



Modern Slavery Statement

December 2022

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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.

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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

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 2022.

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.

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 17,500 students, more than 120 higher education programs, approximately 1,200 staff, \$600 million invested in infrastructure and more than \$9 billion flowing into the local economy, including through the contributions of its almost 35,000 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
- provided 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 with research and teaching centres at K'gari (Dilli Village, Fraser Island), Thompson Institute (Birtinya, Sunshine Coast) and Sunshine Coast Health Institute (Birtinya, Sunshine Coast).

The University's teaching operations are fundamentally 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, high-quality research with real impact. Research operations are largely undertaken within Australia with some overseas delivery, particularly in the Pacific and South East Asia regions.

The University is organised into 5 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 within the University's **Annual Report** and at www.usc.edu.au.

Key facts

 **≈ 17,500 students**

 **≈ 1,200 staff**

 **5 schools**

 **5 campuses**

Supply chains

UniSC purchases goods and services from a wide range of suppliers and 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 purchasing in a responsible manner and ensuring that modern slavery is not present in the procurement of these items through the supply chains of suppliers.

UniSC's supply chains are global and, when involving multi-tier suppliers, complex. Prioritising the analysis and monitoring of these 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 were also monitored by UniSC in relation to this obligation 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 organizational unit of the University to undertake its own procurements, with some exceptions relevant 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.

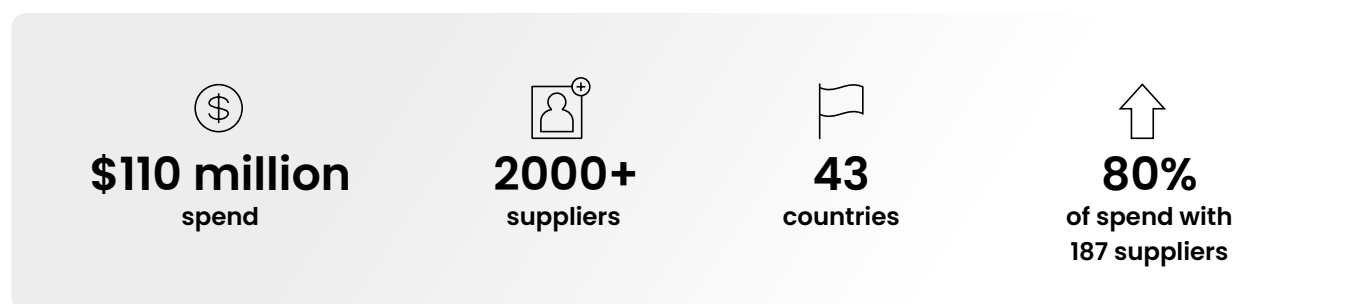
As a government regulated entity, the processes, relationships and timeframes of the University's procurement practices are similar to those of Government agencies rather than other organisations where centralised procurement teams manage purchases and supplier relationships across all elements of the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

In 2022 the University engaged with 2,000+ unique suppliers, with a total value of \$110 million (excluding salary related payments). Approximately 10% of suppliers and 6% of expenditure originated overseas. According to the Global Slavery Index, the majority of overseas providers were in low risk geographical locations. Spend with medium to high risk locations was less than \$1 million.

Based on the Australian Universities Procurement Network (AUPN) taxonomy codes, UniSC's spend can be split into four key areas.

