

Modern Slavery Statement **2022**



Message from the Vice-Chancellor and President

At The University of Queensland (UQ), we recognise that modern slavery remains prevalent around the world – in the form of individual exploitation and the use of coercion, threats, and deception to deprive individuals of their rights, their liberty or their freedom.

As a teaching and research institution committed to delivering for the public good, we are naturally committed to playing our role in eradicating all forms of modern slavery within our own operations and supply chains.

During 2022, UQ made a formal commitment to the United Nations Sustainable Development Goals; our work on understanding and addressing our modern slavery risks is a key pillar to meeting that commitment.

We have been making a meaningful contribution to the eradication of modern slavery over the past few years by following through on the 3 key commitments we made in our first Modern Slavery Statement for the year 2020. This involves:

- investing in the organisational policy and cultural frameworks required to prevent, mitigate and, where appropriate, remedy modern slavery in our operations and supply chains
- developing and implementing the due diligence processes to identify, prevent and mitigate the risk of modern slavery occurring in our operations and supply chains
- developing and implementing procedures to enable the remediation of any adverse modern slavery impacts that UQ causes or contributes to.

In this, our third Modern Slavery Statement, I'm pleased to report that we have continued to develop and mature our organisational frameworks in 2022, and have also created a number of practical approaches to tackling modern slavery risks within our operations and supply chains.

For instance, this year we launched an easy-to-use modern slavery risk assessment tool that gives our staff a simple way of flagging the potential risk of modern slavery in UQ's supply chain and operations – and providing an escalation pathway for further investigation and action.



We have also undertaken a number of activities aimed at improving awareness of modern slavery risks among UQ staff and students and protection against these risks by progressively strengthening our commercial and student placement contracts.

Another important development in 2022 was the launch of UQ's Supplier Standards, which details the University's commitment to responsible sourcing and also outlines our expectations of our suppliers.

Finally, I would like to acknowledge the efforts of the many staff, working right across UQ, who have been so proactive in implementing the initiatives in this very important area.

Through their efforts, we are gaining greater confidence that UQ is both enriching the communities in which we're embedded – and also remaining true to our vision of 'knowledge leadership for a better world'.

Professor Deborah Terry AO
Vice-Chancellor and President

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The University of Queensland

With 3 main campuses at St Lucia, Gatton and Herston and an extensive online and international presence, UQ is one of Australia's leading teaching and research institutions.

Founded in 1910, UQ is a body corporate governed by the *University of Queensland Act 1998*, as amended. Our chief purpose is to provide education, research and innovation at university standard and, through doing so, contribute to the public good of our community.

We are committed to the success of our students and the quality of their educational experience. Importantly, our graduates are leaving UQ with the knowledge and skills they need to make a meaningful contribution to the workplace, and to society.

As one of Australia's leading research-intensive universities, UQ is committed to the generation of new knowledge through excellence in discovery science and fundamental research, as

well as translating our research into progressive ideas, better services, and new products for the benefit of society.

Beyond the direct impact of our education and research programs, UQ is committed to enriching communities by spreading understanding, raising awareness, disseminating culture, building capacity and connecting people.

During the reporting period, UQ became a formal signatory to the United Nations Sustainable Development Goals, laying a strong foundation to implement the *UQ Sustainability Strategy 2021-2025*. In doing so, UQ has joined other government bodies, businesses and organisations around the world to make a public commitment to addressing the world's most pressing social, economic and environmental challenges.

Industry recognition and awards

UQ is climbing in the most recently released rankings of global universities. UQ moved up 4 places in the prestigious Academic Ranking of World Universities (ARWU), to now be ranked 47th in the world. We also jumped 5 places in the latest NTU Rankings to be ranked 33rd in the world. This improvement reflects the incredible strength of our team, working right across UQ.

In other outstanding results, UQ Press was named Australian Small Publisher of the Year at the 2022 Australian Book Industry Awards – and the Andrew N. Liveris Building was awarded the John Dalton Award for Building of the Year, at the AIA's 2022 Brisbane Regional Architecture Awards.

We also had a strong showing at the AWEI Australian LGBTQ Inclusion Awards, being named a 'Gold Employer', and placing us among the nation's leading organisations for workplace inclusion programs.

Our researchers continue to make a huge difference to lives not just in our own state, but around the world. UQ was again the highest ranked Australian university in the 2022 Nature Index of high-quality research outputs. We were also number one in Australia for the Earth and Environment and Life Sciences subject areas.

Our website provides more detailed information about our business, including our strategy and operations, as well as our approach to sustainability.

Modern slavery: UQ's response at a glance

This Modern Slavery Statement (Statement) is published on behalf of The University of Queensland (UQ) and is our third statement under the *Modern Slavery Act 2018 (Cth)*. This Statement is prepared as a single reporting entity and includes UQ's controlled entities.

In this Statement, we describe the status of the initiatives and measures undertaken by UQ and its controlled entities to identify, mitigate and manage the risks of modern slavery in their operations and supply chains during the financial year ending 31 December 2022 (Reporting Period) and highlights our commitments for the years ahead.

UQ's *Strategic Plan 2022-2025* states that by 2032, UQ will be known as a university that is values-led, deeply committed to delivering for the public good and supporting our people, leading reconciliation, and embracing different life experiences and perspectives.

At UQ, we take modern slavery risk seriously and acknowledge our responsibility to play our part toward its eradication. We recognise that our institution has the potential to impact our surrounding communities through education and research, and therefore it is important that we consider modern slavery and broader human rights issues when making business decisions.

During 2022, we continued to broaden our understanding of modern slavery risks, strengthened our due diligence processes and increased transparency of reporting, while also embedding knowledge and understanding of this very important risk across our stakeholders.

We aim to continuously improve our modern slavery program and we welcome constructive dialogue with stakeholders on future action. Feedback and/or questions can be sent to modernslavery@uq.edu.au.

A table setting out how this Statement addresses the mandatory criteria outlined in the *Modern Slavery Act 2018 (Cth)* can be found on page 34.

¹ Unless specified otherwise, references in this Statement to 'the University', 'our', 'us' and 'we' refer to The University of Queensland. All monetary figures are in Australian dollars.

UQ's structure, operations and supply chain

Governance and structure

UQ is [governed](#) by a 22-member Senate and is structured into faculties, institutes, and key divisions including academic services, finance, human resources, information technology, legal, library, property and facilities, research, and student services.

Through our 6 faculties, 8 globally recognised research institutes, and more than 100 centres, we offer study and research opportunities across one of the widest discipline ranges in Australia.

Our faculties bring together teaching and research staff in schools, centres and institutes. They provide study, research and partnership opportunities in Australia and globally. Our research institutes are home to scientists, social scientists and engineers who champion research excellence and continue UQ's tradition of research leadership.

The *University of Queensland Act 1998* specifies the University's functions, establishes the Senate of the University, and recognises it as the University's governing body.

In accordance with the *University of Queensland Act 1998*, UQ has established controlled entities which further the University's educational and research aims. They are included as part of the consolidated result in the University's annual financial statements.

UQ's main campuses are located at St Lucia, Gatton and Herston. Our diverse facilities off-campus include the [Pharmacy Australia Centre of Excellence](#) (PACE) and the [Translational Research Institute](#), marine research stations at [Heron](#) and [Stradbroke](#) Islands, mineral research centre, seismograph station, veterinary and agricultural science teaching and research centres at Gatton, [UQ Business School](#) in UQ Brisbane City, social science research at Long Pocket, and teaching hospitals, health centres and other medical research facilities.

UQ collaborates with international researchers, teachers, innovators and alumni to create a cleaner, healthier, and happier future. Our international partnerships take many forms, including joint research and development centres, licensing deals, scholarships, internships, graduate employment programs and philanthropic foundations. UQ has more than 430 partners across 60 countries. We are one of the leading university development groups in the Asia-Pacific region.

UQ has a total student base of 55,044 (2022)² including 20,743 international students from across the globe, with the top 3 international sources being China, India and Hong Kong.

UQ's full time equivalent staff (including projected numbers for casual staff) in March 2022 equated to 7,410 (3,057 academic staff and 4,353 professional staff).

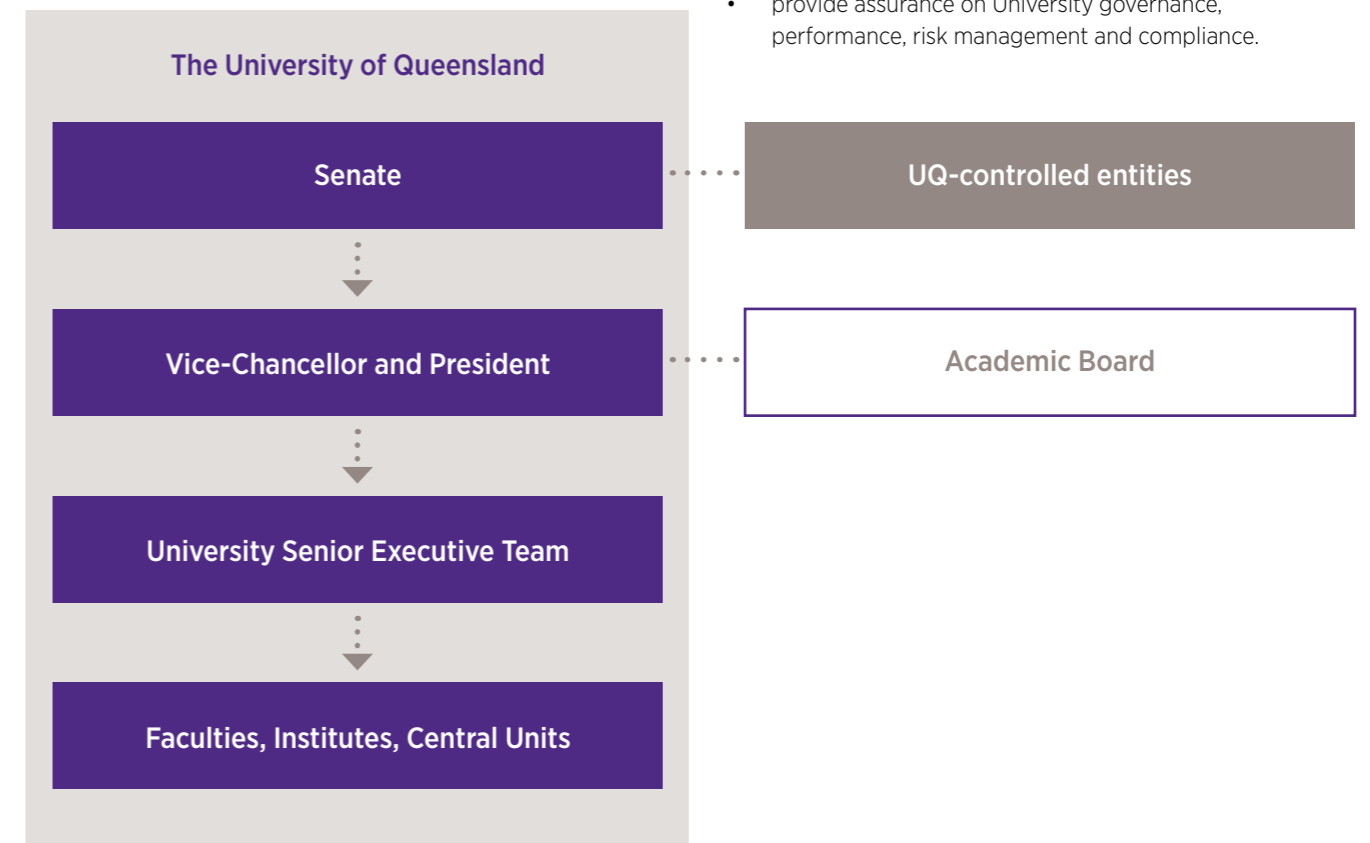
UQ's Governance framework

The governing body of the University is the [Senate](#), as constituted by the *University of Queensland Act 1998*.

