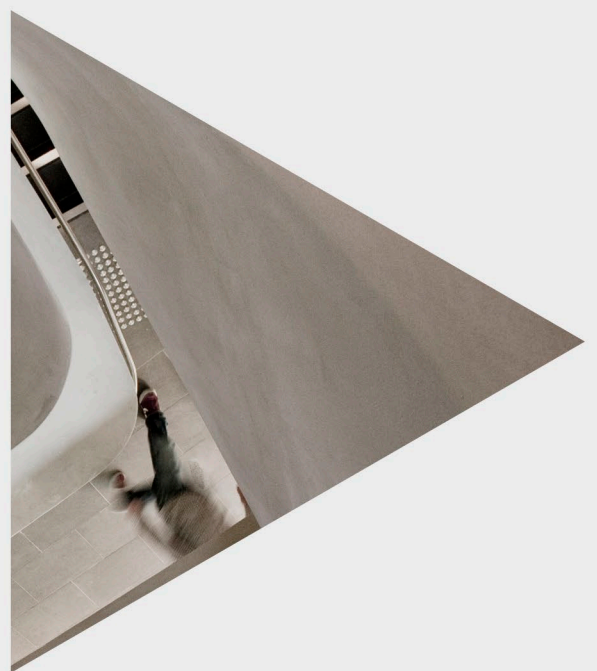


UTS

Modern Slavery

Statement

2021



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Acknowledgement

University of Technology Sydney (UTS) acknowledges the Gadigal people of the Eora Nation, the Boorooberongal people of the Dharug Nation, the Bidiagal people and the Gamaygal people upon whose ancestral lands our university stands. We would also like to pay respect to the Elders both past and present, acknowledging them as the traditional custodians of knowledge for these lands.



From the Vice-Chancellor

Professor Andrew Parfitt Vice-Chancellor and President



Modern slavery is a grievous violation of human rights.

UTS is determined to play a role in the prevention of slavery and in the protection of the human rights.

We work to protect the human rights of trafficked and enslaved people through education, research, advocacy, supporting policy development and law reform, and through the delivery of professional, accessible legal services.

At UTS, we have a long history of working to combat human trafficking, forced labour and forced marriage and we remain dedicated to the abolition of all forms of modern slavery. We believe that responding to the harms of modern slavery is more than meeting our obligations under the Modern Slavery Act 2018.

Universities are in a unique position in the ways they intersect with modern slavery. As global education providers, we recognise that some groups of people – including our own international students, asylum seekers and migrants on limited working visas – may be particularly vulnerable. Ensuring that these members of our community are aware of their rights and are able to seek support is vital.

We are also able to draw on evidence-based research to raise awareness of modern slavery in the community and ensure that all our students and staff, develop an understanding of modern slavery, how to minimise the risks of modern slavery, and how to support victims and survivors.

In developing our 2021 Modern Slavery Statement, UTS recognises the importance of partnerships in this work. We are committed to working with our partners across government, industry, the community and other universities as part of the global movement to eradicate modern slavery, and ensure freedom, dignity and respect for all.

A key partner in our work on modern slavery is Anti-Slavery Australia (ASA), based in the UTS Faculty of Law. ASA are leaders in the anti-slavery movement and the only modern slavery focused specialist legal practice, and research and policy centre in Australia.

Working with ASA allows UTS to draw on the expertise of world-leading legal practice, policy and research, and the insights offered by ASA help us ensure our work focuses on the most effective ways to tackle modern slavery including through awareness raising, embedding anti-slavery measures into policy and procedure, and by supporting victims.

I was particularly proud to see the outstanding work of the team at ASA publicly acknowledged during 2021. ASA Director, Professor Jennifer Burn was an Australian Human Rights Commission Finalist for the 2021 Human Rights Medal; and Sandeep Dhillon, ASA's Human Rights Legal Practice Manager, was recognised as a Finalist for Not-for-Profit Lawyer of the Year in the 2021 Lawyers Weekly Women in Law Awards.

This Statement has a dual purpose. It has been developed not only to comply with the legislation, but to help increase awareness of modern slavery and of the work that ASA and many others across UTS are undertaking to tackle it. I look forward to that work continuing into 2022 and beyond.

Our Approach and Commitment

At UTS we recognise our legal, ethical and moral responsibility to ensure our operations, research activities, supply chains and investments are scrupulous in avoiding modern slavery and other human rights harms. Upholding human rights and preventing human rights abuses, including modern slavery, are central to our mission to be a public university recognised for our positive social and environmental impact.

UTS commits to using our voice to advocate for an end to modern slavery globally and to support of victims and survivors of modern slavery. In all our endeavours we will operate on principles of dignity, equality, and mutual respect within a human rights framework. We will act consistently with the Protect, Respect, Remedy framework set out in the UN Guiding Principles on Business and Human Rights.

UTS will continue working to ensure that our students, staff, suppliers and partners respect and share our commitments to human rights through an ongoing program of dialogue, awareness raising, and due diligence

Within our diverse UTS community we recognise that certain groups, including international students, may be at higher risk of exploitation. We will act to mitigate this risk, through ensuring information, advocacy and support mechanisms are part of the student experience and providing assistance to those at risk.

In making these commitments, we acknowledge that our actions to address modern slavery are evolving. While this Statement provides an opportunity to reflect on the success of our activities to date, it also highlights areas in which we can strengthen our responses: including governance; operational activities and practices; and better integration of due diligence across our operations and supply chains. We will focus on these areas of improvement, striving to continually strengthen and embed actions across our organisation to effectively address instances of modern slavery.





Criterion 1: The reporting entity

This Statement outlines University of Technology Sydney (UTS') commitment and approach to identifying and addressing modern slavery risks in our supply chain, operations, and investments, including those of the entities we control as required by the Commonwealth Modern Slavery Act 2018 (the Act).

It is UTS' second Modern Slavery Statement and identifies actions our organisation and controlled entities have undertaken during the year ended 31 December 2021, in response to mandatory reporting criteria of the Act.

UTS (ABN 77 257 686 961) is a statutory corporation established in NSW pursuant to the University of Technology Sydney Act (1989) NSW (UTS Act). UTS is registered with the Australian Charities and Not-For-Profits Commission and our CRICOS (Commonwealth Register of Institutions and Courses for Overseas Students) provider number is 00099F.

The UTS City campus encompasses a variety of precincts and buildings providing teaching, learning, research, social and administrative activities. Our principal address is 15 Broadway Ultimo NSW 2007.

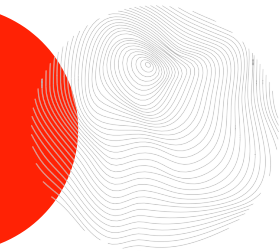
The main City campus precincts – Haymarket, Broadway and Blackfriars – are located at the southern gateway to Sydney's CBD, with newer precincts situated within the elite sporting zone at Moore Park and on an industrial park at Botany.

This statement is made by UTS following consultation with our controlled entities (established via Section 16A of the UTS Act including:

- accessUTS Pty Limited
- UTS College (Insearch Ltd) which is producing its own modern slavery statement to be published on its website covering:
 - Insearch Education International Pty Ltd
 - (Insearch Global Pty Ltd
 - Insearch India LLP
 - Insearch Shanghai Limited)
- UTS Global Pty Ltd:
 - UTS Beijing Ltd
 - UTS Research and Innovation Institute (Shenzhen) Co Ltd)
- Kilimanjaro Learning Solutions Pty Ltd.

Modern Slavery Risk Assessments were completed by accessUTS and UTS Global, with this information provided to UTS for consideration. Kilimanjaro Learning Solutions is a new entity and in 2021 had not yet commenced business activities.

This Statement has been approved by UTS Council as the principal governing body at its meeting in June 2022.



Criterion 2:

2.1 Structure and operations

UTS is a public university of technology defined by our support for the economic, social and cultural prosperity of our communities. We are measured by the success of our students, staff and partners and are committed to research, innovation and the dissemination of knowledge of public value. We are, and always will be, an inclusive university.

