



UNIVERSITY OF
CANBERRA

MODERN SLAVERY STATEMENT

Reporting Period 1 January 2021
to 31 December 2021

The University of Canberra's statement of compliance with the *Modern Slavery Act 2018* (Cth).

Approved by the University Council on 20 May 2022.

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CONTENTS

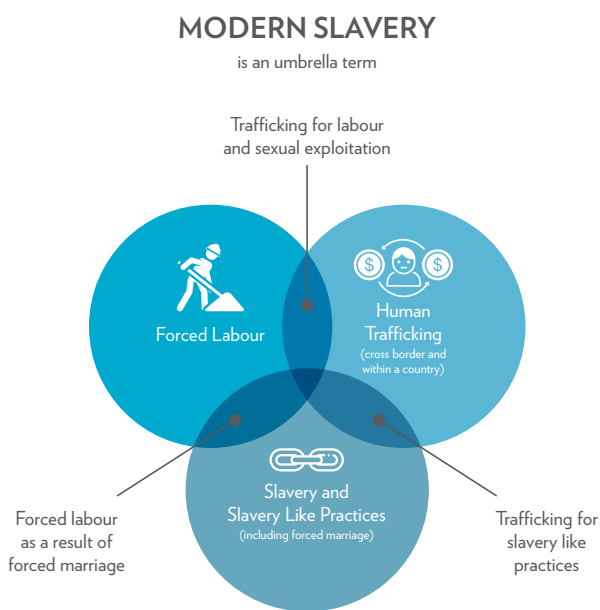
Introduction	2
Our Commitment	2
About UC	2
Structure, Operations and Supply Chain	3
Our Organisational Structure	3
Committees of Council	3
Council	4
Our Controlled Entities	4
Our Operations	4
Our Supply Chain	6
Risks of Modern Slavery Practices	7
Operational Risks	7
Supply Chain Risks	7
Impact of COVID-19	8
Ongoing Actions Taken	9
Treatment Actions	9
Effectiveness of Actions	11
Future Commitments	12
Other Information	14
Annexure A - University Organization Chart	15

Introduction

The University of Canberra (**University**) prepared this modern slavery statement (**Statement**) in accordance with section 13 of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

Modern slavery refers to situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. This includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour. Modern slavery and human trafficking are crimes and a violation of a person's fundamental human rights.

Figure 1 illustrates the umbrella term, "Modern Slavery" as provided by the Walk Free Foundation's Global Slavery Index 2018¹ (**Global Slavery Index**).



Our Commitment

The University's number one strategic goal as outlined in its Strategic Plan 2018 – 2022 is to 'be the national sector leader in EQUITY, DIVERSITY, INCLUSION and ACCESS.'²

The University ranked number one in the *Times Higher Education* Impact Rankings 2021³ for reducing inequalities through its research on social inequalities, its policies on discrimination and its commitment to recruiting staff and students from under-represented groups.

The University is committed to delivering a strong response to modern slavery by continuing to review and investigate its operations and supply chains, to ensure they do not cause, involve or contribute to modern slavery.

The University is also committed to ensuring its suppliers, collaborators and others with whom the University does business, respect and share the University's commitment to minimising the risk of modern slavery.

About UC

The University has its primary campus located in Bruce, in the Australian Capital Territory (**ACT**). In 2021, the University also had campuses located in Melbourne, Brisbane and Sydney, and has international delivery partners in China, Hong Kong, Vietnam, Singapore, Bhutan and India.

The University is ranked among the top 10 universities in Australia and is number 1 in the ACT for graduate employment.⁴

The University is a young university and is well regarded internationally, having risen swiftly up the global university rankings. The Times Higher Education World University rankings for 2022 placed the University in the top 20 young universities in the world, number 2 in Australia, and in the top 200 of *all* universities in the world.⁵

This success has been achieved pursuant to the University's 2018 – 2022 Strategic Plan, 'Distinctive by Design', which weaves together the three overarching themes; empowerment of our diverse people; distinctive teaching and research; and an enriched learning environment.

¹ Walk Free Foundation, *The Global Slavery Index* (Report, 2018) 7.

² University of Canberra, *Distinctive by Design: Our Strategic Plan 2018 – 2022* (Report, 2017) 10.

³ University of Canberra, *Distinctive by Design: Our Strategic Plan 2018 – 2022* (Report, 2017) 11.

⁴ Times Higher Education, 'Impact Rankings 2021 by SDG: reduced inequalities', *Impact Rankings 2021* (Web Page, 22 April 2021) <<https://www.timeshighereducation.com/world-university-rankings/university-canberra>>

⁵ *The Good Universities Guide* (Report, 2021) 52.

