



University of
Southern
Queensland

Modern Slavery Statement **2023**

ABN 40 234 732 081

Message from the Vice-Chancellor

The University of Southern Queensland recognises that modern slavery is a global issue and remains firmly committed to identifying and addressing risks of modern slavery in our operations and throughout our supply chains. Across 2023, the University implemented a program of modern slavery awareness and prevention activities which reflects our resolve and commitment to transparency, integrity, and ethical conduct.

The University is delivering an ongoing program of work that includes implementation of the University's Modern Slavery Prevention Road Map and engagement activities such as training and risk identification workshops.

There is no place for modern slavery in the Australian community and global supply chains of Australian goods and services, and the University of Southern Queensland understands the important role we have in educating, raising awareness and taking preventative action.

This statement outlines our organisational commitments, progress and achievements in combatting modern slavery and details how we will continue to work with our employees, suppliers, and industry partners to mitigate the risks of modern slavery. It is a testament to our shared values and our commitment to a world where every individual is treated with dignity, respect, and understanding.

This statement was approved by the Council of the University of Southern Queensland on 17 June 2024.



Professor Geraldine Mackenzie

Vice-Chancellor, University of Southern Queensland
17 June 2024

The University of Southern Queensland acknowledges the First Nations of southern Queensland and their ongoing connection to Country, lands, and waterways. Further, we recognise Aboriginal and Torres Strait Island peoples as the first educators and researchers of Australia. We pay deep respect to Elders past and present.

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Under the *Modern Slavery Act 2018*, **modern slavery** means conduct which would constitute:

- (a) an offence under Division 270 or 271 of the Criminal Code; or
- (b) an offence under either of those Divisions if the conduct took place in Australia; or
- (c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- (d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

Campus Locations



About the University

The University of Southern Queensland is a statutory body established under the University of Southern Queensland Act 1998. The University of Southern Queensland Act enables the University to deliver the following:

- Provide university standard education;
- Provide facilities for, and encourage, study and research;
- Encourage the advancement and development of knowledge, and its application to government, industry, commerce and the community;
- Provide courses of study or instruction to meet the needs of the community;
- Confer higher education awards;
- Disseminate knowledge and promote scholarship;
- Provide facilities and resources for the wellbeing of the University's employees, students and other persons undertaking courses at the University.

The University of Southern Queensland is headquartered at the Toowoomba campus; has two campuses west of Brisbane - Springfield and Ipswich, and operates the Queensland College of Wine Tourism (QCWT) located at Stanthorpe. The QCWT is a joint venture with the Queensland Government.

In 2023, the University established a presence in the Brisbane CBD, with the official opening taking place in December.

The University also operates the Union Institute of Language (UIL), a provider of quality short and long term English courses, which conducts teaching operations in Springfield, Cairns and the Sunshine Coast. It employs approximately 40 staff comprising permanent, part-time and casual employees.

In addition to on-campus study, the University builds on over 50 years as a provider of higher education programs to students studying off-campus across Australia and overseas by enabling globally connected education, unconstrained by time and location. Some two-thirds of the University's students study fully online both within Australia and overseas.

The University provides products and services including the delivery of higher education, research activities, health and wellness programs, on-campus residential accommodation and a range of support services for employees and students.

The University of Southern Queensland is registered as a charity with the Australian Charities and Not-for-profits Commission. It employs 1647 full and part-time employees within Australia. These figures exclude casual workers and those employed through UIL.

The University undertakes a range of research activities and specialises in the flagship areas of Agriculture, Health, Space and Defence, as well as regional development. University research is undertaken within a Research Code of Conduct which includes robust frameworks and procedures for the ethical management of animal and human research.





Supply chains

The University's supply chains are a mix of global and domestic suppliers and are generally sourced via a competitive procurement process.

Suppliers range from locally based small to medium enterprises to multinational organisations and where possible, the University leverages Queensland whole of government standing offer arrangements. For suppliers of high-volume products, or where a supplier has an identified risk in terms of product, service provision, or geographic risk for quality assurance standards, the University seeks to implement contractual arrangements conducive to the requirement.

The University procurement strategy is progressing toward recognition of consolidated supply categories for the purposes of applying individual strategies where internal business practices dictate.

Supply categories of goods and services can be grouped as:

- business services;
- property and facilities;
- research and teaching; and
- technology.

The University's procurement planning framework includes a Corporate Procurement Plan, with additional plans sitting beneath it. To support the University's supplier profiling activities, the University has continued its sector-based approach to supply chain risk through its affiliation with the Australasian Universities Procurement Network (AUPN).

