



THE UNIVERSITY  
of ADELAIDE

2023

# Modern Slavery Act Statement



GROUP  
OF EIGHT  
AUSTRALIA

make  
history.

# Introduction

The University of Adelaide (ABN 61 249 878 937) is committed to protecting and respecting human rights and to taking steps to eliminate all forms of modern slavery.

This Statement reflects that commitment and fulfils the obligation of the University of Adelaide (the University) and its controlled entities under Part 2 of the Modern Slavery Act 2018 (Cth) (“the Modern Slavery Act”). This Statement reports on the steps taken to assess and address the risks of modern slavery within its operations and supply chains during the University’s 2023 financial year (1 January to 31 December 2023).

The University welcomes the opportunity to actively consider the risk of modern slavery and to provide an annual Statement on its efforts to eliminate any connections to modern slavery practices it identifies.

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# About the University

The University is constituted by the University of Adelaide Act 1971 (SA) for the purpose of:

**the advancement of learning and knowledge, including the provision of university education.**



Founded in 1874, it is one of Australia's oldest universities and a member of Australia's prestigious Group of Eight research-intensive universities. The University is ranked in the world's top 100 universities and is recognised globally as a leading research university.

The University is a diverse institution comprised of students, scholars and professional staff drawn from around the world. The student body alone consists of more than 30,000 students from over 100 countries. Students, along with over 3,400 members of staff, learn, teach and conduct research across the University's four campuses (three located in and around Adelaide, at North Terrace, Waite, and Roseworthy, and one in Melbourne).

Australia's higher education sector is recognised as world leading, and, as a part of that sector, the University understands the manifold challenges confronting the global community today, including the pursuit of sustainability and the impact of globalisation. In this context, the University recognises the shared duty of all Australians to respect and protect human rights, and is committed to understanding and, wherever possible, reducing the risks of modern slavery in its operations and supply chains.

During the reporting year, the University entered into a formal agreement with the University of South Australia to support the creation of a new university called Adelaide University by combining the two

institutions. This decision was followed in December 2023 with the passing of state legislation to establish the new Adelaide University. While work has commenced on planning the merged institution, with a planned opening date of January 2026, the University will in the meantime continue with its existing initiatives relating to the Modern Slavery Act. Any costs incurred and activities undertaken by the University through the merger process will be included in its modern slavery risk analyses and reporting.

<sup>1</sup> As measured by the best-known world university ranking methodologies available – US News Best Global Universities Rankings, QS World University Rankings, Times Higher Education World University Rankings, and the Shanghai Ranking Academic Ranking of World Universities. For more information visit [adelaide.edu.au/about/world-rankings](https://adelaide.edu.au/about/world-rankings)

# The University's structure, operations and supply chains

## Structure

The principal governing body of the University is its Council, chaired by the Chancellor of the University, the Honourable Catherine Branson AC KC. Management of the University is the responsibility of the Vice-Chancellor and President, Professor Peter Høj AC FTSE FNAI (US), who has been appointed by the Council to oversee and manage the academic standards, management and administration of the University. The Academic Board oversees the academic standards of the University.

In 2023, the University was organised into three academic faculties and five administrative divisions:

- Faculty of Arts, Business, Law & Economics
- Faculty of Health and Medical Sciences
- Faculty of Science, Engineering and Technology
- Division of Academic and Student Engagement
- Division of External Engagement
- Division of Research and Innovation
- Division of University Operations
- Division of Vice Chancellor and President

The University is a research-intensive organisation which delivers excellence

in research in a large range of fields through its six research institutes and approximately 40 research centres.

As a leading research and teaching institution, the University enjoys broad and successful relationships with government, industry, communities and research partners.

