



University of
**Southern
Queensland**

Modern Slavery Statement **2022**

ABN 40 234 732 081

Message from the Vice-Chancellor

The University of Southern Queensland recognises that modern slavery is a global issue and is committed to taking a leading role in improving transparency and addressing the risks of modern slavery in our supply chain and operations.

At the University of Southern Queensland, we are united by our three values of Respect, Integrity and Excellence. We respect each other and value diversity of people, culture and ideas within our community; we act with transparency, consistency and fairness and apply the highest personal, professional and ethical standards; and we work together to excel in all that we do as a University community.

Through our actions, we live these values and it is against them that we hold ourselves and others accountable. This is why we are committed to operating responsibly and acknowledge our responsibility to better understand the complex global issue of forced labour and the exploitation of vulnerable workers.

Through its Modern Slavery Working Group, the University focuses on actions that identify, address and mitigate the risks of modern slavery in our operations and throughout our supply chains. These actions are outlined in the following statement, and detail how we will continue to work with our employees, suppliers, and industry partners to mitigate the risks of modern slavery.

There is no place for modern slavery in the Australian community or in the global supply chains of Australian goods and services and the University of Southern Queensland is committed to the long term change required to prevent it from continuing.

This statement was approved by the Council of the University of Southern Queensland on 8 May 2023.



Professor Geraldine Mackenzie

Vice-Chancellor, University of Southern Queensland
8 May 2023

The University of Southern Queensland acknowledges the First Nations of southern Queensland and their ongoing connection to Country, lands, and waterways. Further, we recognise Aboriginal and Torres Strait Island peoples as the first educators and researchers of Australia. We pay deep respect to Elders past and present.

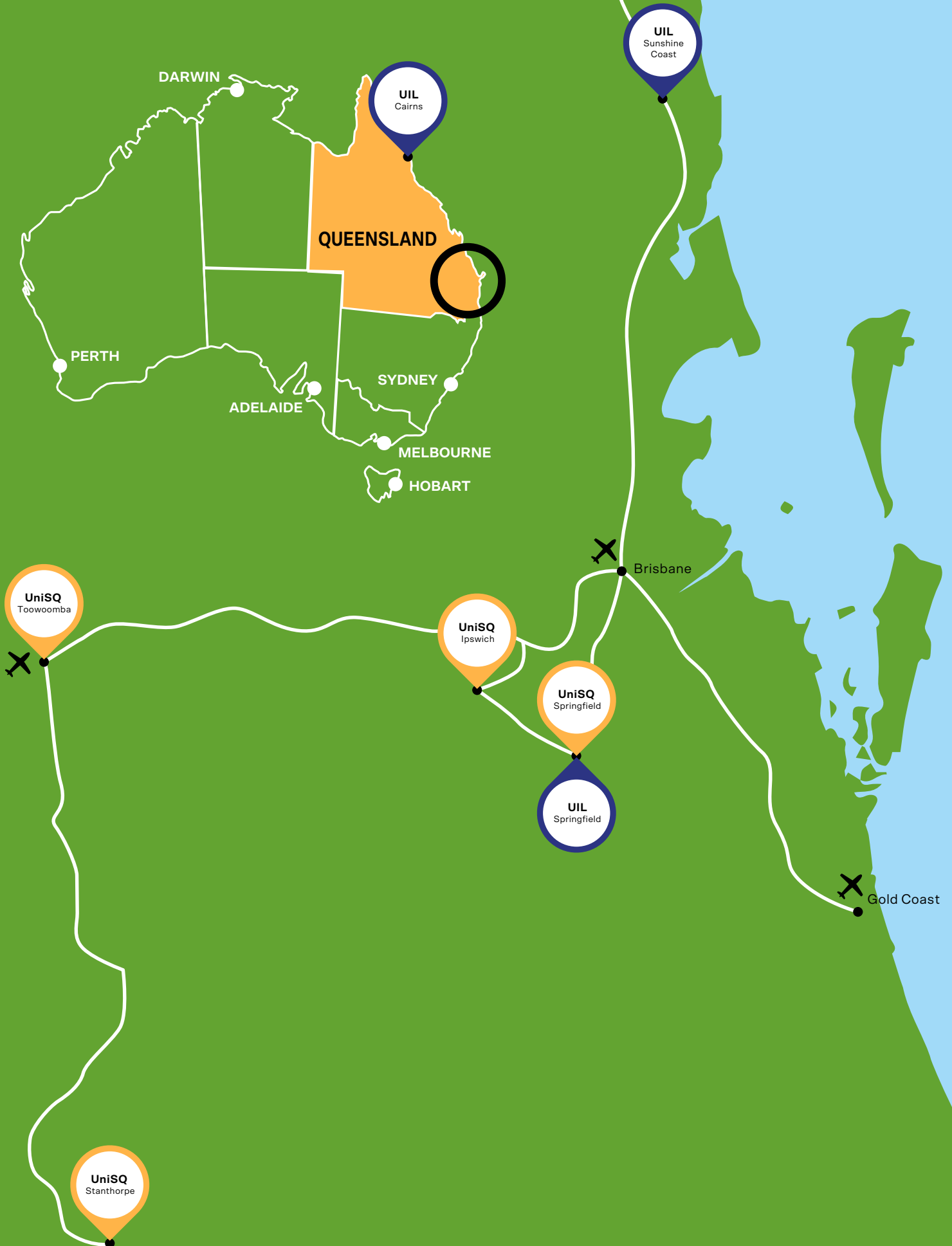
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Modern slavery means conduct which would constitute:

- (a) an offence under Division 270 or 271 of the Criminal Code; or
- (b) an offence under either of those Divisions if the conduct took place in Australia; or
- (c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- (d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

Campus Locations



About the University

The University of Southern Queensland is a statutory body established under the University of Southern Queensland Act 1998. The University of Southern Queensland Act enables the University to deliver the following:

- Provide university standard education;
- Provide facilities for, and encourage, study and research;
- Encourage the advancement and development of knowledge, and its application to government, industry, commerce and the community;
- Provide courses of study or instruction to meet the needs of the community;
- Confer higher education awards;
- Disseminate knowledge and promote scholarship;
- Provide facilities and resources for the wellbeing of the University's employees, students and other persons undertaking courses at the University.

The University of Southern Queensland is headquartered at the Toowoomba campus; has two campuses west of Brisbane – Springfield and Ipswich – and operates the Queensland College of Wine Tourism (QCWT) located at Stanthorpe. The QCWT is a joint venture with the Queensland Government.

In December 2022, the University acquired the Union Institute of Language (UIL), a provider of quality short and long term English courses, which conducts teaching operations in Springfield, Cairns and the Sunshine Coast.

In addition to on-campus study, the University builds on over 50 years as a provider of higher education programs to students studying off-campus across Australia and overseas by enabling globally connected education, unconstrained by time and location. Some two-thirds of the University's students study fully online both within Australia and overseas.

The University provides products and services including the delivery of higher education, research activities, health and wellness programs, on-campus residential accommodation and a range of support services for employees and students.

The University of Southern Queensland is registered as a charity with the Australian Charities and Not-for-profits Commission. It employs 1589 full and part-time employees within Australia and one international employee based in the United Kingdom. These figures exclude casual workers.

The University undertakes a range of research activities and specialises in the flagship areas of Agriculture, Health, Space and Defence as well as regional development. University research is undertaken within a Research Code of Conduct which includes robust frameworks and procedures for the ethical management of animal and human research.



Supply chains

The University's supply chains are a mix of global and domestic suppliers and are generally sourced via a competitive procurement process.