The University continues to invest in better transparency of process and collection of supply data and applies a systematic approach to all procurement practices including risk.

Products

Products purchased by the University range from daily consumables through to small and large assets and are sourced locally, nationally and overseas. A number of research related products are sourced from overseas where appropriate, and are generally specialised pieces of equipment which may require fabrication and long lead times.

Services

Services procured by the University include but are not limited to various disciplines of professional services, maintenance services and employment contract hire. Services are generally locally based and are covered by contractual agreement with terms appropriate to the associated risks.

Products and services used by indirect suppliers in the entity's supply chains

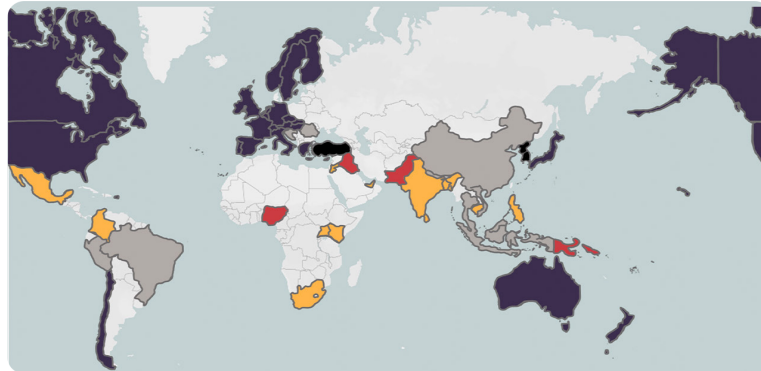
Products and/or services procured by indirect suppliers in the University supply chain are governed by head agreements which may require the supplier to comply with University procurement requirements as if they were a party to the head agreement.

Geographical Risk

adapted from the University's AUPN ArcBlue dashboard

Sustainability- Modern Slavery (Country Risk)

Spend **\$125.4M** Suppliers **9,127** Transactions **40,068**



Very High	High	Medium	Low	Unknown
29 suppliers (0.32%) \$864,040 spends (0.69%) 4 Countries	123 suppliers (1.35%) \$6,287,220 spend (5.01%) 10 Countries	122 suppliers (1.34%) \$693,780 spend (0.55%) 12 Countries	4,923 suppliers (53.94%) \$115,197,692 spend (91.89%) 26 Countries	4,782 suppliers (52.39%) \$2,328,536 spend (1.86%) 10 Countries

Modern slavery risks in operations and supply chains

The University assessed its modern slavery risks through consultation with internal and external stakeholders, combined with knowledge of high-risk products and services as documented by the Australian Border Force, Anti-Slavery Australia and the Global Slavery Index. The following table outlines key risks identified through the process.

DESCRIPTION OF MODERN SLAVERY RISK	
Operations	<p>The University of Southern Queensland is a global organisation that primarily conducts business within Australia and areas where modern slavery risk is considered low, however business dealings with organisations from around the world may expose the University to regions that have a higher risk of modern slavery.</p> <p>The University has potential exposure to modern slavery through activities such as international teaching and student recruitment, research and consulting as examples. The University has a comprehensive policy library to provide standard operating protocols and reduce risks in its operations. The library includes, but is not limited to: the Code of Conduct; Recruitment, Selection and Appointment Policy; Procurement Policy; Work Health and Safety Policy; Risk Management Policy and Procedure; and the Contractor Management Procedure. In 2023, the University drafted a dedicated Modern Slavery Prevention Procedure which is anticipated to be published in 2024.</p> <p>Research activities are widespread and varied across numerous sectors, however high risk industries such as agriculture, are a key focus for the University. Visibility and management of all research activities are reliant on strict adherence to University policies, research ethics, Australian and international customs, laws and directives, contractual obligations, as well as the research objectives. Risks may be additionally mitigated through licensing, training, supervision and ongoing contract management.</p> <p>As risks to international students have rapidly increased, the University has engaged with key stakeholders within its academic, student support, front line areas, and related entities to increase awareness, provide guidance for identifying those at risk and tools to support them.</p>
Supply chain	<p>Lack of supply chain visibility is a key risk for the University, as are the following activities within the supply chain.</p> <p>Cleaning Cleaning is considered a high-risk industry due to the vulnerability of many workers in this occupation. They frequently belong to at-risk groups such as women and girls, migrants and refugees and have low visibility, or barriers accessing legal protection. Although cleaning activities at the University are managed through contractual arrangements and follow the University's standard procurement process, the University recognises this remains a high-risk area.</p> <p>Catering The University's on-campus catering facilities are provided both in-house and through external suppliers. In-house catering employees are subject to University policies and procedures as well as mandatory annual compliance training. External providers are also subject to University policies and procedures and are managed through contractual arrangements. All catering facilities are managed by personnel with extensive knowledge of modern slavery risk, which is considered through procurement of high-risk products such as palm oil, fish, cattle, sugarcane, coffee, cocoa and rice.</p> <p>Construction Construction industry risks exist through the procurement of high-risk products such as bricks, carpet and timber. The University's construction risks are mitigated through mandatory assessment criteria which require successful service providers to attain Quality Assurance to AS/ NZS ISO 9001 for major capital projects.</p> <p>Garment and textiles The University procures a range of garments and textiles including, but not limited to, employee uniforms, student uniforms, personal protective equipment and laboratory garments. Due to the prevalence of cotton in many garments and textiles, this is a risk for the University.</p>