UTS was established in 1988 and by 2021, 45,221 students were enrolled at our university, including 11,944 international students.

Our university offers over 130 undergraduate and 210 postgraduate courses across traditional and emerging disciplines including architecture, built environment, business, communication, design, education, engineering, information technology, international studies, law, midwifery, nursing, pharmacy and science. Student based programs, focused research and innovative teaching approaches aim to create a more just and equitable world.

The university's world leading research centres span a range of disciplines providing practical and relevant solutions to issues of national and international importance and equip graduates with the latest discipline specific skills and practices.

The university also maintains strong relationships with the local community, industry, business and the professions through a wide range of partnerships, projects and events.

Our UTS 2027 strategy outlines our vision to be “a leading public university of technology recognised for our global impact.” Our purpose is to advance knowledge and learning through research-inspired teaching, research with impact and partnerships with industry, the professions and community.

In 2021, UTS employed 3857 full-time equivalent (including casual) staff members.

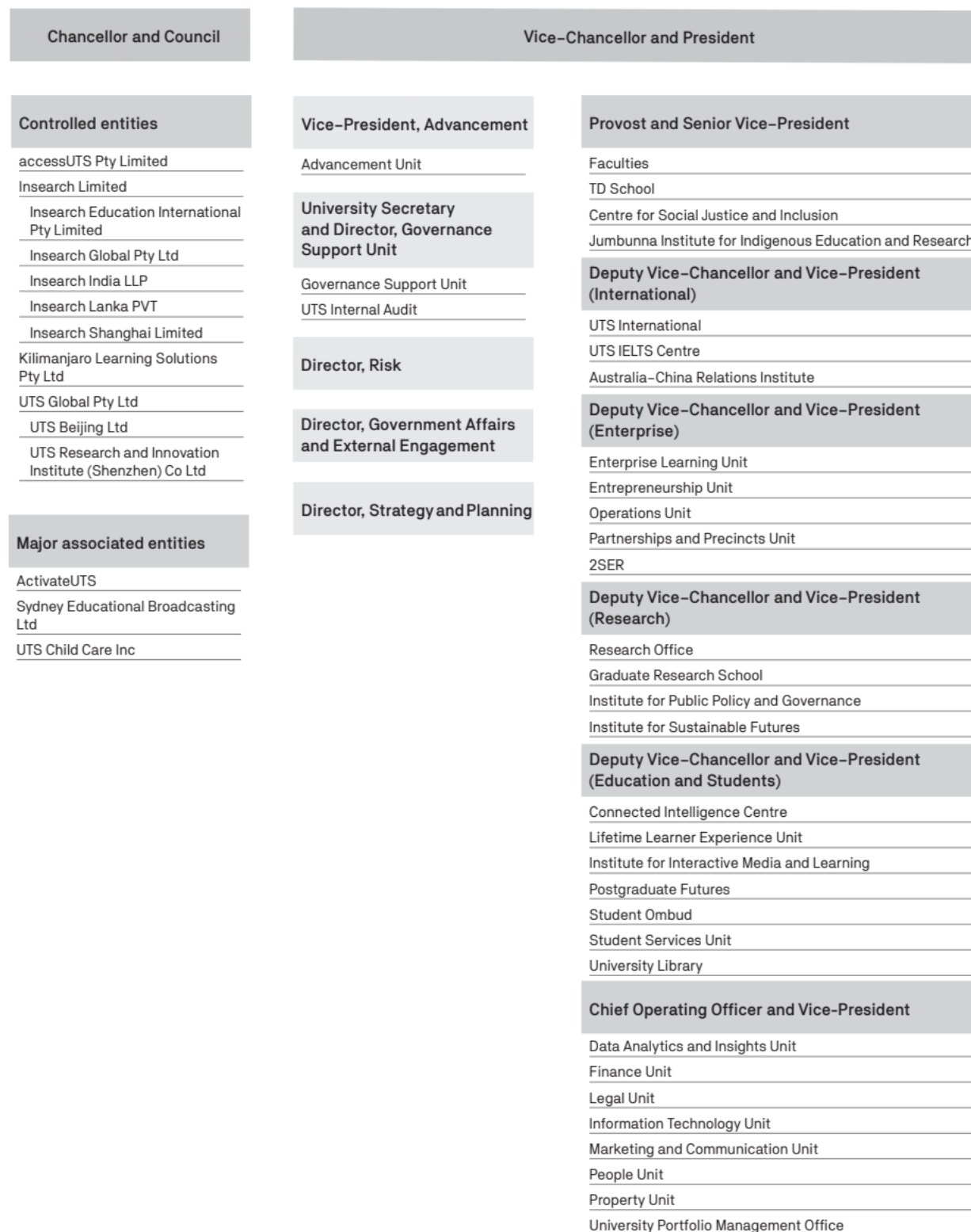
UTS Council is the governing body of the organisation, and is established in accordance with the UTS Act and By-law and relevant UTS Rules.

Council's powers and functions include management and control of the university's affairs, concerns and property. Council acts in all matters that best promote the objectives and interests of the university.

Council is chaired by the UTS Chancellor, who is elected by the Council. The members of Council are elected or appointed, and have expertise and background relevant to the governance needs of the university.

The organisational structure of UTS in 2021 is illustrated in the following diagram and further details about the structure and operations of UTS and our controlled entities are described in more detail in our Annual Report.

UTS organisational structure



There were no significant changes in the nature of the activities of the consolidated entity during 2021.

Operating result for 2021

UTS achieved an operating result of \$122 million (2020: (\$43 million)), made up of an underlying surplus of \$29 million and a \$93 million one-off dividend and revaluation related to UTS' long-term investment in Education Australia. This better than anticipated outcome for 2021 reflects a number of factors, including significant cost control, a lower than anticipated reduction in international student revenue and cash preservation strategies aimed at achieving a sustainable financial position for the most financially challenging 2022 and 2023 years ahead.

Revenue

UTS saw a reduction in International Equivalent Full-Time Student Load of circa 1,300 or around \$28 million in 2021. This was in addition to the 2020 decline of 1,650 or \$38 million. 2021 was a slightly lower reduction than originally anticipated. The university was able to maintain a strong continuing cohort on the back of several key initiatives and investments.

Expenditure

Total expenditure on operating activities in 2021 was \$1.02 billion (2020: \$1.10 billion) representing \$80 million of annualised reduction year-on-year. This reduction reflects significant efforts made by UTS in reducing the size of the workforce by around 400 FTE through structural alignment and management prudence in recruiting in a difficult environment. Non-salary items were slightly lower year-on-year given reduced campus teaching and reductions in activity due to lockdowns.

2.2 UTS' supply chain

The UTS supply chain is diverse and complex, incorporating hundreds of products and services required to support the university's operations including infrastructure construction and maintenance, administration, academic programs and research.

The UTS supply chain includes procurement required to support university operations in teaching, learning, research and professional support services, as well as downstream partners (such as subcontractors including some engaged in supporting the delivery of international research programs).

The supply chain includes research institutions and universities, consultancy firms, local suppliers, self-employed consultants, travel and accommodation providers, security firms, and suppliers of medical and IT equipment and consumables.

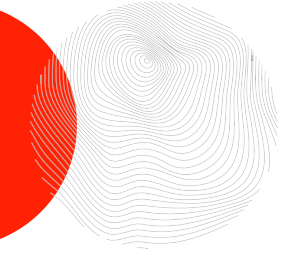
The broad categories across which UTS procures goods and services are:

- Construction and refurbishment
- Maintenance including cleaning and security
- Lecturer and teaching expenses
- Telecommunications
- Professional services
- Human resources
- Office-related supplies
- Logistics and storage
- Utilities and renewables
- IT: software, hardware, network, telecommunications, security, storage
- Hospitality
- Student recruitment
- Library resources
- Travel
- Research infrastructure/equipment
- Insurance
- Plant and equipment
- Marketing and communication
- Workplace health and safety equipment
- Laboratories and research supplies
- Subscriptions and membership

UTS has been collaborating with the Australian University Procurement Network (AUPN) and FRDM as part of a sector-wide program to address modern slavery risk. The FRDM tool algorithmically identifies modern slavery risks allowing suppliers to be assessed, scored and profiled, with 140,000 suppliers now analysed. As many suppliers across the sector are common, participation in this collaboration assists UTS to map its supply chain and enables UTS staff make informed decisions.