The University has established five controlled entities to support its core and strategic purposes. During the reporting period, three of the controlled entities were actively operating:

- Roseworthy Campus Farm Pty Ltd, ABN 56 007 936 834
- National Wine Centre Pty Ltd, ABN 75 117 597 592
- Innovation and Commercial Partners Pty Ltd, ABN 55 008 027 085
- Adelaide Unicare Pty Ltd (non-operating), ABN 13 056 443 059
- ACN 008 123 466 Pty Ltd (non-operating), ABN 31 798 859 716

Each of the operating entities is subject to governance, monitoring and reporting requirements directed and reviewed by various Standing Committees of Council and is required to regularly report directly to one of the University's assigned liaison officers (Deputy Vice-Chancellor (Research) or Chief Operating Officer).

## Operations

The University's core business is teaching (including higher education, pathway programs and professional and continuing education) and research. This work is largely undertaken in Australia; however, some University employees and postgraduate candidates travel for work for varying periods or may reside overseas. The University's controlled entities operate in various South Australian locations.

## Supply Chains

Supporting the teaching and research activities and campus operations of the University requires a diverse range of goods and services provided by a large and complex supply chain. The University purchases materials required to deliver its core teaching services; construction and facilities management services; office equipment including computers and phones; catering services and meals; accommodation for staff travelling; laboratory supplies including consumables, pharmaceuticals, and scientific equipment; and many more goods and services.

In 2023 the University spent over \$514m on goods and services from over 4,600 suppliers, in 238 good and service categories.

# The risks of modern slavery practices in the operations and supply chains of the University and its controlled entities

## How is risk identified?

The Chief Financial Officer (CFO) is responsible for implementing controls for operational risks involving Finance (including Procurement Services) and for ensuring compliance with regulatory obligations and codes of practice. Led by the CFO, the University's Finance branch has developed a response to modern slavery risks, including the descriptions of risks set out in this statement.

This response has been facilitated by the University's membership of the Australasian Universities Procurement Network (AUPN). AUPN members have collaborated to identify key supply chain risks within the higher education sector and to share information about the effective management of these risks. Further details about this collaboration are set out in the 'Actions taken to assess and address risks' section below.

Oversight of all risks at the University is guided by the University's Risk

Management Framework and is reported to the University's Council via the Risk Committee, a Standing Committee of Council.

## Risk in supply chains

The University recognises that there are risks of modern slavery in the supply chains of all the goods and services it purchases. The relative risks for any of the goods and services the University purchases can only be determined by assessing factors such as product or service type and manufacturing or operating locations.

The University also recognises that there are additional risk factors for modern slavery in supply chains beyond geography and industry, including in particular business models such as subcontracting.

During the 2023 reporting year, the University continued to participate in the AUPN's consolidated data analysis

and risk mapping process, to better understand the scope of risk of modern slavery in its supply chain.

The resulting analysis allowed the University to identify where supply chains extend into goods and service categories and geographic locations that are of higher risk for the presence of modern slavery. Goods and services categories identified as being both high risk for modern slavery in the supply chain and proportionally high spend by the University include:

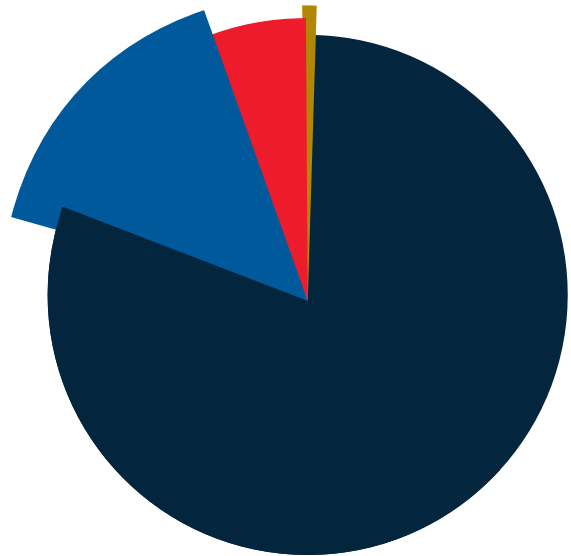
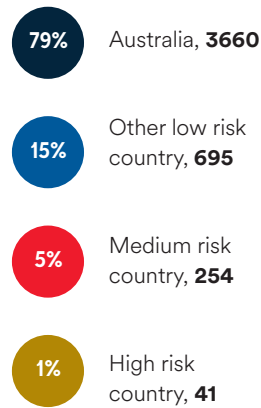
- Commercial cleaning;
- Desktop hardware and IT accessories;
- Building construction and maintenance services;
- Catering and meals; and
- Laboratory consumables and safety equipment.