⁶ Times Higher Education, 'About University of Canberra' (Web Page, 2021) <https://www.timeshighereducation.com/world-university-rankings/university-canberra>

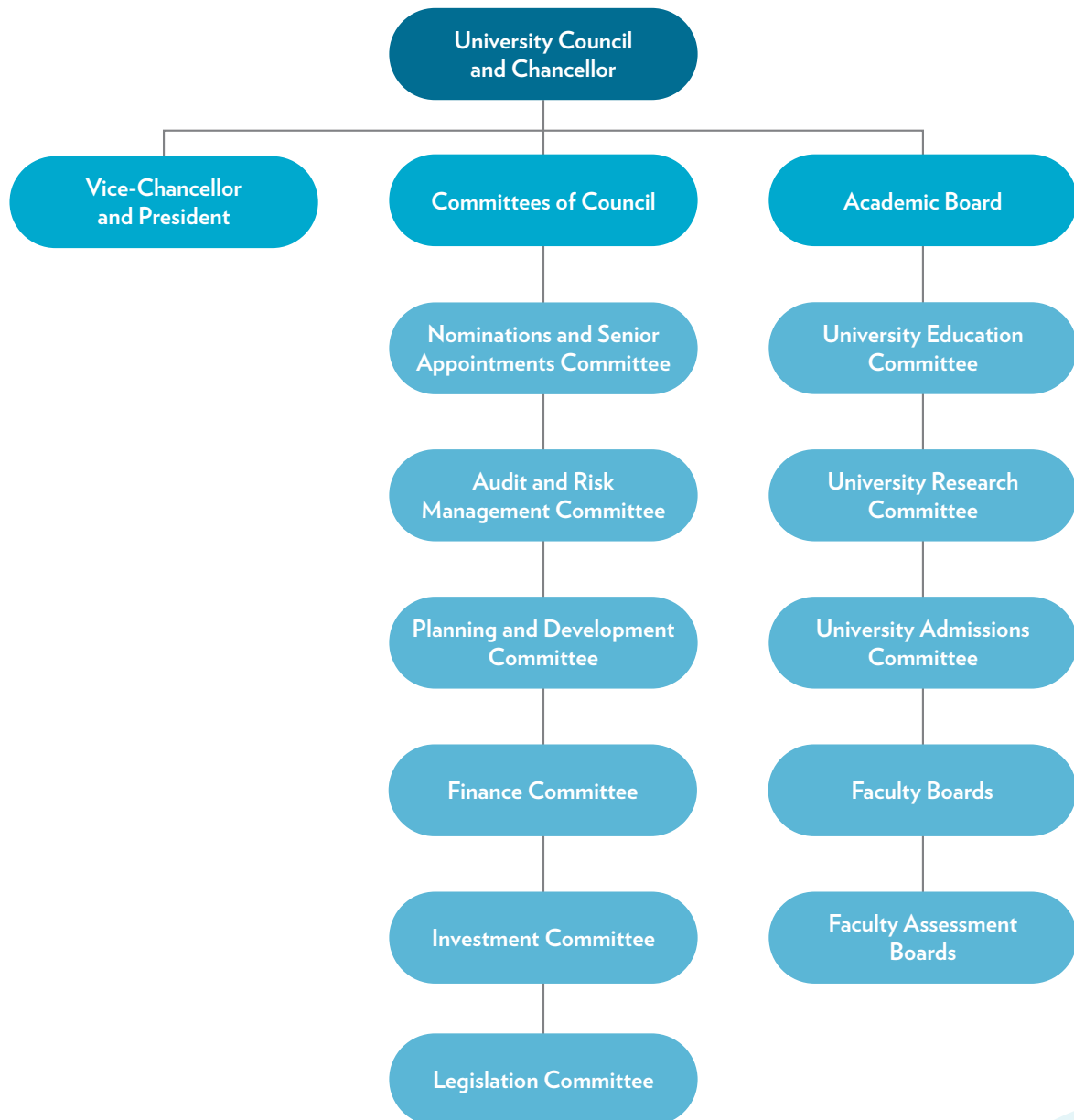
Structure, Operations and Supply Chain

Our Organisational Structure

The University of Canberra is a body corporate established by the *University of Canberra Act 1989 (ACT)* (the Act). The Act defines the functions and powers of the University. The University's organisation chart is **attached** and labelled Annexure A.

Committees of Council

Council has established a number of committees to help it carry out its responsibilities. The following image represents the University's Council committee structure:



Council

The governing body of the University, the Council, is established under the Act and has the entire management of the University. Council is responsible for the governance of the University and sets the strategic direction of the University.

The Council is required to act on all matters concerning the University in a way it considers will best promote the interests of the University.

Council is responsible for appointing the Chancellor, Deputy Chancellor, and Vice-Chancellor and President of the University. The Vice-Chancellor is accountable to Council for the overall management of the University, within its legislative framework and resolutions of Council, and is the primary source of advice to Council.

Our Controlled Entities

The University has two wholly owned subsidiary companies, UCX Ltd (UCX) (ACN 119 755 627) and UC Global Pty Ltd (UC Global) (ACN 095 483 686).

Our Operations

The University works closely with government and the community to educate the future workforce, solve complex research challenges and support the ACT and surrounding region.

The University's functions are provided at section 6 of the *University of Canberra Act 1989* (ACT) as follows:

1. to transmit and advance knowledge by undertaking teaching and research of the highest quality
2. to encourage, and provide facilities for, postgraduate study and research
3. to provide facilities and courses for higher education generally, including education appropriate to professional and other occupations, for students from within Australia and overseas
4. to award and confer degrees, diplomas and certificates, whether in its own right, jointly with other institutions or as otherwise decided by the council
5. to provide opportunities for people, including those who already have post-secondary qualifications, to obtain higher education qualifications
6. to develop and provide cultural, sporting, professional, technical and vocational services to the community

7. to participate in public discourse
8. to engage in extension activities
9. to commercially exploit or develop, for the University's benefit, any property of the University including any facility, resource, real property or other right or interest
10. to exercise any other function given to it under the Act or another territory law. the transmission and advancement of knowledge through teaching and research of the highest quality.