A list of UTS Preferred Suppliers and Supplier Panels has been developed, with suppliers registered following a public tender process to provide visibility and transparency over the goods and services we buy. UTS Preferred Suppliers and Supplier Panels are bound under contract to abide by UTS terms and conditions. Our Procurement Policy specifically aims to ensure that UTS and our suppliers act ethically and responsibly in the acquisition of goods and services, taking into consideration economic, social and environmental impacts including in relation to modern slavery. The Principles of the Procurement Policy specify that "UTS will report on modern slavery risks (and the response to those risks) in university operations and supply chains as required by the Modern Slavery Act 2018 (Cth)."

During the sourcing stage of a tendering process, staff will be required to work on realistic KPIs and to ensure contract clauses include modern slavery, and during onboarding, new vendors will be assessed for modern slavery risks and other ESG risks. Through media notifications, AUPN members are kept up to date on emerging risks related to UTS suppliers/industries.



Criterion 3: Identifying Risks

3.1 Recognising modern slavery

UTS recognises modern slavery as a grave abuse of human rights which includes slavery, servitude, forced labour, debt bondage, forced marriage, trafficking in persons, deceptive recruiting for labour or services and child labour.

- **Slavery:** When a person exercises the rights of ownership over another person. This includes the power to make the victim an object of purchase or to use their labour or services in a substantially unrestricted manner.
- **Human trafficking:** The recruitment, harbouring and movement of a person for exploitation through modern slavery.
- **Servitude:** When a victim is significantly deprived of their personal freedom and does not consider themselves free to cease providing labour or services or leave their place of work because of coercion, threats or deception.
- **Forced labour:** Any work or services people are forced to do against their will under threat of punishment and where they are not free to stop working or to leave the place of their work because of coercion, threat or deception.
- **Debt bondage:** Where a person pledges their services as security for a manifestly unreasonable debt. This is the world's most widespread form of slavery, where victims trapped in poverty borrow money and are forced to work to pay off the debt.
- **Forced marriage:** A person is forced to marry through coercion, threats or deception or where they are incapable of understanding the nature and effect of the marriage ceremony.
- **Child labour:** When children are exploited in slavery or slavery like practices or engaged in hazardous work that can harm their health, safety or morals or used to produce or traffic drugs. The worst forms of child labour can occur in different contexts including orphanage trafficking and child labour in factories, mining and agriculture.

Victims of modern slavery become trapped in these circumstances due to poverty, exclusion and a lack of power and choice making them vulnerable to exploitation and forcing them to take risks in search of safety, opportunities to provide for their families or improve their prospects.

3.2 Our approach to identifying risk

During 2019-20, UTS conducted an initial risk assessment and exploratory investigations to establish the university's spheres of influence where modern slavery risks may occur, the levels of risk and relevant mitigation strategies.

Following our preparation of the 2020 Modern Slavery Statement we have further considered these spheres of influence and the relative risks they present. The areas of potential risk, and the governance and other mechanisms used by UTS to mitigate these risks, are identified in Figure 1.

Governance and oversight of our risk identification activities and actions in relation to modern slavery are critical to our ongoing work.

Reporting and updates on UTS' activities in relation to modern slavery are provided to the Vice-Chancellor's Social Justice and Inclusion Committee, which is chaired by the Provost and includes all faculty deans (or their senior nominees) as members, as well as the University Leadership Team, including the Vice-Chancellor.

This further facilitates engagement and identification of risk across the organisation.

In 2021 a new UTS Modern Slavery Working Group convened by the Pro Vice-Chancellor (Social Justice and Inclusion) and including senior representatives from key areas of the university was established on an ongoing basis to ensure:

- broad engagement in risk identification across our operations and supply chain
- progress on priority actions identified in our 2020 (and future) Statements, and
- that UTS continues to address the criteria set out in the legislation.

Membership of this group comprises directors (or senior nominees) from critical parts of the organisation including:

- University Secretary and Director, Governance Support Unit
- Director, Risk
- Director, ASA
- Director, Property
- Director, Student Services Unit
- Director, People Unit
- Head of Shared Services
- Manager Central Services
- Marketing and Communications Unit
- Manager, Careers Service.

This group has facilitated a thorough and coordinated approach to identifying and addressing the risks of modern slavery across our operations and assisted in increasing awareness of modern slavery across UTS.

In addition, plans were developed in 2021 to ensure management at all levels were better aware of risks of modern slavery in their own areas of work.

Each year, deans and directors are required to undertake a review process to assist UTS in identifying risks, ensuring the safety, integrity, and reputation of the university and meeting our compliance obligations.

This process (known as the Annual Management Sign Off) included a question for the first time for the year ending 2021 requiring all deans and directors to indicate whether they had taken steps to identify and address modern slavery risks in their own operations and supply chains in line with commitments made in the 2020 UTS Modern Slavery Statement.

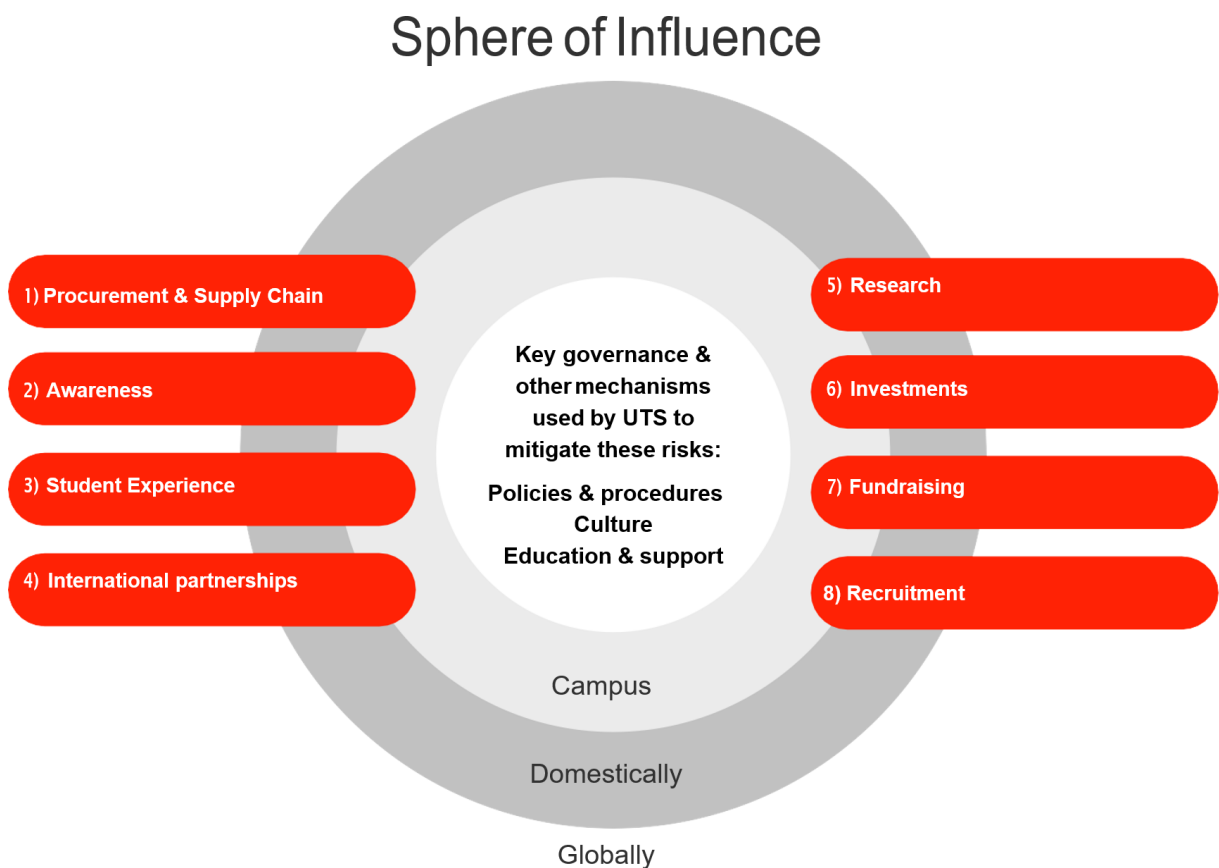
This exercise will provide additional information to UTS about the extent to which different areas are aware of their responsibilities and where additional awareness raising or other supplementary remediation may be required.