The primary role of Senate is to oversee the University and its affairs. In particular, Senate ensures that appropriate structures, policies, processes and planning are in place for UQ to effectively manage its activities and achieve its goals. Senate also reviews and approves the strategic direction of the University as outlined in the [UQ Strategic Plan 2022-2025](#).

UQ's [Governance and Management Framework](#) provides the overall structure and direction for the systematic and disciplined governance and management of UQ and to enable it to:

- perform its functions effectively and efficiently
- plan, create and protect value
- acquire, allocate and use University resources responsibly
- optimise individual and organisational performance
- demonstrate effective risk management and compliance
- provide assurance on University governance, performance, risk management and compliance.



²Figures for 2022 are preliminary and will be finalised in mid-2023.

In 2022, UQ's operating revenue was

\$1.877 billion

Operations

UQ's core purpose is to deliver for the public good through excellence in education, research and engagement with our communities and partners: local, national and global.

UQ's *Strategic Plan 2022-2025* sets out the University's strategic priorities, identifies its core values and re-emphasises UQ's position not only as The University of Queensland but also as the University for Queensland.

We have been successfully achieving our goals for more than a century, increasing our student cohort from 83 in 1911 to more than 55,000 in 2022, and graduating more than 311,000 in that time. According to the [2022 Graduate Outcomes Survey](#), UQ is one of Queensland's leading universities for undergraduate employment rates 3 years after graduation.

Confirming our research excellence, we improved our position in the [Times Higher Education World University Rankings 2023](#) to 53rd globally, and 71st-80th in the [THE World Reputation Rankings 2022](#).

Over the course of 2022, some 3,843 active research projects were underway across UQ, with many seeking solutions to pressing challenges such as climate change, food and water security, biodiversity conservation, and the prevention and treatment of disease.

By providing quality infrastructure and support, UQ continues its long-term strategy to attract and retain leading international researchers and improve strategic research capabilities. While rightly proud of our research excellence, over the coming years we need to ensure that our research remains collaborative and continues to achieve great impact.

In 2022, we launched new plans, programs and activities that exemplify our approach to acting responsibly and sustainably, at the same time as enriching the communities in which we're embedded – both here in Queensland, and around the world.

An Australia Awards training program aimed at bolstering women's leadership in agriculture in Mongolia was recently hosted across UQ's St Lucia and Gatton campuses. Bringing together 20 female agricultural professionals working across government, private, and non-government organisations in the Mongolian agricultural sector, the program provided the opportunity for participants to gain an understanding of the advancements made in agricultural research, development, and business management.

We also signed an agreement with the Asha Society India (Asha) to support the Asha International Education Program through India Equity Scholarships for students from the marginalised communities of New Delhi, India. As part of the agreement, UQ will provide 3 scholarships for postgraduate master's coursework study at UQ as an extension to the line of support already provided by Asha.

UQ proudly announced its Queensland Commitment in August 2022, with the strategic intent to provide a more level playing field when it comes to accessing a university education. By removing many of the personal, financial and geographic barriers that might deter students from lower socio-economic backgrounds and from regional and remote areas from studying at UQ, it will also help foster partnerships as we work together to tackle the complex economic, strategic, climate and technological challenges facing Queensland and the nation.

The University recorded a consolidated deficit of \$310.8 million for 2022. This compares to a consolidated surplus of \$341.9 million in 2021. The total operating revenue for 2022 was \$1,876,513,000.

Most of UQ's expenditure directly supports its teaching and research, with the remainder used to improve and maintain libraries, student services, public services, academic support services, property, facilities and general administration.

Investments

The University maintains 2 long-term managed investment portfolios – the UQ Investment Fund and the UQ Socially Responsible Investment (SRI) Green Fund.

The UQ Investment Fund is managed by external fund managers, who are required to operate within designated asset allocation benchmarks. The UQ Investment Fund has no direct investments in fossil fuel companies. The University regularly monitors the composition of investments managed by external fund managers and ensures fossil fuel companies do not form a material part of the total investment.

The UQ SRI Green Fund offers an alternative to donors providing endowments who are looking for socially responsible investments. The fund will not invest in companies involved with tobacco, armaments, gaming or pornography as they are not deemed socially responsible investments. Further, the fund will not invest in companies excluded from the FTSE All-World ex Fossil Fuels Index.

For the year ended 31 December 2022, the balance was \$803.2 million, of which \$342.7 million relates to endowments and \$460.5 million relates to the UQ Future Fund.

UQ incorporates environmental, social and governance (ESG) principles into its investment decisions through external specialist fund managers. The majority of UQ's fund managers are signatories to the United Nations Principles for Responsible Investment (PRI) and are also members of Responsible Investment Association Australasia (RIAA). They continue to incorporate their ESG philosophies and framework in their investment decisions.

UQ is alert to possible counterproductive expectations in this space, such as seeking unreasonable investment returns or investing in high-risk industries with limited due diligence, that may influence and/or alter UQ's modern slavery risk profile.

Partnerships

UQ is committed to working collaboratively with international partners to increase global connectedness and create positive, lasting change in the communities where we engage. UQ collaborates with international researchers, teachers, innovators and alumni to create a cleaner, healthier, and happier future. Our international partnerships take many forms, including joint research and development centres, licensing deals, scholarships, internships, graduate employment programs and philanthropic foundations.

UQ's impact can be felt right around the globe. See our [Global Partnerships](#) and [Industry Partnerships](#) websites to learn more. We've teamed up with the world's brightest minds to find global solutions to global problems. Our flagship partners include University of Exeter, Indian Institute of Technology Delhi and the Technical University of Munich.

UQ is also focused on building the capacity of people and organisations around the world to achieve their development goals. Clients include leading international development contractors, the Australian Department of Foreign Affairs and Trade, New Zealand Ministry of Foreign Affairs and Trade, the Asian Development Bank, and the World Bank as well as other government agencies, non-government organisations and the private sector.

Supply chain

Our suppliers are our partners and are critical in supporting our operations and ensuring we deliver our research and teaching outcomes.

Our sourcing of products and services often involves multiple suppliers, or tiers of the supply chain. A tier one supplier has a direct relationship with UQ; whereas a tier two supplier (or below) provides input into the goods and services supplied by our direct suppliers. Our supplier arrangements range from one-off purchases to multi-year, large value strategic relationships governed by master contracts.

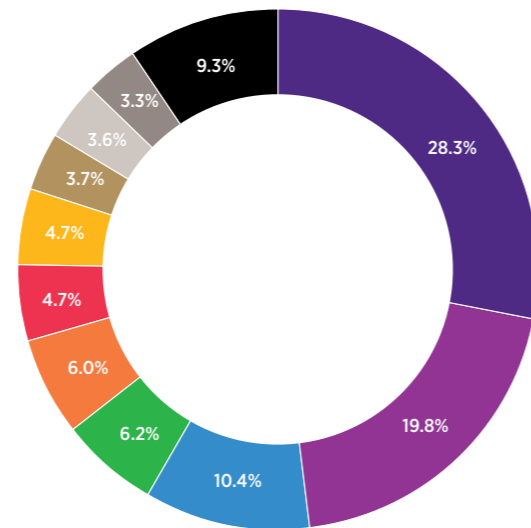
During 2022, our procurement spend was \$624.3 million.³ We recognise that we have opportunity to leverage our supply chain for positive social change within our sphere of influence.

Top 10 known source countries

Our supplier footprint for 2022 comprised approximately 20,000 direct suppliers from 99 countries. Almost 94% of our total spend was in the top 10 countries as shown below.

Categories of spend

We procure a diverse range of goods and services across our operations and projects. Our top 10 categories of spend³ during 2022 are included in the chart above: over 90% of our spend was in these categories.



Category of spend	Spend value	% of total procurement spend
Plant and equipment	\$176,992,304	28.3%
Corporate professional services	\$123,591,742	19.8%
Laboratories and research	\$64,950,800	10.4%
Utilities and renewables	\$38,584,475	6.2%
IT software	\$37,559,933	6.0%
Buildings and grounds (including construction)	\$29,538,642	4.7%
Human resources	\$29,386,457	4.7%
Telecommunications (including hardware)	\$22,988,472	3.7%
Travel and entertainment	\$22,644,393	3.6%
IT professional services	\$20,518,810	3.3%
Other	\$57,573,544	9.3%



Country of spend	Spend value	% of total spend
1 Australia	\$530,445,289	84.96%
2 United States	\$30,336,751	4.86%
3 United Kingdom	\$6,575,874	1.05%
4 Ireland	\$3,752,823	0.60%
5 Canada	\$3,349,338	0.54%
6 Netherlands	\$2,663,383	0.43%
7 Germany	\$2,315,718	0.37%
8 Taiwan	\$2,162,097	0.35%
9 China	\$2,094,785	0.34%
10 Singapore	\$1,575,782	0.25%

³Total spend of \$624.3 million includes procurement across all payment methods, including UQ corporate credit card. For Top 10 categories of spending, Australian University Procurement Network category taxonomy applies.

In 2022, UQ's procurement spend was



~\$624.3 million



20,000+ suppliers



99 countries

Procurement operating model

UQ's procurement operating model is centre-led, category-managed, and business-enabled. This means that strategic procurement decisions are coordinated centrally while delivery and transactional work is executed in a distributed fashion.

This model helps deliver innovative strategies by exercising procurement influence. It offers benefits of standardisation and control that comes with centralisation, while engaging directly with stakeholders and ensuring compliance at the UQ level.