In 2023, 21% of the University's total spend was on high risk good and service categories such as those identified above. 52% of the University's spend was on product categories at low risk of modern slavery.

In 2023, the majority (79%) of the University's suppliers were located in Australia, and 15% of suppliers were located in other countries with a low risk of modern slavery (figure 1). Only 1% of the University's suppliers were located in countries with a high risk of modern slavery. The University acknowledges that supply chains are global, and expects suppliers located in low risk countries to have supply chains which extend into higher risk countries.

The University will continue to monitor the location of workers as a known risk indicator and, along with others in the AUPN, continue to apply due diligence assessments to its supply chains.

**Figure 1:**  
Number and proportion of University suppliers in 2023 by country risk level



## Risk in operations

The University has assessed the likelihood and consequences of modern slavery in core operations to be low.

That is, given the nature of the University's workforce and operations, and the robust legislative environment in which it operates, modern slavery risks are possible but are not expected to routinely arise and are capable of being monitored and controlled by a targeted management strategy.

The basis for this assessment and the management measures that mitigate modern slavery risk is described in detail in the following sections.

## Risk in the management of human resources

The University's operations and staffing profile do not exhibit any of the

characteristics that might indicate a higher risk of modern slavery. The nature of the University's workforce is highly skilled, and all on-going, contract and casual staff are recruited using transparent, recognised processes.

Continuing, fixed term, and casual employees of the University work under the University of Adelaide Enterprise Agreement 2023-2025, which has been approved by the Fair Work Commission.

The University does not use overseas labour brokers to recruit staff, and no staff of the University are subject to recruitment fees or personal or property security deposits. University employees are typically employed directly by the University; where labour hire companies are used, these are Australian based.

The University is diligent in checking that all new employees have the right to work in Australia. Most employees

are based in Australia, however where work is undertaken overseas, University employees remain covered by Enterprise Agreement conditions.

In addition to the Enterprise Agreement, the University has a range of other policies, procedures, and supporting documents in place to help manage the risks of modern slavery in its operations:

- [Recruitment Policy and Procedure](#)
- [Behaviour and Conduct Policy](#)
- [Code of Conduct](#)
- [Public Interest Disclosure Policy](#)

The University's Integrity Unit receives and oversees reports of misconduct and inappropriate behaviour from members of the University community (including students, staff, titleholders, volunteers, visitors, and contractors). During the reporting year, the Integrity Unit received no reports relating to modern slavery.





## International students and workplace exploitation

The University recognises that temporary work visa holders in Australia, including holders of international student visas, are at higher risk of exploitative working conditions including underpayment of wages<sup>2</sup>. The University provides a range of targeted support services and information to this cohort as required under the Education Services for Overseas Students Act, including sharing information about working rights in mandatory courses for new international students, providing information and links on its website<sup>3</sup>, and regularly hosting representatives of the Fair Work Ombudsman to share information and resources with students. The University also partners with StudyAdelaide, which similarly shares information and resources with current and potential future students on working rights in Australia<sup>4</sup>. The University is committed to ensuring that the whole international student experience while in Australia is as positive as possible and will continue to raise the awareness of international students of their rights and where to get help if they experience exploitative working conditions and/or modern slavery-like practices.

