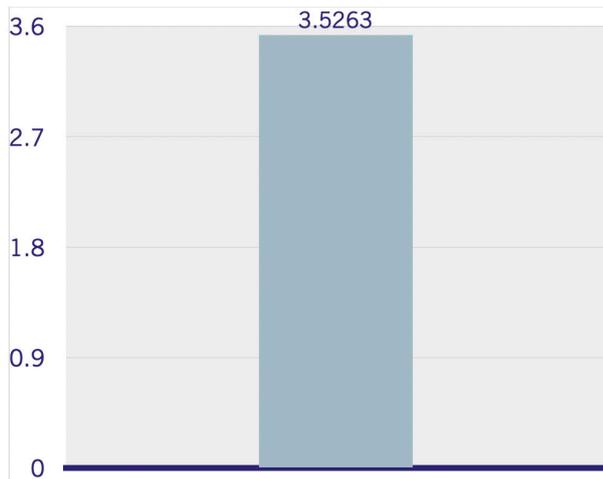
⁷ Morgan, David L., et al. "Dyadic Interviews as a Tool for Qualitative Evaluation." *The American Journal of Evaluation*, vol. 37, no. 1, SAGE Publications, 2016, pp. 109–17, <<https://doi.org/10.1177/1098214015611244>>.



It is the perspective of the interviewer that this may have influenced the types of responses provided, with participants displaying high levels of certainty and confidence.

In only one interview, with a younger man and a woman, did the interviewer observe expressions of uncertainty observed, reflections of the likelihood of gaps in interviewees' knowledge, acknowledgement of probable errors, and the statistical likelihood of risks within the procurement processes reflecting industry-wide labour risks in the two sectors.

LEVEL OF RESPONSIBILITY FOR COMPLIANCE WITH LABOUR LAWS



Responsibility level

Survey participants were asked about their responsibility in terms of compliance with labour laws of the contracted cleaning and/or security supply chain. They were asked to select their level of responsibility between 1 to 5, where 1 is considered as the least responsible and 5 is the most. Survey respondents answered 3.5 as an average level of responsibility in terms of compliance with labour laws of contracted cleaning and/or security supply chain. Overall, respondents perceived themselves to be responsible for the labour conditions of cleaners and/or security guards.

This finding was also reflected in the interviews. All interview participants indicated a strong commitment to addressing the labour conditions of cleaners and/or security guards.

One interviewee who showed an understanding of the risk of breach of labour conditions put it this way:

[Cleaning is] one of our largest categories, full stop, in terms of service category and we know we know...there's been a lot of underpayment in this area and we want to do the right thing. We consider ourselves a good corporate citizen and we don't want to find out from others that we've made a mistake. So we're trying to get on the front foot.

All also indicated strong buy-in or direction to do so from university leadership. This support is indicated by the following statement from one participant:

It's an easy conversation [with the university leadership] because there's only one word to use, and that's 'risk'. As a government institution we are subject to spending public money in the scrutiny of that.

In all cases, addressing labour conditions was seen as a joint effort shared between various personnel through different means: at the point of developing tender documents, when considering tenders, when forming contracts, when managing contracts and overseeing cleaning and security performance, at the point of paying invoices, and so on. When participants considered their level of responsibility for ensuring compliance with labour laws, then, they were likely comparing their direct responsibility with staff members who manage these different means of addressing labour conditions.

One interviewee described the ways they called on other competencies within and external to the university:

I mean, I can't speak for [Interviewee 2], but I am definitely not an expert in award rates at all. We're procurement professionals. We know a little bit of contract law and commercial terms. We negotiate them. We do industry analysis...but we can't be experts in all areas... When it gets particularly tricky we go to an in-house lawyer and when it gets tricky for them they go to external lawyers.



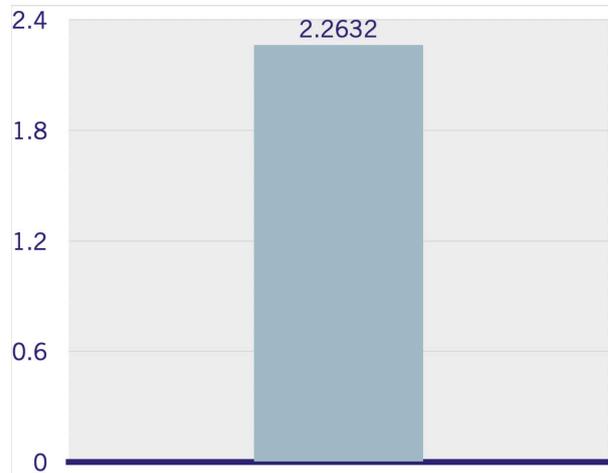
This points to a central challenge for universities in ensuring that workers receive legal conditions. The primary interface with cleaning and security workers, and the primary responsibility for oversight of labour conditions, lies with procurement and contract management personnel. They may call for the assistance of other professionals within or external to the university at times, but day to day responsibility lies with people whose core competency is not labour law compliance.

In the one interview undertaken with personnel other than procurement officers or contract managers, the challenges entailed in this chain of responsibility were described in some detail. The personnel are responsible for developing policies and overseeing ethical procurement across the university, but not directly responsible for managing contracts. They described the challenges of educating and incentivising those who are responsible for tenders and contract management, for whom checking supplier performance against ethical criteria is a new and additional task:

To some [responsible for sourcing] this is a new idea. [They ask] “Why are you telling us to do more work to work with our suppliers on this?” So, we’ve had to use different levers. . .to bring people across, to change hearts and minds, whether it’s to incentivise and encourage them because it is the right thing to do, to share that story of the impact and that we are changing people’s lives for the best...highlighting that this is coming from the very top of our senior leadership. In the training we would play a video from our Vice Chancellor who talks about modern slavery, just to show how important it is for the university commitments, and to highlight that it is a legal obligation. There are KPIs, so, using that lever where the contract managers have to report on what they’re doing around... these supply assessments. It is a new process, and in any university, any organisation, change is challenging...With COVID and the challenges that universities are facing right now in terms of staffing constraints, financial constraints, in that context it has been challenging. But we have brought people across the line and we’re particularly proud of that because we do have that senior leadership backing.

PERCEIVED RISK OF NON-COMPLIANCE WITH LABOUR LAWS

Risk of non-compliance with labour laws



Survey respondents were then asked to rate their perception of the risk of non-compliance with labour laws relating to the cleaning and/or security supply chain. On a scale of 1 to 5, survey respondents on average described the risk of non-compliance as 2.26.