Suppliers range from locally based small to medium enterprises to multinational organisations and where possible, the University leverages Queensland whole of government standing offer arrangements. For suppliers of high-volume products, or where a supplier has an identified risk in terms of product, service provision, or geographic risk for quality assurance standards, the University implements comprehensive contractual arrangements.

The University procurement strategy includes recognition of consolidated supply categories for the purposes of applying individual strategies where internal business practices dictate.

Supply categories of goods and services can be grouped as:

- business services;
- property and facilities;
- research and teaching; and
- technology.

The University's procurement planning framework includes a Corporate Procurement Plan, with additional plans sitting beneath it. To support the University's supplier profiling activities, the University initiated a supplier questionnaire strategy with initial roll out to existing University established standing offer arrangements and panel suppliers and will continue integration as part of its standard business processes.

The University has invested in new systems for better transparency of process and collection of supply data and applies a systematic approach to all procurement practices including risk.

Products

Products purchased by the University range from daily consumables through to small and large assets and are sourced from the Darling Downs and South East Queensland region, nationally and overseas. A number of research related products are sourced from overseas where appropriate, and are generally specialised pieces of equipment which may require fabrication.

Services

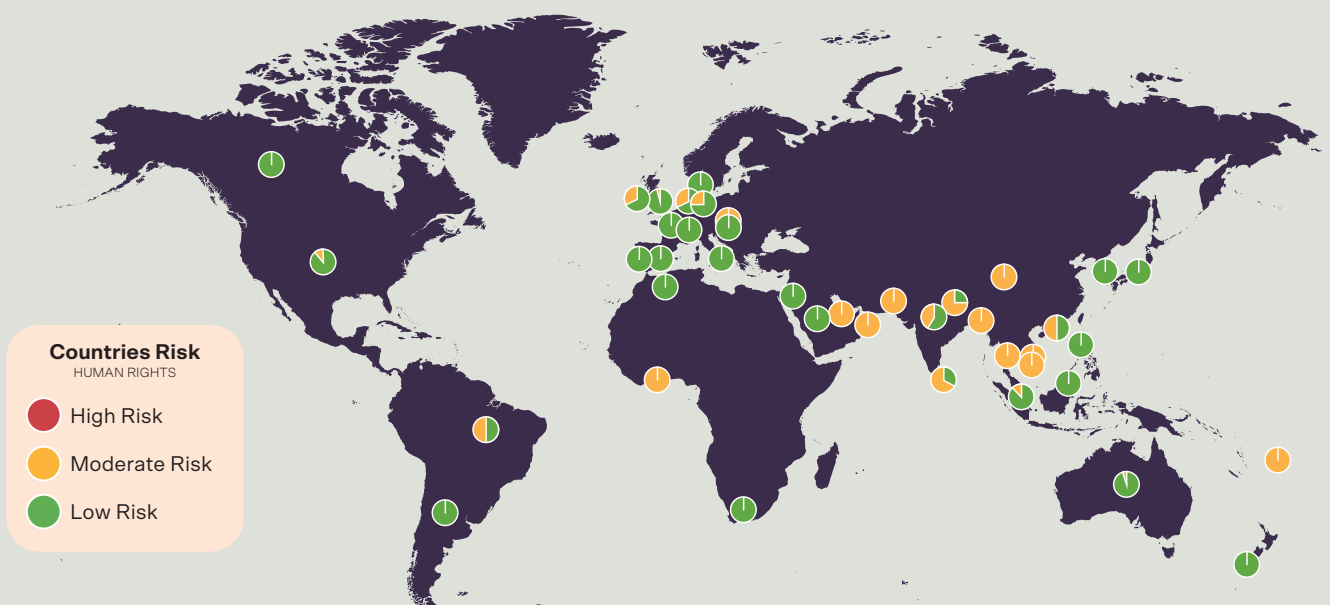
Services procured by the University include but are not limited to various disciplines of professional services, maintenance services and employment contract hire.