### Risk in Research operations

The University's research operations are primarily service based. The scope of research services conducted by University staff may include developing prototypes and field-demonstrable products as a proof-of-concept stage in the application of knowledge to real world endeavours. However, the University is not a commercial producer or manufacturer of goods.

Most research services are undertaken by employees of the University, who are protected by the policies and procedures outlined above. Subcontractors are used when required, and these may be based either in Australia or overseas. When subcontractors are engaged, standard template agreements are used, and in the case of research funded by government sources, the terms of the University's agreement with its subcontractor will mirror those set out in the government funding agreement. Complex or unusual contracts

are reviewed by the University's in-house legal counsel.

The University's research operations also include international research collaborations, in which academic research leaders create and foster collaborations with universities, companies, and other entities outside of Australia. The outcomes of these collaborations (which include grants, academic papers, intellectual property, and student recruitment) are of benefit to the University. These collaborations may be governed by formal agreements, but typical academic-to-academic collaborations are often informal. University staff are routinely required to complete a foreign engagement compliance review and report details of the scope and purpose of any international arrangements to the University.

The University's Responsible Conduct of Research Policy adopts the principles embodied in the Australian Code for the Responsible Conduct of Research 2018.

### Risk in teaching operations

University teaching operations are also service based, with most teaching services delivered by continuing or casual employees who are protected by the policies and procedures outlined above. Contractors are used occasionally.

Most the University's teaching operations are based in Australia; however, some are conducted overseas, through joint ventures with partner universities. Employees of the University who are located outside of Australia are still protected by the Enterprise Agreement and the suite of policies and procedures that apply to all University staff.

<sup>2</sup>Walk Free Foundation 2023, Modern Slavery Index Country Profile: Australia, <https://www.walkfree.org/global-slavery-index/country-studies/australia/>

<sup>3</sup><https://international.adelaide.edu.au/international-student-support/working-while-studying/>

<sup>4</sup><https://studyadelaide.com/career-pathways/work-while-you-study>



## Risk in Controlled Entities

The University's operating controlled entities and the risks of modern slavery in their operations and supply chains are detailed below:

### Roseworthy Campus Farm Pty Ltd

Roseworthy Campus Farm manages the cropping, sheep and cattle operations of the University's farm at Roseworthy. The University farm is crucial to its teaching programs and research priorities. The farm is run as a commercial farming operation, with income earned allocated towards the research projects that will improve understanding of Australian agricultural and livestock management practices.

Employees of Roseworthy Campus Farm are covered by employment agreements underpinned by the relevant professional award. Some contract labour is hired at peak demand times.

The supply chain of Roseworthy Campus Farm includes animal food and care

supplies, as well as facilities management services such as cleaning, and operational goods including IT equipment. Some goods purchased by Roseworthy Campus Farm, including desktop computers, are purchased from the University's preferred and contracted supplier.

### National Wine Centre Pty Ltd

The National Wine Centre of Australia is one of the country's most awarded venues for conferences, meetings and events. A showcase for the Australian wine industry, the venue offers a unique atmosphere for events, a range of tours and cellar experiences, and a chance to experience the winemaking process from the vine to the bottle.

Employees of the National Wine Centre of Australia are covered under the Hospitality Industry (General) Award 2020. Award compliant payroll software is used to ensure adherence to the pay and other conditions set out in this award, and award adherence is also audited annually by an external auditor. Temporary staff

may be hired through an Australian based external labour hire agency.

The supply chain of the National Wine Centre of Australia includes food and beverages for resale, as well as facilities management services such as cleaning, and operational goods including IT equipment. Some goods and services purchased by the National Wine Centre (including desktop computers, cleaning services and building maintenance services) are purchased from the University's preferred and contracted suppliers.

### Innovation and Commercial Partners Pty Ltd

Innovation and Commercial Partners Pty Ltd (ICP) is a wholly owned subsidiary of the University, established for the purposes of commercialisation and development of the University's intellectual property.

