



## Chancellor's Committee CONFIDENTIAL FLYING MINUTE Date Circulated: 24 June 2022

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### Modern Slavery Act Statement for the year ended 31 December 2021

Pursuant to the *Modern Slavery Act 2018* (Cth), the University is required to provide a Modern Slavery Statement to the Department of Home Affairs by 30 June 2022. The Statement must be approved by Council as the University's governing body. Chancellor's Committee is asked to approve on behalf of Council.

A copy of the University's Modern Slavery Statement for the year ending 31 December 2021 is attached as **Appendix A**.

Information about what constitutes modern slavery can be found on the [Department of Home Affairs website](#).

### Discussion

The *Modern Slavery Act 2018* (Cth) came into force on 1 January 2019 and established a reporting requirement for entities, both commercial and not-for-profit:

- with annual consolidated revenue of at least \$100 million in its 12-month reporting period; and
- which are either an Australian entity or a foreign entity carrying on business in Australia in the reporting period.

Reporting entities are required to publish annual Modern Slavery Statements (Statements) describing actions taken to assess and address modern slavery risks. The Statement contain the following seven mandatory content criteria:

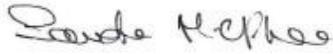
- Identify the reporting entity
- Describe the University structure, operations and supply chains
- Describe the risks of modern slavery practices in the operations and supply chains of the University and any owned or controlled entities
- Describe the actions taken by the University and any entities that it owns or controls to assess and address these risks, including due diligence and remediation processes
- Describe how the University assesses the effectiveness of these actions
- Describe the process of consultation with any owned or controlled entities
- Provide any other relevant information.

The University's Legal Office has reviewed the Statement in relation to addressing the mandatory content criteria.

### Chancellor's Committee:

- (a) **approved** the Modern Slavery Statement for the year ended 30 December 2021; and
- (b) **authorised** the Vice Chancellor and Chancellor to sign the Modern Slavery Statement.

**In favour:**



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29 Jun, 2022 2:04:58 AM GMT+10

Ms Sandra McPhee, AM,  
Chancellor



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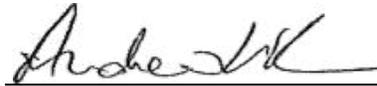
28 Jun, 2022 2:17:33 PM GMT+10

Professor Tyrone Carlin,  
Vice Chancellor

Not Cast

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Mr Murray d'Almeida,  
Deputy Chancellor



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24 Jun, 2022 12:03:03 PM GMT+10

Professor Andrew Rose,  
Chair of Academic Board



# Modern Slavery Act Statement

For the year ended 31 December 2021





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## INTRODUCTION

This statement has been prepared to comply with Southern Cross University's (the **University**) reporting obligations under the *Modern Slavery Act 2018* (Cth) (the Act).

The Act requires entities based, or operating, in Australia, which have an annual consolidated revenue equal to or greater than \$100 million, to report annually on the risks of modern slavery in their operation and supply chains, and actions taken to manage, lessen and, where possible, remove those risks.

The University is committed to the prevention of slavery and human trafficking in all University activities, and to ensuring that University supply chains are free from slavery and human trafficking, wherever they operate.

This statement constitutes the Modern Slavery Statement of Southern Cross University for the year ended 31 December 2021 and has been approved by the Southern Cross University Council.

Sandra McPhee AM  
Chancellor  
Southern Cross University

Professor Tyrone Carlin  
Vice Chancellor and President  
Southern Cross University



## ORGANISATIONAL STRUCTURE

The University is established under the *Southern Cross University Act 1993 (NSW)*.

The object of the University is the promotion, within the limits of the University's resources, of scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence.

The University is governed by a Council to which the University's Chief Executive Officer, the Vice Chancellor, reports.

The Council is chaired by the Chancellor and has 13 members: The Chancellor, the Vice Chancellor, the Chair of the Academic Board, two members appointed by the Minister, four members appointed by Council, three elected staff members and one elected student member.

The Academic Board is the University's principal academic body. It is responsible for establishing and maintaining the highest standards in teaching and learning and research in the University. It is also the primary advisory committee of the Council on academic matters.

The University Council has adopted the Voluntary Code of Best Practice for the Governance of Australian Public Universities. In November 2020, the University Council reviewed the University's standing against the revised Voluntary Code. The University is substantially compliant with the Voluntary Code.

### Reporting Entity

The financial statements include Southern Cross University as the parent entity and the consolidated entity comprising Southern Cross University and its controlled entity Southern Cross Campus Services Limited.