Products and services used by indirect suppliers in the entity's supply chains

Products and/or services procured by indirect suppliers in the University supply chain are governed by head agreements which may require the supplier to comply with University procurement requirements as if they were a party to the head agreement.

Geographical Risk

adapted from the University's FRDM tool dashboard



Modern slavery risks in operations and supply chains

The University assessed its modern slavery risks through consultation with internal stakeholders, combined with knowledge of high-risk products and services as documented by the Australian Border Force, Anti-Slavery Australia and the Global Slavery Index. The following table outlines key risks identified through the process.

	DESCRIPTION OF MODERN SLAVERY RISK
Operations	<p>The University of Southern Queensland is a global organisation that primarily conducts business within Australia and areas where modern slavery risk is considered low, however business dealings with organisations and companies from around the world may expose the University to regions that have a higher risk of modern slavery.</p> <p>The University has potential exposure to modern slavery through activities such as international teaching and student recruitment, research and consulting as examples. The University has a comprehensive policy library to provide standing operating protocols and reduce risks in its operations. The library includes, but is not limited to: the Code of Conduct; Recruitment, Selection and Appointment Policy; Procurement Policy; Work Health and Safety Policy; Risk Management Policy and Procedure; and the Contractor Management Procedure.</p> <p>Research activities are widespread and varied across numerous sectors, however high risk industries such as agriculture, are a key focus for the University. Visibility and management of all research activities are reliant on strict adherence to University policies, research ethics, Australian and international customs, laws and directives, contractual obligations, as well as the research objectives. Risks may be additionally mitigated through licensing, training, supervision and ongoing contract management.</p>
Supply chain	<p>Lack of supply chain visibility is a key risk for the University, as are the following activities within the supply chain.</p> <p>Cleaning Cleaning is considered a high-risk industry due to the vulnerability of many workers in this occupation. They frequently belong to at-risk groups such as women and girls, migrants and refugees and have low visibility, or barriers accessing legal protection. Although cleaning activities at the University are managed through contractual arrangements and follow the University's standard procurement process, the University recognises this remains a high-risk area.</p> <p>Construction Construction industry risks exist through the procurement of high-risk products such as bricks, carpet and timber. The University's construction risks are mitigated through mandatory assessment criteria which require successful service providers to attain Quality Assurance to AS9001 Standard for major capital projects.</p> <p>Garment and textiles The University procures a range of garments and textiles including, but not limited to, employee uniforms, student uniforms, personal protective equipment and laboratory garments. Due to the prevalence of cotton in many garments and textiles, this is a risk for the University.</p> <p>Technology The University has a moderate spend in technology goods and services. Given its reliance on technology and the geographic and other associated risks with technology, this is an area of the University's supply chain which requires ongoing investigation.</p>
Operations and supply chain	<p>Working in a competitive global market has highlighted potential modern slavery risks related to off-shore business arrangements for the provision of goods or services from other countries. The University has arrangements with educational partners, suppliers, recruitment agents, marketing and promotional suppliers and general goods and services providers, all of whom provide services for conducting successful international operations in education. The University has a dedicated International portfolio which is responsible for the engagement and management of the University's overseas education service providers.</p>



Action taken to assess and address risks

The following actions were taken to mitigate modern slavery risks within the University's operations and supply chain.