ICP has no employees and, as it does not conduct purchasing activity, has no supply chain.



# Actions taken by the University to assess and address risks

## Sector due diligence activities

The University of Adelaide is a member of the AUPN, the peak body for strategic procurement in the higher education sector in Australia and New Zealand. The AUPN comprises 41 member institutions from Australia and New Zealand. The University recognises that more meaningful and effective change is achievable through collaboration with other higher education institutions, and, with representation on the AUPN's Executive Committee and Anti-slavery Working Group, the University has played an active role in shaping this sector response.

During 2023, the AUPN's efforts were focussed on capability uplift, collaboration on issues and risks, refining operational processes relating to supply chain risk analysis, and engagement across the sector and with external groups and experts. This includes participating in discussions with other universities and with the Australian Red Cross regarding the workplace exploitation risks faced by international students.

In 2022 the University, and other AUPN members, implemented FRDM supply chain mapping and risk analysis solution; during this reporting year, the AUPN continued to refine and improve the tool and its use across the sector. Importantly, FRDM has enabled the University to start analysing risk in its supply chain beyond Tier 1 suppliers, and provides alerts when a supplier is linked to identified instances or heightened risks of modern slavery.

Implementation of FRDM has allowed the University (and all sector FRDM members) to issue detailed Supplier Assessment

Questionnaires to key suppliers. Responses to these questionnaires will help the University identify areas of risk unique to each supplier and will inform the University's further due diligence and other activities in respect to specific suppliers.

During the reporting period, a small sample of existing University suppliers undertook this questionnaire; future activities will include embedding the completion of the questionnaire as part of the University's standard processes (either as an augmentation to or replacement of the University's current questionnaire that is included in approaches to market) in order to reach more suppliers, particularly those at higher risk of modern slavery.

A total of 97% of the University's purchase data from 2023 will be analysed through the FRDM tool (purchases made on corporate credit cards, which represent approximately 3% of University spend in 2023, will not be included due to data limitations).

## Continuing supplier due diligence activities

The University put in place a number of due diligence processes during 2019-20, in preparation for the University's first reporting year under the Modern Slavery Act. The following activities continued during the reporting year 2023:

- University contracts relating to the purchase of goods and/or services include standard contract clauses which require suppliers to:
  - ~ Comply with the intent and the requirements of the Modern Slavery Act;

- ~ Include similar modern slavery clauses in contracts with their own suppliers and subcontractors;
- ~ Notify the University as soon as the supplier becomes aware of any actual or suspected slavery in a supply chain connected to the contracted goods and/or services; and
- ~ Remedy any identified instances of modern slavery within a reasonable timeframe.

- The University's Supplier Code of Conduct ("the Code") conveys its public commitment to undertaking procurement activities in an environmentally, socially, ethically, and economically responsible manner. During the 2023 reporting year, the University's standard contracts for purchase of goods and/or services included a clause requiring the supplier to comply with the Code. In instances where an alternate contract was used (for example, supplier's own contracts), suppliers were requested to sign the Code and confirm they agree to it and understand their expectations as a supplier to the University.
- When undertaking formal approaches to market in 2023, the University asked suppliers to respond to questions relating to their reporting status under the Modern Slavery Act; their policies, education, and training practices relating to modern slavery; and the steps they have taken to ensure the risks of modern slavery have been identified and addressed in their supply chains and operations. Supplier responses to these questions assisted the University in identification and management of risk.

## Training and awareness

Strategic Procurement and Purchasing are centralised activities at the University. In 2023, all new staff in the Strategic Procurement and Purchasing teams received training in modern slavery, ensuring these key staff are aware of the University’s proactive approach to addressing modern slavery risks and the meeting its obligations under the Modern Slavery Act. Targeted outreach activities occurred when University staff outside of the Strategic Procurement team were involved in the evaluation of high risk purchases.

