

MODERN SLAVERY STATEMENT

Reporting Period 1 January 2022 to
31 December 2022

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

Approved by the University Council on 19 May 2023.





Modern Slavery Statement

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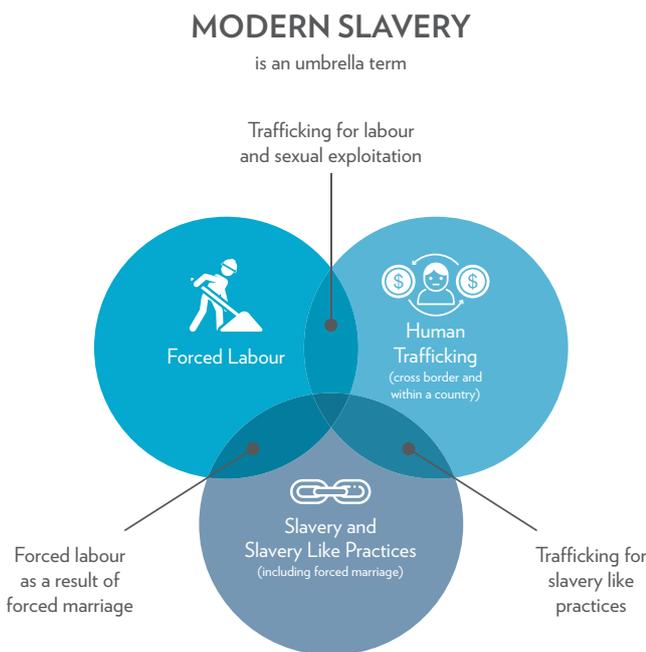
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Introduction

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.

The diagram below 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 ambition, as outlined in *Connected*, the University's decadal strategy 2023-2032 is to be the most accessible university in Australia and a global leader in driving equality of opportunity.²

The University ranked number one in the *Times Higher Education* Impact Rankings 2021³, 2022⁴, 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 addition, in 2022, a University of Canberra degree could be studied in Sydney, Brisbane or internationally in China, Vietnam, Singapore, and Bhutan.

The University is ranked among the top 20 universities in Australia and ranked number one in the ACT for graduate employment.⁵ It was also ranked number one in the world for reducing inequalities in the Times Higher Education Impact Rankings 2022, for the second consecutive year.⁶

The University is a young and well-regarded institution 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 and ranked it the number two young university in Australia.⁷ The Times Higher Education rankings for 2023 placed the University among the top 20 universities in Australia and in the top 300 of all universities in the world.⁸

This success was achieved pursuant to the University's 2018 – 2022 Strategic Plan, *'Distinctive by Design'*, which had three themes; empowerment of our diverse people; distinctive teaching and research; and an enriched learning environment. The University's new decadal strategy, *Connected 2023-2032*, will support the University to continue its success and build upon its achievements. *Connected* weaves together three overarching themes: partner for community wellbeing and sustainability; becoming the future workforce provider of choice; and enhancing research and local impact.

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

² University of Canberra, **Connected, A Decadal Strategy 2023-2032**

³ Times Higher Education, **Impact Rankings 2021 by SDG: reduced inequalities**

⁴ Times Higher Education, **Impact Rankings 2022 by SDG: reduced inequalities**

⁵ The Good Universities Guide, **Undergraduate Full-Time Employment university Ratings and Rankings 2022/2023**

⁶ Times Higher Education, **Impact Rankings 2022**

^{7,8} Times Higher Education, **Explore Rankings Data for University of 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.