	ACTIONS TAKEN
Operations	<p>Internal Control Certifications Modern slavery declarations were incorporated into annual Internal Control Certifications provided by Financial Delegates.</p> <p>Risk workshops and stakeholder engagement The Modern Slavery Working Group continued to liaise with key University stakeholders in 2022 and facilitated a risk identification workshop with key members of its Information and Communication Technology (ICT) Services team.</p> <p>Further engagement was undertaken through various internal stakeholders and committees including: the Senior Leadership Group, Enterprise Services Division Executive, Vice-Chancellor's Executive, Audit and Risk Committee, and University Council; and externally through suppliers and professional bodies.</p> <p>Complaints management review The Modern Slavery Working Group provided input on the draft Complaints Management policy suite which was circulated for University review.</p>
Supply chain	<p>Sector networking and collaboration The University's ongoing membership with the Australian Universities Procurement Network (AUPN) has enabled the University to adopt a coordinated approach to gathering and analysing procurement data through a dashboard, assessing risks, developing training materials, supplier questionnaires and various other resources. This was complemented by the University's engagement of an external consultant to provide procurement analytics, converting University spend data to an output categorised according to AUPN taxonomy (a hierarchy of spend categories), enabling upload to the AUPN Modern Slavery FRDM tool.</p> <p>FRDM Tool The FRDM tool enables University supply chain data to be monitored through a dashboard view of suppliers, industries, and countries risks. This technology provides supplier survey tools, alerts on key risks and a range of analytics. The FRDM tool has been established to gain deeper understanding of the University's supply chains and risks associated with suppliers, their products and geographical locations.</p> <p>Cleaning Accountability Framework Industry specific framework affiliation requirements were incorporated into procurement activities related to the University's cleaning contract.</p> <p>Supplier questionnaires A supplier questionnaire was developed in 2021 and was continued to be circulated to suppliers in the 2022 reporting year. Data captured through the supplier questionnaire has been incorporated into the University's Contract Management System, enabling enhanced supplier segmentation.</p>
Operations and supply chain	<p>Roadmap and Action Plan The University's Modern Slavery Prevention Roadmap progressed to initial endorsement and is expected to be adopted early 2023. The Action Plan will continue to be progressed and has been identified as a future action.</p> <p>Training and education The University expanded its training and awareness activities, with a key focus on stakeholders in positions that may be exposed to modern slavery risk. 52 employees employed in the areas of executive and management; human resources; IT support; finance; and risk, completed paid online modern slavery training in 2022. Supplementary modern slavery training is available to all University employees and students and will continue to be expanded in the future.</p>

Action taken to assess and address risks *Cont.*

Actions taken as a result of COVID-19

The University took the following approach to ensure continued progress on addressing modern slavery risks.

- During peak outbreaks, the Vice-Chancellor's Executive and University Pandemic Preparedness Working Group met regularly to monitor and control business continuity requirements.
- Training sessions and stakeholder meetings were facilitated online wherever possible to limit exposure and enable continued progress despite travel restrictions brought about by the pandemic.

Remediation Process

The remediation process commences through the organisational Complaints Management Framework. Complaints can be made to specific officers or anonymously. The Director (Integrity & Professional Conduct) coordinates the University's response.

It is anticipated that the University's complaints management process will be further enhanced in 2023 following the implementation of a new complaints management system.



Continuous Improvement Approach

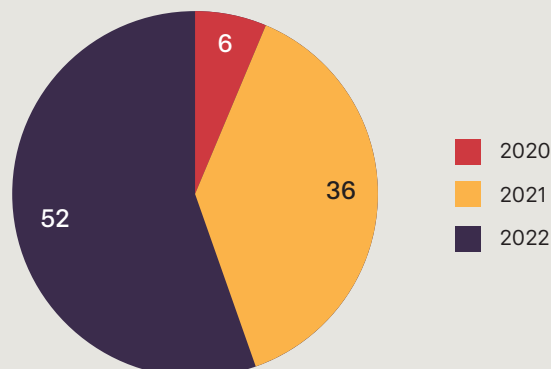
Modern slavery risks require ongoing monitoring and measurement. Through enhanced use of the FRDM tool and ongoing stakeholder engagement, the University will continue to improve its approach to identify and mitigate risks through risk assessments, supplier relationships, and in partnership with Government agencies and other third-party organisations.