This finding differs from the attitudes of participants in interviews. With the exception of two interviews, participants generally described a very high level of confidence in the processes and policies deployed to address labour conditions. This confidence is reflected in the following response:

We haven't really had any challenges, so I'm interested to hear what those challenges might be.

Asked whether there was concern about ghosting, one interviewee said:

The numbers that we have of security guards we would only have four or five guards per campus. There's no room for it. There's just no opportunity, I think.



Another interviewee stressed the provision of entitlements beyond the minimum, again reflecting high levels of confidence:

The labour conditions we provide are normal labour conditions plus actually go above and beyond here because we provide a lot of training for our staff, both in the first aid and other areas such as evacuation drills. We pay for their first aid courses: we give them extra training in things like asthma and anaphylaxis. That's all of the guards. OK, so we ensure that our team is not only treated right in writing, but in actuality.

Examples of lower confidence included one interviewee, interviewed alone, who described being at the early stages of implementing a supplier management framework. This participant explained that a reason not to be overly confident in the capacity of the team to address labour conditions was the unevenness in levels of knowledge about labour and modern slavery laws amongst staff members responsible for procurement and tendering:

I think there's a bit of an education and understanding piece as well as the question of consistency and standardisation across the university. There are different levels of maturity across different departments. So, for example, in commercial services one of my colleagues is well versed in the requirements of modern slavery and all the requirements. So, she's working on that piece. But have we taken everyone on a journey internally? I think that's probably one of the biggest challenges to date.

In an interview in which both interviewees expressed concern about the likelihood of labour law breaches in supply chains, the role of immigration laws was noted as a key driver of exploitation.

In an interview in which both interviewees expressed concern about the likelihood of labour law breaches in supply chains, the role of immigration laws was noted as a key driver of exploitation. This participant noted that the fact that international students are often employed by suppliers increased the risk to universities:

With borders opening that this [labour shortage] will not be a long-term change. I think there will be then a big supply of workers coming through soon, including our own international students, and I think that's another point to highlight. Is that not only is cleaning a high-risk area, it's also high risk because our own students at the university could be engaged as cleaners and therefore be victims of modern slavery. I think that's a really important point to highlight. A lot of the challenges stem from the restrictions placed on working holiday visas or student visas and how many hours they can work...Because they're being underpaid, they now need to work extra hours in breach of their own visa so their employer is breaking the law in terms of underpaying them, but equally, the international student is forced to break the law by working extra hours to survive in a big city. So I think the government also has a role to make sure that our rules and visa conditions don't lead to exploitation.



HOW COMPLIANCE WITH LABOUR STANDARDS IS CHECKED AND VERIFIED

A central finding of this report is that there is no standardised method for checking and verifying compliance with labour standards by contractors, and those processes currently adopted were described as embryonic, having only been developed over the past five years.

Table 1: Method of checking and verifying compliance with labour standards of cleaning and/or security contractors

Answer choices	Responses (percentage)	Number of responses
Internal desk-based audits	36.84%	7
External desk-based audits	26.32%	5
Regular (at least quarterly) meetings with contractor	78.95%	15
Consultation with United Workers Union	5.26%	1
Talking to workers	21.05%	4
Statutory declarations	36.84%	7
Others	10.53%	2
	Answered	19
	Skipped	5

Table 1 shows how survey respondents check and verify compliance with their labour standards of cleaning and/or security contractors. Participants were given 7 choices and asked to mark multiple if applicable. Most of the respondents marked that they had regular (at least quarterly) meetings with contractors to check and verify compliance with labour standards. Internal desk-based audits and statutory declarations were the second most selected answers. Among all choices, survey respondents felt consultation with the United Workers Union was the least preferable way to verify compliance with labour standards of cleaning and/or security contractors.

Regular meetings with contractors

While the survey data describes regular meetings with contractors as the most commonly used method of checking compliance with labour standards, this was not discussed in great detail in the interviews. Interviewees often described in passing “knowing the contractor well” or “having confidence in the contractor”, but did not spend a great deal of time describing how meetings with the contractor were used to check compliance with labour standards. One interview described monthly meetings with contractors:

The university holds monthly performance meetings with all of our contractors and the very first segment of all of those performance meetings is health and safety. All the contractors need to provide a report each month that includes all of their health and safety activity, and it outlines what issues that that they, the company itself and their staff, have identified during the previous month.

Requirement not to subcontract or to ask permission to subcontract

Most interviewees mentioned a stipulation in contracts not to subcontract. This type of statement was typical of descriptions:

So, so in that procurement process there are some very explicit requirements. First of all is that we require them to confirm that they do not subcontract labour and all their employees are direct employees and that all wages are paid in accordance with the relevant awards. They are our primary, minimum standards.



Requiring tenders to account for legal labour costs

It was commonplace in interviews for participants to describe in detail how they stipulate in tender documents and contracts that contractors must comply with labour laws and the Modern Slavery Act (2018). Almost all interviewees discussed these types of clauses and processes within tendering procedures. Most interviewees who described the incorporation of ethical filtering into tendering processes described them as new or only implemented for one or two rounds of tenders.

A participant from one university said:

The tender document will outline the minimum requirements that we want responders to comply with.

A participant from another university described the inclusion of modern slavery clauses:

We introduced modern slavery clauses into our contracts. As part of tender submissions we are asking how they are fulfilling their modern slavery obligations, so of course they need to produce some sort of evidence at the time of tender.

Another participant described the early development of the stipulations around minimum labour standards in tendering documents:

[We have engaged] a small boutique consulting firm that specialises in facilities management. They're helping us get the tender documentation right. They are developing...the regulatory compliance requirements that we need to spell out in the tender documentation.

A few – but not all – participants described universities requesting that tenders address the cost of labour, and that the tenderer explain how they comply with labour laws:

We are asking detailed working behind not just an hourly rate; we need to see how that hourly rate is even built up, whether they have included super, whether they included leave. Long, long service leaves and sector or sectors. So all that background came along with their, with their

tender, which was assessed by our team. So that gave us some extra comfort that they are, you know, fulfilling all these statutory and other legal requirements.

Participants from one university attempted to calculate the cost of labour themselves, to check this against tenders:

We actually went through and identified the staff that we currently have servicing our campuses and we took out their names and only referenced their titles and the campus location where they were and their pay grade so that we knew that. And we referenced through the tendering process that these are the people that will go forward; this is their current pay, their benefits, overheads and everything else. So basically, it took the competitive nature of tendering for that portion of the contract out.