## OPERATIONS AND SUPPLY CHAINS

Structure	Operations	Supply Chains
<p>Southern Cross University (ABN 41 995 651 524) is a not for profit statutory body incorporated by the <i>Southern Cross University Act 1993</i> (NSW) with its registered office at Military Road, EAST LISMORE NSW 2480</p>	<p>Southern Cross University is a registered Higher Education Provider in accordance with the <i>Tertiary Education Quality and Standards Act 2011 (Cth)</i> and carries out teaching and research activities.</p>	<p>In 2021, the University directly engaged with 216 suppliers from overseas predominately in the category of business services in the form of student recruitment and research services.</p> <p>Student recruitment services are provided in the majority of cases from the Asia region due to the University's geographical footprint.</p>
<p>Southern Cross University has a wholly owned subsidiary being Southern Cross Campus Services Limited. This subsidiary is a limited by guarantee company and the principal activity of Southern Cross Campus Services Limited during the year was to provide on campus amenities and services to students and staff of the University.</p>	<p>Through Southern Cross Campus Services, the University carries out additional activities including operating food and beverage facilities, catering services, pool, gymnasium and fitness facilities.</p>	<p>The main types of goods and services that the University procure relate to services in the technology and facilities categories. Specifically, the categories of rent, electricity, cleaning and security services along with technology software and network infrastructure.</p> <p>Additionally, the University procures external teaching services and facilities support through established arrangements with partners and other joint arrangements.</p>
<p>The University, as a consolidated group, trades under the following additional key business names:</p> <ul style="list-style-type: none"> <li>- Southern Cross University Health Clinic</li> <li>- The Hotel School (Sydney, Melbourne)</li> <li>- Southern Cross Environmental Analysis Laboratory</li> <li>- Southern Cross Analysis Research Laboratory</li> <li>- Regenerative Agriculture Alliance</li> <li>- SCU Fitness For You</li> <li>- Southern Cross Catering Lismore</li> <li>- The Uni Bar</li> </ul>	<p>The University's arrangements with suppliers are structured in many different ways depending on the nature of the category of spend. Some arrangements are short term in nature and others extended for multiple years.</p>	



	<p>In addition to traditional supplier relationships the University has established long term relationships with partners to operate key strategic functions including teaching services at its metro-based branch campuses, online courses and management of facilities at the Coffs Harbour Campus.</p>	
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## RISKS OF MODERN SLAVERY PRACTICES IN THE UNIVERSITY'S OPERATIONS AND SUPPLY CHAINS

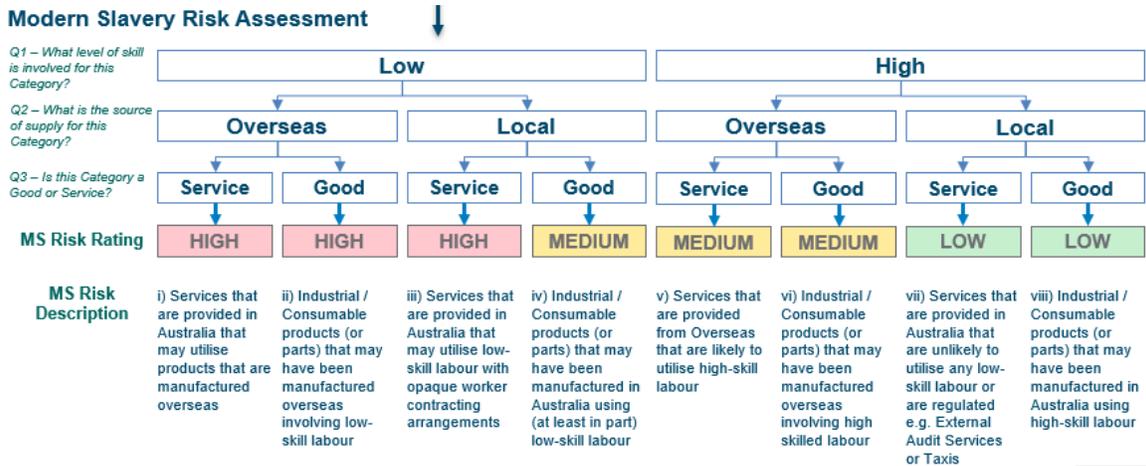
### 2021 Assessment

The outcome from the 2021 Modern Slavery Risk Assessment highlighted ~1% of the vendors the University engages are assessed as having a potential for 'High' risk of Modern Slavery.

<u>SPEND</u>	<u>#SUPPLIERS</u>	<u>#INVOICES</u>
\$111,935	1701	12,389

The University has identified suppliers that are considered to have a potentially high risk of Modern Slavery based on the following criteria:

- i) Services that are provided in Australia that may utilise products that are manufactured overseas
- ii) Industrial / Consumable products (or parts) that may have been manufactured overseas involving low-skill labour
- iii) Services that are provided in Australia that may utilise low-skill labour with opaque worker contracting arrangements





## **ACTIONS TAKEN BY THE UNIVERSITY TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

### **Due Diligence and Screening**

#### **Spend Analysis**

The University continues to screen and identify suppliers that may have Modern Slavery risks embedded in their business practices or supply chains.