Council

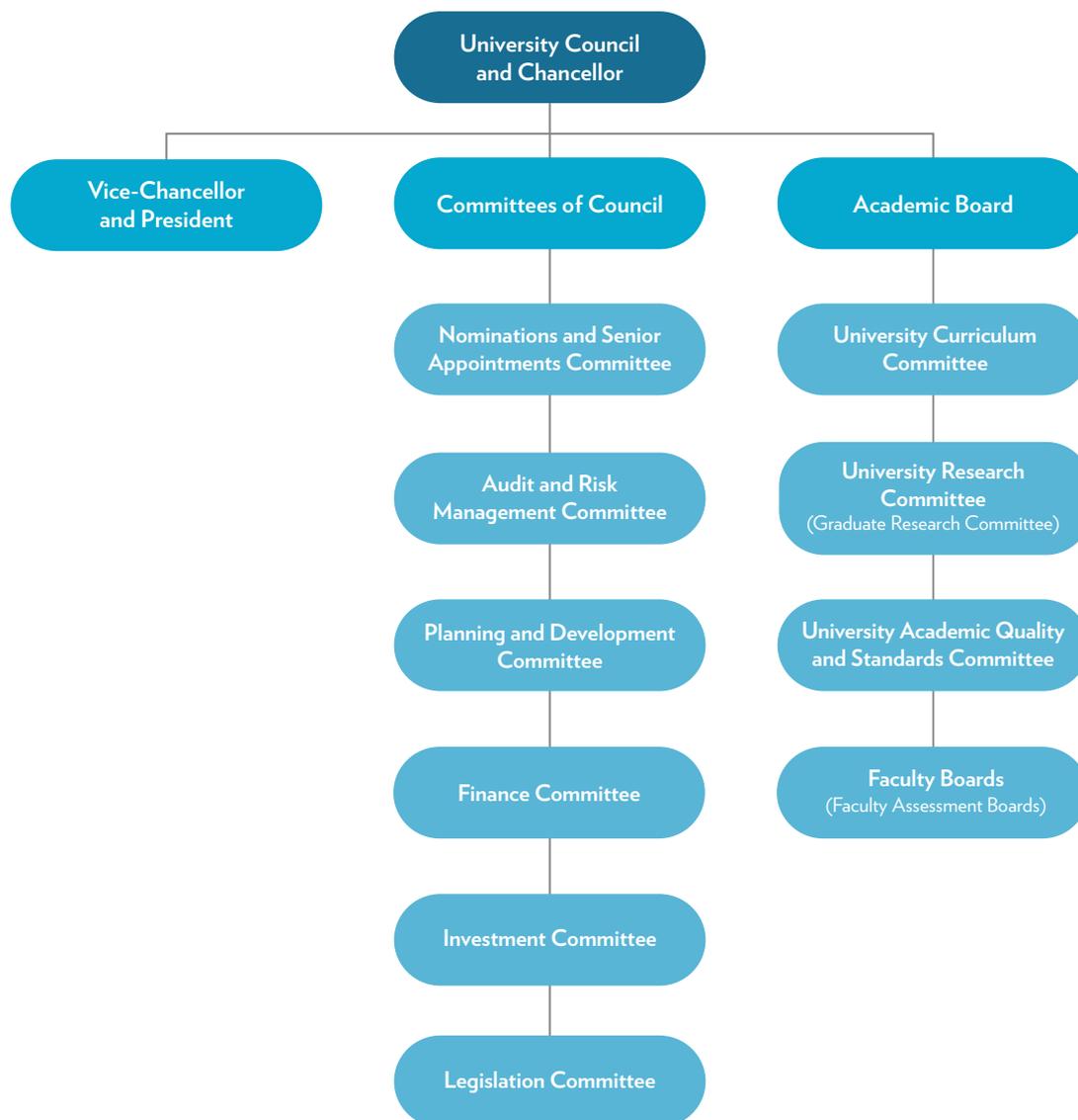
The governing body of the University, the Council, is established under the Act and has the entire management of the University. Council is responsible for the governance of the University and sets the strategic direction of the University.

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, Vice-Chancellor and President, and the Deputy Vice-Chancellor and Vice-President positions 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.

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:



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 provided at section 6 of the *University of Canberra Act 1989* (ACT) are 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 17,279 students across all campuses in 2022, and 2,334 staff members (as at 31 January 2023).

In the 33 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.

