



# Modern Slavery Statement

## December 2023

# Contents

<b>Introduction</b> .....	<b>2</b>
<b>A. Reporting entity</b> .....	<b>2</b>
<b>B. Structure, operations and supply chains</b> .....	<b>2</b>
<b>Structure and operations</b> .....	<b>2</b>
<b>Supply chains</b> .....	<b>3</b>
<b>C. Risk of modern slavery practices</b> .....	<b>5</b>
<b>University approach</b> .....	<b>5</b>
<b>Risk within operations</b> .....	<b>5</b>
<b>Risk within supply chain</b> .....	<b>5</b>
<b>D. Actions taken to assess and address risks</b> .....	<b>6</b>
<b>University actions</b> .....	<b>7</b>
<b>Sector actions</b> .....	<b>7</b>
<b>E. Assessment of the effectiveness of actions</b> .....	<b>8</b>
<b>F. Consultation</b> .....	<b>8</b>
<b>G. Other information/looking forward</b> .....	<b>8</b>

## **Acknowledgment of country**

We acknowledge the Traditional Custodians of the land on which we work and live, and recognise their continuing connection to land, water and community. We pay respect to Elders past, present and emerging.

---

Published by the University of the Sunshine Coast, June 2024

Information contained in this publication was correct at the time of publishing. For the most up-to-date information about the University, visit [usc.edu.au](https://usc.edu.au)

All amounts are in Australian dollars. University of the Sunshine Coast is registered on the Commonwealth Register of Institutions and Courses for Overseas Students. CRICOS Provider Number: 01595D.

## Introduction

The Modern Slavery Statement for the University of the Sunshine Coast (UniSC or the University) sets out the actions taken to identify, assess and address risk of modern slavery across our operations and supply chain in the financial year ending 31 December 2023.

This statement is made in compliance with the *Modern Slavery Act 2018 (Cth)*. The purpose of this statement is to outline our commitment to be an ethically and socially responsible organisation committed to ensuring our practices combat slavery and human trafficking. We recognise our role in respecting and promoting the fundamental human rights of our people, suppliers and customers.

The University supports the Australian Government's global leadership in preventing modern slavery. By working with our sector, employees, contractors, partners and suppliers on processes and practices to effectively manage modern slavery risk, UniSC aims to create and maintain an environment in which there is no place for modern slavery, and to contribute to this achievement in the wider Australian community and in the global supply chains of Australian goods and services.

### About modern slavery

Modern slavery is defined as slavery that involves exploiting other people for personal or commercial gain. It is a serious global issue and breaches human and labour rights. Modern slavery is an umbrella term for human trafficking, forced labour, child labour, forced marriage, debt bondage, removal of organs and other slavery like practices.

## A. Reporting entity

The University is an Australian higher education institution which provides a wide range of teaching, research and education-related activities.

The University is established under the *University of the Sunshine Coast Act 1998* (an Act of Queensland Parliament) and is a statutory body as defined by the *Financial Accountability Act 2009*. The University is parent to two wholly-owned subsidiaries whose operations are minimal to dormant and are not considered reporting entities.

## B. Structure, operations and supply chains

### Structure and operations

UniSC was founded by its community in 1996 with the belief that opportunity is everywhere – especially in regional Queensland. As the first greenfield university to open in Australia since 1971, UniSC has helped unlock the innovation, productivity and potential of its regional communities.

Its impact on economic, social, cultural and environmental development is clear. With more than 17,800 students, over 120 higher education programs and approximately 1,145 staff, UniSC has \$700 million invested in infrastructure and more than \$9 billion flowing into the local economy, including through the contributions of its 39,759 graduates.

In accordance with its Act, the University's functions are to:

- provide education at university standard.
- 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 at levels of achievement the Council considers appropriate, 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 staff, students and other persons undertaking courses at the University.
- maximise commercially, for the University's benefit, a facility or resource of the University, including, for example study, research or knowledge, or the practical application of study, research, or knowledge, belonging to the University, whether alone or with someone else.
- perform other functions given to the University under the Act or another Act.

The University operates from five campuses in Australia, located at Sippy Downs (Sunshine Coast), Moreton Bay, Caboolture, Gympie and Fraser Coast (Hervey Bay) with research and teaching centres at K'gari (Dilli Village), Thompson Institute (Birtinya, Sunshine Coast) and Sunshine Coast Health Institute (Birtinya, Sunshine Coast).