Statutory declarations

Interview participants from four different universities described requiring statutory declarations stating that correct and legal labour costs have been paid when contractors invoice:

Each time they send us an invoice they send us a statutory declaration...stating they've paid their staff correctly. It's on a legally enforceable document and that's attached to every invoice. I paid very large amount of money...worth of invoices yesterday, and both of those invoices have this stat dec attached to it. They're held to account that they're going to pay the award and that they can't pay subcontractors unless the manager gives them direct, specific written approval.

A participant from one university was critical of this approach of asking for assurances or statutory declarations from suppliers:

Some of the suppliers' feedback is that "no one has really asked us to complete a third party independent assessment. Usually we just submit some documents and that's it"... I would say that no company could actually guarantee there's no modern slavery. Because if you look far enough there will be slavery...I think our process is quite different to other universities.



Internal desk-based audits

Interview participants also commonly described conducting audits of contractors from within the university. The methods used for auditing varied and what was described was often not of a systematic nature.

External desk-based audits

Most participants did not describe external, third-party audits. For example, one participant said:

The university does not undertake third party auditing. Not down to that level.

Participants from only three universities described hiring external parties to conduct audits to check compliance with labour standards. One interviewee described using a mixture of internal desk-based audits and external desk-based audits:

From an operational phase we retain a right to do spot audits on all contractors to ensure that they are paying what they [say they are paying]. We do it quite regularly across both cleaning and security, in particular that the labour hire contracts, which are essentially what they are... I want to put it politely, free from abuse. There's a couple of ways we can do it in house. We've got enough expertise in-house [to say] "so show us the payslips for this individual and show us that you have paid the bank receipts, and that the payslips cover labour, super, WorkCover". We will choose a random selection of people over a random number of days over a random period of time, and if we're not completely satisfied with that we can have forensic auditors come in and do it for us. We have a guy who we know here in Sydney who has done it numerous times, and a number of times has found anomalies in the records. We have run this process numerous times and had satisfactory results with some not satisfactory results within, which then led us into the forensic side of it and that was able to prove our suspicions at the time. We then fronted this company and said, please explain before we issue termination. They put their hands up and said "yeah we got caught". We terminated that company.

No participant described contracting an independent auditor with a track record in auditing the cleaning industry or cleaning industry specialisation.

Instead, they often described 'relational contracting' whereby a party that they trust with another task takes on the role of auditing. For example, one participant described engaging a payroll company:

A company that runs our payroll system let me know they had expertise, or they could outsource to a legal firm where they didn't feel they had sufficient expertise around award interpretation. So we went to them in the first instance, because we have a relationship with them and we know that they can do it.

Another set of interview participants, who voiced concern with labour standard breaches within cleaning and security value chains, described conducting regular risk assessments and utilising a company called EcoVadis to assess risks within supply chains:

Interviewee 1: So what we've, what is a mandatory part of the process for sourcing people as they take on new projects... they complete a risk assessment. As part of the risk assessment they are posed with some very direct questions that affect labour and human rights. When they flag risks, we talk about mitigation strategies. Currently the university is using a tool called EcoVadis. If it's a high risk industry and/or a huge spend with the supplier, then in those circumstances we ask the supplier to undertake the assessment...It's quite a detailed assessment. It takes on average, you know 3 odd months to complete. Part of it involves suppliers providing information around questions that are posed to them and then a more detailed assessment being undertaken by EcoVadis... If it does turn out that they are deficient in some areas that also gives us an opportunity for our contract managers to improve their performance in those areas.

Interviewee 2: As part of EcoVadis they get a scorecard out of 100, and EcoVadis also provides recommendations for improvements. So the idea is then, once we have that baseline data, we will then work with the supplier to improve over time...So we've selected prioritizing about 100 of our key suppliers to go through this process, and that was based on a criteria of modern slavery risk

No participants described external, third-party in-person audits.



Biometric scanners and other methods of monitoring attendance and working hours

Participants from two universities described the installation of biometric or geometric scanners to ensure that 'ghosting' is not occurring:

The security industry has also been through the ringer at ICAC [Independent Commission Against Corruptions], if you're aware, in the last 18 months to a massive extent. We have biometric scanners to make sure that people are [turning up on the days they are rostered]...we installed them around or about the time of the first COVID wave, which is March to April 2020...so, we've had biometric scanners here for approximately 18 months, and what that does is it proves that someone who's got a fingerprint which registers here. The ghosting that happened in [large city] was highly criminal and it was in the millions of dollars, so we've taken a lot of steps...across this, checking invoices, biometric scanning. I will quite regularly order a random check of CCTV to make a guard come into a camera...so we could prove they're on site. So there's lots of little checks to do, but the biometric scanners are reasonably cheap and sensible...they are a wonderful technology.

Interviewees from one university described the use of an app to track cleaning working hours, to address the problem of either 'ghosting' or of working hours being longer than documented on timesheets:

We want...reports from our cleaning provider that confirms how many cleaners have been on site and for how long. We are implementing a new system that basically requires the cleaners to log in by their smartphone when they're actually on site and when they leave the site. It is a system that the cleaning company is implementing.

Contracting 'top tier' contractors

Interviewees from three universities described selecting 'top tier' or 'premium' companies as a way to ensure compliance with labour laws.

Many interviewees also described being wary of tenders that appeared too cheap. One response is indicative of this attitude:

The only thing with security that gives us particular comfort is we were very careful to select what we considered a premium service provider and not pick the one that was cheapest. In fact, we were wary of the ones that were cheapest. We have changed the company, but you often don't change the workforce. The security personnel on campus are customer service advocates...They have to, they have to deal with students...they have to do it in a way that doesn't disenfranchise people. OK, so we've always prided ourselves on trying to have a good workforce on site, a premium workforce on site that's service-orientated and as the contractors who managed this security contractor changed...they are not mandated that they should use the same employees, but they've been encouraged to consider them.

This response is consistent with the survey findings described in the next section about what was most important to survey respondents in considering tenders.

Grievance mechanism

Participants from one university described a new grievance mechanism through which confidential grievances could be lodged about human rights breaches or concerns:

This week the university is launching our modern slavery grievance mechanism, so that's been in the works for several months. We have an online form...where anyone, whether it's a staff member, student, supplier, or worker in the supply chain or just an external member of the community, can raise any grievances or incidents of modern slavery. And there is a whole process, then, to investigate and to ensure that the right area at the university is responding to that.