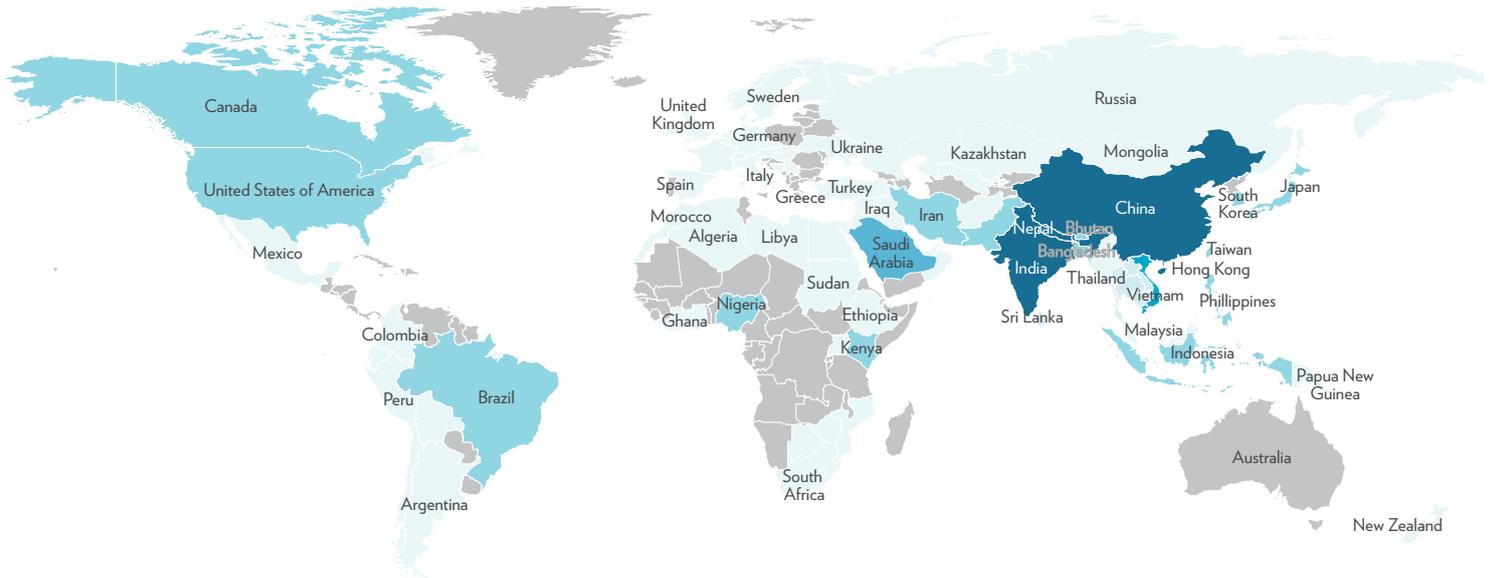
Our Students

In 2022, the University reported a total of 17,279 students across its campuses, of this 4,119, 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. Hong Kong
7. Bangladesh
8. Saudi Arabia
9. South Korea
10. Pakistan

The diagram below illustrates the global distribution of University of Canberra international student nationalities in 2022.