General awareness of modern slavery has been promoted during the reporting year through the publication of information on the University’s intranet, and the development of a fact sheet. During the reporting year, all staff undertook mandatory training on Conflicts of Interest and Working with Integrity.

## Refreshed risk criteria

In 2023, the University revisited its classification of country and product risk factors for modern slavery, which were first developed in 2019-20 and refreshed in 2022. Updated data and information from a range of sources were reviewed and the University’s risk criteria updated accordingly.

## International student recruitment

The University engages a number of third-party international student recruitment agents to connect it with potential students around the world. These organisations provide detailed information and guidance to potential students, match students to universities which best meet their needs, and assist students with university and visa application processes and documentation. Agents are paid commissions by the University when students successfully enrol in, and complete a portion of, a course of study at the University.

International student recruitment agents may be based in Australia but are also commonly based (or have staff located) overseas in any market where potential students may be found. At the University, this means agents appear as suppliers in countries which are classified as high and medium risk of modern slavery. As shown in Figure 2, these suppliers represent a significant proportion of spend and suppliers in high and medium risk countries, including 46% of all University spend in medium risk countries in 2023. This significant representation in countries at higher risk of modern slavery has prompted a deep dive into the sector and a close review of how the risk of modern slavery can be managed in this supplier category, which was initiated in 2022 and continues into the next reporting year.

In working with international student recruitment agents, the University complies with the Education Services for Overseas Students Act 2000 (ESOS Act) and the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code).

The University does not work with uncontracted agents and does not engage with agents who make unsolicited approaches to the University. Agents

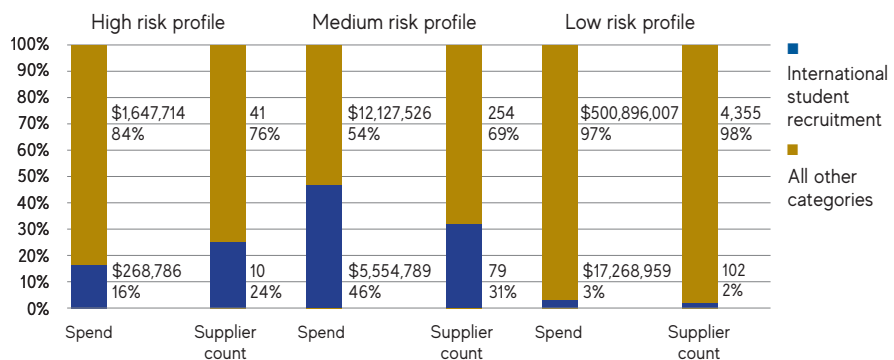
are selected to work with the University typically after being recommended by similar institutions, and only after completing a comprehensive due diligence process. The University’s contracts with agents contain strict terms for agent conduct, set out the University’s requirements for performance review and monitoring, and contain terms describing the corrective actions the University may take if the agent, an employee, or a subcontractor do not meet their responsibilities under either the University’s contract or the National Code.

The University’s contracts with agents allow the termination of the agreements with immediate effect if prohibited conduct or failure to take corrective action occurs. No instances of prohibited conduct relating to modern slavery were identified during the reporting period.

The University is a member of the Australian Universities International Directors Forum, a sector-wide platform for facilitating cooperation and cohesion in university international engagement activities<sup>5</sup>. This network allows the University to contribute to and benefit from information and resource sharing across “the higher education sector, including sharing information relating to agent conduct and reputation.

The University acknowledges that there are risks presented in outsourcing student recruitment activities to third party providers, particularly those in countries with weak governance and regulatory environments, and that there is particular risk in business models that include subcontracting. In future reporting years, the University will explore additional steps to help manage these risks, including by introducing clauses specific to modern slavery in its agent contracts and by implementing an Education Agent Engagement Policy.