The University makes a major contribution to the ACT economy and society with 16,566 students across all campuses and just under 2000 staff.

In the 30 years since its establishment, the University has developed well-recognised, high quality education faculties in a range of areas including education and health and has a growing research capacity and reputation.

The University undertakes various academic, research and commercial activities in various countries. The majority of the University's suppliers of goods are sourced from within Australia, however, the University does have suppliers based around the globe.

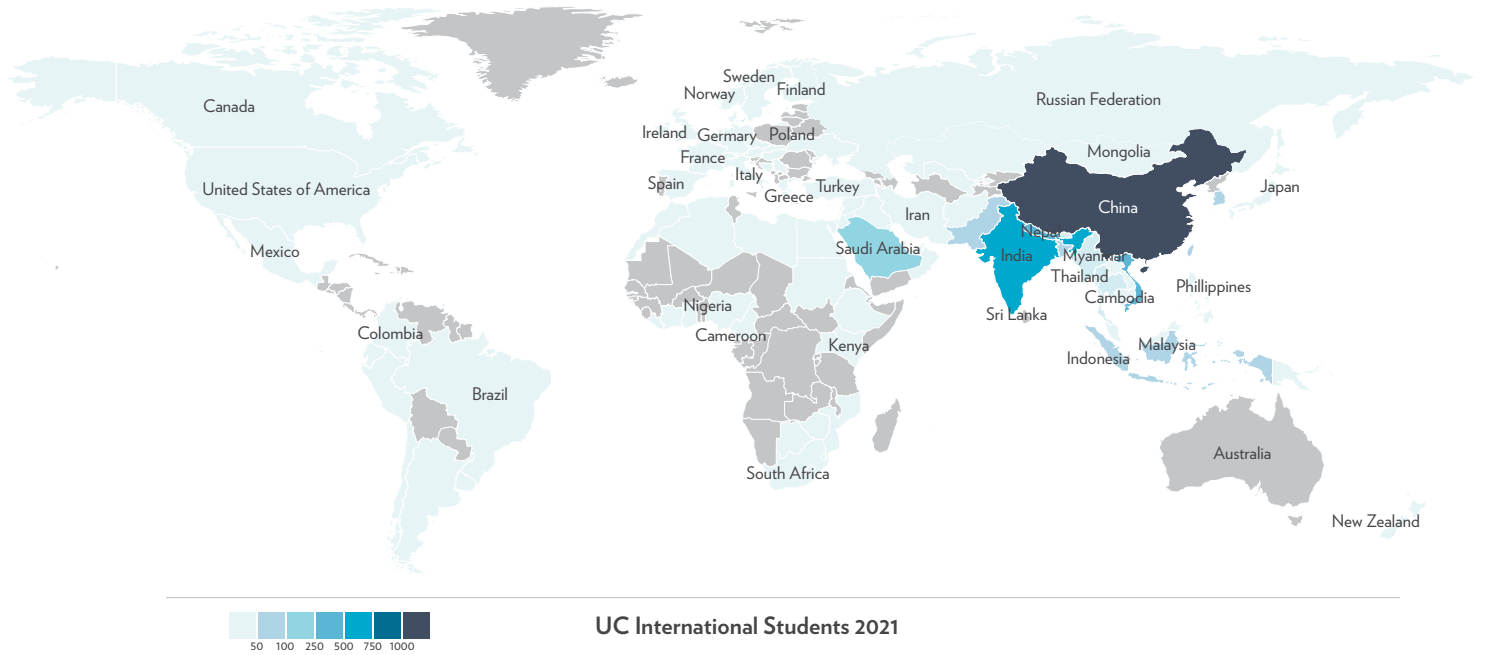
Our Students

In 2021, the University reported a total of 16,566 students across its campuses, 3,671 of these were international students.

The ten highest countries/region of origin for these students were:

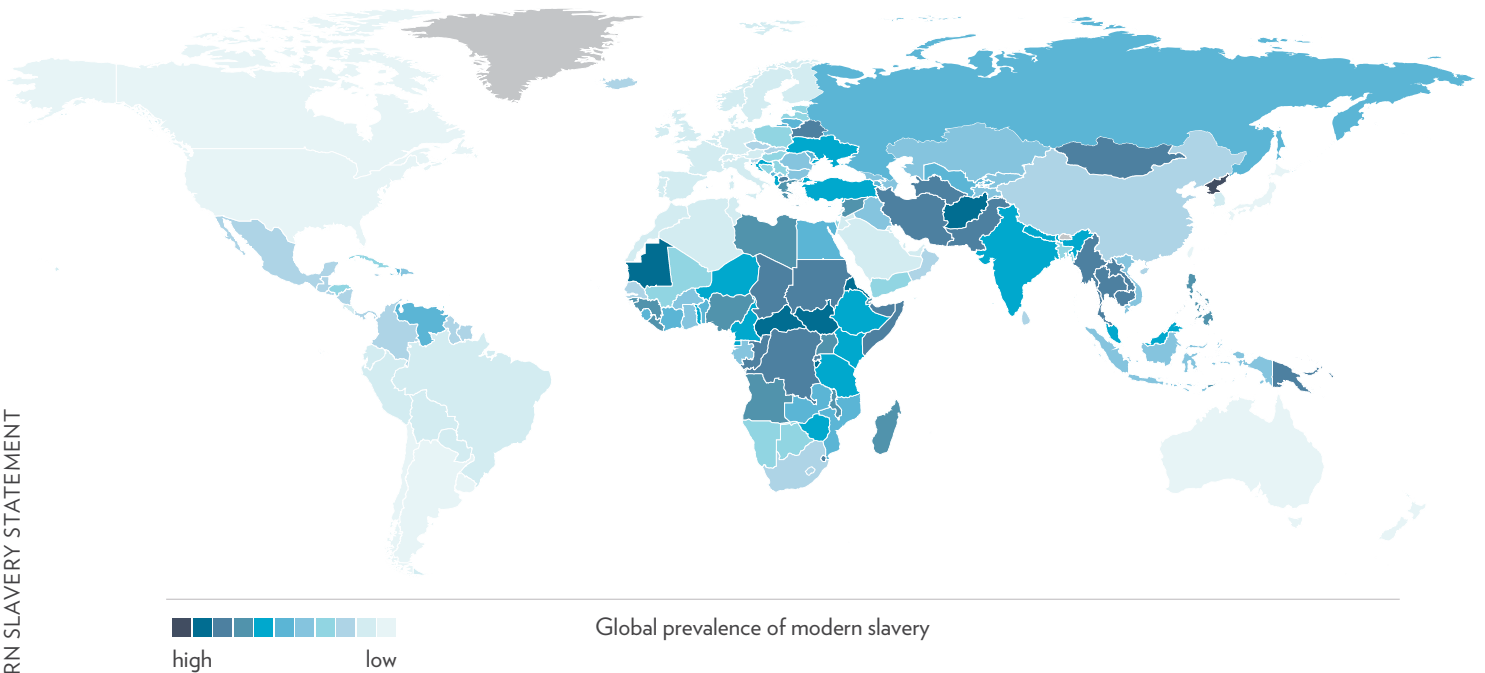
1. China
2. India
3. Nepal
4. Bhutan
5. Vietnam
6. Saudi Arabia
7. Republic of Korea
8. Pakistan
9. Indonesia
10. Hong Kong

The diagram below illustrates the global distribution of University of Canberra international student nationalities:



In 2021 172 UC students had nationalities that align with the top 25 countries estimated to the highest prevalence of modern slavery victims as identified in the Global Slavery Index (2018) and displayed below.

The diagram below illustrates the global prevalence of modern slavery:



Our Supply Chain

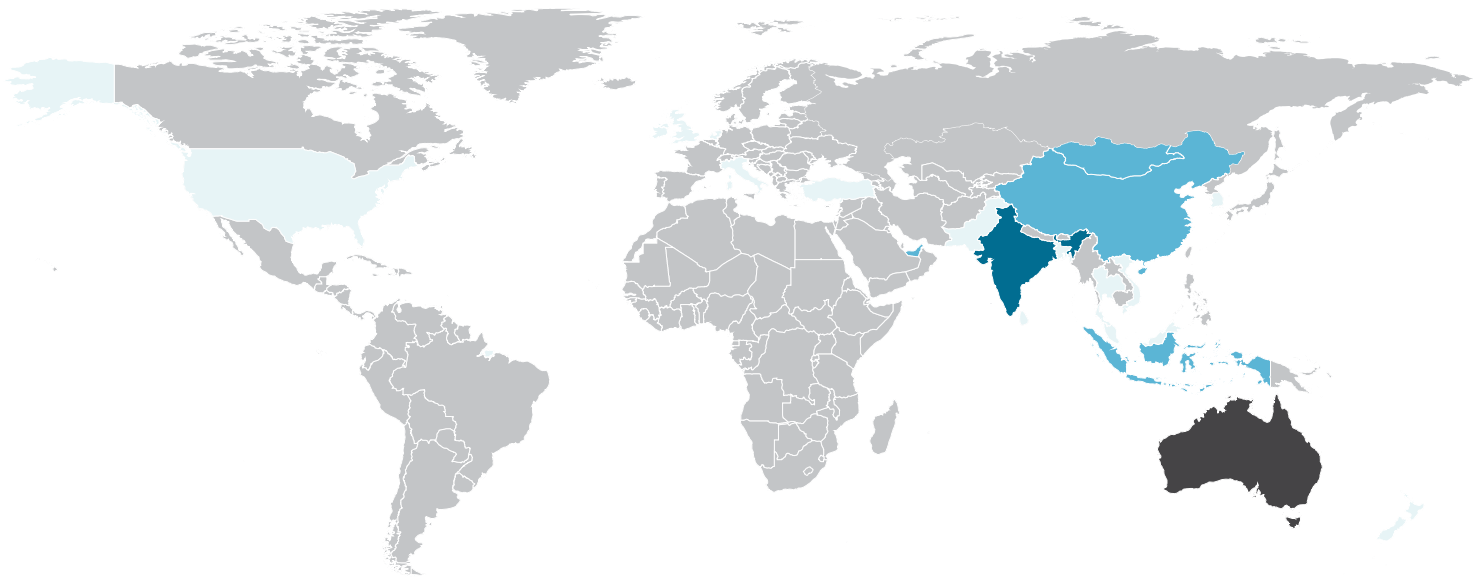
The University procures a wide range of goods and services from both domestic and international suppliers to support its operations.

Our Suppliers

The University's supply chain includes suppliers, contractors, partners and affiliates (collectively, suppliers).

In the 2021 calendar year, the University engaged in financial transactions with approximately 1,748 suppliers. These suppliers represent the University's 'tier one' suppliers. Of the 1,748 tier one suppliers, 1,711 are located in Australia representing approximately 96 per cent of the University's supply chain expenditure.