It is proving particularly valuable as a tool to identify potential risks in an environment of decentralised procurement and devolved financial delegations where large numbers of staff are involved in external purchasing. In addition, this process is assisting in ensuring that all staff (including fixed term and casual staff), who may come into contact with students who could be vulnerable to, or experiencing, modern slavery, understand how to recognise and report suspected incidences.

The outcomes of this process are reported to the Audit and Risk Committee of Council each year.

Further information about risk assessment methodology in relation to procurement and supply chain is provided in follow sections.

Figure 1: UTS' sphere of influence where modern slavery risks may occur



3.3 Risks in UTS Policies and Procedures

The UTS Governance Support Unit (GSU) with support from the Modern Slavery Working Group has undertaken a program of work during 2021 to review all relevant UTS policies and procedures to ensure modern slavery is appropriately considered and referenced.

Policies and procedures that have been amended through this process are:

- Child Protection Policy
- Code of Conduct
- Equity, Inclusion and Respect Policy
- Internships Management
- Procurement Policy
- Research Policy and procedures
- Staff Travel, Expenses and Credit Card Policy

Links will be made from all relevant policies to the current webpage on modern slavery, with work underway to further develop the content and profile of the UTS web presence in relation to modern slavery.

GSU has also undertaken a benchmarking exercise to determine governance responses to modern slavery across the sector. While our policy settings are generally sufficiently robust to minimise the risk of modern slavery at UTS, further work will be undertaken to ensure recognition and reporting of modern slavery among UTS staff, students and affiliates.

The UTS Code of Conduct (the Code) sets out behavioural standards and professional expectations for anyone who works for, or on behalf of, the university. This includes a specific reference to the management of modern slavery risks and to undertakings made by UTS in our annual Modern Slavery Statement. Most relevantly it requires all staff and affiliates to:

- treat all members of the university and wider community with dignity and respect
- comply with all legal, industrial, contractual and administrative requirements, and lawful and reasonable directions given by or on behalf of UTS
- be aware of and apply any legislative and regulatory requirements relevant to their position, specialisation or line of work
- make decisions reasonably and without bias guided by facts and best practice
- maintain timely, adequate and appropriate documentation to support decision making
- act responsibly when becoming aware of any unethical or unacceptable behaviour and
- be familiar with, implement and comply with all UTS policies, procedures and guidelines.

The Code further requires, where possible, that staff responsible for contract development, contract management and/ or engaging contractors ensure that its behavioural requirements are included in the contract. Where this is not possible, behavioural expectations must be otherwise managed within the contract.

Any behaviour or conduct that is inconsistent with the Code or relevant Policy is unacceptable and managed as a breach of the Code or a breach of contract (as appropriate).

UTS will investigate any unethical or unacceptable behaviour brought to its attention, particularly that which may have an adverse effect on the wellbeing of staff or students, and take any necessary action.

Additional awareness raising activities have commenced with staff and students to encourage members of our community to report any suspected human rights abuses via our existing policies and procedures that provide the reporting mechanism for modern slavery complaints (i.e. the Staff Complaints Policy, Student Complaints Policy and Fraud, Corruption and Public Interest Disclosures Policy).

The need for a web presence to act as a single visible point for reporting modern slavery is currently under discussion.

This aims to strengthen and better integrate identification and response to different types of modern slavery complaints across UTS (i.e. whistleblowing, staff, student and community complaints, reporting incidents of sexual assault etc).



3.4 Risks in UTS Culture

UTS strongly and explicitly supports and promotes a culture grounded in equity, fairness, respect and dignity, and human rights for all.

Any form of modern slavery is an abuse of human rights. As a public institution, we are committed to driving social change within and beyond our campus and we aim to ensure that our research, education and practice benefit the people who work and study at UTS, as well as the wider community.

Our Social Impact Framework sets out our objectives in this area, specifically that:

- An increased number of equity target groups successfully complete a higher education degree at UTS
- Students have the agency to enact personal and social responsibility
- Staff have the confidence and are supported to maximise their social impact
- Targeted research, teaching and program outcomes have social impact and actively contribute to communities
- UTS is an advocate, critical voice and thought leader on issues that concern and impact communities and
- UTS business operations and strategies reflect a long-term independent commitment to social impact.

In order to achieve these objectives UTS takes an approach which is focused on ensuring that our executive and senior managers promote a responsible risk management culture within their areas of responsibility, building awareness and ensuring compliance with our policy and procedures. Key to our work is ensuring that our organisation embraces a culture that truly values social justice and human rights for all.

A continuing cultural risk at UTS in relation to modern slavery remains ensuring that our objectives to eliminate modern slavery and support victims are communicated and understood across all levels of our organisation.



3.5 Risks in Education and Support

The core business of UTS is teaching, learning and research. We are the top-ranked young university in Australia and our vision is to be a leading public university of technology recognised for our global impact.

We are known for our innovative teaching. We are committed to practical innovation and research that benefits industry and society. We believe in social change to create a more just and equal world.

As higher education providers with a global outlook, one of our specific challenges is to ensure our students, wherever they are based and whatever their communities of origin, experience a high quality, supportive higher education experience that prepares them for the future workforce leaders.

In 2021, close to 12,000 international students were enrolled at UTS. The ongoing impacts of the COVID-19 pandemic increased the vulnerability of students to exploitation and modern slavery. Many students were unable to travel to Australia to commence or continue their study. Recognising these risks, UTS undertook a series of actions to help support vulnerable students financially and in other respects (detailed in the following section).

Increasing the capabilities of our staff to understand how to support and assist vulnerable students was central to our actions during 2021 and will continue to be, going forward.

Our partnership with Anti- Slavery Australia (ASA), a specialist legal, research and policy centre in the Faculty of Law continues to offer valuable expertise to UTS on taking a person-centred approach to supporting vulnerable people and victims of modern slavery, and ensuring leading practice training for our staff and students.

For close to 20 years, ASA has been the only specialist centre providing free legal and migration services through its collaboration with academic and solicitor, Professor Jennifer Burn, to people who have experienced or are at risk of modern slavery in Australia.

Clients can contact the ASA directly through a national advice hotline or My Blue Sky, a website dedicated to education and support in relation to forced marriage. Clients are also referred by the Australian Federal Police, Australian Red Cross, and other community support organisations. ASA has assisted hundreds of clients across every state and territory in Australia, who have been trafficked, enslaved or forced to marry in Australia.

Through a holistic, person-centred approach, ASA helps clients navigate the legal process including providing advice and assistance on immigration, citizenship, employment law, family law, criminal law and victims' compensation. This work enables survivors of modern slavery to build positive futures for themselves and their families.

ASA's free self-paced online course on Modern Slavery launched in 2020 has been promoted to UTS staff and students to increase awareness about all forms of modern slavery, the indicators of modern slavery, and protections that are available.

ASA also works to engage communities (including the UTS community), raise awareness about what trafficking and slavery means, and empower communities to take a stand against slavery and respond appropriately. It does this through events such as conferences, awards, media engagement, public advocacy and the arts.