The University's teaching operations are delivered in Australia through an on-campus experience complemented by technology-enabled learning. The University partners with industry, institutions and all levels of government to deliver innovative and high-quality research with real impact. Research operations are largely undertaken in Australia with some overseas delivery, particularly in the Pacific and South East Asia regions.

The University is organised into five academic groups:

- School of Business and Creative Industries
- School of Education and Tertiary Access
- School of Health
- School of Law and Society
- School of Science, Technology and Engineering

UniSC also hosts a central academic support unit, student services, corporate services, and research services.

More information about UniSC, our activities and performance is available via the University's

**Annual Report** and at [usc.edu.au](https://usc.edu.au)

## Supply chains

UniSC purchases goods and services from a wide range of suppliers across a number of categories. Our supply chain is varied and includes individuals, small-to-medium enterprises (SMEs) and multi-national organisations. We are committed to responsible purchasing and ensuring that the procurement practices of our suppliers avoid elements of modern slavery in their supply chains.

UniSC's supply chains are global and, when involving multi-tier suppliers, complex. Prioritising the analysis and monitoring of categories of expenditure will enable UniSC to minimise its risks and to further develop and improve its due diligence processes.

UniSC also undertakes significant collaboration with research partners. These collaborations are monitored by UniSC in relation to the obligations under the Modern Slavery Act.

The University Procurement Framework consists of policies and procedures adhering to the requirements of the Queensland Procurement Policy (QPP). While considering the traditional aspects of procurement in value for money, integrity, probity and accountability, the framework reflects the expectations of advancement of economic, environmental and social objectives, particularly for Queensland communities.

The framework enables each organisational unit of the University to undertake its own procurements, with some exceptions. Those exceptions relate to expert collaboration and involvement, particularly for IT equipment, construction related activities and laboratory resources. The framework includes financial thresholds, decision-making gateways and other formal structures to enable contributions by key senior staff, procurement specialists and subject matter experts as appropriate.

As a government regulated entity, the processes, relationships and timeframes of the University's procurement practices are similar to those of Government agencies rather than other organisations where centralised procurement teams manage purchases and supplier relationships across all elements of the business.

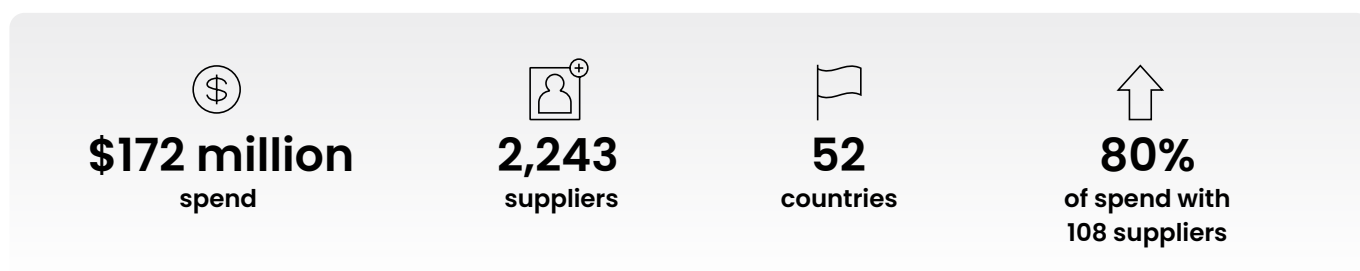
The Australasian University Procurement Network (AUPN) has engaged with an ArcBlue tool to implement a new technology platform that utilises AI to identify modern slavery risks in the supply chain. As more suppliers complete the modern slavery questionnaire, the more information we will have to advance the maturity of modern slavery within the University. As supplier risk alerts are raised, our central Procurement, Governance and Risk Management, and Legal teams are able to monitor and determine the appropriate course of action in collaboration with relevant stakeholders.

In 2023, the University engaged with 2,000+ unique suppliers, with a total value of \$172 million (excluding salary related payments). Approximately two percent of suppliers and four percent of expenditure originated overseas. According to the Global Slavery Index and the Arcblue tool, the majority of our overseas providers were in low-risk geographical locations. Spend with high to very high-risk locations was \$1.5 million.

Based on the AUPN taxonomy codes, UniSC’s spend can be split into four key areas.