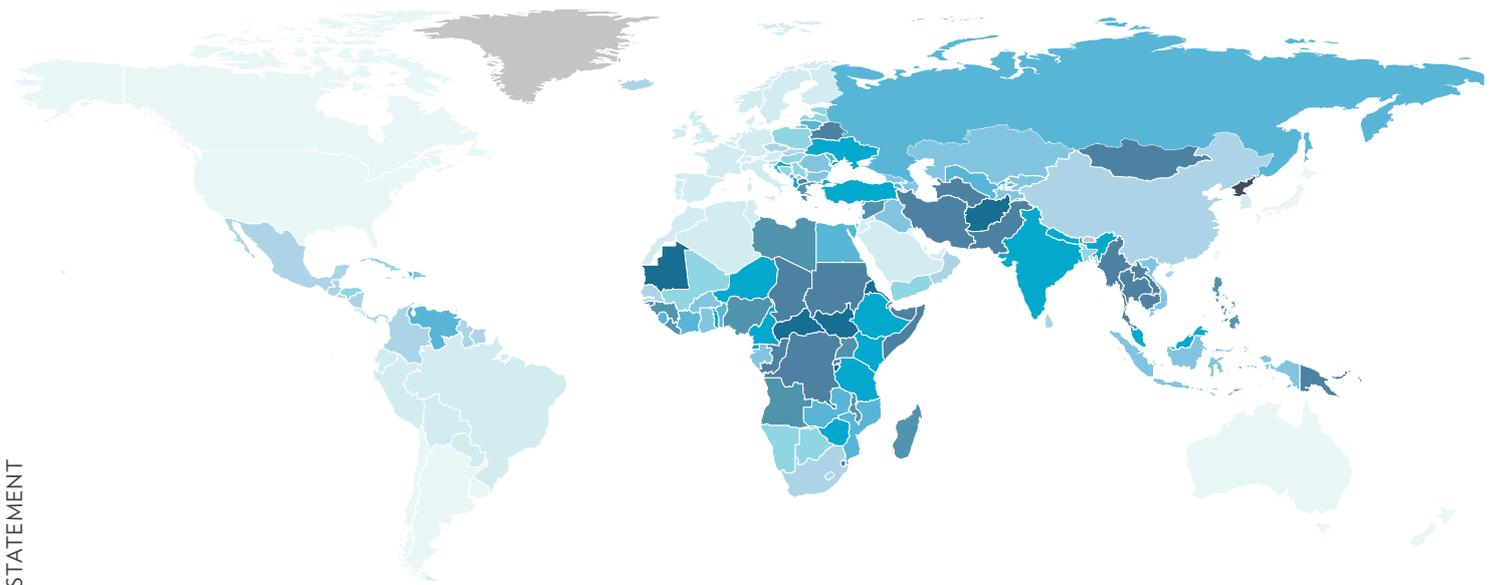


International students by country 2022

In 2022 the University had 151 students whose nationalities align with eight of the 25 countries estimated to have the highest prevalence of modern slavery (per 1,000 population) as identified in the Global Slavery Index (2018) and displayed below.

Over half of the University’s 4,119 international students were from India and China, the two countries estimated to have the largest absolute number of modern slavery victims.

The diagram below illustrates the global prevalence of modern slavery.