For the year ended 31 December 2021 the University has undertaken the following to assess and address Modern Slavery risks:

- Extract Spend Data for the year ended 31 December 2021
- Cleanse supplier names, locations, currency, dates and apply filters for data
- Categorise the Modern Slavery Risk at a Taxonomy 4 Level supplier level for the majority of spend (1701 suppliers).
- Assess taxonomy categorisation and apply Modern Slavery risk rating framework to category
- Review output from Modern Slavery assessment and adjust rating at supplier level (to mitigate incorrect categorisation)

#### **Modern Slavery Supplier Surveys**

The University continues to issue all high-risk suppliers with a questionnaire which provides due diligence over the suppliers' supply chain, international operations, labor recruitment practices and other factors. Additionally, each supplier is required to provide a copy of their Modern Slavery Act Statement, where applicable.

#### **Industry Benchmarking and Collaboration**

The University is a member of the Australian Universities Procurement Network (AUPN) which represents the Australian higher education sector, who work together to improve excellence in procurement practice and in the skills of procurement professionals.

The Australian Universities Procurement Network (AUPN) is working on a sector wide approach for the Act.

The AUPN Modern Slavery Act working group has been established to support the development and implementation of a program of works. As part of the program the AUPN MSA working group the University participates in assessing risks of Modern Slavery through the contribution of supplier data, providing:

- all AUPN universities the opportunity to access shared resources to support requirements under the Act;
- the ability to leverage aggregated data to identify common suppliers
- a trial of the process for requesting and collating data at an aggregated level supporting the requirements under the Act moving forward.



## Agreements, Policies and Procedures

The University has a suite of policies and procedures with a specific focus on the University's supply base and procurement operations to ensure their alignment with the Act. The documentation includes the following:

- 1. Sourcing process documents:**
  - a. Request for Tender Template
  - b. Request for Proposal Template
  - c. Request for Quotation Template
  - d. New Supplier Request Form
  - e. SCU Purchase Order Terms and Conditions
  - f. SCU Modern Slavery Supplier Questionnaire
- 2. Procurement strategy & guideline documents:**
  - a. Purchasing Process Map (Future State)
  - b. Contract Management Framework
  - c. Procurement Policy
  - d. Purchasing Procedures

## Training

The University has developed a Modern Slavery Training Pack that has been initially distributed to members of the University's Procurement Board, with a view to completing a broader training roll out with the support of the University's Human Resources team.

## Reporting incidents or concerns of modern slavery

The University is advising staff, students and parties external to the University to raise concerns about modern slavery, which should be reported to [purchasing@scu.edu.au](mailto:purchasing@scu.edu.au)

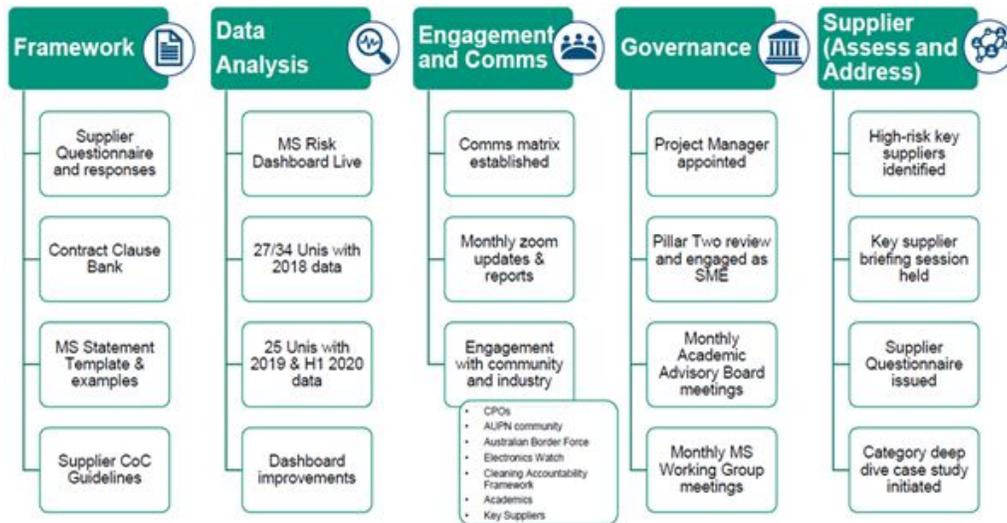


## HOW THE UNIVERSITY ASSESSES THE EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

During the 2021 Calendar Year the University continued the development of its framework for identifying, assessing and mitigating risks of modern slavery.