DESCRIPTION OF MODERN SLAVERY RISK (CONTINUED)

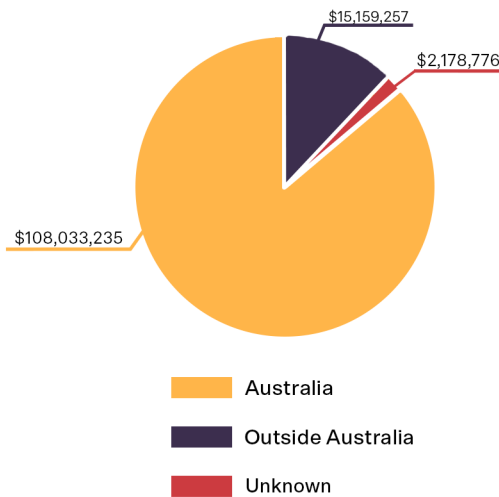
<p>Supply chain (continued)</p>	<p>Security Similar to the cleaning industry, security is a high-risk area due to the 24-hour nature of the work creating an environment with low visibility. The University's security services are managed through contractual arrangements, with ongoing reviews of key performance indicators.</p> <p>Solar Panels The University has a large number of solar panels at each of its three main campuses. While the vast majority were procured prior to the Modern Slavery Act 2018, procurement for replacement panels and new installations will include a thorough risk assessment to minimise exposure to modern slavery risk.</p> <p>Technology The University has a moderate spend in technology goods and services. Given its reliance on technology and the geographic and other associated risks with technology, this is an area of the University's supply chain which requires ongoing investigation.</p>
<p>Operations and supply chain</p>	<p>Working in a competitive global market has highlighted potential modern slavery risks related to off-shore business arrangements for the provision of goods or services from other countries. The University has arrangements with educational partners, suppliers, recruitment agents, marketing and promotional suppliers and general goods and services providers, all of whom provide services for conducting successful international operations in education. The University has a dedicated International portfolio which is responsible for the engagement and management of the University's overseas education service providers. Similar activities undertaken by the Union Institute of Language are also managed through close relationships with key suppliers, both on and off-shore.</p>

Procurement Spend

adapted from the University's AUPN ArcBlue dashboard

Spend **Suppliers**
\$125.4M **9,127**

2023 Local Country Spend (All Categories)



- Categories include:**
- Business Services
 - Property & Facilities
 - Research & Teaching
 - Technology
 - University specific
 - Not yet categorised



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Action taken to assess and address risks

The following actions were taken to mitigate modern slavery risks within the University's operations and supply chain.