Working with unions or formal worker voice mechanisms

As with the survey findings, in interviews most participants described universities using a mixture of methods to address labour compliance. The interviews confirmed the finding of the survey that consultation with the relevant union is rarely adopted by procurement managers, who prefer other methods. While they also often mentioned direct relationships with workers, no interview participants discussed having set up ‘worker voice’ mechanisms or ‘worker-led monitoring’, though the literature suggests that such mechanisms would be most effective in assessing compliance with labour laws and are likely far less expensive than the range of methods described by interviewees. While there may be unions organising these workers, we note that this was not at front of mind for participants during the interviews.

At the one university that participants described as having an active union, interviewees noted that while there was an active cleaning union there was no security guard union:

Interviewee 1: [The union] has come on site... and they spoke to the cleaners and ask them if they're happy with their rates and everyone was happy.

Interviewee 2: I have never ever seen a union delegate in all my 14 years demand to come on site. Not once. They do have a union but I couldn't even tell you who it is.

Interviewee 1: But unions are becoming less [powerful]. Even at this place...we've got two unions here. One of them is actually very polite and the other one is little bit louder at times, but I don't think the trade unions have anything like the presence they used to, is the simple answer.”

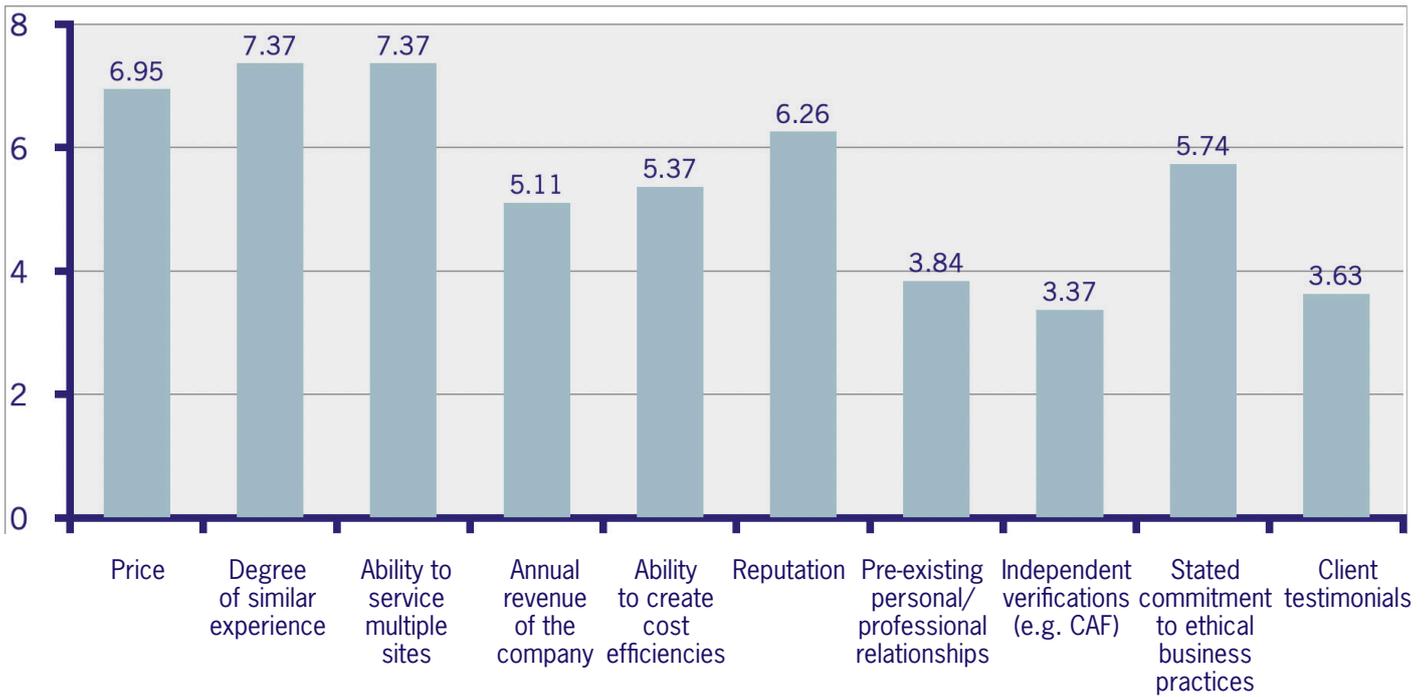
When interviewees discussed talking to workers directly, they described a managerial, top-down approach, despite referring to the workers as “partners”:

Cleaning over the last 20 years has gone through a fairly similar migration wave to the country. I think it's probably a good way to look at it. When I first started, a lot of the cleaners were with southern Chinese or Vietnamese or Indonesian: from the Southeast Asian area. It's now moved to India, Pakistan, Burma, Nepal, those areas. South Americans are starting to come into a lot more of them. There are some language challenges because I don't speak Nepalese or speak some Mandarin, but not enough. We have enough diverse staff here that we can talk to them in their native language if necessary, in that it tends to make people a lot more comfortable but most of them have a good grasp of English so we'll sit down and talk like normal people. They need to do a job. We need a job done. If we can make their life easier, that will generally make our life easier. That's how we partner with them. It sounds like a bit of a clichéd term but we need we need them as a partner because I've got 126 hectares of land and 85 buildings. I've got a team of seven. We can't look at every building every day. That just doesn't happen. So we need we need feedback directly from them, which is what we get.

No interview participants discussed having set up ‘worker voice’ mechanisms or ‘worker-led monitoring’, though the literature suggests that such mechanisms would be most effective in assessing compliance with labour laws and are likely far less expensive than the range of methods described by interviewees.



Most important in considering tenders



MOST IMPORTANT IN CONSIDERING TENDERS

Survey respondents were asked about the tender process. They were questioned whether it was a requirement to provide evidence of compliance with labour laws in tendering process. All 19 respondents answered yes to this question.

Survey respondents were then asked to rank what was most important in considering tenders, with 1 being the most important and 10 being the least. Respondents marked both ‘degree of similar experience’ and ‘ability to service sites’ equally important when considering tenders. The second most important rank was given to ‘Price’, which scored 6.95. Reputation was ranked next after price. ‘Stated commitment to ethical business practices’ came in fourth with an overall importance of 5.74. Respondents felt that ‘ability to create cost efficiencies’ and ‘annual revenue of the company’ were the next necessary points to maintain while considering tenders. Least importance was given to ‘pre-existing personal/professional relationships’, ‘client testimonials’, and ‘independent verification’ (e.g. CAF), which were scored 3.84, 3.63 and 3.37, respectively.