Criterion 4: Actions

Having identified the spheres of influence noted in the previous section, UTS is evolving a program of actions to mitigate potential modern slavery risks across eight identified risk areas. These are:

1. Procurement and Supplier Engagement
2. Awareness of Modern Slavery
3. Student Experience
4. International Partnerships
5. Research
6. Investments
7. Fundraising
8. Recruitment



4.1 Procurement and Supply Chain

UTS recognises the importance of influencing positive change through our procurement. By keeping ethical considerations at the forefront of buying decisions, we can promote decent working conditions and human rights, and demonstrate a willingness to work with suppliers to address issues.

We understand that the prevalence of modern slavery in supply chains globally is a significant issue and the due diligence processes that UTS undertakes when selecting and continuing relationships with suppliers and other third parties reflect relevant risk exposure. These take into consideration factors such as:

- the sector in which the third party operates
- the country or countries in which goods are manufactured and from which services are provided
- the measures taken by third parties in relation to modern slavery risks in their own operations and supply chains and
- the complexity and transparency of supply chains, including the extent of sub-contracting.

A number of industries are recognised as experiencing a higher risk of modern slavery, including construction, catering and hospitality, security, textiles production and manufacturing (most relevantly of lab supplies, research equipment, and IT hardware). These sectors can pose high risks due to characteristics and processes, such as widespread use of low skilled labour or heavy reliance on outsourcing.

Similarly, certain countries and regions are recognised as having a higher risk of modern slavery, principally due to factors which increase vulnerability such as poverty; discrimination and marginalisation of groups such as women, children, migrants and refugees, ethnic and religious minorities; civil disruption and armed conflict; weak rule of law and impunity; and natural disasters.

UTS is taking both a broad and detailed approach to reducing the likelihood of our contributing to modern slavery. This includes implementing as standard practice recommended sustainable supply chain practices such as:

- paying suppliers in fair timeframes
- avoiding undue delays to payments and
- avoiding unreasonable contract variations.

In addition, we are working towards identifying and addressing risks of modern slavery in our supply chain across the procurement planning and delivery life cycle. Engaging with suppliers in this work is critical to ensure our suppliers align with UTS values. We are doing this through a range of actions in progress including:

- Reflecting modern slavery risks in the sourcing strategy (scope of modern slavery concerns that will be considered during the procurement process include addressing the standard required from suppliers; how UTS will manage the risk of modern slavery in the procurement process; and identifying roles and responsibilities for the modern slavery component of the procurement).
- Raising awareness when engaging the market
- Considering conditions of participation during market engagement activities.

At the sourcing stage UTS is:

- Requesting suppliers to respond to tender schedules
- Including modern slavery in contract clauses
- Working with suppliers on realistic KPIs.

Key to our work to mitigate risk of modern slavery in procurement and supply chain is working with the Australian University Procurement Network (AUPN). As an AUPN member UTS has been part of a project during 2021 along with social tech firm FRDM that is working to support 34 participating AUPN universities to build improved supply chain risk transparency across more than 140,000 suppliers. All UTS vendors related to 2021 expenditure have been analysed using FRDM tool.

This major project is delivering an integrated program to reduce risks of modern slavery in the higher education sector by establishing common suppliers across the sector in higher risk areas, undertaking supplier risk assessment, developing supplier questionnaire assessments and training, strengthening procurement training and procurement processes.

FRDM supports universities by algorithmically identifying modern slavery risks throughout the universities' global supply chains, enabling each university (and the sector collectively) to make informed decisions and take action to address modern slavery risk in their supply chains.

The project has been formally underway since August 2021 and has completed key milestones in relation to:

- Data collation, cleansing and handover
- Data transformation
- Platform configuration
- Platform provisioning, analysis and testing and
- UAT testing.

During 2021, approximately 100,000 suppliers were loaded into FRDM tool, representing 34 Universities and a \$16.2B spend.

The platform was soft launched in December 2021 to members of the project group (including UTS) with final testing and signoff completed by January 2022 and the AUPN Portal platform live as of February 2022.

The platform contains 14 self-assessment questionnaires for high-risk supplier categories with a second wave of SAQs and additional data uploads due to be issued in 2022.

The platform provides levels of risks for suppliers, with users prompted on possible measures to manage those risks identified and assist due diligence processes which in turn could trigger the need for questionnaires or discussions with risk and compliance teams.

Recent amendments to our Procurement Policy clarify requirements for procuring goods and services for or on behalf of UTS to reduce risks of modern slavery and ensure that UTS acts ethically and responsibly in the acquisition of goods and services, with specific reference to modern slavery risks (and the response to those risks) in university operations and supply chains.

Provisions in our procurement contracts aim to ensure compliance by suppliers and identification and reporting of non-compliance, however, decentralised procurement across UTS faculties and divisions means this remains a challenge. The Procurement Policy provides a mechanism for breaches, or suspected breaches of contract to be reported to the

relevant supervisor, dean or director for investigation and action by the Chief Financial Officer (CFO).

UTS is also prioritising action against modern slavery risks in cleaning contracts, by adopting the core principles of the Cleaning Accountability Framework (CAF). The CAF principles, also supported by Australian Human Rights Commission (AHRC), incorporate ethical procurement, the promotion of decent working conditions, fair and transparent pricing, quality outcomes, engendering employment practices to eliminate exploitation and providing cleaners the ability to speak up safely.

CAF has been working with the higher education sector since 2020 and UTS Central Services and Security Services have been involved in the project, supplying information to CAF during 2021 for the development of an evaluation framework.

CAF will continue the work on finalisation and development of the audit framework throughout 2022-2024 in the hope of having a pilot system up and running by the end of 2022 or early 2023.

There will be a maximum of two to three Universities taking part in the initial pilot, and UTS has indicated it is willing to be a part of this pilot. CAF hopes to do a final evaluation of the pilot in 2024 before rolling out across the wider higher education sector.

In relation to the controlled entities accessUTS and UTS Global, supply chain and procurement activities have been initially assessed as low risk for modern slavery as predominantly these activities relate to professional services (accounting, legal, banking, communications and marketing). UTS will continue consultation with these entities to ensure on-going alignment with UTS activities in assessing its wider supply chain.

4.2 Awareness of Modern Slavery

UTS recognises that actions to increase awareness of modern slavery will be critical to the success of our program of works to reduce the risk of modern slavery in our operations and supply chain and to supporting vulnerable cohorts and victims.

UTS Media and Communications Unit and the Centre for Social Justice and Inclusion began a program of raising awareness of UTS activities in relation to tackling modern slavery through internal channels such as staff notices and student newsletters during 2021.

A particular focus has been promoting uptake of ASAs free online course on modern slavery, available on the UTS Open platform. It is aimed at high school students, university students, community workers, front line responders, educators, and Australian community members who want to learn more about modern slavery, human rights and social justice issues.

ASA is currently developing an additional bespoke training module specifically for UTS staff to improve awareness of modern slavery and to raise awareness of how to identify risks and respond appropriately in the context of UTS' policy and procedural framework.

A new initiative current being scoped is the development of a comprehensive and transparent web presence that highlights UTS' work on modern slavery, and provides clear guidance to staff, students, suppliers and other members of the community about how to respond to suspected incidents of modern slavery.

Building a comprehensive program of communications and education across UTS is particularly important to ensure that students who may be at heightened risk of experiencing modern slavery both in Australia and overseas are protected from and supported in cases of exploitation and deceptive employment practices. This is especially so in the face of the enhanced vulnerability of many students due to COVID-19.

Information for UTS students has focused on raising awareness of modern slavery as a human rights issue; identifying signs of modern slavery; and assisting students to understand what to do if they are experiencing or suspect someone else is experiencing modern slavery.

Information about UTS' program to address modern slavery is regularly raised with senior managers across the university through forums such as the University Leadership Team and Vice-Chancellor's Social Justice and Inclusion Committee.

These communications activities aim to complement other awareness raising activities with both an internal and external focus.