Key for momentum and mitigating the risks of modern slavery in the supply chain is ensuring the business is aligned in terms of strategy, policies, systems, key performance indicators and training. This is well supported by the centre-led operating model, which helps to improve knowledge sharing and best-practice execution.

Our Enterprise Procurement team, along with our Category Management teams, deliver substantial value to UQ, manage key supplier relationships, and help improve social outcomes and stakeholder satisfaction. Category management oversight over our largest spend categories ensures that we provide advice and specialist support to the business and align commercial drivers with responsible sourcing as well as taking a long-term approach to supplier contracts and relationships.

Procurement activities for \$200,000 and over follow centrally designed sourcing processes, as part of which suppliers must provide responses about ethical and social considerations.

Local buying

UQ encourages local buying which, in turn, improves supply chain visibility and improved assessment of modern slavery risks.

Indigenous procurement

2022 saw the launch of UQ's *Indigenous Procurement Strategy 2022-2025*. This strategy is the first of its kind at UQ and has been developed in alignment with the [UQ Strategic Plan 2022-2025](#) and [Reconciliation Action Plan 2019-2022](#) (RAP). The Indigenous Procurement Strategy promotes active consideration of opportunities to procure required goods/services from Indigenous suppliers which, in turn, supports the University to strengthen relationships, opportunities and understanding with Aboriginal and Torres Strait Islander businesses and communities.

Encouraging spend with Australian suppliers

UQeMarket is UQ's preferred pathway for buying goods. This electronic marketplace of Australian supplier catalogues offers products from categories including:

- laboratory supplies and consumables
- stationery and office supplies
- IT and audiovisual equipment
- health and safety products
- hygiene supplies
- furniture
- electronics.

Local benefits

At UQ, the local benefits test is applied to significant procurement activities, i.e. procurement with a value threshold of \$1 million and over, thereby allowing UQ to consider broader strategic factors such as stimulating local employment, increasing local socio-economic development, and supporting social objectives when making procurement decisions.

Impact of COVID-19

During 2022, as the COVID-19 pandemic evolved, life began returning to normal.

UQ campuses were open and operated under COVID-safe conditions. [UQ Health Care St Lucia](#) offered free COVID-19 vaccinations to both staff and students.

Vaccination mandate

In line with government regulations, in early 2022 UQ introduced a mandatory COVID-19 vaccination requirement for all people attending UQ campuses for business purposes. This included suppliers, whether visiting casually for ad hoc engagements, or being on campus for longer periods to deliver services (e.g. contractors). The implementation of this requirement required suppliers to acknowledge their workers' vaccination status.

This is unlikely to have had any specific impact on modern slavery risks in UQ's supply chain.

Staff and students

UQ recognises that changes caused by COVID-19 have and are requiring us to adapt rapidly to new ways of living, working and studying. Looking after personal mental health and supporting others has never been more important. UQ offered a range of resources, tools and support to both staff and students that could help during this time.

Additionally, staff and their immediate family members were able to access a free and confidential wellbeing, coaching and counselling service.



Working at UQ on the development of a vaccine against COVID-19.

Work-integrated learning and industry placements

Virtual industry placements, both locally and internationally, remained historically high during 2022, with students using technology to connect with industry and workplaces. The risk of students being engaged in a way that would expose them to potential modern slavery was subsequently lessened over the year.

As business activity transitions to a more traditional workplace post COVID-19 and workplaces are impacted by widespread staff shortages, pressure for students to work extra hours may occur, which may increase the risk of exploitation. With more industry placements occurring in-person, ongoing modern slavery risks will be assessed and monitored in this context.

Supply chain

COVID-19 has had a material impact on global supply chains through both demand and supply effects. Restrictions and stimulus measures concurrently shifted spending away from services, while driving unprecedented demand for goods. Conversely, restrictions adversely impacted the production and distribution of goods.

Supply chain pressure eased somewhat during 2022. Pandemic-related disruptions helped reshape our thinking in how to improve our ability to manage our supply chain by:

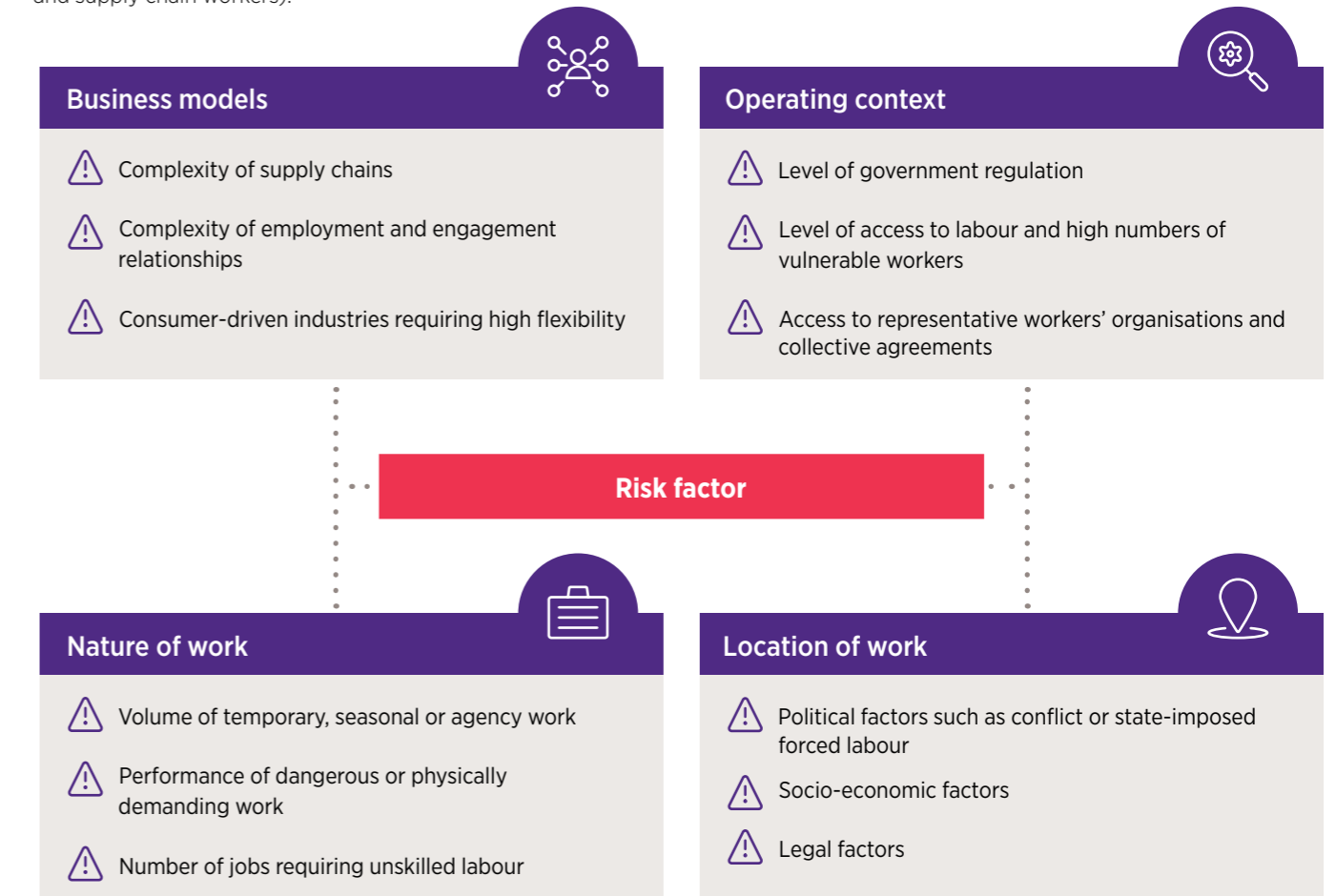
- fostering more open and regular communication with suppliers
- increasing local sourcing
- diversifying the supply base
- entering into arrangements for critical items such as personal protective equipment
- acquiring deeper knowledge of upstream supply chains to assess their vulnerability to potential global threats
- factoring risk management and resilience into all aspects and levels of decision-making at UQ.

Risks of modern slavery in UQ's operations and supply chain

Understanding our modern slavery risks is critical to targeting our actions and partnerships to prevent and address the issue.

With our operations and supply chains spanning across the globe, we are committed to improving the working conditions of workers connected to UQ and recognise the need to monitor for conditions that may put workers at risk of modern slavery.

We assess modern slavery risks in our operations and supply chains using the Risk Model⁴ below in conjunction with research, external reports and standards, country and sector risk profiles, previous assessments, and input from our peers and experts in this area. These risk factors are considered in the context of our broad categories of workers (employees, students, volunteers, contractors and supply chain workers).



We recognise that our operations and supply chains are highly complex and diverse in nature. In delivering our research and teaching services, we operate in some locations, sectors and supply chains that may have an elevated exposure to the risk of modern slavery. These warrant a heightened standard of vigilance in meeting our obligations.

⁴ Adapted from *Addressing Modern Slavery: A Guide for Australian Businesses*; Australian Red Cross

Modern slavery risks may arise due to issues present in the countries and regions in which we operate and from which we source, the type of products and services we procure, and the specific entities with which we engage. As such, our modern slavery risk profile continually evolves and potential modern slavery risks may change over time. These changes can reflect internal factors such as establishing new operations, or external impacts such as COVID-19.

Risks in operations

During 2022, we built on the work undertaken in the operational space during 2020 and 2021.

2020 	2021 	2022 
<p> High-level discovery work, including questionnaires and follow-up interviews with organisational units and controlled entities, to understand and assess at a high level where and how UQ's operations may be exposed to modern slavery risks, and to identify existing controls that are in place to manage these</p>	<p> Detailed risk assessments with organisational units and controlled entities to understand and assess modern slavery risks, existing controls and proposed additional controls</p>	<p> Identifying UQ's organisational units that have activities or operations in 15 high-risk jurisdictions for modern slavery risks</p> <p> Developing a Modern Slavery Risk Assessment Tool to use as a pilot within the organisational units identified above</p>



UQ employs a wide range of staff in many roles for diverse audiences, using thousands of suppliers.

Employees

Modern slavery risks for UQ employees are mitigated by:

- The majority of UQ employees are employed directly on a permanent or casual basis through standard contracts of employment administered centrally by UQ's Human Resources Team.
- UQ's recruitment procedures comply with the relevant local regulations and standards.
- UQ adopts a fair and equitable approach when scouting for talent and all wages comply with local laws and regulations.
- UQ supports its staff's mental and physical wellbeing through a variety of initiatives, including training programs, wellbeing workshops and the provision of an employee assistance program.

- UQ offers a supportive and flexible workplace for those balancing families and other responsibilities with their careers, and strives to ensure our work environment is safe, family-friendly, environmentally friendly, and culturally sensitive with equal opportunity for all.