Global prevalence of modern slavery

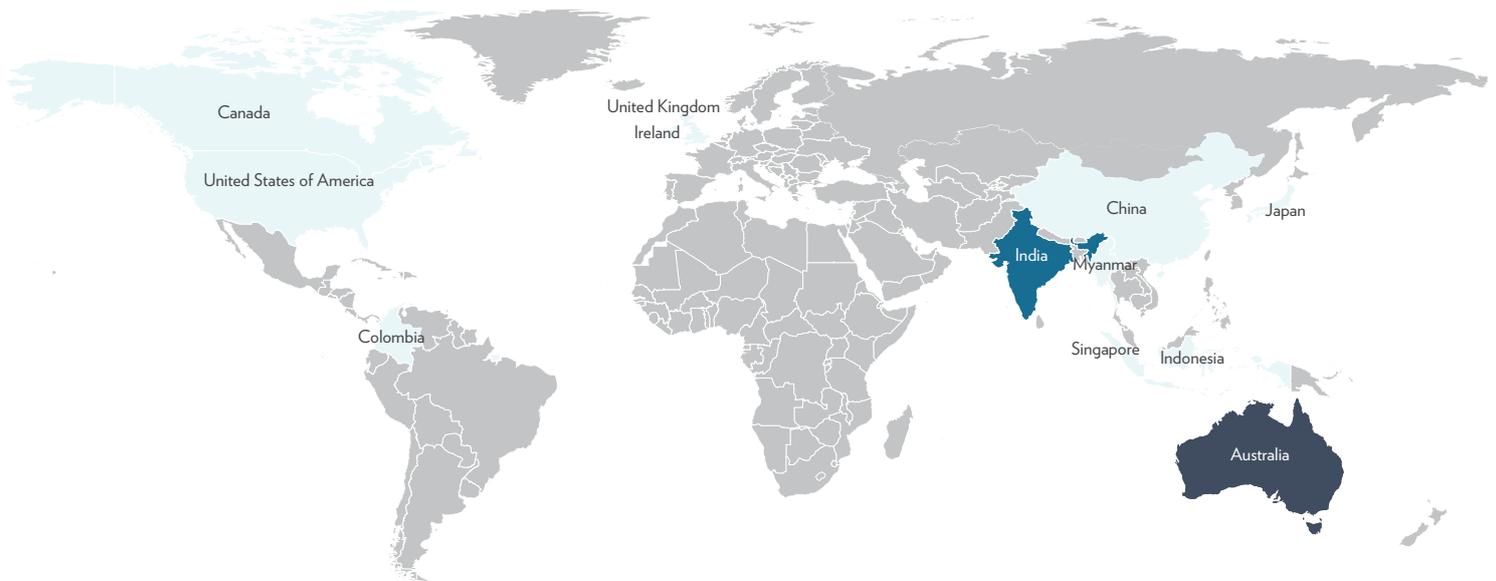
Our Supply Chain

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 2022 calendar year, the University engaged in financial transactions with approximately 1,533 suppliers. These suppliers represent the University’s “tier one” suppliers. Of the 1,533 tier one suppliers, 1,515 are located in Australia representing approximately 99 per cent of the University’s supply chain expenditure. The diagram below demonstrates the global distribution of the University’s suppliers.



Expenditure by Country (AUD)

< 100K 100K-1M 1M-5M >5M

Global distribution of the University’s suppliers 2022

Top Supplier Industries

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

1. Education and Student Services
2. Information Technology and Software
3. Utilities
4. Banking
5. Facilities Maintenance

Our People

As at 31 January 2023, the University employs 2,334 staff. Of these staff, 2,174 are employees of the University on either a continuing, fixed term, casual or sessional basis, and 160 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.⁹ There is also an unquantifiable number of modern slavery victims working in the supply chains of Australian companies around the world.

Operational Risks

The University's supply chain at tier one level is dominated by Australian businesses, with many being owned and operated locally in the ACT, however, the University acknowledges 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 a wide range of partnerships with organisations including universities and colleges; research bodies; government departments; non-government organisations; and private enterprise. 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.

The University also has an extensive portfolio of education agents across the globe. Education agents play an essential role in promoting the University in international markets and recruiting qualified students who meet the University's entry standards and requirements to study at the University.

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 that its partners are of an appropriate standing for the University. However, the University acknowledges that despite these processes, the risk remains 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 slavery¹⁰. The following provides comfort to the University that the risk of modern slavery activities from this supplier are low:

- regular site visits, (likely to resume in 2023 following the easing of 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; and
- 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.

⁹ Global Slavery Index, Walk Free Foundation (p 181).

¹⁰ Walk Free Foundation, The Global Slavery Index (Report, 2018) 7.

Location

Amongst the University's top 50 suppliers, nine (9) 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 China, one of the two countries with the highest estimated number of modern slavery victims according to the Global Slavery Index.¹¹ 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. Where a supplier is from a country with a higher risk of modern slavery activities and/or is involved in a high-risk modern slavery industry, the University has begun undertaking analysis of the relevant supply chains beyond tier one.

Industry

The Global Slavery Index identifies the top 15 goods¹² at risk of being produced by modern slavery.¹³ 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.¹⁴

The University's top four industries of engagement based on financial value (in particular, "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 suppliers used by the University in 2022. These countries include China, Vietnam, Thailand, Brazil, Pakistan, India, South Korea, Indonesia, Russia, Japan, Nepal, Taiwan and Malaysia. In 2022 the University had five (5) 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 2022, the ongoing COVID-19 pandemic continued to place pressure on income generation in the higher education sector. 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 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 FRDM, a supply chain mapping technology deployed throughout the University sector, which is assisting the University in identifying and selecting suppliers who, despite the adversity created by COVID, have a strong focus on anti-modern slavery practices.

¹¹ Walk Free Foundation, The Global Slavery Index (Report, 2018) p 178-181.

¹² In order of ranking, cotton; bricks; garments; cattle; sugarcane; gold; carpets; coal; fish; rice; timber; brazil nuts and chestnuts; cocoa; diamonds; and electronics.