During 2021, such activities have included ASA events (such as a recent webinar on forced marriage) and a recent screening of the documentary 'Sisters for Sale' held as part of Think Global Summer, jointly run with UTS BUILD and the UTS International Outbound Global Mobility team.

Other external awareness raising and advocacy activities during 2021 included:

- A seminar with the UN Special Rapporteur on Contemporary Forms of Slavery
- Participation in the ASEAN-Australia Strategic Youth Partnership (AASYP) - Break the Chain Program
- Human Mart installations in Oxford Street Sydney and at UTS.

- The launch of the ASA Speak Now project funded by the Department of Social Services which aims to prevent forced marriage and other forms of modern slavery in the home
- Promoting World Day Against Trafficking in Persons
- Professor Burn's evidence to the Commonwealth Parliamentary Inquiry into child and forced marriage
- Provision of Train the Trainer training for Migrant Employment Legal Service community educators and
- Convening 'Partnering to end Modern Slavery', Australia's first national online conference on modern slavery.

Human Mart is an interactive art installation highlighting 61 true stories of modern slavery in Australia.

Through telling their stories, the humanity of the people who have experienced these offences is also unveiled. All the stories are taken from a variety of sources in the public domain, and have been painstakingly and carefully anonymised. In this way, the human rights and dignity of each survivor is respected by guarding their right to privacy and confidentiality which is so important to their recovery.

Human Mart is a pro bono collaboration between Anti-Slavery Australia and Coffee Cocoa Gunpowder, a marketing agency who came to us with this ambitious creative idea. With support from The Glue Society, Revolver and Candid Communications. During 2021, Human Mart opened for a limited time on Oxford St, Sydney, and was exhibited at UTS on Broadway.

This exhibition is vitally important. A pre-Human Mart survey showed that 66% of people are unaware that exploitation of people through modern slavery takes place in Australia.

Human Mart is driving awareness of modern slavery and much needed donations to Anti-Slavery Australia to help victims and survivors.



4.3 Student Experience

As highlighted in the previous section, one of the most significant impacts on UTS students during 2021 was as a result of increased vulnerability as a consequence of the COVID-19 pandemic.

Students, along with other young people, are at a heightened risk of experiencing modern slavery both in Australia and overseas.

Students are particularly vulnerable to workplace exploitation, especially those who have fewer support networks, lower English language proficiency, work in the gig economy, or are unaware of workforce laws in Australia.

COVID-19 is compounding the likelihood of exploitation in the workplace for all young people, including both domestic and international students.

Such exploitation can be visible through practices such as:

- employer wage theft, sham contracting, threats of dismissal, unfair dismissal and excessive work hours
- employers taking advantage of international student visa status work limits to underpay staff
- deceptive recruitment or labour services where the person has been deceived about their work and the work involves exploitation through a specific type of modern slavery
- 'paying' students in food and housing instead of paying wages.

Such exploitation may also be an indicator of other modern slavery practices, exposing students to risks including:

- debt bondage (e.g. being forced to provide labour or services as security or repayment of an inflated student debt, through deceptive third party student recruitment practices) and
- forced labour (e.g. feeling unable to stop working or to leave a place of work because of coercion, threat or deception).

COVID-19 placed our international student cohort at particular risk. Many students were unable to travel to Australia to either start or continue their study.

To support our international students, we established an international student hardship fund of up to \$10 million and set up a hotline serviced by Mandarin speaking staff for commencing and continuing Chinese students. We also established offshore learning centres (OLC) in China at four partner universities, with approximately 500 students attending. In September we established an additional OLC in Vietnam.

We also contacted all 191 UTS students overseas on exchange programs at the time the pandemic hit, liaising with UTS Insurance, Risk and Legal to provide ongoing cover for students; as well as providing clear, ongoing advice and support to the 524 exchange and study abroad students at UTS, their home universities and agents.

UTS has also identified a number of other situations where students may be at particular risk including:

- Internships and work placements
- Scholarships and
- Forced marriage.

Enabling our students to participate in industry experiences to support them becoming job-ready at the conclusion of their course is a priority for UTS. To support this process, UTS has a tailored one stop shop for our students, CareerHub, to help students find jobs, internships, volunteering and industry experience opportunities.

Internships are defined in the UTS Student Rules as covering course-related internships which may be:

- mandatory course requirements and for credit
- mandatory course requirements and not for credit
- optional and for credit
- optional and not for credit (not course-related).

Any organisation wishing to post an opportunity onto CareerHub must complete the registration process, which includes signing up to our terms and conditions which set out our values and expectations. When posting opportunities for domestic internship or placement, the organisation must sign a placement agreement with the student, which contains contractual protections for our students to address modern slavery and other risks.

UTS works with local providers of international placements to create contracts that align with domestic Australian arrangements and/or leverage our partnerships to influence the contractual arrangements of the third party and minimise modern slavery risks.

Our UTS Careers team monitors the conduct of the organisations placing opportunities on CareerHub and reviews feedback from students who have undertaken opportunities from this platform. In partnership with the relevant UTS faculty, further action and investigation is undertaken if any ethical, moral or other significant issues are identified.

The UTS Internships Management Policy has also recently been reviewed to clarify that all prospective internship arrangements are to be assessed through a due diligence and risk assessment to ensure that they meet UTS' compliance obligations under relevant legislation including the Modern Slavery Act 2018.

UTS policies and processes require that any instances of suspected modern slavery should be reported to a staff member's relevant manager or supervisor (for escalation as appropriate), Anti-Slavery Australia or the Australian Federal Police. UTS will notify relevant statutory authorities and/or agencies, and action may be taken by a statutory authority.

The UTS Scholarships and Prizes Policy has been reviewed to ensure that there are adequate protections in place to prevent scholarship holders from being coerced into activities such as providing unpaid labour.

Given the particular vulnerability of students to forced marriage (both in Australia and overseas), UTS has been supporting and promoting the national project, 'Speak Now', launched in 2021, which aims to prevent forced marriage and other forms of modern slavery in the home, through education, awareness-raising and collaboration with service providers, frontline communities and young people from across Australia.

The project is a partnership between ASA, My Blue Sky and UTS, funded through the Commonwealth Department of Social Services (DSS) under the National Plan to Reduce Violence against Women and their Children 2010–2022.

The project emphasises that forced marriage, and other forms of modern slavery in the home, can happen to anyone from any background. These practices are often hidden and misunderstood, but can have devastating consequences for the individuals, families and communities affected. Best practice research and experience tells us that the most effective approach to achieving positive change is through community engagement and capacity-building.

Speak Now’s participatory approach strives for the genuine inclusion of diverse experiences and perspectives, recognising the complexities and misconceptions around forced marriage. It aims to address these through meaningful engagement with young people, communities and others whose voices are often excluded from these conversations. By working with young people, communities and service providers from across Australia, the project hopes to raise awareness around forced marriage and other forms of modern slavery in the home, and build their capacity to respond to these situations in their everyday lives.

Until June 2022, the project will be collaborating to develop:

- Co-developed resources – for frontline workers, communities and families
- A podcast series – a conversation starter on forced marriage, featuring the experiences and expertise of people from diverse professional and personal backgrounds, including people with lived experience
- A codesigned online campaign to promote consent-based decision-making and raise awareness about forced marriage and healthy relationships amongst young people.



4.4 International Partnerships

As a public purpose university, we occupy a unique institutional position. We are advocates and a critical voice on issues that concern and impact communities, and we use this position to advance the rights of vulnerable communities in Australia and globally.

Activities where UTS operates beyond the borders of Australia may include:

- research collaborations
- research training opportunities
- teaching and learning
- academic arrangements that provide entry to UTS courses in Sydney and
- provision of professional consultancy services.

The UTS Offshore Policy requires that all UTS offshore courses and activities comply with the relevant legal and regulatory requirements of both Australia and the host country.

UTS offshore partners will usually be institutes of higher education with high educational reputations and academic standing. Any other partners must be of such an academic standing and reputation to satisfy the Vice-Chancellor that they are appropriate UTS offshore partners.