We recognise sham contracting⁵ as a risk that may also have some relevance in the modern slavery context. Correct engagement as an employee ensures the mitigation of modern slavery risks through the above controls being carried out for the worker. UQ has strong governance and controls to ensure it engages with its workers in the right way.

At the request of UQ's Senate, UQ's Finance and Business Services team worked closely with the Australian Taxation Office and external consultants with relevant subject matter expertise to formalise its strategy, including tools and templates to use.

⁵ Attempt by an employer to disguise an employment relationship as a contractor relationship to avoid payment of taxes and/or entitlements.

Students seeking work experience

Modern slavery risks with UQ students seeking work experience are assessed as low due to:

- strong regulatory frameworks where these opportunities are within Australia
- UQ's robust student placement framework, which includes:
 - policies and procedures
 - partner screening and due diligence of host organisations
 - contractual framework
 - recording and reporting requirements
 - training and guidance for student supervisors.

During 2022, UQ took steps to further improve the guidance provided to our organisational units on due diligence performed for student placement agreements. We also engaged with our students to build awareness of modern slavery risks and the available escalation pathways. This work is further described on pages 18–27.

Contractors and supply chain workers

Modern slavery risks with UQ's contractors and supply chain workers are described on pages 16 and 17.

Workers of partners engaged as part of UQ's teaching, research, consultancy and commercial activities

Modern slavery risks with workers of UQ's partners are assessed as low due to:

- UQ's robust policy framework, which includes partner due diligence
- contractual controls
- oversight of engagements by UQ's central support functions.

During 2022, we further identified the broad nature of activities and engagements that UQ's organisational units undertake in 15 high-risk offshore jurisdictions to enable a focused approach on risk assessment and capability building. This work is further described on pages 18–27.

Volunteers

Modern slavery risks with UQ's volunteers are assessed as low due to UQ's policy framework, which is designed to ensure that volunteers are engaged on a truly voluntary and non-exploitative basis.

During 2022, UQ began a comprehensive review of its policy framework in relation to volunteers. This work is further described on pages 18–27.

Risks in supply chain

Given the value and nature of our spend, UQ can make an impact in the worldwide fight against modern slavery through our supply chain by leveraging our buying power to influence positive behaviour and outcomes.

We recognise that the first and most important step in doing so is developing a better understanding of our supply chain and where those risks lie. To this end, during 2022, we undertook a detailed risk mapping of our supply chain using our risk model.

Our approach

Insights from this mapping helped us determine where to focus our efforts and resources besides providing insight into industry-wide challenges and systemic issues.

Broadly speaking, our approach to mitigating these risks is through:

- creating awareness through training and other initiatives
- supplier engagement and dialogue to achieve an understanding of suppliers' practice and culture
- asserting influence over behaviour through our sourcing activities
- improving accountability through contractual instruments.

Modern slavery risk of UQ's 2022 purchasing, including business models and nature of work⁶



⁶ Australian University Procurement Network category taxonomy, depicting risk rating based on desktop research and literature review of published reports and data sets related to the specific goods and services procured, as well as AUPN category risk allocations. See *Country of spend* table on page 17 for colour coding of risk categories

Limitations of our approach

We recognise the following limitations in our approach:

- We have prioritised understanding our risks with our direct suppliers, given we have almost 20,000 direct suppliers and potentially have a greater degree of influence with these suppliers. We are aware, however, that we also need to understand our modern slavery risks across the various tiers of the supply chain. This is a complex process requiring dedicated resourcing and effort.
- We know we cannot address many of these complex issues alone; they will require broader collaboration between multiple stakeholders including governments, other organisations and civil society.
- More than 84% of our direct spend is with Australian-based suppliers. While Australia is recognised as a low-risk country from a modern slavery perspective, we recognise that we cannot be complacent given that modern slavery does occur in Australia. Moreover, where suppliers are located does not necessarily represent the country of origin of the goods and/or services supplied.
- Some of our operational practices, including stakeholder expectations and procurement practices that create downward pressure on suppliers (e.g. unrealistic budgets, late payments, short-term supplier relationships), may be counterproductive and influence modern slavery risks within our supply chain.

Collaboration with the Australian University Procurement Network (AUPN)

In parallel to the mapping that we undertook during 2022, we continued our collaboration with other universities within the AUPN about the modern slavery program of works, including the implementation of a supplier risk portal.

Work is well progressed in automating the supplier risk assessment process using the portal, which is essentially a risk-based segmenting tool to determine the risk profile of suppliers in our supply chain. The portal was rolled out to universities during 2022 and the program is now focused on improving the insights and output derived therefrom. The level of potential risk for each supplier will determine the formal risk profile of the supplier and inform further due diligence approaches, including assessment questionnaires, reporting and further engagement with suppliers.

In recognition of the benefits to both universities and their supply base to create meaningful change in the modern slavery space, in June 2022, the AUPN Modern Slavery project was awarded the inaugural Sustainability Project of the Year Award, sponsored by ExceleratedS2P.

Country of spend	Risk ⁷	% of total procurement spend ⁸
1. Australia	Low	84.96%
2. United States	Low	4.86%
3. United Kingdom	Low	1.05%
4. Ireland	Low	0.60%
5. Canada	Low	0.54%
6. Netherlands	Low	0.43%
7. Germany	Low	0.37%
8. Taiwan	Low	0.35%
9. China	High	0.34%
10. Singapore	Low	0.25%
11. Other	High	4.75%
	Medium	0.42%
	Low	1.08%
TOTAL		100%

⁷ Risk factors include operating context and location of work; country of spend data includes data provided by our bank on UQ Corporate credit card usage; risk rating is based on country risk rating outlined in the [Global Slavery Index 2018](#).

⁸ Suppliers paid using UQ Corporate credit card are allocated to a country based on the currency in which they are paid, which may not necessarily be the country where the supplier is located. 'Other' category includes suppliers based in countries other than the top 10 countries of spend or where the country of spend is unknown.

Actions taken to assess and address the risks of modern slavery

We understand that effective action towards the eradication of modern slavery requires sustained and long-term effort.

Our focus for the reporting period has been on enhancing our core capabilities for the identification of and response to modern slavery risks. Broadly speaking, this covers:

- ensuring we have progressive standards and policies affirming our commitment and ambition in relation to human rights
- capability building to ensure our stakeholders, including our suppliers and their workers, are equipped to identify modern slavery risks and know what support is available in this space
- improving the visibility of our supply chain
- undertaking risk-based due diligence within our broader engagement framework in our operations and supply chain
- collaborating with our peers and wider industry to ensure alignment of effort, reduce duplication, and achieve more with less.

Details of the actions taken during the reporting period to assess and address the risks of modern slavery are encapsulated in the 2022 Highlights section from page 19.

We continued to monitor progress against our 2021 commitments and identified priorities for future years as specific reporting against the broad indicators of our Modern Slavery Action Plan. Mapping of our actions against our action plan and our future commitments to expand the current baseline measures and controls are included on pages 26 and 27.



UQ staff meet at UQ Brisbane City, making use of the University's plant and equipment – UQ's top supply chain category by value of spend in 2022.

2022 Highlights

Modern slavery risk assessment – Operations

Engagements in high-risk jurisdictions

As the next step to the risk assessments we conducted during 2021, we engaged with our faculties, divisions and institutes to better understand where potential issues and greater modern slavery risks may arise, and where to prioritise our efforts. We then selected 15 high-risk jurisdictions⁹ to gain deeper insight into the nature of UQ's engagements within these countries.

In all of the selected jurisdictions, UQ held student-related engagements. Additionally, in most of them we undertook research engagements. UQ's advancement, teaching, international partnerships and the provision of services were more dispersed. These insights have given us a good sense of where we need to focus our efforts and build capability for modern slavery risks.

Work already undertaken to uplift understanding of modern slavery risks in relation to a potentially at-risk stakeholder group, students, should continue. Further, specific effort should be made to ensure our staff undertaking research in such jurisdictions should be educated to understand the nature of potential modern slavery risks connected with their work. This should include ensuring there is a representative of the research community on the UQ Modern Slavery Working Group, as well as continuing the education campaign to ensure those staff responsible for research partnerships understand what the indicia of modern slavery may look like in these engagements.

Modern Slavery Risk Assessment Tool

UQ's operations are complex and diverse. Engagement decisions are generally taken at the business level with support from professional services teams and subject matter experts. We recognise that to improve our governance and risk oversight in relation to modern slavery, we need to enable our business, i.e. our stakeholders who engage with entities, to identify these risks and escalate them for further assessment and elevated due diligence as required. We do not and cannot expect all our stakeholders to have expert knowledge of how a risk assessment is conducted.

Moreover, any risk assessment for modern slavery risks must align with UQ's own [Enterprise Risk Management Framework](#) and integrate into our wider risk, audit and due diligence programs.

⁹ Source data: [Global Slavery Index 2018](#) (GSI).

With assistance from our Enterprise Risk team (our subject matter experts on risk), we developed an easy-to-use Modern Slavery Risk Assessment Tool designed to assist our decision-makers to undertake a high-level modern slavery risk assessment when engaging with an entity for a UQ business purpose. The Tool uses a set of simple questions that need to be answered by the stakeholder engaging the entity and then auto-populates a modern slavery risk score for the entity in relation to the engagement being assessed. Based on the risk score, a set of recommendations are then provided to the stakeholder to consider and carry out for the engagement. Cases where a high-risk score is determined and/or where the stakeholder requires additional support are to be escalated to UQ's Modern Slavery Working Group for advice and assistance.

During late 2022, we piloted the Modern Slavery Risk Assessment Tool with various stakeholders at UQ and our controlled entities to test whether it works as intended. Initial feedback has been encouraging.

Insights from the pilot phase will be collated and used to further improve the Modern Slavery Risk Assessment Tool during 2023. Next steps involve:

- finalising the strategy for use of the Modern Slavery Risk Assessment Tool
- advertising the Modern Slavery Risk Assessment Tool to the UQ community
- gathering learnings and feedback to inform further improvements.

Volunteer engagements

Volunteers may not have the same protections as UQ employees. This activity has potential to be regarded as exploitative business practice if used as a substitute for paid employment, particularly in international jurisdictions.

At UQ, volunteers have an enormous impact on our activities and are valued for the contributions they make to fundraising, marketing, and program execution. UQ supports the engagement of volunteers on projects that improve relationships between the University and the community, provided they are not engaged to replace paid staff.

Review of UQ's Volunteers Policy and associated procedure commenced during 2022 and is in progress. The review provides an opportunity to further raise awareness of modern slavery risks and strengthen controls in UQ's volunteer engagement practices.