ACTIONS TAKEN	
Operations	<p>Complaints management and remediation process The Modern Slavery Working Group reviewed its complaints management and remediation process and incorporated details into a new draft Modern Slavery Prevention Procedure.</p> <p>Internal Control Certifications Modern slavery declarations form part of annual Internal Control Certifications provided by Financial Delegates.</p> <p>Modern Slavery Prevention Procedure A Modern Slavery Prevention Procedure was drafted and outlines the University's process for identifying, assessing and managing modern slavery risks within its operations and supply chains. The procedure is expected to be released in 2024.</p> <p>The Modern Slavery Working Group was engaged to provide feedback on a new draft Research Management Procedure and should also be published in 2024.</p> <p>Risk workshops and stakeholder engagement The Modern Slavery Working Group continued to liaise with key University stakeholders in 2023 and facilitated numerous risk identification workshops with key areas of the University. These included the Academic division (including the executive, Academic Affairs, Academic Transformation, Learning & Teaching Futures, the Library, Students Portfolio, Student Systems & Strategic Projects, the Multi-Faith Service, and UniSQ College), Engagement, International (including the Homestay team), the People Portfolio, as well as the Union Institute of Language .</p> <p>Further engagement was undertaken through various internal and external stakeholders and committees to develop and enhance existing resources, provide guidance on emerging risks, and updates on potential reporting changes under the Modern Slavery Act. Stakeholders engaged through these activities included: Finance and Business Solutions, Engagement, International, the People Portfolio, Legal Services, the Governance Office, the Union Institute of Language, the University's Senior Leadership Group, Enterprise Services Division Executive, Vice-Chancellor's Executive, Audit and Risk Committee, and University Council; and externally through suppliers and professional bodies.</p>
Supply chain	<p>Sector networking and collaboration The University participated in several sector networking and collaboration opportunities in 2023. These included training, webinars and workshops with entities such as the Australasian Universities Procurement Network (AUPN), ArcBlue, FRDM, Be Slavery Free, the Mekong Club, and the Supply Chain Sustainability School.</p> <p>The University's ongoing membership with the Australasian Universities Procurement Network (AUPN) has enabled the University to adopt a coordinated approach to gathering and analysing procurement data through a dashboard, assessing risks, developing training materials, supplier questionnaires and various other resources. This was complemented by the University's engagement of an external consultant to provide procurement analytics, converting University spend data to an output categorised according to AUPN taxonomy (a hierarchy of spend categories), enabling upload to the AUPN Modern Slavery dashboard.</p> <p>Modern Slavery Dashboard The AUPN Modern Slavery tool enables University supply chain data to be monitored through a dashboard view of suppliers, industries, and country risks. This technology provides supplier survey tools, alerts on key risks and a range of analytics. The tool was established to gain a deeper understanding of University supply chains and risks associated with suppliers, their products and geographical locations and allows for sharing of de-identified data to enable efficiencies for supplier engagement and improved sector benchmarking.</p>

ACTIONS TAKEN (CONTINUED)

Supply chain (continued)

Modern Slavery and Ethical Supplier Clauses

Modern Slavery and Ethical Supplier clauses were embedded in all General and Comprehensive contractual templates, including recent agreements for promotional products, security and cleaning services.

General Purchasing Arrangements

Default terms and conditions for University general purchasing arrangements were drafted. These were approved and incorporated into the University's e-commerce platform where contracts do not exist.

Supplier questionnaires

A supplier questionnaire was developed in 2021 and was circulated to suppliers in the 2023 reporting year. Data captured through the supplier questionnaire has been incorporated into the University's Contract Management System, enabling enhanced supplier segmentation.

Operations and supply chain

Modern Slavery Prevention Road Map

The University finalised its Modern Slavery Prevention Road Map which is publicly available on its Corporate Responsibility and Modern Slavery web pages.

Modern Slavery risk meetings (UIL)

The Modern Slavery Working Group established regular meetings with key members of the Union Institute of Language's management team to identify risks, assess controls and address any emerging concerns.

Training and education

The University developed a Modern Slavery Awareness training module for inclusion in its annual compliance training program. The program is a mandatory requirement for all employees to be rolled out in January 2024.

Supplementary modern slavery training is also available to University employees and students through a dedicated Modern Slavery training page which was expanded to include links to additional third party content.

Resource development

The University has drafted a flyer identifying differences between unfair working conditions and instances of modern slavery. This resource will be vetted by key stakeholders in the People Portfolio and Legal Services before being incorporated into the University's suite of modern slavery resources.

Subscriptions and alerts

The Modern Slavery Working Group subscribed to third party communications and established global notifications for modern slavery related correspondence to complement existing alerts.

Action taken to assess and address risks *Cont.*

Actions taken as a result of COVID-19

The University maintained its approach of assessing operational and supply chain activities to ensure it did not cause or contribute to modern slavery risk. This included:

- Facilitation of online risk identification workshops with key stakeholders;
- Ongoing review of the Modern Slavery Risk Register; and
- Development of a flyer identifying differences between unfair working conditions and instances of modern slavery.

Remediation Process

In 2023, the remediation process was reviewed with details incorporated into a new draft Modern Slavery Prevention Procedure.

The remediation process commences through the organisational Complaints Management Framework. Complaints can be made to specific officers or anonymously. The Director (Integrity & Professional Conduct) coordinates the University's response.