Property and facilities 56%	Business services 25%	Technology 10%	Research and teaching 9%
<ul style="list-style-type: none"> <li>• Buildings and grounds</li> <li>• Construction, refurbishment and works</li> <li>• Plant and equipment</li> <li>• Property management</li> <li>• Utilities and renewables</li> </ul>	<ul style="list-style-type: none"> <li>• Corporate professional services</li> <li>• Human resources</li> <li>• Logistics and storage</li> <li>• Marketing and media</li> <li>• Office related supplies and services</li> <li>• Travel and entertainment</li> </ul>	<ul style="list-style-type: none"> <li>• IT hardware</li> <li>• IT professional services</li> <li>• IT software</li> <li>• Telecommunications</li> </ul>	<ul style="list-style-type: none"> <li>• Laboratories and research</li> <li>• Lecturer and teaching expenses</li> <li>• Library services</li> </ul>

### Key statistics



- In 2023, the University spent \$172 million with a total of 2,243 suppliers. 98.6 percent of this spend was with low-risk Australian suppliers.
- 0.09 percent of total spend (\$1.5m) was with 83 suppliers in high-risk countries. This spend reflects consultancy engagements to support research projects.

### 2023 High risk country spend and supplier numbers



Source: Global Slavery Index and ArcBlue Tool.

## C. Risk of modern slavery practices

In accordance with the Act, the University has considered the potential to cause, contribute to, or be directly linked to modern slavery. Given that the University's operations are largely undertaken in Australia, a country rated by the Global Slavery Index as low in prevalence of and vulnerability to modern slavery practices, it considers itself low risk in this respect. However, the University recognises the potential risk of being directly linked to modern slavery practices through its business relationships and the possible increased risk from downstream supply chains.

### University approach

The University's approach to implementing the Modern Slavery Act is based around a three-stage process – identify, address and maintain.

#### Identify

- Understand modern slavery risk as a whole
- Collaborate with the AUPN and similar networks
- Identify high risk industries and geographical locations
- Identify areas within the university to be reviewed

#### Address

- Review policies, procedure, tender process
- Preventative contract clauses
- Review suppliers base and onboarding process
- Analyse data available in MS tools and address risk areas as required
- Increase staff knowledge of potential risks

#### Maintain

- Continue, maintain, and adapt from previous stages to address the future approach
- Develop ongoing initiatives
- Continue to collaborate with industry networks and utilise capture and reporting tools
- Continuous review and improvement

### Risk within operations

UniSC consider the risk of modern slavery in its operations is low. This assessment is based on the legislative frameworks that regulate the conditions within which the University is required to operate and which provide a robust set of safeguards against modern slavery occurring within its operations.

The fundamentals of these frameworks are reflected in the following University documents:

- ☑ Staff code of conduct – Governing policy
- ☑ Student conduct – Governing policy
- ☑ Equity diversity and inclusion – Governing policy
- ☑ Health safety and wellbeing – Governing policy
- ☑ Working with vulnerable people (including Child Protection) – Governing policy
- ☑ Student grievance resolution – Governing policy
- ☑ Anti-discrimination and Freedom from Bullying and Harassment Staff – Governing Policy
- ☑ Enterprise agreement 2023

### Risk within supply chain

In conjunction with efforts coordinated at a university sector level, UniSC has considered the risks within its supply chains. Within any given year, approximately 10 percent of UniSC suppliers are considered high risk when looking across the range of expenditure categories and country locations of supplier head offices.

UniSC has identified the following areas within the supply chain for focused analysis, education and consideration of risks of inherent modern slavery practices.

#### IT Hardware

Reflecting an ever evolving, digital-enabled environment, combined with an infrastructure for growth program, the University's expenditure on information technology goods and services accounted for 3 percent of total expenditure in 2023.

Identified risks include:

- complexity of supply chains, stretching across multiple countries, making it difficult to track and monitor individual suppliers and their modern slavery risk management processes
- production of parts (including raw materials required) which may involve workers subjected to modern slavery.

### Cleaning and security services

The University largely outsources these services, which reduces the direct influence and visibility that the University has over its business practices. Cleaning services procured include general, periodical and specialist cleaning services that require specialist knowledge and equipment.

Security services include a 24-hour presence at all UniSC locations with general guarding, alarm monitoring and maintenance of security technologies and information.