► See Case Study 1

Case Study 1: Volunteering: UQ Alumni Friends

UQ's Alumni Friends have been supporting the University through fundraising and volunteering for more than 50 years. A major initiative for the group is the UQ Alumni Friends Book Fair, an annual fundraiser organised by volunteers who harness their love of books and generously donate their time to help raise funds for research and for scholarships to support UQ students.

Volunteers prepare more than 110,000 books each year: sorting, classifying, pricing and packing books, and then setting them up for the 4-day fair. Books not selected for sale are passed on to community organisations, locally and overseas. In 2022, the UQ Alumni Friends Book Fair received 4,394 visitors and raised \$129,098.

Through a dedicated Alumni Friends coordinator, UQ's Advancement and Community Engagement Team has been working alongside Alumni Friends volunteers to provide enhanced support for these dedicated volunteers. This includes funding and supporting the full operations of the Book Fair – from recruitment and coordination of volunteers, through to marketing, promotions and event logistics – and we are continually working to better understand the needs of our volunteer community. This extraordinary partnership allows volunteers to connect with members of the community who share their passion for both books and UQ.

In 2022, a UQ Alumni Volunteering project was undertaken to better understand volunteering opportunities for alumni at UQ and to explore recruitment, onboarding and stewardship to ensure a mutually beneficial and meaningful experience. More than 39 active volunteer programs across UQ were identified and highlighted the need to manage volunteers more effectively.

Three tiers for volunteer stewardship were recommended: leaders, supporters and ambassadors. An enhanced process has been developed to recruit, onboard, support and steward volunteers. Recommendations for celebrating and making alumni volunteer opportunities more visible will be implemented in the years ahead.



Due diligence of research partners

During the reporting period, we further progressed our work on strengthening the due diligence processes for UQ's research partners and collaborators.

Our project for rolling out a due diligence screening platform to facilitate smarter, automated and comprehensive due diligence of our research partners is progressing well. Insights from the platform will feed into UQ's research management system and will inform the overall evaluation of the research partner. They will also refine our existing due diligence frameworks.

Because this platform is driven by data with risk management at its core, it will help us streamline a range of compliance and ethical considerations, including modern slavery risks in relation to our research partners, as well as enable a consistent approach to risk management.

The rollout of the platform across UQ's research teams is on track for 2023. Work is underway preparing local standard operating procedures and supporting artefacts, guidance materials and checklists to complement the platform release.

Modern slavery risk assessment – Supply chain

Modern slavery due diligence framework

During the reporting period, UQ's Enterprise Procurement team developed a draft framework for modern slavery due diligence of UQ's supply chain. Objectives of this framework include:

- building capability, ensuring that UQ's buying community is better equipped to identify and assess modern slavery risks in UQ's supply chain
- introducing practical due diligence tools that incorporate socialising and communicating supplier due diligence processes across UQ's buying community to encourage uptake and improve understanding and implementation
- improving supplier engagement on modern slavery risks that include building capacity and capability in this space
- improving visibility of modern slavery risks across UQ's supply chain.

Consultation on the draft framework will commence during 2023.

Discovery work on supply chain risk assessment

During 2022, we undertook a manual risk assessment of a section of our direct suppliers as a pilot exercise. To make this a meaningful exercise, expending time and effort to understand challenges, if any, and what practical outcomes could be achieved from the exercise was important.

► See Case Study 2

Source to contract platform

During 2021, we procured a source to contract digital procurement platform called 'UQProcure'. This platform will help us improve the visibility of our suppliers and offers several opportunities to embed supplier due diligence, risk assessment and awareness-raising as part of the supplier registration process, while at the same time streamlining supplier management processes.

During the reporting period, our focus was on implementing the platform, which included:

- understanding the capabilities of the platform, setting up an initial sample set of workflows and configuring the system to work well for UQ's procurement activities
- forming a pilot group and undertaking procurement activities through the platform. This involved putting workflows to the test, improving workflows, understanding how to undertake the many procurement activities using the tools available in UQProcure and investigating the capabilities in the contract management and supplier management modules
- working with the pilot project participants to test and understand how the system works with live procurement and tendering activities.

Broader rollout of the platform to a wider audience of users will follow completion of the pilot phase and will be accompanied by a refresh of the Procurement Policy and Procedure, related training materials and artefacts.

Supplier standards

We recognise that modern slavery cannot be addressed in isolation from other human rights and broader ethical issues. That is why we integrate modern slavery risk management with our broader work to protect and respect human rights, including through our [Supplier Standards](#), finalised during 2022.

These Standards set our principal expectations of suppliers and align our supply chain with our principles for operating as a socially responsible organisation. This is an integral part of our commitment to responsible sourcing, as well as legal and social expectations. We encourage prospective suppliers to review UQ's Supplier Standards to ensure they agree with the principles addressed, and take action to remedy potential shortcomings.

The Standards were published on our [Suppliers webpage](#) and reference to them is being progressively embedded in our supplier relationship management practices as part of our ongoing efforts to ensure that social and environmental responsibility and ethical conduct exist throughout our supply chain.

Case Study 2: Pilot supply chain risk assessment

In September 2022, we completed a manual risk assessment of 50 carefully selected UQ suppliers to determine their modern slavery risk. Each was scored in this pilot according to UQ's Risk Model¹⁰, with the calculation adjusted up if any adverse media releases and/or other information of concern were known, or adjusted down if the supplier had put in place positive controls (e.g. awareness programs and training, or robust policy frameworks).

From this assessment:

- 11 suppliers were deemed low-risk, with no further action required (besides casual observation)
- 36 were considered medium-risk – information about modern slavery resources and training was provided as part of our communication on the UQ Suppliers webpage. Modern slavery will be reinforced as a factor in contract management activities. Detailed assessments are planned to better understand their modern slavery controls.
- 3 suppliers were classified as high-risk, leading to detailed assessments being conducted that ensured they implemented robust modern slavery controls. These suppliers will continue to be monitored.

The purpose of the exercise was to determine:

- whether we can drive tangible outcomes from risk assessment
- what challenges we will experience with the practical implementation of a risk assessment exercise across a wider range of suppliers
- whether the risk assessment process is easy to understand and follow
- what additional tools and artefacts can support the risk assessment
- how modern slavery risk assessment can be integrated with broader due diligence work
- what impact the process will create on UQ's buying community and UQ's suppliers or prospective suppliers
- how roles and responsibilities of stakeholders in the process can be articulated
- how we can achieve recordkeeping, transparency and visibility across UQ's buying community to minimise duplication of effort
- if the exercise will drive any unintended consequences.

¹⁰ Looking to the future, the AUPN Supplier risk portal can be used for either determining or confirming the inherent risk score.

Case Study 3: Establishing UQ Print for printing, merchandise and apparel

In 2020, we established a centralised model for printing and procuring merchandise and apparel, UQ Print, one outcome being to help reduce the high risks of modern slavery identified in the garment and textile industries from factors such as:

- vulnerable workforce
- labour-intensive sector
- high-risk jurisdictions – lower labour standards
- manufacturers removed from consumers in the supply chain
- business model heavily reliant on sub-contracting.

Effective and continual due diligence is required to identify and eliminate these risks and practices, but in the meantime, many benefits have been delivered:

- Using UQ Print has allowed UQ's buying community to buy with impact.
- Suppliers are awarded a panel position only if they prove a high level of environmental and ethical accreditation via internationally recognised audit processes across their entire supply chain.
- An Indigenous supplier is on the panel, which improves supplier diversity.
- Environmental impact is considered – UQ Print is Forest Stewardship Council certified – only 3 other printers in Queensland hold this accreditation.
- Modern slavery risks associated with decentralised procurement of print, merchandise and apparel supplies are significantly reduced.
- We are developing strategic partnerships and long-term relationships with suppliers on the panel.
- Robust mechanisms are in place for performance management of panel suppliers and regular contract review meetings are held to discuss ethical sourcing.

Establishing effective strategic partnerships with our suppliers

We recognise that establishing panel arrangements with suppliers allows us to improve visibility of our supply chain, develop long-term relationships with our suppliers, and more easily manage those relationships over time. These arrangements help us connect with suppliers on an ongoing basis and provide formal mechanisms for not only performance management but also for discussing modern slavery risks and UQ's expectations of its suppliers more generally. Maximising visibility and control over our supply chains ensures greater oversight and knowledge of relevant risks by reducing the complexity of our supply chain. This can in turn encourage efficient use of resources and promote quicker responses to any problems that may arise.

UQ encourages establishing panel arrangements, where relevant, as a solution to procurement challenges. A significant benefit of these panel arrangements in the past has been that the process and relationships help to identify and assess modern slavery risks.

► See Case Studies 3 and 4

Capability building



International Day for the Abolition of Slavery

Every year on 2 December, International Day for the Abolition of Slavery draws attention to slavery that still exists in the world and focuses on efforts towards its eradication. It is a day of remembrance and recognition and an urgent call to action.

We recognised this day by:

- issuing an all-staff memo from the Chief Operating Officer
- publishing an [article](#) explaining how slavery and similar exploitative practices remain significant – but not inevitable – global problems, and how even small changes in business operations can make a tangible difference to the lives of those being exploited. Authored by Dr Joseph Lelliott, senior lecturer in the TC Beirne School of Law and key representative of our Modern Slavery Working Group, the article was published in UQ's *Contact* magazine, distributed to an audience of around 180,000 worldwide (including UQ staff and alumni)
- hosting a webinar organised by key representatives of UQ's Modern Slavery Working Group, who shared information about the Modern Slavery Risk Assessment Tool and encouraged stakeholders to use it when engaging with third party entities, and to provide feedback on how to improve it.

Improving staff awareness of modern slavery risks

UQ recognises the importance of training, raising awareness, and embedding knowledge and understanding of human rights, ethical standards and risks for its employees.

During April 2022, the Office of Chief Operating Officer conducted a survey to understand the current level of awareness of modern slavery among UQ staff, and to increase this awareness through sharing resources and training materials. A second survey took place during December 2022 to find out more about the levels of staff awareness.

The survey outcomes will help measure progress and identify areas of focus for stakeholder engagement as part of the continuing work on UQ's modern slavery action plan.

Of the total respondents to the December 2022 survey:

- 60% knew what modern slavery means and feel equipped to identify potential red flags
- 34% had seen or read UQ's 2020 *Modern Slavery Statement*
- 32% were familiar with Australian modern slavery legislation
- 27% knew where to escalate for support if they observed modern slavery practices
- 15% knew about UQ's Modern Slavery Working Group
- 12% had visited UQ's [Modern Slavery webpage](#) at least once.

While somewhat encouraging, these results suggest that we need to do much more to raise staff awareness of this important risk for our first line of defence in identifying and helping address any instances of modern slavery. Overall, the survey generally reflected a low maturity in relation to modern slavery understanding and mitigations.