In collaboration with the broader Higher Education Sector, the Australian University Procurement Network established a Modern Slavery Working Group, of which the University is a part, that delivered and developed the following across the sector:

- Modern Slavery Risk Framework
- Data Analysis
- Engagement and Communications
- Governance
- Supplier Assessment and Action



The AUPN working group, in partnership with software provider FRDM, delivers a technology solution that supports collaboration of University members to gather and interrogate supplier data, identify risk, focus resources, inform action, and measure effectiveness.

FRDM is a supply chain technology company that is transforming how businesses identify, monitor and mitigate social and environmental risks in their global supply chains via dashboard reporting which is still in its development stage

**From:** [Murray d'Almeida](#)  
**To:** [Tracy Manning](#)  
**Cc:** [Murray d'Almeida - 2 \(Dalmeida1948@icloud.com\)](#); [Sandra McPhee AM \(sandra.v.mcphee@jpmorgan.com\)](#); [Sandra McPhee](#); [Tyrone Carlin](#); [Belinda Atkinson](#); [Office of the VC](#)  
**Subject:** Re: Chancellor's Committee Flying Minute - Modern Slavery Act Statement  
**Date:** Tuesday, 28 June 2022 2:25:03 PM

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Good afternoon Tracy, I would like to confirm I am in accord with the flying minute. I am on the road but will sign the minute and return when I am back in my office this evening. Please advise if my email confirmation will suffice until I return the signed documents. Regards,  
Murray

Sent from my iPhone

On 28 Jun 2022, at 2:10 pm, Tracy Manning <[tracy.manning@scu.edu.au](mailto:tracy.manning@scu.edu.au)> wrote:

Good afternoon Chancellor's Committee members,

A gentle reminder to submit your vote for this flying minute, which is due today.

Kind regards,

**Tracy Manning**

Administrative Officer (Council)  
Governance Services

**Southern Cross University**

Lismore campus

T: 02 6626 9191

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**From:** Tracy Manning <>  
**Sent:** Friday, 24 June 2022 10:52 AM  
**To:** Andrew Rose <[andrew.rose@scu.edu.au](mailto:andrew.rose@scu.edu.au)>; Murray d'Almeida - 2 (Dalmeida1948@icloud.com) <[Dalmeida1948@icloud.com](mailto:Dalmeida1948@icloud.com)>; Murray d'Almeida 1 (murray@dalmeida.com.au) <[murray@dalmeida.com.au](mailto:murray@dalmeida.com.au)>; Sandra McPhee AM (sandra.v.mcphee@jpmorgan.com) <[sandra.v.mcphee@jpmorgan.com](mailto:sandra.v.mcphee@jpmorgan.com)>; Sandra McPhee AM (sandra@smcphree.net) <[sandra@smcphree.net](mailto:sandra@smcphree.net)>; Tyrone Carlin (Tyrone.Carlin@scu.edu.au) <[Tyrone.Carlin@scu.edu.au](mailto:Tyrone.Carlin@scu.edu.au)>  
**Cc:** Kazia Lombardo <[kazia.lombardo@scu.edu.au](mailto:kazia.lombardo@scu.edu.au)>; Belinda Atkinson (Belinda.Atkinson@scu.edu.au) <[Belinda.Atkinson@scu.edu.au](mailto:Belinda.Atkinson@scu.edu.au)>; Office of the VC <[ovc@scu.edu.au](mailto:ovc@scu.edu.au)>; Chancellor <[chancellor@scu.edu.au](mailto:chancellor@scu.edu.au)>  
**Subject:** Chancellor's Committee Flying Minute - Modern Slavery Act Statement  
**Importance:** High

Good morning Chancellor's Committee members,

A flying minute relating to the Modern Slavery Act Statement for the year ended 31 December 2021 is now available in Diligent Boards for your consideration.

To access it, please log in to Diligent Boards to view this new material and submit your vote. A direct access link is available below for your convenience:

<https://director.diligentboards.com/s/SouthernCrossUniversity/d/435/p/1?b=NKN>

**Please submit your vote before 5.00 pm, Tuesday, 28 June 2022.**

Kind regards,

**Tracy Manning**

Administrative Officer (Council)

Governance Services

Lismore campus

T: 02 6626 9191

<image001.jpg>

**Lismore, Gold Coast, Coffs Harbour**

[www.scu.edu.au](http://www.scu.edu.au)

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Southern Cross University acknowledges and pays respect to the ancestors, Elders, and descendants of the Lands upon which we meet and study.