Due to geographical locations, security and cleaning personnel are regularly interacting with surrounding community members who do not have a direct relationship with the University. Its expenditure in cleaning and security services accounted for three percent of the total expenditure in 2023.

Identified risks include:

- workers who may be paid incorrectly – underpayment may lead to modern slavery
- workers, particularly migrant workers, who may have been exploited through modern slavery because they may not be fully aware of, or comfortable claiming, their legal rights and entitlements
- use of unskilled, contract labour and a focus on low cost service delivery.

As with before, the risks arising through these relationships are managed at both the pre-contract stage, through the tender process, and through the contractual obligations the appointed suppliers are made subject to. This, coupled with the careful management of the contracts during their term, minimises any exposure.

### Personnel resourcing for research activities

It is noted that activities related to research operations often involve personnel resources engaged through contracts, particularly where the resource is in a country outside of Australia. These contracted resources are often sole or minority-owned operators in environments which may not access the benefits provided by a regulated environment such as Australia.

Identified risks include:

- workers for the subcontractor who may be paid incorrectly – underpayment or payment through alternative means may lead to modern slavery
- servitude and/or forced labour within the supply chain.

### Construction

In 2023, the University engaged a range of specialist contractors and consultants that supported the delivery of building and infrastructure projects. Major projects included three timber buildings and a building extension utilising more traditional materials.

Identified risks include:

- highly competitive and cost-driven processes
- outsourcing and sub-contracting
- raw materials are sourced from high-risk geographical areas.

### Other professional services

At five percent of 2023 expenditure, the University's suppliers of professional services, including the outsourcing of teaching delivery and student supervision, could be considered high risk according to the Global Slavery Index. Due to the majority of suppliers being direct Australian entities (including some Government entities) the risk is low, however it will be important to continue to monitor this.

## D. Actions taken to assess and address risks

As part of this continued annual reporting exercise, the University expresses its commitment to improving the management of its supply chains and to continue to aim to achieve greater transparency and responsibility towards the people working within them.

The University continues to deliver a number of structured awareness and education sessions regarding the Act with key purchasing areas in Information Technology, Facilities Management and Academic Support Unit. These sessions help to identify areas where active engagement and relevant activity would be required to comply with the requirements of the Act.

These areas particularly include human resources, legal, governance, risks and procurement for analysis of policies, procedures and practices to ensure their adequate alignment with the Act.



## University actions

The University is focused on ensuring appropriate actions are taken to alleviate risk of modern slavery in its supply chain. The key actions undertaken to date are outlined below:

Task	Achievements
Contract clauses	<ul style="list-style-type: none"> <li>Established a modern slavery clause across all UniSC standard agreements.</li> <li>Incorporated the modern slavery clause into purchase order terms and conditions.</li> </ul>
Policies and procedures	<ul style="list-style-type: none"> <li>Incorporated modern slavery provisions into the existing procurement policies, procedures, and tender documents.</li> </ul>
Suppliers	<ul style="list-style-type: none"> <li>Strengthened the Supplier Code of Conduct to help suppliers understand the University's expectations.</li> <li>Enhanced the creditor onboarding process to systematically capture supplier details related to ethical measures, including the Modern Slavery Act (MSA) compliance.</li> </ul>
Risk Management	<ul style="list-style-type: none"> <li>Leveraged industry tools, including annual supplier data imported into the ArcBlue tool, to conduct comprehensive risk analysis within the supplier chain.</li> <li>Monitored, managed and responded to impacts relevant to the MSA environment through the ArcBlue tool.</li> <li>Conducted a data analysis on the University's suppliers by utilising the Modern Slavery Risk Dashboard (provided by the ArcBlue tool, hosted on the AUPN website), which provides insights into the University's risk across expenditure categories and geographical locations.</li> </ul>
Training	<ul style="list-style-type: none"> <li>Continued to improve modern slavery staff training.</li> <li>Continued to raise staff awareness of modern slavery.</li> </ul>
Due Diligence	<ul style="list-style-type: none"> <li>Adopted the Queensland Government's Ethical Supplier Mandate.</li> <li>Embedded an ethical procurement check within our procurement evaluation process.</li> </ul>
University section-wide response	<ul style="list-style-type: none"> <li>Continued active participation in the section-wide response to modern slavery through the AUPN.</li> </ul>
Assessment tool	<ul style="list-style-type: none"> <li>Implemented new ArcBlue modern slavery tool including data upload into tool.</li> </ul>

## Sector actions

In addition to this internal focus, the University is an active member of the AUPN. A university sector-wide body, the AUPN identified, at an early stage, the value in sector collaboration to support all member universities to meet the challenge of human rights transparency and risk management in their supply chains. Through this, member universities are required to contribute to the fulfillment of members' reporting obligations under the Act.