During the reporting year, we undertook a mix of measures such as issue of communications, posters and presentations to key groups to raise awareness. We also undertook a targeted exercise to encourage our staff in procurement roles and participants of our Procurement Community of Practice to undertake modern slavery training.

Separately, we provided training programs at UQ with special focus for managers on appropriate workplace behaviour, mental health, and fraud and corruption. Our employees undertake regular refresher training on our [Code of Conduct](#) and Ethics and Compliance policies. Training participation is documented, repetition cycles are clearly defined, and follow-up is automated. Training on our Code of Conduct reinforces the expectation that our staff follow applicable laws and report concerns of illegal or unethical activity.

Student engagement

During the reporting period, we promoted communication efforts aimed towards improving knowledge and awareness of modern slavery risks across our student community. This was done via student-facing social media posts. We also highlighted modern slavery risks with our staff engaged in supporting students with work-integrated learning activities.

Case Study 4: Improving supply chain visibility through panel arrangement for creative services

During 2022, we undertook a detailed and rigorous open market sourcing process with the intention of establishing a panel for advertising and creative services.

Our supplier invitation materials included enquiries about potential suppliers' modern slavery governance procedures. The response submitted by the Tier 1 panel supplier being discussed in this Case Study was extremely proactive and positive. The *Modern Slavery Act 2018 (Cth)* does not apply to this supplier, so submission of a Modern Slavery Statement was not mandatory; yet this supplier recognises its ethical and social obligations, following best practice, and with processes in place to ensure safe work practices, the promotion of diversity and inclusion, and no engagement with entities that support modern slavery.

Advantages of the panel:

- improving spend with local suppliers
- improving spend and engagement with Aboriginal and Torres Strait Islander suppliers
- formal onboarding and induction processes with panel suppliers
- centralised engagement and management of suppliers which, in turn, ensures a consistent approach in raising awareness of suppliers and discussing concerns associated with modern slavery risks
- close management of panel suppliers using an engagement model that outlines the key roles and responsibilities in relation to contract management and a pathway to escalate and resolve issues.

Identifying issues with Tier 3 of our supply chain

Our close contract management with our Tier 1 supplier means that we have regular opportunities to discuss modern slavery and broader ethical considerations besides commercial issues.

During the reporting period, we were alerted to media releases about a supplier of digital equipment, based overseas, being linked to human rights issues. This supplier was a Tier 2 supplier for our Tier 1 supplier, which meant it was UQ's Tier 3 supplier. We immediately raised these concerns and alerted our Tier 1 supplier, who was extremely proactive in understanding the issues involved. They shared the alerts with their primary supplier, who is now taking active steps to investigate the issues with their direct (Tier 1) supplier. Our Tier 1 supplier is also taking active steps to strengthen the due diligence they undertake for their own supply chain and are working on reviewing their procurement processes.

This case was a useful opportunity for us to understand how due diligence in the area of modern slavery and human rights works in practice, especially with second- or third-tier supply chains. We were able to achieve a positive outcome in terms of influencing the behaviour of our direct panel supplier and raising awareness of modern slavery issues. We also provided assurance to our panel supplier that we can support and provide them with assistance, through a direct escalation pathway.

Governance and policy

Contracts

Contractual mechanisms are one important part of mitigating the risk of modern slavery. During the reporting period, UQ commenced a review of select standard contract templates used for general commercial contracts, and research collaboration contracts with a supply aspect, to support UQ's appropriate management of modern slavery risks.

These contract templates are currently under revision to include, inter-alia, clauses that provide for:

- warranties that the person has not and will not engage in modern slavery or breach any legal requirement relating to modern slavery
- warranties that the person will not deal with subcontractors or third parties on the same basis
- a special right to terminate the contract if such warranties concerning modern slavery were or become inaccurate, incomplete, out-of-date or misleading.

Policy framework

UQ's commitment to upholding fundamental human rights is embedded in our policies and procedures, which require an assessment of human rights limitations when being reviewed or updated. As reported in our previous statements, we have a Staff Code of Conduct that articulates our values and sets out the standards of conduct the University expects and requires of all staff and contractors, and the consequences of failing to meet those standards. A revised Code was published in 2022 following a comprehensive review.

Our governance structure and policies support our response to modern slavery and broader human rights risks. They help ensure that responsibility for managing modern slavery risks is clearly defined across our business and help us take a consistent and coordinated approach.

During 2021, UQ undertook a detailed gap analysis to identify the need for a standalone UQ Modern Slavery Policy. We found that the establishment of a standalone policy was not required, and this was supported and endorsed by the University Senior Executive Team. It was considered that any modern slavery concerns addressed in policy should be targeted and would fit more effectively within UQ's existing suite of policies and procedures. We consider this approach to policy development – underpinned by our Governance and Management Framework, Enterprise Risk Management Framework, and Enterprise Compliance Management Framework – coupled with stakeholder education and training, provides a meaningful way to raise awareness of modern slavery risks across UQ.

During the reporting period, we further strengthened our commitment to embedding modern slavery risk considerations into existing policy and governance mechanisms with the following initiatives:

- development of amendments to UQ's [Financial and Contract Sub-delegations Procedure](#) to improve staff consideration of modern slavery impact/risk. This Procedure addresses pre-contract due diligence and outlines a number of factors that UQ sub-delegates need to consider before entering a contract on behalf of UQ. Highlighting modern slavery as a risk to UQ's decision makers (i.e. contract delegates and sub-delegates) before signing a contract will strengthen controls in this area.
- incorporation of modern slavery risks and escalation pathway for support and advice on these risks in UQ's policy development resources.

Modern Slavery Working Group

UQ's Chief Financial Officer oversees UQ's modern slavery program of works.

Reporting to the Chief Financial Officer, UQ's Modern Slavery Working Group was established during 2020 as part of our governance structure to oversee and support the management of modern slavery risks across our operations and supply chain.

The group comprises staff representatives from key functions across UQ including procurement, legal services, research, international development, teaching, business analysis, and student enrichment. This cross-functional approach is essential for harnessing knowledge and understanding of our business and operations. It also eases the effort involved in facilitating and coordinating actions to manage key risk areas.

Importantly, Working Group members also become knowledgeable on modern slavery within their own function and act as Change Champions within their respective organisational units. This helps to further integrate our modern slavery risk management into existing business processes and identify opportunities for further action.

Formal duties of the Working Group are based on its Charter, which includes the terms of reference.

The group met 6 times during 2022. We continued to evolve and realign to meet the needs of our modern slavery action plan, and established separate sub-streams to track progress against our planned deliverables.

Escalation pathways

During 2022, we continued to promote our escalation pathways for modern slavery concerns. We shared information at several UQ forums throughout the year and supplemented this with engagement initiatives targeting UQ staff, alumni, students and our controlled entities. We encouraged our stakeholders to report any suspected unethical, illegal, fraudulent or undesirable conduct within our own operations and supply chain, including suspected modern slavery and other adverse impacts on people, communities or the environment.

We also used our [Suppliers webpage](#) to raise awareness of these reporting mechanisms across our supply chain and their workers.

Three concerns were reported during 2022, which were escalated to our Modern Slavery Working Group for investigation and to address as appropriate. The Working Group conducted due diligence in relation to the entities involved and this gave us some assurance on the growing awareness of modern slavery risks across our community.

Considering the breadth of our operations and supply chain and the diverse nature of risk profiles, we are continually striving to improve opportunities for workers to raise issues through our established escalation pathways.

We also worked on developing a draft template to document the process we will follow when managing identified concerns for modern slavery. We hope to derive the following benefits from use of this template:

- disciplined approach when considering modern slavery concerns and ensuring key considerations are taken into account before recommending a course of action
- consistent process in terms of management of the concern
- process and related recordkeeping captured for transparency
- allegations of modern slavery appropriately triaged and managed.

During 2023, this template will be shared with the Modern Slavery Working Group for feedback before improving it and trialling it for use. Next steps include building a plan for corrective action and remedy.

Mapping against our action plan

We continued to monitor progress against our 2022 commitments and identified priorities for future years as specific reporting against the broad indicators of our Modern Slavery Action Plan.

Management support – senior leadership engagement

- Stakeholder engagement
- Capability building

Actions during the reporting period (2022)

- Conducted a survey to gauge staff awareness of modern slavery risks. Results of this survey will inform ongoing design of training initiatives and provide useful insights on ways to improve capability in this space.

Plan for 2023 and beyond

- Continue regular education and engagement activities with senior management.
- Provide regular updates to UQ governance bodies.
- Establish reporting on measuring effectiveness of actions.

Modern Slavery Working Group

- Stakeholder engagement
- Capability building
- Monitoring and reporting

Actions during the reporting period (2022)

- Embedded cycle of UQ's modern slavery statement production into annual calendar of work.

Plan for 2023 and beyond

- Review and refresh membership of the Working Group as necessary to ensure relevancy and provide opportunity to stakeholders across the University to contribute to the group.
- Refresh the Working Group Charter and terms of reference.

Operational risk identification, prioritisation and management

- Risk assessment
- Monitoring and reporting

Actions during the reporting period (2022)

- Developed a Modern Slavery Risk Assessment tool.
- Identified nature of UQ's activities or operations in 15 high-risk jurisdictions for modern slavery risks.
- Progressed our work on strengthening the due diligence process for UQ's research partners and collaborators.
- Progressed the review of our Volunteer engagement framework.
- Improved our engagement with students on modern slavery issues.

Plan for 2023 and beyond

- Develop and implement targeted education and engagement activities to lift knowledge and awareness of modern slavery risks for high-risk areas/activities.
- Finalise a modern slavery risk assessment framework.
- Roll out refreshed framework and platform for conducting due diligence of UQ's research partners and collaborators.

Sector-wide collaboration

- Risk assessment
- Capability building
- Remediation

Actions during the reporting period (2022)

- Continued engagement with other universities through collaboration with the AUPN to identify best-practice approaches to modern slavery due diligence in the supply chain and research ways to maximise our collective impact in this space.

Plan for 2023 and beyond

- Leverage the supplier risk portal available through the AUPN to inform specific supplier due diligence activities.
- Continue engagement with the AUPN and broader industry stakeholders to reduce duplication of efforts towards shared social outcomes.

Supplier risk identification, prioritisation and management

- Risk assessment
- Supplier engagement
- Monitoring and reporting

Actions during the reporting period (2022)

- Released UQ's 'Supplier Standards' document on our Suppliers webpage setting UQ's expectations of its suppliers in terms of acting ethically, with integrity and according to good commercial and social practice.
- Improved supply chain visibility and contract management practices by establishing arrangements across a selection of key spend areas and progressing the implementation of our digital procurement platform.
- Developed practical insights on the application of the Local Benefits Test to select procurement activities to encourage and support local suppliers to supply to UQ.
- Developed understanding of the supplier risk portal provided through the AUPN and participated in related program of works.
- Mapped UQ's supply chain and conducted a pilot risk assessment on 50 suppliers.
- Developed a draft framework for modern slavery due diligence of UQ's supply chain.