Due Diligence

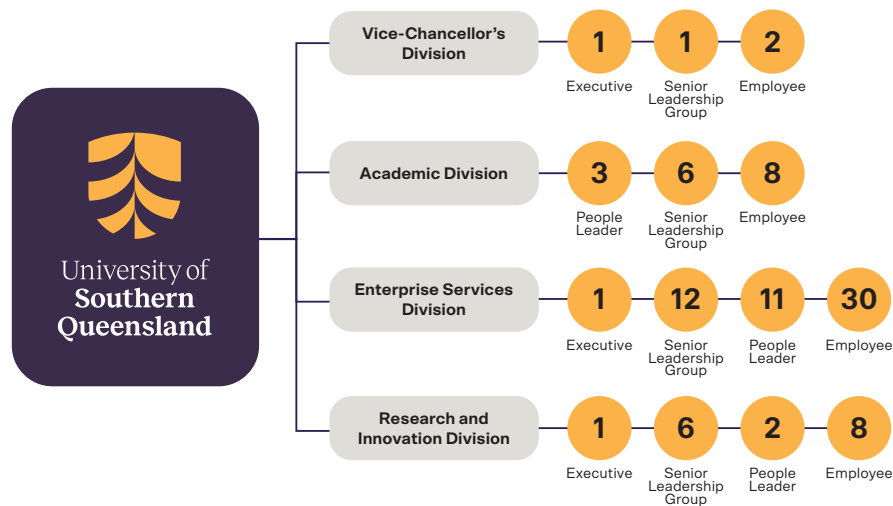
To strengthen the due diligence process, the University undertook the following key actions to identify and assess risks.

- Through training, risk workshops and other engagement activities, additional risks and controls were identified, as were several key stakeholders.
- Supplier segmentation activities continued to ensure greater understanding of suppliers in each category.
- Data captured through the supplier questionnaire was incorporated into the University Contract Management System.
- Sector related risks continue to be reviewed and discussed with key stakeholders to consider suitable controls to eliminate exposure.

UniSQ employee completion of paid online modern slavery training



UniSQ employee completion of paid online modern slavery training by division and position level



Future actions

The following modern slavery prevention activities will be embedded within the University with support from the Modern Slavery Working Group.

FUTURE ACTIONS	
Operations	<ul style="list-style-type: none"> Integrate use of the FRDM tool into University processes. Further identify risks and rank according to significance, defining both short and long-term actions. Incorporate modern slavery considerations into University policies and procedures where appropriate. Review procurement training competencies against position requirements and incorporate modern slavery content where possible. Facilitate ongoing modern slavery training for University employees. Ensure audit findings pertaining to modern slavery risks are shared with the Modern Slavery Working Group.
Supply chain	<ul style="list-style-type: none"> Review Queensland Government Ethical Supplier list/resources against University of Southern Queensland suppliers, existing procurement and contractual arrangements, and resources. Continue to embed modern slavery guidance resources released by Queensland Government Procurement.
Operations and supply chain	<ul style="list-style-type: none"> Finalise the Modern Slavery Prevention Roadmap and Action Plan. Gain a deeper understanding of modern slavery risks within the University's entities. Implement additional performance metrics for both the University and its suppliers to measure/mitigate modern slavery risks. Develop additional resources for both employees and suppliers such as pre-contract guidance documents, reporting requirements for actual and suspected instances of modern slavery, advocacy support tools and supplier templates. Increase monitoring and evaluation activities. Strategically review pre-existing longer-term contracts for compliance and consider changes where required. Undertake further assessment activities to address high-risk services.

Assessing effectiveness of actions

Modern slavery controls continue to be assessed and appropriate actions are identified for mitigating residual risks. The effectiveness of these actions is measured through analysis of operational and supply chain data including: risks assessments and regular reporting; performance metrics; ongoing engagement and review of suppliers, internal audits; and independent external reviews.

Ongoing participation in sector and government groups and multi-stakeholder initiatives will enable benchmarking and information sharing to ensure the University's actions are effective.