In early 2019, the AUPN established the Anti-slavery Working Group which undertook a discovery exercise leading to the development of the sector-wide Anti-slavery Program. The Working Group continues to meet once every month and is attended by Procurement. This program of work is ongoing and continues to meet milestones.



## E. Assessment of the effectiveness of actions

Assessing the effectiveness of our actions is key to driving continuous improvement in our approach to modern slavery risks.

As our measures and data continue to improve our ability to assess, we are able to more effectively monitor and prevent modern slavery.

Steps taken by the University include:

- The strengthening of Rfx (request for quote, request for tender, request for proposal) response schedules to include questions about modern slavery to successfully raise awareness of modern slavery across University staff and suppliers.
- UniSC has embedded anti-slavery terms and conditions throughout its standard contracting and procurement practices.
- Mandatory procurement training for UniSC staff with financial and purchasing responsibilities to address varying levels of organisational awareness of modern slavery ensuring compliance.

At a sector level, in 2023, AUPN had five focus areas:

1. **Risk software** – Training and training materials, University support, data uploads and quality, operational processes, issue remediation.
2. **Capability uplift** – Academic Advisory Board, University modern slavery forums, expert insights, sector risk insights.
3. **Engagement** – Resources for stakeholder engagement, external collaborations, presentations to University stakeholder groups.
4. **Issues/risks collaboration** – Supplier questionnaires and analysis, subgroups to act on category risks and issues, media alert.
5. **3rd party program support** – Cleaning Accountability Framework (CAF), electronics watch review, Australian Red Cross – international student risk, others.

Additionally, the AUPN continues to operate an Academic Advisory Board consisting of 10 academics from seven universities with experience and expertise in modern slavery principles aimed at enriching the sector approach. Meetings are held monthly and are structured to review and refine AUPN developed artefacts and initiatives. The AUPN delivered/facilitated a virtual session, enabling members to engage in a panel discussion with the wider AUPN community to provide academic insights into modern slavery risks and subsequent actions. The University continues to participate in these sessions.

As a Community of Practice, the AUPN participants, through the Working Group and Anti-slavery Program, consider case studies, alert notifications and similar industry/sector developments to assess, address and evaluate actions in relation to the risk of modern slavery occurring within a university operation or supply chain.

## F. Consultation

As the University's controlled entities are largely dormant, it has been unnecessary to extend the consultation beyond the University entity itself. The AUPN Working Group efforts continue to be key to University collaboration activities when creating the Commonwealth Statement.


## G. Other information/looking forward

The University is committed to maturing its practices to adopt best practice for human rights transparency and to address the risk of modern slavery in its operations and supply chain. Activities to be undertaken in the coming reporting periods include:

- **Review and change policies on expenditure:** We will review policies on expenditure moving from low control purchasing methodologies, such as credit cards, to higher control options, such as purchase orders and contracts.
- **Active participation in AUPN modern slavery monthly meeting:** We will actively engage in identifying, managing, and addressing modern slavery risks within the university sector using the ArcBlue tool.
- **Ethical procurement check:** We will integrate ethical procurement checks into our contract management due diligence process.
- **Supplier code of conduct acceptance:** We will ensure that suppliers accept our Supplier Code of Conduct during the creditor onboarding process.
- **Staff training on modern slavery:** We will continue to develop and train staff on modern slavery awareness.
- **Deep dive sessions with research groups:** We will conduct targeted sessions with core research groups, especially those working with vulnerable communities.
- **Guidance for assessing modern slavery risks:** We will continue to guide the development and application of tools to help university officers assess modern slavery risks in both new and existing procurements.

This Statement was approved by the University of the Sunshine Coast Council on 13 June 2024.

Signed



**Prof Helen Bartlett**  
**Vice Chancellor and President**  
University of the Sunshine Coast  
13 June 2024



UniSC

[usc.edu.au](http://usc.edu.au)