Plan for 2023 and beyond

- Design and implement supplier engagement and awareness initiatives based on risk assessment as part of enhanced due diligence activities.
- Review opportunities for embedding modern slavery due diligence into contractor and supplier onboarding and management processes.
- Explore pathways to issue the Supplier Standards using the procurement digital platform.
- Develop guidelines to complement the AUPN supplier risk portal to cover application of consistent and structured due diligence processes and specific supplier engagement activity based on supplier risk profile.
- Introduce Category-specific sessions with Category Managers covering modern slavery risk assessment of UQ's supplier base.
- Leverage the supplier risk assessment work being done by UQ to conduct further due diligence on the supply chain of its controlled entities.
- Raise modern slavery awareness across the supply chains of UQ controlled entities.

Education, training and capability uplift

- Capability building

Actions during the reporting period (2022)

- Continued to build the capability and competency of our stakeholders to identify, assess and address modern slavery risks using a mix of initiatives including webinar, communication pieces, social media posts, posters and surveys.

Plan for 2023 and beyond

- Develop UQ learning module on modern slavery to improve understanding and assessment of modern slavery risks in the UQ context.
- Develop appropriate guidance material and training programs for the UQ buying community to assist with identification of high-risk areas and approaching those effectively.

Remediation

- Escalation pathways
- Remediation

Actions during the reporting period (2022)

- Developed a draft template to document the process that UQ will follow in relation to management of identified concerns for modern slavery.
- Managed modern slavery concerns escalated to the Modern Slavery Working Group.

Plan for 2023 and beyond

- Build a corrective action plan template as part of UQ's remediation framework.

Governance, Risk and Policy framework

- Governance framework

Actions during the reporting period (2022)

- Sought endorsement from UQ's Senior Executive Team in relation to not establishing a standalone UQ Modern Slavery Policy.
- Consideration of modern slavery risks within refresh of UQ's Financial and Contract Sub-delegations Procedure and our policy development resources.
- Engaged with UQ's Enterprise Risk team to build a Modern Slavery Risk Assessment Tool and to determine how modern slavery risk management fits into UQ's Enterprise Risk Framework.

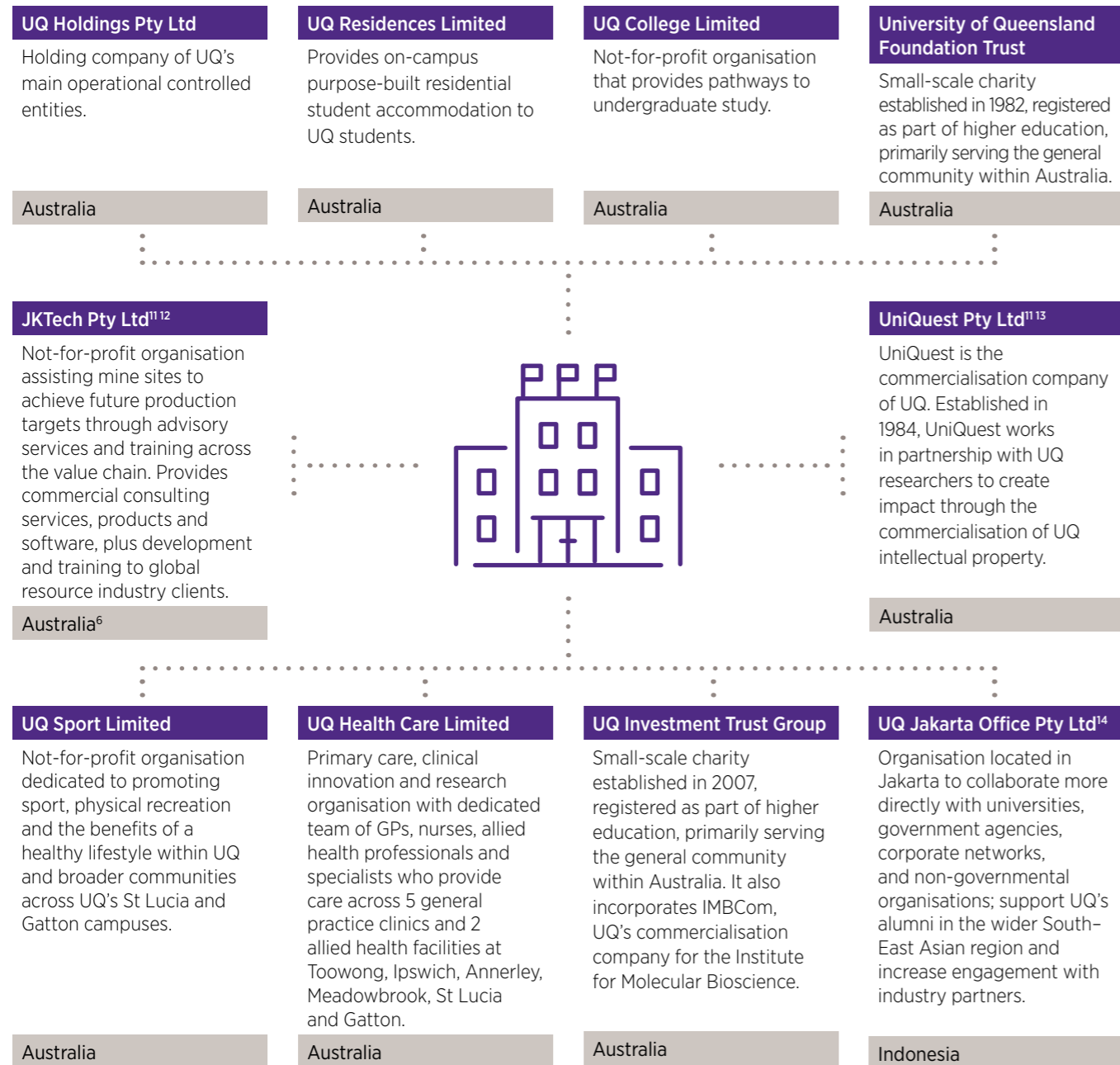
Plan for 2023 and beyond

- Ongoing review and improvement of policies, procedures and processes to increase their effectiveness in helping to manage UQ's modern slavery risks.

UQ controlled entities

Overview

[UQ's Controlled Entities Policy](#) provides a framework in relation to the creation, acquisition or additional investment in a controlled entity; and ensures that controlled entities are managed appropriately and meet their stated objectives.



¹¹ This controlled entity is also a parent company to other subsidiaries

¹² JKTech is an industry-facing arm of the world's foremost bodies of mineral processing and extraction knowledge (i.e. the Julius Kruttschnitt Mineral Research Centre ('JKMRC') and the WH Bryan Mining and Geology Research Centre ('BRC'), both of which are Centres within UQ's Sustainable Minerals Institute). JKTech P/L's subsidiary is established in South America. The main focus of the subsidiary entity 'SMI-ICE Chile SpA' is research activities focused on Chile but can also encompass other countries within Latin America. SMI-ICE-Chile can also provide commercial consulting services and professional development and training.

¹³ Activities comprise commercialisation of UQ intellectual property (IP), including the management and protection of IP, licensing, establishment and management of startups, and drug discovery and development activities through the Queensland Emory Drug Discovery Initiative (QEDDI).

¹⁴ UQ Jakarta Office is currently in the process of being deregistered.

Key insights on modern slavery risks and controls

Our controlled entities of UQ Holdings Pty Ltd, UQ Investment Trust Group and University of Queensland Foundation Trust are passive investment bodies and do not engage in operating activities. We therefore consider that our position on modern slavery does not greatly change with these entities taken into account. Consultation on this matter is minimal.

UniQuest Pty Ltd

Modern slavery risks in relation to UniQuest's operations, which include engagements (both domestically and internationally) with partners and contract research organisations, is assessed as low. UniQuest has comprehensive due diligence processes together with a robust governance and contractual framework including associated monitoring and reporting mechanisms.

In relation to the supply chain, although UniQuest's risks are not materially different to that of UQ's own supply chain, the volume and value of procurement is relatively low, thereby allowing modern slavery risks to be assessed and mitigated.

During 2022, UniQuest raised staff modern slavery awareness. This included the delivery of professional development training to staff in August including what constitutes modern slavery and the associated risks. In November, UniQuest marked International Day for the Abolition of Slavery by releasing resources and materials on its staff intranet.

UQ Health Care Limited

UQ Health Care's supply chain risks are not materially different to those of UQ's own supply chain. All direct spend is with Australian suppliers. Queensland Government Standing Offer Arrangements are leveraged wherever possible.

An audit of suppliers (including a review of modern slavery risks) was undertaken during 2021. Very few new suppliers were added to the supply chain during 2022.

During 2023, UQ Health Care will reassess its supply chain with a focus on modern slavery risks, and will also be raising awareness of these risks with staff.

UQ Jakarta Office Pty Ltd

UQ Jakarta was in the process of being deregistered in 2022 and so the issue of modern slavery was not discussed during the reporting period.

UQ College Limited

During 2022, UQ College focused on raising general awareness across its buying community and finance staff involved in the procurement and purchasing processes. The risk register for the College recognises modern slavery as a risk in its supply chain.

UQ College leverages UQ's supply chain to the extent possible and practicable to meet its procurement needs. A high-level assessment of those suppliers indicated a low risk from a modern slavery perspective.

During 2023, the College plans to trial UQ's Modern Slavery Risk Assessment Tool to reassess its suppliers for modern slavery risks, and report findings through its Risk Register.

Additionally, plans to improve awareness of modern slavery risks through a range of initiatives include:

- encouraging staff at managerial levels to undertake modern slavery training
- raising awareness through monthly newsletters and staff meetings
- reiterating the importance of risk assessments and due diligence of the supply chain.



UQ College Limited provided a wide range of services for clients during the year and aimed to boost awareness about modern slavery to its buying community.

UQ Sport Limited

Supply chain risks for UQ Sport are not materially different to those of UQ's own supply chains, with the exception of procurement categories such as contractors for delivery of fitness training and sporting goods and equipment.

The majority of our direct spend is with Australian suppliers. UQ's supplier panel arrangements are leveraged wherever possible.

In line with UQ Sport's commitment to socially responsible procurement, the following accreditations are affiliated with our apparel merchandise.

Global Organic Textile Standard (GOTS)

GOTS is the worldwide leading textile processing standard for organic fibres, including ecological and social criteria, backed up by independent certification of the entire textile supply chain. From the harvesting of raw materials, and environmentally and socially responsible manufacturing to labelling, textiles certified to GOTS provide a credible assurance to the consumer.