We seek to positively influence the policies and practices of our partners in relation to modern slavery. All prospective domestic and international partners are assessed through our due diligence and risk assessment process.

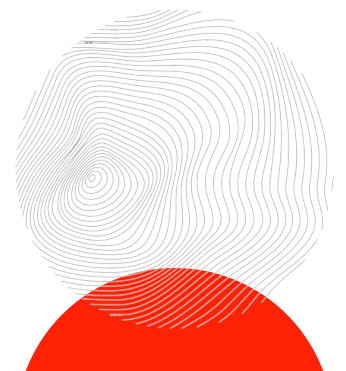
This process includes assessing how the partners have earned their funds and a level of basic due diligence assessing the fit with UTS (both strategic and values-based) and considering any human rights, unethical or unfair activities performed by the potential partner. Depending on the outcome of the initial risk assessment, external due diligence may be sought to help inform any decision to either agree to or decline a partnership opportunity.

Appropriate academic and other relevant quality assurance standards and practices must be met in respect to offshore activities delivered by UTS or its offshore partners

We also aim to harness UTS' capacity to further contribute meaningfully to public dialogue on modern slavery in the global community, driving it beyond a focus on legal compliance towards practical, survivor-centred responses to addressing modern slavery.

In this we particularly draw on the expertise and leading role that ASA has played, and continues to play, as an advocate for law and policy reform on modern slavery.

We will extend our reach through collaboration with business, government, community partners and other organisations internationally to use our collective influence to minimise modern slavery risks and drive action to address modern slavery.



4.5 Research

UTS is committed to carrying out our research, learning and teaching to the highest standards of ethics and integrity.

During 2021, UTS revised our range of research policy frameworks and procedures to ensure they reflect current legislation and our commitment to addressing modern slavery. This included making amendments to the UTS Research Policy which now clarifies that research funding must be assessed through a rigorous due diligence and risk assessment process to ensure compliance with UTS values, external legislation (including the Modern Slavery Act 2018 (Cth)) and other external guidelines (for example Guidelines to Counter Foreign Interference in the Australian University Sector). In line with UTS values, UTS does not seek or accept research funding in any form from the tobacco industry.

UTS complies with our responsibilities in the Australian Code for Responsible Conduct of Research, and National Statement on the Ethical Conduct of Human Research which establishes a framework for responsible and ethical research practices and principles. The Statement encompasses the values and principles of research merit and integrity, justice, beneficence and respect, including specific reference to vulnerable populations, or victims of illegal activities.

UTS researchers must be familiar with and comply with the principles and responsibilities outlined in the Australian Code as well as UTS policy.

UTS also complies with the National Statement on Ethical Conduct in Human Research and AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research.

We will further endeavour to develop measures to know if we cause or contribute to human rights breaches or if our actions are linked to breaches of human rights.

We will continue to regularly and clearly communicate our expectations of our research suppliers and partners. We seek to positively influence the policies and practices of our research partners in relation to modern slavery and are also developing additional principles and guidelines for accepting research funding, including considerations for ensuring funders do not have any links or affiliations with modern slavery practices.

Before we look to share knowledge through collaborations or research activity, we undertake due diligence and risk assessment processes. These assess the potential use or dual use of the knowledge shared, the fit between UTS and the external party (both strategic and values based) and considers any human rights, unethical or unfair activities performed by the external party and compliance with Australian legislation and regulation.

Depending on the outcome of the initial risk assessment, external due diligence may be sought to help inform any decision to either entering into or decline the knowledge sharing activity.

UTS will continue to develop its own program of research into modern slavery through ASA with research that is grounded on a unique combination of practical firsthand experience with survivors, coupled with the academic rigour required by the UTS Faculty of Law. This ongoing body of research, includes partnerships and commissioned work into areas including human trafficking, forced marriage, dowry abuse, online sexual exploitation of children, asylum seeker exploitation, survivors' perspectives, and modern slavery reporting requirements.

4.6 Investments

As a university we have adopted a responsible investment ethos: a broad-based approach to investing which factors in people, society and the environment, along with financial performance, when making and managing investments.

We recognise the responsible investment definition outlined in the United Nations Principles for Responsible Investment as a strategy and practice to incorporate Environmental, Social and Governance (ESG) factors in investment decisions and active ownership (or stewardship).

The university acknowledges the relevance of the UN Sustainable Development Goals in enabling institutional investment to better align investors with broader objectives of society and that this can assist to better manage risk and generate sustainable, long-term returns. When investing funds, ESG factors will be considered in the selection of investments and in the investment process, to ensure socially responsible investment, consistent with the university's values.

In 2021, short term funds were restricted to investment with Australia's Big 4 banks. Other funds are invested under an ESG - integrated stewardship policy.

UTS is responsible for endowment funds circa \$20m which are donated to the university to fund a variety of scholarship-type activities that are important to UTS and its donors. These are invested in a fund that encompasses integration, as well as management of UTS ESG issues. During 2021 UTS began the development of a Sustainable/ESG Investment Strategy for our endowment funds to ensure enhanced alignment with our values, finances and the needs of our endowment activities.

UniSuper is UTS' key superannuation provider and the largest scheme to which the university contributes on behalf of employees. UniSuper is one of Australia's largest industry superannuation funds with over 450,000 members and more than \$100 billion in funds under management.

UniSuper is considered a leader in responsible investment with all investment decisions considering ESG standards and principles. The fund is one of Australia's largest investors in ESG-themed strategies, with more than \$14 billion in funds under management across these investment options.

One of UniSuper's priority ESG themes is workforce issues incorporating modern slavery and supply chains. The fund submitted its second Modern Slavery Statement at the end of 2021 detailing the activities they have undertaken to identify, assess and address the risks of modern slavery in internal operations and supply chains.

4.7 Fundraising

The UTS Philanthropic Fundraising Policy was reviewed and amended in 2021 in relation to ensuring that it adequately addressed issues relating to foreign interference and modern slavery. All prospective donors will be assessed through an opportunity assessment and due diligence process by the Advancement Unit. This opportunity assessment and due diligence must incorporate the management of any modern slavery risks among other risk management and risk mitigation processes.

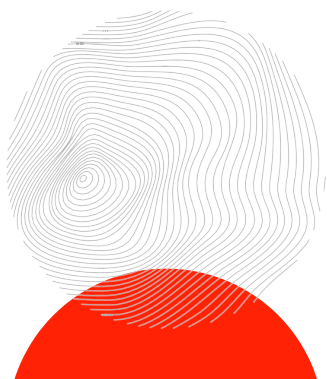
This policy sets out the clear expectations of all staff across the university in undertaking fundraising activities.

These expectations focus on conducting all activities ethically, in line with the university's strategies, values and policies. We expect all UTS staff engaged in fundraising to conduct themselves as ambassadors for the entire university in line with the code of conduct and the Equity, Inclusion and Respect Policy.

The university has reserved the right to reject funds from any source based on an assessment of their alignment with the university's values. All prospective donors are assessed through a due diligence and risk assessment process by our Advancement Unit.

This process includes assessing how the donors' funds were earned and a level of basic due diligence assessing the fit with UTS (both strategic and values-based) and considering any human rights, unethical or unfair activities performed by the donor. Depending on the outcome of the initial risk assessment, external due diligence may be sought to help inform any decision to accept or refuse a donation.

Fundraising, internship, and investment activities are not undertaken by controlled entities.



4.8 Recruitment

Staff Recruitment

Conditions of employment at UTS are determined by legislation, collective agreements, common law and university policies, practice and by-laws. The industrial conditions governing the employment of UTS staff are prescribed in the Academic and Professional staff agreements and the Senior Staff Group agreement.