¹³ Walk Free Foundation, The Global Slavery Index (Report, 2018) 220.

¹⁴ Walk Free Foundation, The Global Slavery Index (Report, 2018) iv.

Ongoing Actions Taken

Treatment Actions

The University continues to include actions within its processes that are 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. The FRDM tool assists the University to improve transparency of its supply chains, identify high risk countries, categories and suppliers, and signal areas of concern. The tool algorithmically identifies modern slavery risks in supply chains, enabling the University and the sector collectively to make informed decisions about suppliers and take action to address modern slavery risk.

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.

Where possible, the University uses suppliers who 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.

Where a potential supplier is from a high-risk modern slavery country and/or operating in a high-risk modern slavery industry, the University is seeking to identify and manage deeper supply chain risks by looking at its tier two suppliers (those who supply its tier one suppliers).

Example of tier two analysis

The University has undertaken analysis to tier two in its search for a supplier of a rooftop solar system.

Renewable energy has been identified as one of the high-risk industries for modern slavery with evidence linking it to slave labour in manufacturing, especially in China. Given this, a key consideration of the University's approach to market was supplier analysis to the second tier. This analysis included:

- a mandatory supplier questionnaire requiring respondents to answer questions relating to their supply chain and that of their subcontractors;
- in depth analysis of the proposed solar panels using FRDM and other online resources;
- review of supplier Modern Slavery Statements to the third tier; and
- requests for information about how suppliers ensure that their suppliers are compliant with modern slavery requirements.

The risk of modern slavery will be further mitigated by modern slavery clauses in the engagement contract, and requirements for a mandatory certificate of origin prior to installation of solar panels.

Education Partners and Agents

Due diligence is conducted prior to the engagement or partnering with any new education partner or overseas entity.

Education Agents are selected after undergoing an extensive selection and assessment process. The University endeavours to work only with agents who adhere to the highest ethical standards required under the National Code of Practice for Providers of Education and Training to Overseas Students (the Code). The Code is a set of nationally consistent standards to support providers to deliver quality education and training to overseas students.

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 issue or concern with an agent 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.¹⁵

The University has an extensive new partnership proposal process which requires completion of an online form and progression through a series of checks and approvals. 'Know your Partner' due diligence is conducted against all new partners prior to progressing to contractual negotiations. All partner and contract details, and documentation is maintained on a central university database. Partnerships and contractual arrangements are reviewed on an ongoing basis and partner renewals are safeguarded through an online partnership renewal process.

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;
- insurance compliance review;
- risk assessment review; and
- 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 2022 where a risk relating to modern slavery required further review by the University.

Policy and Procedure

During 2022, 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, respect and share the University's commitment to minimising the risks of modern slavery in its operations and particularly its supply chains.

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 others;¹⁶ 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).

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 *University of Canberra 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.

¹⁵ Education Services and Overseas Students Act 2000 (Cth).

¹⁶ See *Human Rights Act 2004* (ACT).

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 *Investment Policy* requires that the University 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 2022, 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.

Effectiveness of Actions

The University established a Modern Slavery Working Group in 2020 tasked with the management of the University's modern slavery commitments, obligations and overall response. A core function of this Working Group is ongoing engagement with the guidance materials and recommendations of external expert bodies focused on modern slavery.

The Working Group members include representatives from relevant sections within the University and the controlled entities. In 2022, the Working Group continued to focus on the implementation of the Modern Slavery Policy and development of the associated Procedure.

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; and
- 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 considering introducing key performance indicators via the Modern Slavery Policy and its associated Procedure.

The University's work in this space is ongoing. The University conducts an annual modern slavery risk assessment and develops treatment actions as part of its commitment to the continual monitoring of modern slavery risks and assessment of the effectiveness of its response. The University is held accountable for its commitments to eliminating modern slavery through the requirement for regular reporting to its Audit and Risk Management Committee.

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.

2021 Identified actions

2022 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.

2021 ACTION: Development of a Modern Slavery Procedure.

PARTIALLY COMPLETE: The University introduced a Modern Slavery Policy (approved by Council in December 2021). A Modern Slavery Procedure has been drafted to support the Modern Slavery Policy and has undergone consultation with core stakeholders. University wide consultation will take place once core stakeholder feedback has been incorporated.