Property and facilities 45%	Business services 33%	Technology 14%	Research and teaching 8%
<ul style="list-style-type: none"> • Buildings and grounds • Construction, refurbishment and works • Plant and equipment • Property management • Utilities and renewables 	<ul style="list-style-type: none"> • Corporate professional services • Human resources • Logistics and storage • Marketing and media • Office related supplies and services • Travel and entertainment 	<ul style="list-style-type: none"> • IT hardware • IT professional services • IT software • Telecommunications 	<ul style="list-style-type: none"> • Laboratories and research • Lecturer and teaching expenses • Library services

Key statistics



2022 top countries spend breakdown

Top 10 countries by spend	% 2022 spend	Country risk level
Australia	93.98%	Low
United States	1.48%	Low
United Kingdom	1.01%	Low
Netherlands	0.77%	Low
Germany	0.50%	Low
Fiji	0.36%	High
Singapore	0.22%	Low
Ireland	0.21%	Low
New Zealand	0.19%	Low
Canada	0.14%	Low

Source: Global Slavery Index

C. Risk of modern slavery practices

In accordance with the Act, the University has considered the potential for UniSC through its operations and supply chains to cause, contribute to, or be directly linked to modern slavery. Given that the University's operations are largely undertaken within Australia, a country rated by the Global Slavery Index as low in prevalence of and vulnerability to modern slavery practices, the University considers itself also low risk in this respect. The University recognises, however, that risks exist for it to be directly linked to modern slavery practices through its business relationships with other entities within the extended supply chain.

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 which provide a robust set of safeguards against modern slavery occurring within the University's operations.

The fundamentals of these frameworks are reflected within the University's policies and agreements including:

- ☑ 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 2019-2022

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% of UniSC suppliers are considered high risk when considered 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 14% of total expenditure in 2022.

Risks include:

- complexity of supply chains, potentially stretching across multiple countries, which may make 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 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.

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.

Personnel Resourcing for Research Activities

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

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

The University engaged a range of specialist contractors and consultants that supported the delivery of building and infrastructure projects. Major projects included 3 timber buildings and a building extension utilising more traditional materials.

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 8% of 2022 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. Because the majority of suppliers are direct Australian entities (including some Government entities) the risk is low, however it will be important to continue to monitor this.

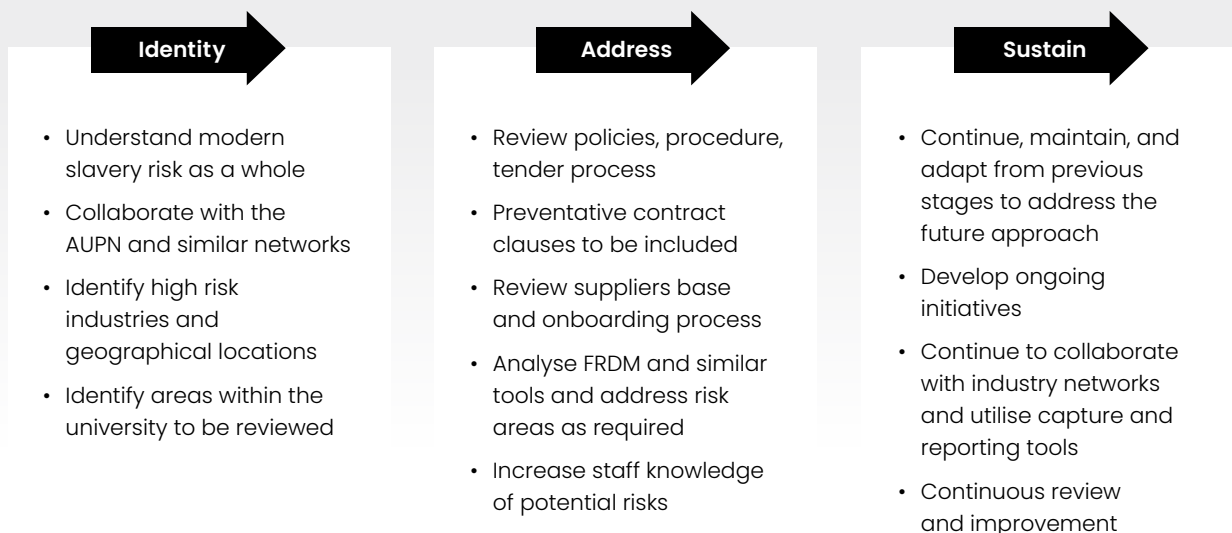
D. Actions taken to assess and address risks

As part of this reporting exercise in this and future years, 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 raising and education sessions regarding the Act with key University stakeholders. These sessions help to identify areas within the University 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, risk and procurement for analysis of policies, procedures and practices to ensure their adequate alignment with the Act.