While it may not be viewed as the most important factor by survey respondents, in interviews, participants described ethics and compliance with the law as non-negotiable factors.

The below statement was indicative of the sentiment of expressed by all interviewees:

So once these companies fulfilled our [ethical] criteria only then value for money comes into play. It’s not necessarily that the cheaper will win. So that’s our main objective.

LEVEL OF CONFIDENCE THAT CLEANERS/ SECURITY GUARDS FEEL SAFE AND RESPECTED

The survey asked questions regarding the working conditions of the cleaners and/or security guards. Respondents were asked how sure they were that cleaners and/or security guards are working safely at all times on the university campus. They were asked to rate from 1 to 5 where 1 is the least and 5 is the most. Respondents rated their confidence at 3.73 on average. Respondents were also asked how sure they were that the cleaners and/or security guards felt respected at the workplace. Here, their confidence was slightly lower, with respondents ranking 3.63 on an average. The difference is marginal, with reasonable levels of confidence expressed on both points.



Level of confidence that cleaners/security guards feel safe and respected



Respondents thought it was highly unlikely that incorrect payment was driven by the university, with only 5.26% saying it would be because the university does not pay enough to the contractor.

Furthermore, only a few respondents chose 'high workloads and/or lack of training'.

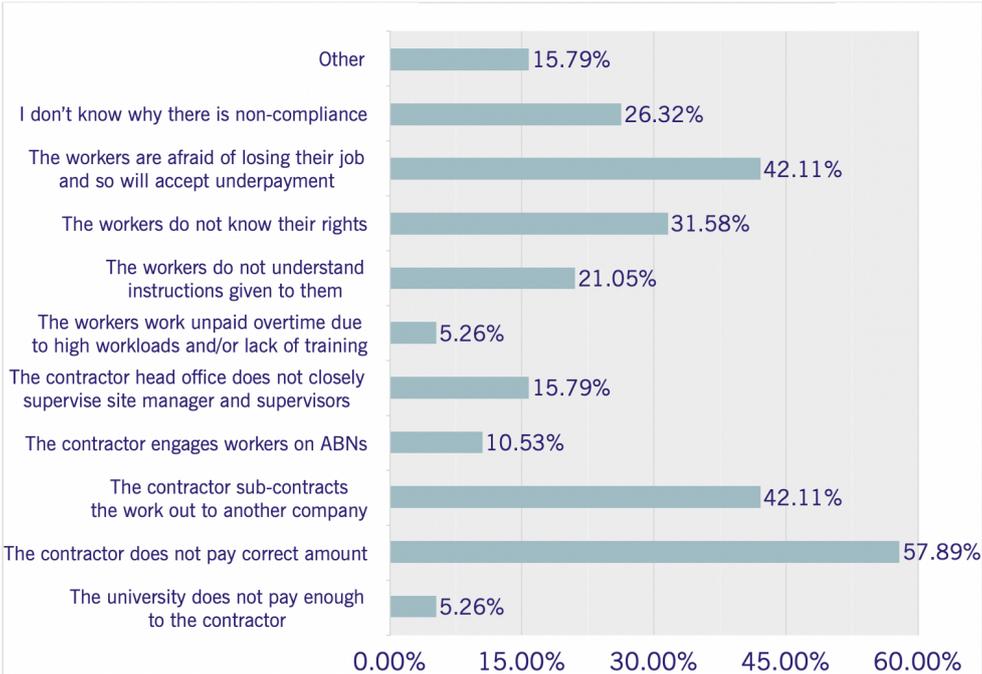
Most saw the problem lying elsewhere, with almost 58% stating that the most likely reason for incorrect payment would be that the contractor did not pay the correct amount. The next most common reason given was that the contractor sub-contracts work out to another company (42.11%). The next two perceived most likely reasons for incorrect payment related to worker fear (42.1%) and that 'the workers do not know their rights' (31.5%).

PROPER PAYMENT

Survey respondents were asked how sure they were that cleaners and/or security guards are being paid correctly at all times. They were asked to rate their level of confidence where 1 is the least and 5 is the most. Respondents on average rated their level of confidence regarding pay at 4, higher than their confidence about work safety and respect.

Survey respondents were then asked about the reasons that cleaners and/or security guards were not being paid properly. They were asked to select from multiple choices answers, and given the option of selecting more than one option. Respondents thought it was highly unlikely that incorrect payment was driven by the university, with only 5.26% saying it would be because the university does not pay enough to the contractor.

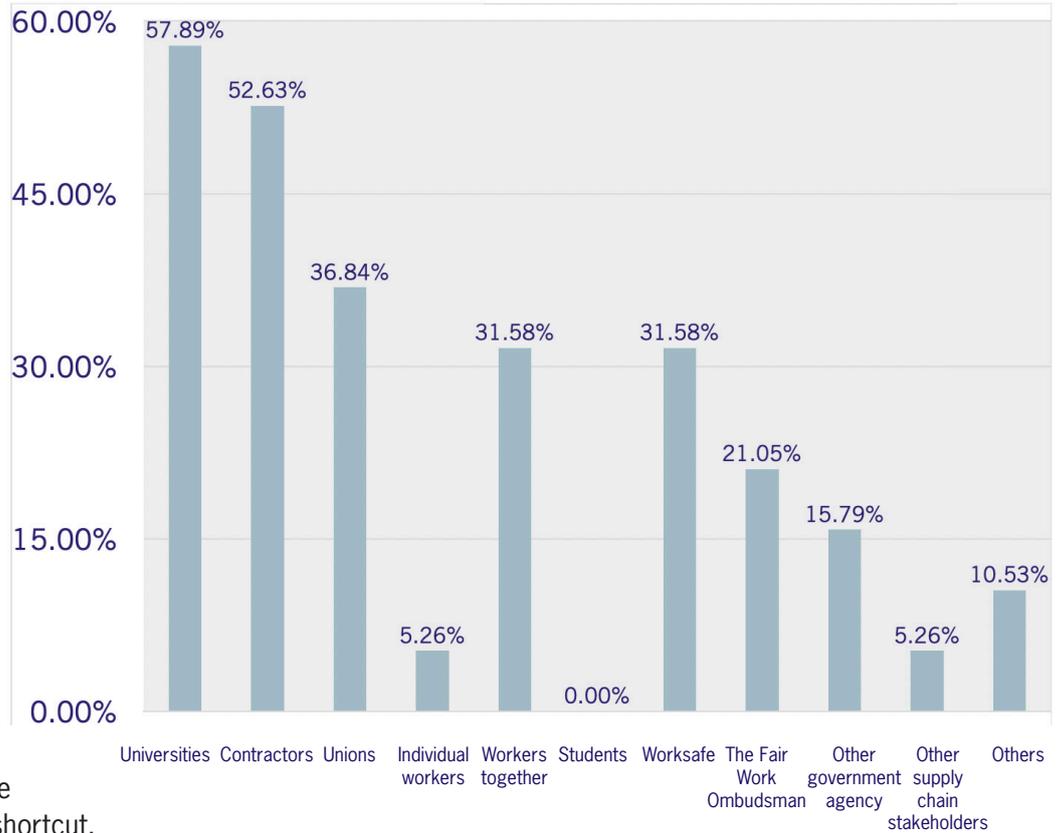
Reasons for not being paid properly



One interviewee who expressed lower confidence than others about contractors paying the correct amount thought it likely that contractors would try to cheat the system:

There are always ways around [compliance], for example, how many hours they then get their staff to work and all that sort of stuff so, though we get more mature [in our compliance efforts], I think companies and people always find a way to shortcut.

Power to improve working conditions of cleaners and security guards



IMPROVEMENT OF WORKING CONDITIONS

Survey respondents were asked to rate their knowledge of federal and state labour laws and modern slavery laws. They were asked to mark their level of knowledge from 1 (the least) to 5 (the most). The average number of their responses is 3.68 which indicates that respondents believe they have a good knowledge of federal and state labour laws and modern slavery laws.

Survey respondents were asked who they think has the most power to improve the working conditions of cleaners and/or security guards. They were given multiple options and asked to select the top three. The majority believed that universities (57.9%) and contractors (52.6%) had most power to improve the working conditions. Interestingly, this contradicted the perceptions about who was responsible for breaches of labour laws, in the form of low-payment, where universities were rated as having low responsibility.

Almost 37% responded that unions have the power to improve working conditions. This contradicts earlier survey findings that indicate that unions are not seen as a method for checking labour conditions.

Workers together, as well as Worksafe were perceived to be equally powerful. 21% of respondents supported the proposition that the Fair Work Ombudsman can promote improved working conditions. Government agencies were not raised in interviews. Survey respondents generally had a low belief that individual workers and other supply chain stakeholders had the most power to improve the conditions of work for cleaners and/or security guards.

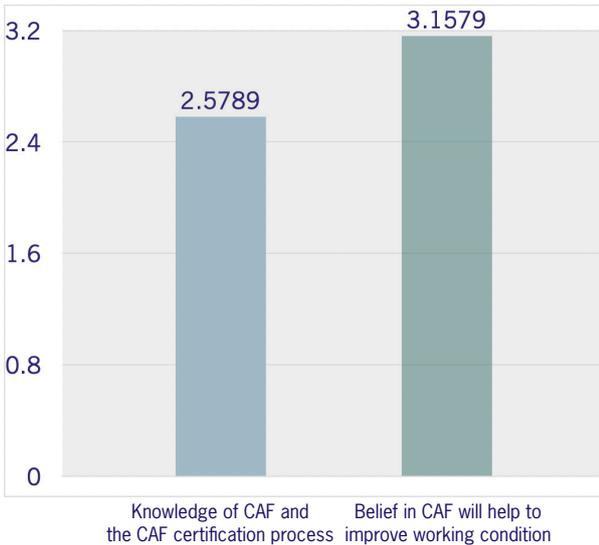
The majority believed that universities (57.9%) and contractors (52.6%) had most power to improve the working conditions.



IMPORTANCE OF CAF CERTIFICATION PROCESS

The survey inquired into respondents' knowledge about and the importance of CAF certification.

Knowledge and belief that CAF will help to improve working conditions



Survey respondents were asked how knowledgeable they felt about CAF and the CAF certification process. They were asked to mark their level of knowledge from 1 to 5 where 1 is the least and 5 is the most. The average rating was 2.58, which indicates that respondents did not perceive themselves to have high knowledge of CAF and the CAF certification processes. Participants were also asked how successful they believed CAF would be in improving conditions for cleaners and security guards across the industry. They were asked to mark their level of confidence in CAF from 1 to 5 where 1 is the least and 5 is the most. On average, they rated their confidence in CAF at 3.12. While it can be said that respondents had confidence on CAF, this level of confidence could be improved.

Labour cost pricing tool

When asked what interviewees want from CAF in particular, the most common response revolved around the labour pricing tool.

The following exchange between two interviewees captures this interest:

Interviewee 1: It would help...the next time we go after tender, if there's a good tool we can use to help us in the process. So, two years down the track, we will run a tender...we would benefit by having you know a tool that we can use so that we can really interrogate...pricing...interrogate and analyse responses [from tenders].

Interviewee 2: Yes, CAF mentioned they have an Excel spreadsheet that can assist with analysing the prices that come in and making sure that the baseline that they set. [It] will basically indicate that where there are potentially some issues with the payments of staff and other things, so that would be a good value to us. And also auditing and dealing with cleaners on the ground so they do work with them. I believe they talk about their conditions and make sure they are paid as per the award.

Standardised approach across universities and utilising cross-university buying power

Interviewees from two universities stressed the importance of developing a standard approach across universities and the confidence that this would build labour standard compliance. The following quotes are from the same person from different points in the interview:

Over time universities will start using the CAF certified cleaning suppliers over those that haven't completed certification. It's about the trust and knowing that they are reputable.

From my perspective, rather than each organisation trying to work out how they're going to do within this in their space, for an organisation to lead it with a consistent framework, backed by research, and then for us to apply and implement, I think that that would be quite powerful.



Worker voice

Two sets of interviewees expressed interest in CAF’s worker voice mechanisms. One stated:

And it’s bringing the workers’ voice to the fore, and I think that’s really important. Often in business and human rights, and in the modern slavery space, the rights holders, the workers themselves, are often left out of the puzzle. It’s very much focused on policies and processes from the organisation’s end rather than who are the peoples whose rights could be violated. That’s often missing, so I think it is really wonderful that CAF has that interaction and consultation with the workers and with unions and other bodies that traditionally wouldn’t be in this arena.