The diagram below demonstrates the global distribution of UC suppliers:



Expenditure by Country (AUD) < 100K 100K - 1M 1M - 5M > 5M

Global distribution of UC suppliers

Top Supplier Industries

Of the University's top 50 suppliers, the most common industries of which goods and services are procured from, (based on financial value and significance to operations) are:

1. Construction Projects
2. Information Technology and Software
3. Education and Student Services
4. Utilities
5. Legal Expenses

Our People

The University employs just under 2000 staff. Of these staff, 1,883 are employees of the University on either a continuing, fixed term, casual or sessional basis, and 104 of these staff are the full or part-time staff, and casual staff of UCX.

Employees of the University are bound by the *Charter of Conduct and Values*, which sets out the values and standards of conduct for the University, and constitutes the basis of decision-making and behaviour in the University community.

The *Charter of Conduct and Values* is enforceable and seeks to provide an ethical framework which outlines the University's expectations of its employees whilst also clarifying the University's obligations and commitments. These standards are supported by the values and the University's strategic direction, fostering an ethical, collaborative and innovative environment.

Risks of Modern Slavery Practices

Modern slavery is present in every country of the world, including Australia. The Global Slavery Index estimates there were 15,000 people living in Australia in 2018 that engaged in modern slavery practices.⁶ There is an immeasurable amount of people victimised by modern slavery across the globe, working in the operations and supply chains of Australian businesses.

Operational Risks

The University's supply chain at the tier one is dominated by Australian businesses, with many being owned and operated locally in the ACT, however, the University does acknowledge the presence of modern slavery even in Australia. The University prides itself on its global connectivity and operates on an international level every day through various academic and professional activities, including the recruitment of international staff and students.

Enterprise Partners and Agents

The University engages with international partners for both education and research activities and has arrangements with education agents across the globe.

The University has wide range of partnerships with organisations including universities and colleges (both commercial and not-for-profit organisations); research bodies; and government departments. The University conducts a wide scope of partnership activities with its partners including, but not limited to, delivery of University of Canberra courses, education pathways for international students, staff and student exchange opportunities, study abroad and study tours.

Education agents play an essential role in recruiting students to study at UC and are instrumental in providing life-changing learning opportunities for future UC students around the world.

The University endeavours to work only with partners and agents who adhere to high ethical standards. The University has due diligence processes in place to ensure the partners with which we cooperate are of an appropriate standing for the University. However, the University acknowledges the risk that its partners and agents may directly or indirectly be involved in modern

slavery practices, including the use of threats, coercion or deception in order to recruit international students to the University.

Academic and Professional Activities

The University engages people from all over the world to work both in Australia, and internationally, to undertake academic and professional activities. One way the University engages in these activities is through collaborative partnerships. Some of the University's partners are located in countries considered to have a high prevalence of modern slavery. As a result, there is a risk that staff in these countries may directly or indirectly be involved in, or subject to incidents of modern slavery. For example, the working conditions may not be at the appropriate standard, including excessive working hours and underpayment, and may be considered a form of modern slavery.

Supply Chain Risks

The University has undertaken a preliminary risk assessment relating to its tier one suppliers. While the vast majority of the University's suppliers are located domestically, the University's second largest supplier is based in India, which is reported to have a medium risk of modern slavery⁷. The following provides comfort to the University that the risk of modern slavery activities from this supplier are low:

- regular site visits, when not restricted by COVID-19 travel restrictions
- the supplier's sector relies on a relatively skilled workforce and current workforce conditions favour employees with opportunities to negotiate remuneration and seek career progression
- the supplier's corporate policies and processes are designed to minimise the potential for modern slavery practices within its own activities and that of its supply chains.

⁶ Walk Free Foundation (n 1).

⁷ Walk Free Foundation, *The Global Slavery Index* (Report, 2018) 7.

Location

Amongst the University's top 50 suppliers, seven were identified as being either a global company with several subsidiary companies, or a global company belonging to a larger parent company also with numerous subsidiaries. The presence of global companies indicates larger and more complex operations and supply chains, which results in a decreased visibility over the operations and supply chains of those suppliers.

The University's supply chain includes Pakistan, a country in the top ten for prevalence of modern slavery according to the Global Slavery Index.⁸ The University acknowledges that there is a risk that its suppliers located in these countries may be directly or indirectly involved in modern slavery practices, however as the total expenditure was less than \$200, the University is unlikely to have a significant impact on modern slavery practices within that country.

Industry

The Global Slavery Index identifies the top 15 goods⁹ at risk of being produced by modern slavery.¹⁰ In 2018, Australia was the eighth highest consumer of those goods amongst the G20 countries, importing 12 billion dollars' worth of those goods. Australia's major imports of these goods were garments (i.e. clothing and accessories), electronics (i.e. computers and mobile phones), fish, rice and cocoa.¹¹

The University's top four industries of engagement based on financial value (in particular, 'construction and projects', and 'information technology and software'), generally interact with many of the goods listed as being at higher risk of being produced by modern slavery. The University considers that there is a risk that its suppliers in these industries, may be directly or indirectly engaging in incidents of modern slavery.

Some of the source countries for these goods are home to the suppliers used by the University in 2021. Those countries include China, Vietnam, Thailand, Brazil, Pakistan, India, South Korea, Indonesia, Russia, Japan, Nepal, Taiwan and Malaysia. The University had 14 suppliers in these countries.