University approach

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



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"> Established a modern slavery clause for all UniSC standard agreements Added the modern slavery clause to purchase order terms and conditions
Policies and procedures	<ul style="list-style-type: none"> Embedded modern slavery provisions within the existing procurement policies, procedures and tender documents
Suppliers	<ul style="list-style-type: none"> Enhanced the Supplier Code of Conduct Enhanced creditor onboarding process to capture supplier details relevant to ethical measures (including MSA)
Risk Management	<ul style="list-style-type: none"> Maximise the use of industry tools including annual supplier data imported in to the AUPN FRDM tool, proving analysis through which to understand and identify risk within the supplier chain Monitoring, managing and responding to impacts relevant to the MSA environment through the FRDM software Data analysis of the University's suppliers through the application of the Modern Slavery Risk Dashboard (data analytics tool) to provide an indication of the University's risk across expenditure categories and geographical locations
Training	<ul style="list-style-type: none"> Delivery of staff training with stakeholders
Due Diligence	<ul style="list-style-type: none"> Adopted the Queensland Government's Ethical Supplier Mandate Embedded an ethical procurement check within our procurement evaluation process

Sector actions

In addition to this internal focus, the University is an active member of the Australian Universities Procurement Network (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, and to contribute to the fulfillment of members' reporting obligations under the Act. In early 2019, the AUPN established the Modern Slavery Working Group (MSWG) which undertook a discovery exercise leading to the development of the sector-wide Modern Slavery (MS) Program. This program of works is ongoing and continues to meet milestones set.

E. Assessment of the effectiveness of actions

Assessment of actions undertaken to date has focused on a number of activities occurring at the sector level.

For UniSC suppliers, awareness of the Act is generally limited to large entities who are also required to comply. Many smaller suppliers are unaware of and unfamiliar with the Act.

At a sector level, the AUPN engaged modern slavery specialist Pillar Two to provide modern slavery subject matter expertise and support for the MS Program. To date Pillar Two has provided:

- a review of the AUPN MS Program, including 25 recommendations to enhance the sector's approach
- modern slavery SME support throughout the technology solution tender process, and
- review of the Modern Slavery Risk Dashboard and risk ratings.

Additionally, an Academic Advisory Board has been established consisting of 12 academics from nine 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. An AUPN community virtual session enabled members to engage in a panel discussion with the AUPN community and provide academic insight into modern slavery risks and actions.

As a community of practice, the AUPN participants through the MSWG and MS Program, consider case studies, alert notifications and similar industry/sector developments to assess, address and evaluate actions in relation to 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 MSWG 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 within its operations and supply chain. Activities to be undertaken in the coming reporting periods include:

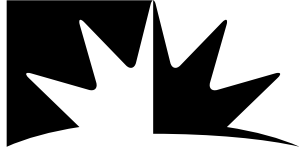
- continuing to be an active participant in the AUPN agenda of identification, management and remediation of modern slavery risks within the University sector using the FRDM tool
- continue to embed ethical procurement check in contract management due diligence process
- continue to obtain acceptance of the supplier code of conduct from suppliers in the new creditor onboarding process
- continue to develop and train staff on modern slavery
- undertaking business-focused 'deep dive' sessions with the University's core research groups, particularly those operating with vulnerable communities
- continuing to guide the development and application of tools to support University officers in assessing modern slavery risks in new and existing procurements.

This Statement was approved by the University of the Sunshine Coast Council on 8 June 2023.

Signed



Prof Helen Bartlett
Vice Chancellor and President
University of the Sunshine Coast
8 June 2023



UniSC

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