**Figure 2:** International student recruitment as a proportion of spend and supplier count by country risk profile, 2023



<sup>5</sup> <https://www.auidf.org/>

# The University's assessment of the effectiveness of its actions

## FRDM supply chain visibility

Implementation of the FRDM tool has provided the University with greater transparency over its supply chain. In 2023 the University participated in a sector activity which involved the targeted approach to a small number of key suppliers, eight of which were used by the University. These suppliers completed detailed Supplier Assessment Questionnaires, which provided the

University with detailed insight into their specific risk and mitigation factors.

Of the eight suppliers which completed Supplier Assessment Questionnaires, four were assessed by the University as suppliers of high risk products, and one was assessed as a supplier of medium risk products. None of the completed Supplier Assessment Questionnaires disclosed incidents of modern slavery in the operations or supply chain of the suppliers.

Implementation of FRDM has provided the University with access to alerts based on its unique suppliers and their trading partners, industries, and countries of operation. In 2023, 12 of the University's tier 2 suppliers and 11 tier 3 suppliers were monitored in FRDM. No instances of modern slavery were identified any direct, tier 2 or tier 3 suppliers of the University in 2023. The University will work to expand the number of trading partners beyond tier 1 covered by the FRDM solution during future reporting years.



# Consultation with controlled entities

The University's controlled entities currently operating were consulted as part of the development of this report.

For this fourth reporting year under the Act, the University was able to invite the National Wine Centre to provide categorised spend data for its supply chain risk assessment process. The supplier data from the National Wine Centre has been combined with that of the University for the 2023 risk identification and analysis activities, enabling the University to undertake this risk assessment process for a total of 169 unique suppliers not previously captured.



# Other information

## Next steps

Having identified systems and processes that will collectively support the University's approach to managing modern slavery risks, future activities will focus on:

- Ongoing requirements for contracts with suppliers to include clauses specific to modern slavery, for suppliers to conform with the University's Supplier Code of Conduct, and for data relating to modern slavery from suppliers participating in market activities to be provided;
- Using the FRDM tool, or alternate tool/s identified by the higher education sector through the AUPN, to monitor risk and identify any instances of modern slavery in our supply chain, and conducting detailed assessments of high risk suppliers;
- Working to implement contracts for high risk goods and service categories not currently under contract;
- Continuing to improve awareness of the risk of modern slavery and responsibilities under the Modern Slavery Act within the central Procurement Services team and across the wider organisation;
- Working to include the supply chains of all operating controlled entities into the University's ongoing risk identification and analysis process;
- Continuing to share best practice in addressing modern slavery risks and human rights as they relate to the higher education sector;
- Continuing to gain insight from academics employed in Australian universities working in research fields related to modern slavery and human rights; and
- Continuing to look for best practice in addressing modern slavery risk across industries, including by engaging with third party organisations established to identify and mitigate modern slavery risks.



# Approval

This statement was approved by the University of Adelaide Council in its role as principal governing body on 8 April 2024.



**Professor Peter Høj AC FAA FTSE FNAI (US)**

Vice-Chancellor and President,  
the University of Adelaide

**8th May 2024**

Date



# Annexure

Mandatory criteria	Page Number
Identify the reporting entity	1
Describe the reporting entity's structure, operations, and supply chains	3
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	4 – 8
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	9 – 10
Describe how the reporting entity assesses the effectiveness of these actions	11
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls	12
Any other information that the reporting entity considers relevant	13





## Further enquiries

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Australian University Provider Number PRV12105

CRICOS Provider Number 00123M

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April 2024. Job no. UA31168.

### **Kaurna acknowledgement**

We acknowledge and pay our respects to the Kaurna people, the original custodians of the Adelaide Plains and the land on which the University of Adelaide's campuses at North Terrace, Waite, and Roseworthy are built. We acknowledge the deep feelings of attachment and relationship of the Kaurna people to country and we respect and value their past, present and ongoing connection to the land and cultural beliefs. The University continues to develop respectful and reciprocal relationships with all Indigenous peoples in Australia, and with other Indigenous peoples throughout the world.