The University acknowledges the risk that when engaging with suppliers in these countries, those suppliers may be directly or indirectly involved in modern slavery practices.

Impact of COVID-19

In 2021, the ongoing COVID-19 pandemic continued to place pressure on income generation in the higher education. The increased pressure on available University resources may have a flow-on impact to its partners, suppliers and affiliates, particularly lower cost suppliers. Additionally, COVID-19 travel restrictions have limited the University's visit and interact with international suppliers. The University acknowledges that the impacts of COVID-19 have increased the risk of the University indirectly contributing to substandard working conditions and modern slavery.

In order to mitigate these identified risks, in 2021 the University procured the FRDM tool, which will assist the University in identifying and selecting suppliers who, despite the adversity created by COVID-19, have a strong focus on anti-modern slavery practices.

⁸ Walk Free Foundation, *The Global Slavery Index* (Report, 2018) 7.

⁹ In order of ranking, cotton; bricks; garments; cattle; sugarcane; gold; carpets; coal; fish; rice; timber; brazil nuts and chestnuts; cocoa; diamonds; and electronics.

¹⁰ Walk Free Foundation, *The Global Slavery Index* (Report, 2018) 220.

¹¹ Walk Free Foundation, *The Global Slavery Index* (Report, 2018) iv.

Ongoing Actions Taken

Treatment Actions

The University continues to include actions within its processes designed to minimise the risks of modern slavery.

Due Diligence

Procurement

The University conducts thorough assessments of suppliers during the due diligence process for procurements. For example, the University is aware that one of the highest risk areas for modern slavery is in the manufacturing of merchandise. For this reason, the University sources all branded merchandise from a supplier with a focus and policy on ethical sourcing.

The University has a preferred supplier list which is used when possible and accounts for providers which have been recommended across the higher education sector and vetted by the University and Government.

As an ACT statutory body, the University is also entitled to utilise current supplier arrangements put in place by ACT Shared Services Procurement.

Education Partners and Agents

Due diligence is conducted prior to the engagement or partnering with any new education partner or overseas entity. A comprehensive assessment of student applications is conducted where applications are received from 'high risk' countries, and subsequent action is taken if a concern or issue arises.

If a recurrent agent issue or concern is identified, the University counsels that agent so the agent can understand the issue and its effect, and how it can be resolved. If the issue continues, the University may terminate the relationship with the agent. The review and management of recruitment practices by the University's agents is also a Commonwealth legislative requirement.¹²

Contractor Safety Management System (CSMS)

All contractors engaged to provide goods and services relating to the physical and environmental state of the University's campus, such as construction, design, facilities and maintenance services, security and parking, are engaged through the University's CSMS prequalification process.

This CSMS process includes assessment of the following factors:

- WHS Safety Management System review against ISO and the WHS Act 2011
- ethical sourcing questionnaire
- modern slavery review in accordance with the Modern Slavery Act
- insurance compliance review
- risk assessment review
- qualification and licencing audit

The CSMS review and assessment process highlights any suppliers whose operations are inconsistent with the University's acceptable standard. There were no instances in 2021 where a risk relating to modern slavery has required further review by the University.

Policy and Procedure

During 2021, the following policies and procedures were in effect and supported the University's goal to mitigate the risks of modern slavery in its operations and supply chain.

Modern Slavery

The *Modern Slavery Policy* codifies the University's commitment to deliver a strong response to modern slavery by seeking to ensure that the University itself, its partners, suppliers, contractors, and others with whom the University does business, respects and shares the University's commitment to minimising the risks of modern slavery.

Human Rights

The *Human Rights and Discrimination Policy* affirms the rights of all people, asserting the University's commitment to act against individuals who engage in conduct which limits the legislative rights of others¹³; and affirms that all University decisions will be made, and policies will be written and enacted with due consideration to human rights as expressed in the *Human Rights Act 2004 (ACT)*.

¹² *Education Services and Overseas Students Act 2000 (Cth)*.

¹³ See *Human Rights Act 2004 (ACT)*.

Complaints and Grievances

The University has various processes in place to facilitate the handling of grievances and other concerns such as the University's management of human rights issues.

Students may refer to the *Student Grievance Resolution Policy* and staff may refer to the *Respect at Work (Prevention of Bullying) Policy* and the processes outlined in the *UC Enterprise Agreement*.

Members of the University or public may express dissatisfaction with decisions of the University or policies and processes of the University by writing to the Vice-Chancellor.

University staff and other persons are encouraged to report suspected corrupt conduct and allegations of maladministration within the University, including conduct contrary to the University's commitments regarding modern slavery and human rights. The *Public Interest Disclosure Act 2012 (ACT)* provides specific protections for staff reporting such conduct.

Procurement

The University has a well-documented *Procurement Policy* and *Procurement Procedure* which outline due diligence that must be conducted at each stage of the procurement process.

Freedom of Speech

The *Academic Freedom and Freedom of Speech Policy* supports the University's stance on the ability of anyone to enjoy the human right to freedom of speech and to engage in critical and free enquiry. The University encourages its community to participate in informed intellectual discourse and matters of public importance.

Investment

The philosophy of the Investment Policy includes that the University is to be a socially responsible institution and a socially responsible investor, which includes the requirement to avoid any investment opportunities which are likely to cause social injury. Where an organisation is determined to behave in a manner inconsistent with the Investment Policy, the University may exclude that organisation and all associated holdings from the University's investment portfolio.