It is anticipated that the University's complaints management process will be further enhanced in 2024 following the implementation of a new complaints management system.



Continuous Improvement Approach

Modern slavery risks require ongoing monitoring and measurement. Through increased training and awareness, enhanced analysis of procurement data through the AUPN Modern Slavery dashboard, and ongoing stakeholder engagement, the University will continue to improve its approach to identify and mitigate risks. This will be an ongoing approach through risk assessments, strengthening supplier relationships, and through its partnerships with Government agencies and other third-party organisations.

Due Diligence

To strengthen the due diligence process, the University undertook the following key actions to identify and assess risks.

- Subscribed to additional third party communications and established global notifications for modern slavery related correspondence.
- Employed updated General and Comprehensive contractual templates where possible.
- Drafted default T&Cs for general purchasing arrangements.
- Identified additional stakeholders, risks and controls through training, risk workshops, and other engagement activities.
- Provided advice to key stakeholders on new and emerging risks and potential reporting changes.
- Continued segmentation of suppliers to ensure greater understanding of suppliers in each procurement category.

Modern Slavery Prevention Road Map

Improving transparency in our operations and supply chains



Future actions

The following modern slavery prevention activities will be embedded within the University with support from the Modern Slavery Working Group.

FUTURE ACTIONS	
Operations	<ul style="list-style-type: none"> • Integrate use of the AUPN Modern Slavery dashboard into University processes. • Further identify risks and rank according to significance, defining both short and long-term actions. • Incorporate modern slavery considerations into University policies and procedures where appropriate. • Review procurement training competencies against position requirements and incorporate modern slavery content where possible. • Facilitate ongoing modern slavery training for University employees. • Ensure audit findings pertaining to modern slavery risks are shared with the Modern Slavery Working Group.
Supply chain	<ul style="list-style-type: none"> • Review Queensland Government Ethical Supplier list/resources against University of Southern Queensland suppliers, existing procurement and contractual arrangements, and resources. • Continue to embed modern slavery guidance resources released by Queensland Government Procurement.
Operations and supply chain	<ul style="list-style-type: none"> • Gain a deeper understanding of modern slavery risks within the University's entities. • Implement additional performance metrics for both the University and its suppliers to measure/mitigate modern slavery risks. • Develop additional resources for both employees and suppliers such as pre-contract guidance documents, reporting requirements for actual and suspected instances of modern slavery, advocacy support tools, and supplier templates. • Increase monitoring and evaluation activities. • Strategically review pre-existing longer-term contracts for compliance and consider changes where required. • Undertake further assessment activities to address high-risk services.

Assessing effectiveness of actions

Modern slavery controls continue to be assessed and appropriate actions are identified for mitigating residual risks. The effectiveness of these actions is measured through analysis of operational and supply chain data including: ongoing engagement and review of suppliers; risk assessments and regular reporting; performance metrics; internal audits; and independent external reviews.

Concerns or complaints relating to modern slavery will be managed through the University's Complaints Management Framework, and will be analysed and reported on to improve the University's approach to modern slavery prevention.

Ongoing participation in sector and government groups and multi-stakeholder initiatives will enable benchmarking and information sharing to ensure the University's actions are effective.

Through stakeholder workshops and targeted training, the University intends to increase awareness of modern slavery risks in its operations and supply chains. These stakeholder workshops have provided valuable insight into University activities and have validated the effectiveness of actions taken to strengthen its approach.

Consultation

The Modern Slavery Working Group, with assistance from members from the University's senior leadership group, undertook extensive consultation with key stakeholders and external agencies. This consultation aimed to identify the University's scope of operations and supply chains, inherent risks, and to report on current practices and future priorities for mitigating modern slavery risk.

Following the previous reporting period, additional focus was applied to stakeholder awareness to ensure adequate consultation and communication with suppliers, external agencies and University employees. Internal stakeholders were engaged through training and risk workshops to highlight the prevalence of modern slavery and identify opportunities for eliminating exposures.

The following groups were consulted during the 2023 reporting period.

- The Vice-Chancellor's Executive;
- The Senior Leadership Group;
- Academic Division Executive and nominated representatives;
- Engagement;
- International
- The People Portfolio; and
- The Union Institute of Language (UIL).

Consultation with University stakeholders will be ongoing as future actions are implemented.





Summary

The University continues to mature its processes for identifying and eliminating modern slavery risk within its operations and supply chains. The University is committed to future improvement and will continue to work with its employees, suppliers, and industry partners to ensure it continues its ongoing commitment to eliminating modern slavery.

Where to go for more info

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