2023 ACTION: Finalise the development of a Modern Slavery Procedure to support the University's Modern Slavery Policy.

2021 ACTION: Implement an annual risk assessment review of the University's supply chain.

PARTIALLY COMPLETE: The University has procured and is using FRDM, a supply chain mapping tool, to improve transparency of its supply chain. The University is now moving into a phase of ongoing monitoring.

2023 ACTION: Ongoing monitoring of the University's supply chain and consideration of actions to be taken if modern slavery is detected.

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.

2021 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.

PARTIALLY COMPLETE: The implementation of FRDM is assisting 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. FRDM will also assist with identifying those parties that require education and/or assistance to achieve the standard expected by the University.

The University has reviewed its suppliers and will continue to do so on an ongoing basis including collaborating with other Universities. The University has updated how it engages with suppliers about the University's standards and expectations in relation to Modern Slavery.

2023 ACTION: The University will continue to communicate with its suppliers on the University's values, policies and practices in relation to modern slavery and move into a phase of monitoring to ensure ongoing alignment with those values, standards and policies.

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.

2021 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.

PARTIALLY COMPLETE: The staff modern slavery intranet site has been updated to ensure that all staff have easy access to Modern Slavery Statements, the Modern Slavery Policy, Modern Slavery resources and details of the University's response and commitments. Disruptions caused by COVID-19 and other high priority work commitments meant that it was not possible to expand awareness raising activities beyond University staff in 2021-2022.

2023 ACTION: Development of resources for external stakeholders to assist them in understanding the University's commitment to the eradication of modern slavery and its expectations for suppliers and partners.

2021 ACTION: The development and implementation of customised training and tools for staff with specific responsibilities and engagement with modern slavery obligations.

INCOMPLETE: Due to COVID-19 disruptions and other high priority work, this commitment has not yet been addressed. Specific responsibilities for modern slavery will be set out in the Modern Slavery Procedure and training will be progressed as a priority once the Modern Slavery Procedure is finalised.

2023 ACTION: Development of training for staff with specific roles and responsibilities in relation to modern slavery under the Modern Slavery Procedure.

2021 ACTION: The development of modern slavery compliance and requirements clauses for use in University contract templates and other agreements.

COMPLETE: Modern slavery clauses were incorporated in all University contract templates and other University agreements in 2022.

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

INCOMPLETE: Significant disruption caused by COVID-19 between 2020-2022, and other high priority work commitments have meant that this action has not been progressed.

2023 ACTION: The University will investigate what resources are available to support the development of modern slavery guidance material and an awareness campaign for students.

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.

PARTIALLY COMPLETE: The University has reviewed its partners, suppliers and agents. The recently implemented supply-chain mapping tool FRDM is being utilised on an ongoing basis to help the University analyse and monitor its partners, suppliers and agents. The University conducts extensive due diligence prior to the engagement or partnering with any new education partner or overseas entity.

The University has begun reviewing subsequent tiers of its operations and supply chains beyond tier one on a case by case basis where a supplier is from a country with a higher risk of modern slavery activities and/or is involved in a high-risk modern slavery industry. Collaboration with other Universities also supports ongoing analysis and review of suppliers and supply chains.

2023 ACTION: The University will continue its efforts to undertake in-depth analysis of its partners, suppliers and agents and work towards more systematic analysis of subsequent tiers of its operations and supply chains.

Consultation

The University has an effective and well embedded system of reporting and communication with its controlled entities. UCX officeholders are primarily University executive staff and one independent (external to the University) member. UC Global is currently dormant and so was not directly consulted on the Modern Slavery Statement but its officeholders are all University executive staff, and as such are aware of the Modern Slavery Statement. UCX was included in the same consultation process that occurred across all portfolios and business units of the University. Senior and middle management were consulted at every stage of the development of this statement and will continue to be included in all discussions and actions going forward.

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 2022 and has been approved by the Council of the University of Canberra at meeting C236 on 19 May 2023.