University Internal and External Networks

The University is a member of various external networks which provide information and resource sharing opportunities for best practice across the higher education sector, including but not limited to:

- Australian University Procurement Network (AUPN)
- Tertiary Access Group (TAG)
- Society of University Lawyers (SOUL)

These groups provide a platform for members to share experiences with suppliers and to discuss and collaborate on other relevant issues, which has included modern slavery.

Remediation

Whilst instances of modern slavery were not identified in the University's operations and supply chain in 2021, the University intends to work with any parties found to have instances of modern slavery in their operations or supply chain by providing education, guidance and assistance as required.

The University intends to further assess effectiveness by introducing key performance indicators to measure the effectiveness and success of the actions taken.

The University's work in this space is ongoing, and by committing to the continual monitoring of modern slavery risks and development of treatment actions and measures, the University will have an intrinsic ability to assess the effectiveness of its response.

Effectiveness of Actions

The University established a Modern Slavery Working Group tasked with the management of the University's modern slavery commitments, obligations and overall response. In 2021, the Working Group continued to focus on the implementation of the Modern Slavery Policy and development of the associated Procedure, including the compilation of resources to assist the University Community in meeting the objectives of the Policy.

The University has continued to assess the effectiveness of these actions primarily by seeking the feedback of staff, regarding:

- the use, effectiveness, and ability to conduct due diligence processes and how these processes could be improved
- the frequency of discussions around modern slavery in the workplace, including incidences where advice may be sought or consideration required
- the ideal tools, training, and other resources to assist staff in realising the University's modern slavery commitments which led to the acquisition of the FRDM tool

The University intends to further assess effectiveness by introducing key performance indicators via the Modern Slavery Policy and its associated Procedure to measure the effectiveness and success of the actions taken.

The University's work in this space is ongoing, and by committing to the continual monitoring of modern slavery risks through the University's commitment to conducting annual risk assessment and development of treatment actions and measures as a result, the University will have an intrinsic ability to assess the effectiveness of its response.

Future Commitments

The University is committed to reducing the risks of and eliminating modern slavery and will continue to undertake the following actions to support this commitment.

2020 Identified actions

2021 Progress against actions and future commitments

The development and implementation of a University modern slavery-specific policy and procedure, as well as ensuring where applicable, the University's policies and procedures address the risks of modern slavery and endeavour to mitigate those risks.

PARTIALLY COMPLETE: The Modern Slavery Policy approved by Council in December 2021. The policy was developed in consultation with the University community and the University's Modern Slavery Working Group. It affirms the University's position on Modern Slavery and makes a commitment to work towards the elimination of Modern Slavery in its operations, but particularly in its supply chains, and in the meantime, mitigate the risks of Modern Slavery in procurement and partnerships through the inclusion of anti-modern slavery clauses in contractual agreements for suppliers and downstream partners.

2022 ACTION: The development of a Modern Slavery Procedure.

Working with suppliers, partners and stakeholders to conduct due diligence and risk assessments to ensure that the parties the University engages with are also committed to minimising the risks of modern slavery.

COMPLETE: The conduct of due diligence and risk assessments to ensure that the parties the University engages with are committed to minimising risk are standard business practices at the University. To assist with this process the University procured a supply-chain mapping tool. The tool will assist the University to improve transparency in its supply chain by offering end to end risk optics at all levels of the University's supply chain and allows the University to more effectively identify high risk countries, categories and suppliers, map its supply chain, and signal areas of concern to all members.

2022 ACTION: Implement an annual risk assessment review of the University's supply chain.

Working with suppliers, partners and stakeholders to ensure best practice is being followed and to provide education and assistance where required so those parties may also prioritise the minimisation and elimination of modern slavery in their operations and supply chains.

PARTIALLY COMPLETE: The implementation of the supply-chain mapping tool will assist the University to engage suppliers who are open, transparent, and have the mitigation and elimination of Modern Slavery at the forefront of their operational objectives. The tool will also assist with identifying those parties that require education and/or assistance to achieve the standard expected by UC.

2022 ACTION: Revision of the preferred supplier list to ensure that the values, policies and practices of the University's preferred suppliers in relation to Modern Slavery are aligned with the University's values and practices.

Promoting awareness of modern slavery through the implementation of training and the provision of materials, such as templates and other tools to enable staff, as well as suppliers, partners and other stakeholders, to identify and respond to risks of modern slavery.

PARTIALLY COMPLETE: The staff modern slavery intranet site has been updated to ensure that all staff had easy access to the 2020 Modern Slavery Statement, the Modern Slavery Policy, Modern Slavery resources and details of the University's response and commitments.

Due to the significant disruption caused by COVID-19, it was not possible to expand awareness raising activities beyond University staff in 2021.

2022 ACTION: Develop resources for external stakeholders to ensure that they understand the University's commitment to the eradication of Modern Slavery and its expectations for suppliers and partners.

The development and implementation of customised training and tools for staff with specific responsibilities and engagement with modern slavery obligations.

INCOMPLETE: Due to the significant disruption caused by COVID-19, this commitment has not been addressed and will be progressed in 2022.

The development of modern slavery compliance and requirements clauses for use in University contract templates and other agreements.

INCOMPLETE: Due to the significant disruption caused by COVID-19, this commitment has not been addressed and will be progressed in 2022.