Through stakeholder workshops and targeted training, the University intends to increase awareness of modern slavery risks in its operations and supply chains. These stakeholder workshops have provided valuable insight into University activities and have validated the effectiveness of actions taken to strengthen its approach.

Consultation

The Modern Slavery Working Group, composed of representatives from Finance and Business Solutions (incorporating Business Services, Procurement and Executive Support), and with assistance from Integrity and Professional Conduct, Legal Services, the People Portfolio, the University Secretary and the Chief Financial Officer, undertook extensive consultation with key stakeholders and external agencies. This consultation aimed to identify the University's inherent risks, its scope of operations and supply chains, to report on current practices and future priorities for mitigating modern slavery risk.

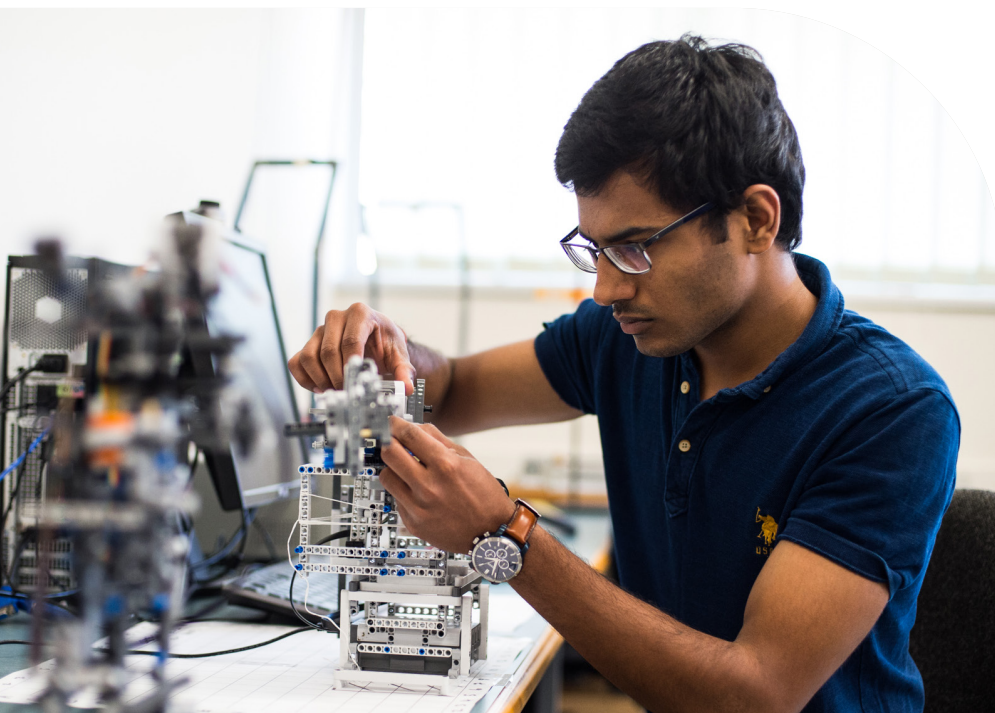
Following the previous reporting period, additional focus was applied to stakeholder awareness to ensure adequate consultation and communication with suppliers, external agencies and University employees.

Internal stakeholders were engaged through training workshops and various committees to highlight the prevalence of modern slavery and identify opportunities for eliminating exposures.

The following stakeholders were consulted during the 2022 reporting period.

- The Senior Leadership Group;
- Enterprise Services Division Executive; and
- Vice-Chancellor's Executive.

Consultation with University stakeholders will be ongoing as identified actions are implemented.





Summary

The University acknowledges it is still maturing its processes for identifying and eliminating modern slavery risk and continues to make progress within its operations and supply chains. The University is committed to future improvement and will continue to work with its employees, suppliers, and industry partners to ensure it continues its ongoing commitment to eliminating modern slavery.

Where to go for more info

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