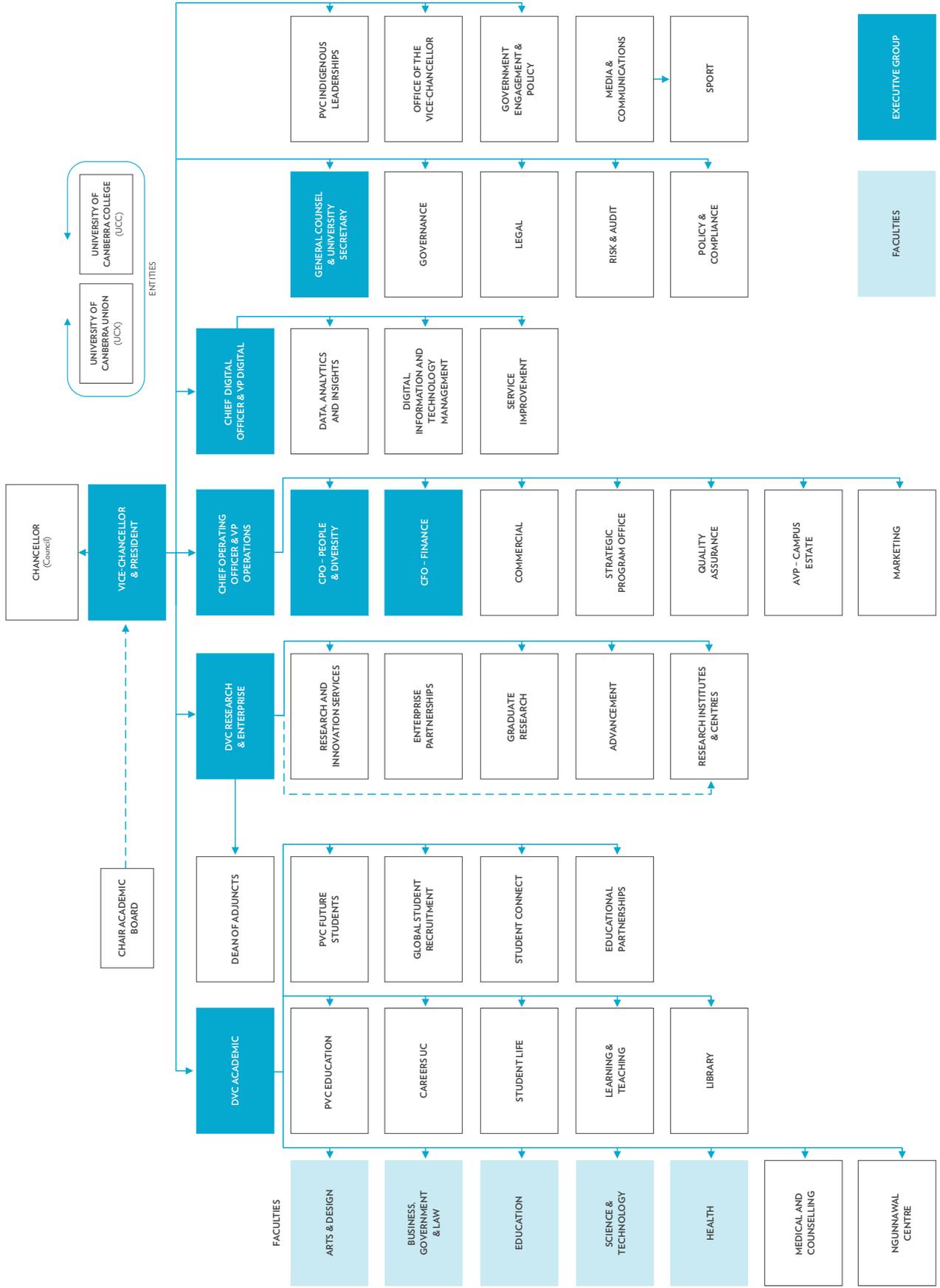
Professor Paddy Nixon

Vice-Chancellor and President

University of Canberra



Annexure A – University Organisation Chart





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