The development of modern slavery guidance material, an awareness campaign for students and ongoing support for students.

INCOMPLETE: Due to the significant disruption caused by COVID-19, this commitment has not been addressed and will be progressed in 2022.

Ensuring the University is held accountable for its commitments to eliminating modern slavery through regular reporting to the University's Audit and Risk Management Committee.

COMPLETE: The 2021 Audit and Risk Management Committee workplan included reporting on compliance issues, including Modern Slavery, to every meeting. The requirement for this reporting was met in 2021 and is now an ongoing expectation.

Continuing to engage with and utilise the guidance materials provided and recommended by Australian Border Force and peak higher education bodies and affiliates.

COMPLETE: The University's Modern Slavery Working Group was established in 2020 and continues to review the University's response to Modern Slavery issues. A core function of this Working Group is the ongoing engagement with the guidance materials and recommendations of external expert bodies focused on Modern Slavery.

Undertaking in-depth analyses of the University's partners, suppliers and agents, including review of the subsequent tiers of the University's operations and supply chain.

INCOMPLETE: The 2021 implementation of the supply-chain mapping tool will assist the University to progress this action in 2022.

Other Information

This statement is made pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and constitutes the Modern Slavery Statement of the University of Canberra for the calendar year ending 31 December 2020 and has been approved by the Council of the University of Canberra at meeting C229 on 8 July 2022.



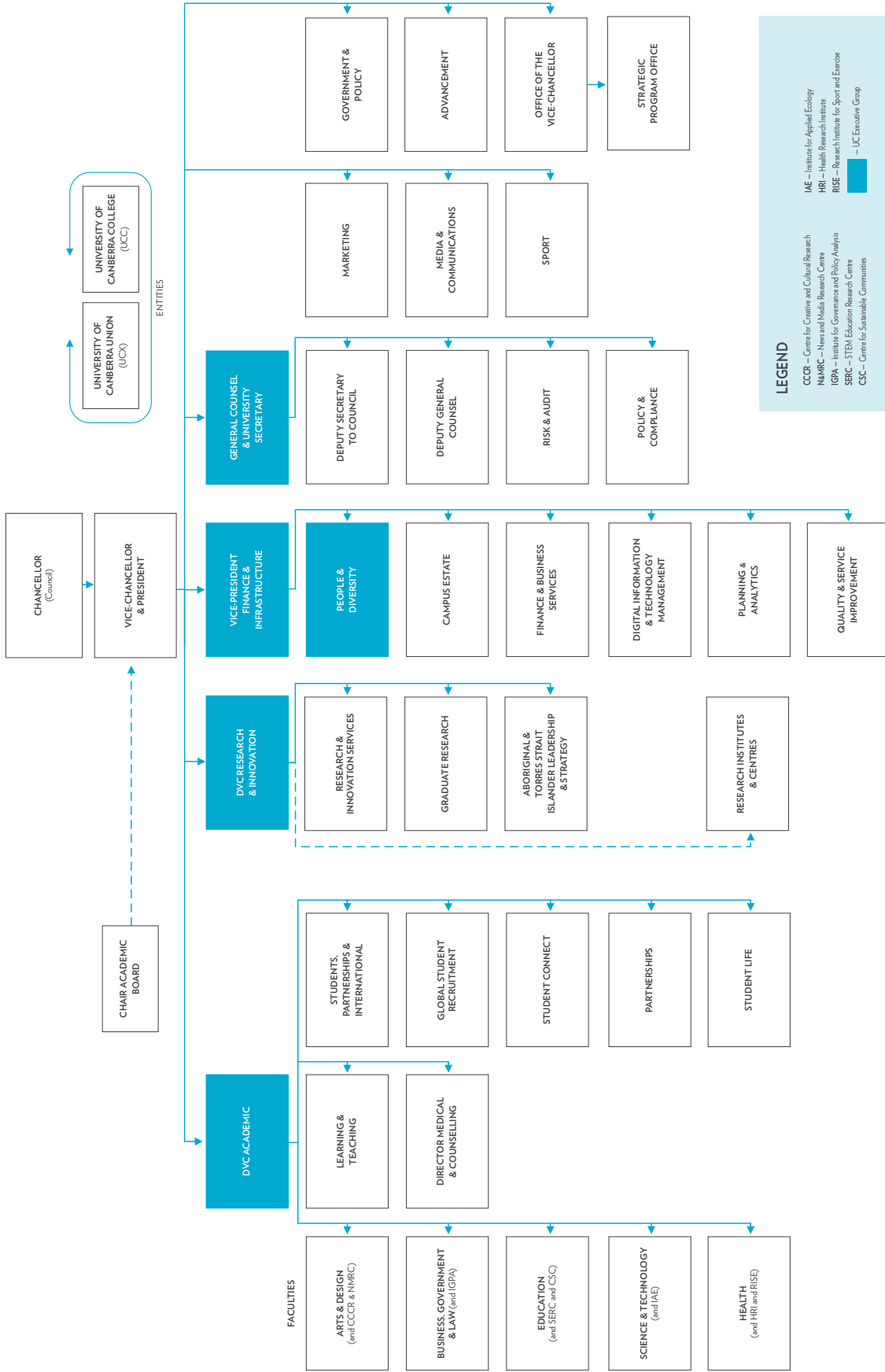
Professor Paddy Nixon

Vice-Chancellor and President

University of Canberra



ANNEXURE A - UNIVERSITY ORGANISATIONAL CHART





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