A more rigorous process

The same interviewee from this university stressed that CAF provides rigorous processes to investigate the real problems workers might be experiencing, and to uncover labour standards breaches in the supply chain. They contrasted this with the processes commonly undertaken by organisations when reporting under the Modern Slavery Act (2018), which they characterised as often being more of a compliance-based and public relations exercise:

Modern Slavery Act reporting is often seen as a compliance process, like a tick-a-box exercise... [which is] to be honest, quite weak. It’s very much based around just publishing a statement every year on the mandatory criteria and the actual content and the processes behind that is not mandated. I think CAF creates a model of what it could look like, what it should look like, where you are involving all the different parties together but also...seeing what’s really going on. To speak to your earlier questions: do we check timesheets or payments and slips? Or what’s the workers’ actual opinion on the ground? That is missing in the process. I think with the whole modern slavery journey with companies and organisations there is an over-emphasis on policy documents; to look like

everything is going well. To say, “we have a zero tolerance for modern slavery” is great but what does that look like in practice? And I think, we’re not there yet, and I think CAF is a great model to get there.

Table 2: Reasons for low confidence in CAF certification process

	Response
Response 1	Never heard of this, it seems to be 'cleaner' based. There is quite a lot of difference between the security requirements, licensing, education, and the like.
Response 2	As it's a new proposal and yet untested
Response 3	Medium confidence
Response 4	Ability to facilitate larger scale adoption of CAF certification in the built environment
Response 5	Minimal knowledge of CAF
Response 6	Change needs to happen
Response 7	It's only employer's business

When the survey respondents were asked to state the reasons they had low confidence in CAF and the CAF certification process, the response rate was low, reflecting the high confidence in CAF. Of the seven who responded, respondents indicated they have low knowledge of CAF processes and certification and that it is relatively new and untested.

In interviews, even those who were enthusiastic about CAF still had concerns or points they hoped CAF would address. These included the timing of the pilot process, the challenges in maintaining good relationships with suppliers at the same time as subjecting them to heightened scrutiny, and extra work.



Concern about timely assistance

In interviews, a number of participants described being enthusiastic about CAF's services but concerned about the timeline for the pilot. Interviewees often described a current problem they wanted help and guidance with, and worried that CAF would not act in a timely manner. In the following comments from an interview, the participants describe a problem which they imagined CAF could help with, but voiced disappointment that CAF might not be onboard in time. The exchange also demonstrates the difficulties procurement managers experience in costing complex labour pricing against the award:

Interviewee 1: There's a little bit of history here...Our preferred supplier [was very cheap], so I had a second look at the costings and [though] award interpretation is quite difficult and it's a specialty field, I was concerned that there was very little margin in that contract.... I just thought this looked very, very tight. How can they possibly do that? And further, two years into the agreement, they offered to clean some extra spaces for free...as long as they got an extra two year's worth of contract term.

Interviewee 2: I'm no expert of the award either... [it is necessary to] review the awards and the payments that are made at various times of the day, and if you have certain times of shifts, etc.

Interviewee 1: I just took a high-level view and I thought this looks tight, and it was also quite a bit cheaper than anywhere else. I can still remember writing the review...I sent it to the facilities director and said "I have...some question marks around it"...We're going to do a quite detailed audit of what they get paid. We're doing that independent of CAF. The pilot is moving too slowly for our requirements, to be honest with you, because we just want to satisfy ourselves before we take up those final two years. We're doing quite a forensic audit of our own to satisfy ourselves that they're being paid correctly...We've randomly selected... I think we have something like 70 cleaners... a large number of cleaners.

Interviewee 2: Yeah, between 60 and 70 cleaners.



Interviewee 1: We selected 15 of those randomly and then we...selected a certain time period. And then we asked the cleaning company to print off their time sheets for that period and their payroll slips for that period and we are sending them to a third party for review to make sure they're getting paid in accordance with the award.

Concern around relationship with suppliers

In another interview in which enthusiasm for CAF was expressed, the interviewees raised concerns around their relationship with suppliers and the risks entailed in "opening this Pandora's Box":

Interviewee 1: [We need to be] prepared because you are actually opening potentially a can of worms, so having the heart to then actually deal with it and do something about it. I think that's the crux of it, right?

Interviewee 2: The sensitivities of opening this Pandora's box are potentially [challenging]. We want, as a university, and like any other university, we want to maintain good relationships with our suppliers. Suppliers may feel threatened by this process because we are digging into what's going on. I think it's very important that we do manage the relationships carefully in a considered way, not where we rush in or where we take an overly activist approach for want of a better word, but where all the parties come to the table together. We're almost like the bridge bringing in CAF, bringing in our suppliers and their workers together. And we need to maintain all those relationships. So I think it's important that CAF then takes a sensitive approach.



The average number of their responses was 3.79, which indicates that respondents believed it is likely that the university they work for would invest in CAF certification scheme to ensure proper payment and an exploitation-free workplace.

Cost

Most interviewees expressed interest in CAF, but said they needed more information about the costs and what is involved, as expressed in this interview response:

But yeah, I mean there is a cost to all this, so what that cost is once the pilot has been completed for the universities, I'm not sure of at this stage. That would have to be looked at as well, but it would be quite useful to get them to help with making sure cleaners are paid as per the award.

Willingness to invest in CAF

The final survey question about CAF asked how willing the respondent thinks their university is to invest in certification schemes such as CAF to ensure workers are paid correctly and are working in a safe, secure, and slavery-free environment. Respondents were asked to mark their perception of willingness from 1 (the least) to 5 (the most). The average number of their responses was 3.79, which indicates that respondents believed it is likely that the university they work for would invest in CAF certification scheme to ensure proper payment and an exploitation-free workplace.

In some interviews, the participants noted that although they were enthusiastic about CAF, the investment would not be their decision. They also noted the fiscal strain that universities are under.



RELATIONSHIP AND CAUSATION BETWEEN QUESTIONS

To analyse the baseline survey data, it is helpful to estimate the relationship and causation between survey questions or factors. A linear probability model (LPM) was used to analyse how the factors affect perceptions of labour conditions in cleaning and security value chains. Several independent or explanatory variables were employed to explain the variability within the dependent or response variables. This helped to deduce which of the independent variables were more relevant than others in terms of statistical significance and effect size.

Here, the regression model employed respondents' responsibility for cleaning service tenders as a dependent variable and the independent variables were staff members' position, their role in overseeing performance, compliance, and non-compliance with labour laws, and their knowledge of CAF process.

Table 3 presents descriptive statistics of the variables used in the regression analysis. The number of observations was 19. The dependent variable was measured in a binary variable where 1 indicated yes as to whether the members are responsible for cleaning and/or security service tenders and 0 indicated no. For the university staff member's position variable, procurement officers including a chief procurement officer were taken in the analysis since procurement officers were found in the survey to be primarily responsible for procurement tools to aid the process of tendering for cleaning and/or security service contracts.