A new UTS Recruitment and Appointment Policy was developed during 2021 which sets out the key principles that the university uses to guide its recruitment and selection practices. These include recruitment and selection:

- being undertaken within the context of achieving a diverse workforce profile capable of achieving the university's vision and strategic objectives
- being guided by the principles of equal employment opportunity to ensure that the most capable person is selected for a position on the basis of merit, and recognises historic and ongoing disadvantage that creates barriers to access to employment for people in equity target groups through such special measures as targeted recruitment programs.
- being conducted in such a way as to protect and enhance the reputation of UTS in the labour market, and be fair, equitable, transparent and compliant with relevant legislation.

All candidates must have the right to work in Australia in accordance with the requirements of the Department of Home Affairs. In special circumstances, UTS may sponsor a candidate who does not have a right to work in Australia.

Student Recruitment

UTS student recruitment is undertaken both in Australia and overseas. Arrangements for marketing and the recruiting of international students are managed through UTS International with a range of formalised procedures in place to ensure the welfare of international students is protected including through:

- Governance and policy infrastructure that supports:
 - an international network of student recruitment agents
 - international partnerships, MOUs and agreements
 - benchmarking data and reporting requirements for various external organisations, ESOS and regulatory compliance (National Code, Sanctions, Simplified Student Visa Framework (SSVF))
 - compliance risk management and audits and
 - development of policy and support systems, and procedures for international recruitment and services, including training programs.
- Monitoring and reviewing admission systems and procedures
- Developing, implementing and reviewing international student recruitment strategies

UTS agreement templates related to international student programs (including: partner university articulation agreements; Knowledge Transfer Partnership (KTP) Agreements; MOUs; Study Abroad Agreements; Student Exchange Agreements) specify that UTS and the international partner/s are required to meet certain obligations under Australian State and

Commonwealth laws and in the relevant international jurisdiction, including but not limited to sanctions laws; foreign interference and foreign influence laws; export control laws; privacy and data control laws; work, health and safety laws; immigration laws and laws relating to provision of education to international students

While modern slavery is not currently specified in these agreements, consideration is being given to whether including a modern slavery clause would strengthen our agreements and contracts.

Similarly, while UTS has not yet added a specific clause on modern slavery into our agreement templates for international recruitment agents, this is currently under consideration as part of a review of the templates being undertaken in 2022.

All UTS registered Student Recruitment Agents must complete or have completed the Education Agent Training Course (EATC) from Professional International Education Resources (PIER) in order to become Qualified Education Agent Counsellors and this is one of the criteria for consideration of agent appointment. This industry recommended course was developed in collaboration with Australian Education International (AEI) and the Department of Home Affairs.

We have identified that the UTS International Counsellor's Manual presents an opportunity for increasing awareness of modern slavery risks among international recruitment agents.



Criterion 5: Assessing the effectiveness of our actions

UTS monitors the effectiveness of our actions to address modern slavery through a variety of reporting and review processes including:

- annual risk assessment activities and the development of risk mitigation strategies in line with the UTS Risk Management Policy and procedures
- reporting and review of student and staff complaints via Safety and Wellbeing Reports to UTS Council as required by the Health and Safety Policy, Office of the UTS Student Ombud Annual Report, and Student Complaints Resolution Office in line with the Student Complaints Policy and Procedures
- reviews of UTS Procurement Policies and Procedures procurement practices.

The UTS Modern Slavery Working Group established during 2021 has responsibility for monitoring progress on actions identified in our 2020 (and future) Modern Slavery Statements. The commitments made in UTS' 2020 Modern Slavery Statement have been expressly considered by the Working Group as part of the preparation of the 2021 Statement to ensure progress on their implementation.

The identified priority actions for 2021 were:

- Progressing and monitoring the Cleaning Accountability Framework
- Introducing targeted modern slavery training for UTS staff
- Working with the Australian University Procurement Network (AUPN) on sector wide risk assessment, training and strengthening of procurement processes
- Continuous improvement of our policy portfolio to ensure modern slavery considerations are embedded in all relevant frameworks, decision making processes and practices
- Implementing improved human rights due diligence in line with the United Nations Guiding Principles on Business and Human Rights.

Updates on the progress of these items have been reported during the year to the University Leadership Team and Senior Executive and have been included in this Statement.

UTS has also developed a Social Impact Framework to measure our social impact as a university, and to guide our efforts in the future. The Framework is the first of its kind for an Australian university and outlines a clear, shared strategic vision for UTS to follow to increase our social impact.

The Social Impact Framework is shifting broad practice at UTS (and beyond) in three distinct ways:

- It recognises and rewards excellence in practice.
- It evaluates existing initiatives so we are able to continually refine and reform efforts, in order to remain forward- thinking and proactive in our social justice response.
- It is a key tool used to identify gaps and lead to new social justice initiatives.

UTS Social Impact Framework, Domain 6 specifically focuses on UTS business operations and strategies, including key elements of our work to eliminate modern slavery in our operations and supply chains. During 2021, development began on a series of evidence based Social Impact Dashboards. These Dashboards include interactive graphs and tables

that demonstrate how we are tracking and feature stories and case studies about programs and activities in place to achieve UTS' social impact goals.

The Dashboards ensure UTS is transparent and accountable in the social impact goals we set for ourselves and, importantly, help us identify areas where additional metrics are required and where we need to improve to reach our goals. Developing a suite of metrics to comprehensively track our progress in relation to preventing and responding to modern slavery is part of this current work.

We aim to demonstrate our long-term independent commitment to social impact and understand that driving social change begins on our own campus and in our community. We strive to embed human rights, inclusivity, sustainability and accessibility as a key part of our business and employment practices.

UTS also publishes an annual Social Justice Report which tracks our progress and records and celebrates our achievements of UTS staff and students in the social justice space.



Criteria 6: Consultation

Consultation was undertaken during 2021 with UTS' controlled entities listed below to identify current and/or prospective activities which present risks in relation to modern slavery practices:

- accessUTS Pty Limited
- Insearch Limited
 - Insearch Education International Pty Limited
 - Insearch Global Pty Ltd
 - Insearch India LLP
 - Insearch Shanghai Limited
- UTS Global Pty Ltd
 - UTS Beijing Ltd
 - UTS Research and Innovation Institute (Shenzhen) Co Ltd
- Kilimanjaro Learning Solutions Pty Ltd.

Kilimanjaro Learning Solutions Pty Ltd was incorporated on 29 September 2021 but was not operating during 2021.

The Director of Risk will continue to liaise with these entities to raise awareness of modern slavery and the reporting requirements of the Act, inform them of the actions UTS is undertaking to address the requirements of the Act and provided them updates on our progress.

Under the Act, UTS is not required to consult with or report on behalf of our major related entities (ActivateUTS, Sydney Educational Broadcasting Ltd and UTS Child Care Inc) however in the spirit of the legislation, the Director of Risk and Head of Shared Services will consult with these related entities on an ongoing basis to support them to identify and address modern slavery risks.

Future Actions

UTS has identified a series of priority actions for 2022 including:

- Rolling out targeted and bespoke modern slavery awareness training for UTS staff, students and community partners. This will include training for all UTS staff via an online module and be complemented by workshop-based training of key personnel
- Implementing a program to increase visibility and awareness of modern slavery at UTS through a comprehensive communications strategy
- Reviewing the adequacy of existing complaint mechanisms to respond to modern slavery and developing a new web portal to streamline information about and complaints related to modern slavery
- Developing a comprehensive and transparent web presence that highlights UTS' work on modern slavery and provides clear guidance to staff, students, suppliers and other members of the community about how to respond to suspected incidents of modern slavery
- Continuing work with the Australian Universities Procurement Network in particular in relation to ensuring leading practice management of supplier questionnaires, grievance mechanisms and remediation processes and pathways
- Working to further our progress in relation to the Cleaning Accountability Framework (CAF) and working with our cleaning contractors to extend the CAF across the broader higher education sector
- Investigating the alignment of our current activities with human rights due diligence in line with the United Nations Guiding Principles on Business and Human Rights through:
 - identifying adverse human rights risks and impacts including modern slavery
 - mapping supplier profiles
 - developing a supplier engagement communication strategy and
 - identifying suppliers in key risk areas.