Fairtrade

Fairtrade is about stable prices, decent working conditions, and the empowerment of farmers and workers around the world. Fairtrade changes the way trade works through better prices, decent working conditions, and a fairer deal for farmers and workers in developing countries. Fairtrade's approach enables farmers and workers to have more control over their lives and decide how to invest in their future.

By choosing Fairtrade apparel, people can create change through their everyday actions. A product with the Fairtrade mark means producers and businesses have met internationally agreed standards that have been independently certified. Farmers and workers have a strong voice at every level – from how they invest in and run their local organisations to having an equal say in Fairtrade's global decision-making.

Fair Wear

UQ Shop is the Australian distributor for Continental Clothing and Stanley Stella who are Fair Wear Foundation members. The Fair Wear Foundation is an independent, non-profit organisation that works with companies and factories to improve labour conditions for garment workers.

Carbon neutral

Carbon neutrality refers to achieving net-zero carbon dioxide emissions. It is used in the context of carbon dioxide-releasing processes associated with transportation, energy production, agriculture, and industry.

JKTech Pty Ltd

JKTech's supply chain risks are not materially different to those of UQ's own supply chain.

Modern slavery risks associated with its offshore operations and engagements are assessed as low due to robust governance structure and contractual frameworks in place, comprehensive due diligence processes, and reporting requirements.

Specific actions introduced during 2022 included:

- a high-level desktop review of key suppliers to understand actions taken in relation to modern slavery risk mitigation
- engaging with UQ's Modern Slavery Working Group to obtain assistance with assessing the modern slavery credentials of potential clients.

UQ Residences Limited

UQ Residences leverages UQ's supply chain to meet its procurement requirements for printing, cleaning, catering and bed linen. Many of these suppliers take active steps in modern slavery risk mitigation as described in their Modern Slavery Statements.

In the real estate and rental industry, there is a general risk of rental properties being utilised for trafficking purposes. UQ Residences considers the likelihood of this risk eventuating as very low due to the following controls in place, which offer multiple layers of security:

- student accommodation towers are secured at all entrances and are only accessible with individual security passes; buildings are monitored and have CCTV cameras; and have staff and/or security staff on premises 24/7
- security passes in the towers are linked to individual accounts with photo ID for verification
- rooms and houses are only tenanted with registered students or staff members, whose identities are linked to either student numbers or registered with the human resources team.
- under 18-year-old students have co-signature requirements with parents/guardians who are also listed as contacts.

Additionally, a UQ Welfare Officer is assigned to UQ Residences to provide further support and regular contact with under 18s and vulnerable students/tenants.

Senior management at UQ Residences attend UQ's Modern Slavery briefing sessions to raise their awareness of the risks of modern slavery and human trafficking. Concerns about modern slavery, if any, are reported to UQ and the relevant authorities.

Assessing our effectiveness

Understanding the effectiveness of our actions is important - we need to know if and how what we are doing is making a difference in our effort to eradicate modern slavery. The table below (and continued on page 33) lists some of the ways we have assessed the effectiveness of our actions.

From a longer-term perspective, we consider that an effective response to modern slavery is one that reduces vulnerability of workers to exploitation by driving changes to behaviour and practices across our operations and supply chain.

We recognise that we need to improve and mature in the way we are conducting this assessment and in refining the indicators used but we need to start somewhere.

Area	Targeted long-term impact	How do we measure impact of our actions?	Indicators used during the reporting period	Reporting against indicators used
Stakeholder engagement <i>Modern Slavery Working Group</i>	Our Working Group explores challenges and best practices in the modern slavery space, as well as is regarded as UQ's peak engagement body on modern slavery issues	Are Working Group members experts on different dimensions of contemporary slavery and do they share an ambitious commitment to achieving change?	Number of times the Working Group met during the year	6
			Number of times the Working Group was refreshed and realigned	2
Governance framework <i>Management support - senior leadership engagement</i>	Our leaders provide a clear vision and drive for addressing modern slavery issues as well as a pathway of accountability	Are our leaders passionate about and take active interest in human rights issues?	Number of engagement activities with senior management	6
			Number of updates to UQ governance bodies	1
Modern slavery risk assessment <i>Operational risk identification, prioritisation and management</i>	Our organisational units manage their modern slavery risks in line with good practice	Do we have robust due diligence processes to identify, prevent, mitigate and account for how modern slavery risks are addressed?	Number of modern slavery flags raised through entity engagement processes	3
Supplier engagement <i>Supplier risk identification, prioritisation and management</i>	UQ's buying community manage modern slavery risks in supplier engagements in line with good practice with due support by experts in the Enterprise Procurement team	Do we have robust due diligence processes to identify, prevent, mitigate and account for how modern-slavery risks are addressed?	Number of suppliers on whom risk assessments were undertaken	50
			Number of supply invitation materials issued that included questions in relation to modern slavery	40

- Informal** – ad hoc/incidental/inconsistent
- Documented** – emerging/managed/standardised/repeatable
- Integrated** – structured/measured/disciplined/competent
- Proactive** – continuous improvement/adaptive/innovative



Policy commitment

Policy commitment to meet UQ’s responsibility to take steps to prevent, mitigate and, where appropriate, remedy modern slavery in UQ’s operations and supply chains.

Modern slavery due diligence

Develop and implement a modern slavery due diligence process to identify, prevent, mitigate and account for how UQ addresses its impacts on modern slavery risks.

Remediation framework

Develop and implement processes to enable the remediation of any adverse modern slavery impacts UQ causes or to which UQ contributes or is directly linked to.

Area	Targeted long-term impact	How do we measure impact of our actions?	Indicators used during the reporting period	Reporting against indicators used
Capability building <i>Sector-wide collaboration</i>	We have achieved the desired level of collaboration to gain sufficient leverage to drive change in behaviour as well as sharing activities, learning and innovation to accelerate improving conditions for workers within our operations and supply chains	Are we able to tackle common problems, mitigate risks and improve practices in the longer term by collaborating with other entities?	Feedback received from our stakeholders	0
			Number of modern slavery issues addressed through collaboration	0
			Number of best practices shared and scaled more widely each year	0
Stakeholder engagement <i>Education, training and capability uplift</i>	Our employees understand what modern slavery is and act with integrity and courage to prevent and address it	Is our awareness campaign improving our stakeholder understanding of modern slavery risks and escalation pathways?	Insights from surveys released to gauge awareness of modern slavery	An average of 72% of staff who responded to UQ’s modern slavery staff awareness survey know what modern slavery means (18% improvement between beginning/end of year) An average of 44% of staff who responded to UQ’s modern slavery staff awareness survey feel equipped to identify potential red flags at UQ (9% improvement between beginning/end of year)
			Number of times activities and actions related to modern slavery were communicated to all or a section of employees	6
			Number of staff who have completed code of conduct training	In 2022, 10,000+ staff completed code of conduct training
			Number of staff trained on modern slavery	Not possible to calculate currently, pending introduction of a UQ learning module on modern slavery
			Our broader stakeholder base including the entities we engage with and their workers and UQ students understand modern slavery and know where to escalate and go for support	Are stakeholders engaging with our promotional and information resources?
Monitoring and reporting <i>Governance, risk and policy framework</i>	Our governance and policy framework affirms our commitment to contribute to ending all forms of modern slavery and supports the expectation of a culture of high ethical standards, including compliance with applicable laws, contractual and other obligations	Do we have clear policies setting out modern slavery-related expectations of our employees and wider stakeholder base including our suppliers, and other parties directly linked to operations, products or services?	Number of policy materials refreshed or introduced each year which address modern slavery risks and controls	2
Escalation pathways	Our escalation pathways are accessible to workers who are victims of modern slavery	Do we have processes to enable the escalation of any modern slavery-related incidents that we identify we have caused or contributed to, or directly linked to?	Number of concerns reported through our reporting channels	3
Remediation	Our model of remediation is mature and consistent in application	Do we have processes to enable the remediation of any modern slavery-related incidents that we identify we have caused or contributed to, or directly linked to?	Number of cases where remediation was required and enabled	0

Summary

We acknowledge that modern slavery is one of the most complex and important human rights challenges of our time. This challenge can only be overcome by a joint effort of Governments, public and private enterprises and civil society. We remain committed to upholding our fundamental role in this critical effort.

Respect for human rights is a strategic element of our responsible business practices. We are committed to expanding our work to further understand and address any modern slavery risks that may arise in our operations and supply chain.

We understand that effective action towards the eradication of modern slavery requires sustained and long-term effort. While we have made some progress in improving the maturity of our practices, focused and strategic attention is needed to continue to enhance our approach in the years to come.

Approval

This Modern Slavery Statement was approved by The University of Queensland Senate at its meeting on 18 April 2023 and signed by the Vice-Chancellor and President, Professor Deborah Terry AO, in accordance with the *Modern Slavery Act 2018 (Cth)*.



Compliance with mandatory criteria as outlined in the <i>Modern Slavery Act 2018 (Cth)</i> , s16(1)	Pages
a] Identify the reporting entity	2-5
b] Describe the reporting entity's structure, operations and supply chains	6-11
c] Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	13-17 28-30
d] Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address those risks, including due diligence and remediation processes	18-27 28-30
e] Describe how the reporting entity assesses the effectiveness of such actions	31-33
f] Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	34
g] Provide any other relevant information	12

Consultation

The consultation process for this Statement was managed by UQ's cross-functional Modern Slavery Working Group, and involved the following stakeholders:

- UQ's governance bodies – Senate Governance and Senate
- UQ's senior executive team
- UQ controlled entities
- Australian University Procurement Network (AUPN)
- various UQ organisational units.

UQ considers collaboration an essential piece in its ethical journey. Combining efforts and sharing knowledge on modern slavery and wider human rights issues are key to achieve momentum in this space.

We take a coordinated approach to managing modern slavery risks across our business, including through consultation and collaboration with key functions. Consistent with this approach, we undertook a detailed consultation process to develop this statement led by UQ's Modern Slavery Working Group.

We encourage attendance at relevant forums and engagement with other organisations to follow best practice and learn from each other.

Participation in the AUPN modern slavery program of works has enabled us to share learnings with peers and collaboratively discuss issues and concerns.

We welcomed the consultation piece on the comprehensive review of the *Modern Slavery Act 2018 (Cth)* during 2022. We engaged with the consultation process by submitting our response to the Issues Paper during November 2022.

We are committed to constant adaptation, improvement and review of the processes by which we manage and meet our obligations for modern slavery. This will include extending our collaboration efforts to ensure the mechanisms by which we mitigate our exposure to modern slavery risk are sustainable and effective.

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