Responsibility for overseeing performance of cleaning and/or security service contractors were also measured in binary numbers where 1 indicated yes and 0 indicated no.

Compliance and non-compliance with labour laws were measured in continuous variables from 1 to 5 where 1 was considered as the least and 5 the most. The other explanatory variable was the staff members' knowledge of CAF, which was also measured on a scale from 1 to 5 where 1 was considered as the least and 5 was the most.

Table 3: Descriptive statistics

Variable	Observations	Mean	Std. dev.	Min	Max
Members are responsible for cleaning and/or security service tenders	19	0.78	0.41	0	1
Procurement officers	19	0.42	0.50	0	1
Overseeing performance	19	0.53	0.52	0	1
Responsibility in terms of compliance	19	3.52	1.12	1	5
Current level of risk of non-compliance	19	2.26	1.09	1	5
Knowledge of CAF	19	2.57	0.90	1	5



Regression model:

Responsible for cleaning service tenders = f (position, overseeing performance, compliance with labour laws, current level of risk of non-compliance with labour laws, knowledge of CAF)

Table 4: How staff members’ involvement affects supply chain of cleaning and/or security services

Variables	Staff member’s responsibility for cleaning and/or security guards service tenders
Procurement officers	0.14 (0.40)
Overseeing performance	0.56* (1.4)
Responsibility in terms of compliance	-0.18* (-2.60)
Current level of risk of non-compliance	-0.07 (-1.49)
Knowledge of CAF	0.16 (1.75)
Constant	0.81** (2.91)
Observations	19
R-squared	0.75

FINDINGS FROM REGRESSION ANALYSIS

Table 4 reports the LPM results on the effects of university staff members’ involvement in the oversight of cleaning and/or security services. The table shows procurement officers were responsible for cleaning and/or security service tenders, but the result was not found to be significant. Furthermore, the result for overseeing performance was statistically significant, which indicates that staff who oversee the performance of cleaning and/or security contractors were more responsible for service tenders. However, a significant negative association was found between staff’s level of responsibility in terms of compliance with labour laws of the contracted cleaning and/or security supply chain and the staff’s involvement in service tenders. This indicates that people who are responsible for service tenders had less responsibility in terms of compliance with labour laws of the contracted cleaning and/or security supply chain.



DISCUSSION OF FINDINGS

Overall, the findings of this report reflect a great deal of good will and a desire to ensure that security guards and cleaners enjoy their legal entitlements. However, the data also suggests that the methods for checking compliance lack standardisation or verification across universities. Furthermore, the opportunity to harness the immense collective buying power of universities has not yet been utilised.

A summary of findings has been provided in the executive summary, and will not be repeated here. In this section, we reflect on the report's findings. The regression analysis showed that methods of responsibility for overseeing the performance of workers, and responsibility in terms of compliance with labour laws, are significantly associated with the nature of the responsibility for cleaners and/or security service tenders.

These findings reflect the challenges entailed in placing the responsibility for ensuring compliance with labour laws on those responsible for procurement. While the survey and interviews indicated confidence in the processes that universities have put in place to ensure that workers who are employed through a supplier are enjoying their full legal conditions, procurement managers are not legal compliance experts. Instead, their expertise lies in management. Though they may receive advice from professionals with this type of expertise, the main responsibility within the university for managing suppliers and being alert to the risk of labour exploitation lies with them.

That so much responsibility for labour conditions lies with staff members who do not directly employ cleaners and security guards, and who lack legal compliance expertise, is the result of the historical trajectory of universities outsourcing services.

The opportunity to harness the immense collective buying power of universities has not yet been utilised.

The following exchange summarises the trajectory in the industry, with widespread outsourcing occurring 20 years ago for cleaning and more recently for security:

Interviewee 1: I've been in procurement for the past 20 years now...It's changed a lot in 20 years. It was a relatively new, specialty area, I guess. [When I started] it was in its infancy. In those days the emphasis was on trying to get costs down as much as possible, because there was a lot of fat in supply chains in those days, right? I think that during that process, though, people pushed pricing a bit too hard at times. Historically, that is my observation.

Interviewee 2: About 5 years ago...at that time, there was a lot of bad press about cleaning companies underpaying their workers and subcontracting and things like that. We didn't want to be in the news and we wanted to be doing the right thing by all our workers.

Interviewee 1: People may be paid correctly in accordance to a timesheet, but whether they are able to claim all the hours they're working, well, I don't know. We don't know but we have decided that we want to try and find out.



Similar exchanges occurred in other interviews, describing how, beginning around 20 years ago, services were outsourced from universities, and pressure was placed on prices. More recently, concern for labour conditions has increased and alarm bells rang for the reputations of universities.

In the past 5 years a raft of measures have been put in place by universities to address compliance with labour conditions. Yet these measures have not been tested to ensure they are the most effective (or efficient) method of ensuring compliance. Auditing and compliance checks by third parties are rarely deployed, and not in a systematic manner. The checks are generally paper-based, checking timesheets and payslips against invoices, which will not address the most commonly documented causes of breaches of labour laws for cleaners: unpaid overtime and unsafe work practices. Nor will it address the problem of 'ghosting', which has been found to be a significant problem in the security industry. When independent checks are employed, it is generally because procurement officers have raised concerns. This system relies greatly on the expertise of procurement officers to notice anomalies.

Perhaps the most serious finding of the report is how rarely workers are consulted about their labour conditions in a systematic manner. While contractors change, most interviewees described relatively stable workforces.

Interviewees described security guards and cleaners moving from one contractor to another but continuing to work at the same university. Procurement and contract managers described good relationships with these workers, who they often characterised as ambassadors for the university. They described the heightened importance of both cleaners and security guards during the COVID-19 pandemic. Cleaners are responsible for sanitising lecture theatres and offices, and security guards have been given the extra responsibility of checking students and staff into the university, as part of contact tracing efforts, and checking vaccination statuses. Yet, survey respondents and interviewees did not rate worker consultation highly as a method for checking labour conditions. And further, unions were not described as being part of the arsenal for monitoring and improving working conditions, though their power is recognised in the survey data.

Overall, then, the data suggests that universities are not yet harnessing all the power or methods at their disposal to ensure compliance with labour and modern slavery laws. Yet at the same time, the interviews and survey data indicate high regard for the workers who were recognised as vital to the functioning of the universities, particularly during a pandemic. The data also indicates a high willingness to deploy further efforts to improve the conditions of these workers, and a favourable attitude towards CAF.





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