



# Modern Slavery Statement 2021



University of  
South Australia

# Introduction

The University of South Australia ('University') is pleased to publish our modern slavery statement, which has been prepared for the financial year ending 31 December 2021.

We continue to recognise the inherent risks of modern slavery practices in our business dealings and procurement supply chains. We also recognise our ongoing responsibility to ensure that we do not facilitate modern slavery-like practices. This statement describes the progress we have made since our first statement, and the further steps we are taking to identify and address modern slavery risks.

## Reporting entity

The University of South Australia provides this modern slavery statement in accordance with the Modern Slavery Act 2018 (Cth) ('**Modern Slavery Act**'). The statement covers the operations of the University and its wholly-owned subsidiaries, UniSA Health Pty Ltd and UniSA Ventures Pty Ltd.

# Summary of progress

The University is committed to continually improving our awareness and management of any modern slavery risks in our operations and procurement supply chains. Since the University's first modern slavery statement, we have made the following progress:

- We have updated invitation to bid documents with mandatory questions relating to modern slavery awareness, management programs, identified risks and resultant action.
- We seek that prospective suppliers confirm their commitment to identifying modern slavery in their supply chains and managing any associated risks.
- We have introduced standard contractual provisions that require all newly-appointed suppliers to take reasonable steps to identify and address risks of modern slavery practices.
- We have updated our procurement instructions to require tender panels to consider supplier responses to our modern slavery questions and how the University will work with the supplier to address any risks.
- Our purchase agreement templates include a range of modern slavery identification and reporting requirements, commensurate with the value of the contract and an assessment of the modern slavery risk profile.
- We have updated our procurement instructions to require University staff to record modern slavery risks in their local risk registers, which are reported through to the Council – the University's principal governing body – in accordance with the University's Risk Management Framework.
- We helped to lead sector-wide collaboration through the modern slavery working group for the Australian Universities Procurement Network ('AUPN'), which is supporting member universities to meet the challenge of human rights transparency and risk management in their supply chains.
- We further helped to support sector-wide collaboration through representation on an Academic Advisory Board to advise and enrich the AUPN's approach to mitigating modern slavery risks.

- In collaboration with 33 other participating members, we have invested in a new enterprise-grade technology that overlays the University's own purchasing data with information about the inherent risks of certain goods or services.

The University has also continued its contribution to the global understanding of modern slavery risks and the effectiveness of reporting through world class research which, in 2021, included:

1. the effectiveness of entity actions to eliminate modern slavery risks, from inductive analysis of the first 255 modern slavery statements published on the Australian Modern Slavery Register<sup>1</sup>, and
2. how blockchain technology might be used to reduce vulnerability and risk in migrant worker populations<sup>2</sup>.

---

<sup>1</sup> Katherine L. Christ, Roger L. Burritt, *The British Accounting Review*, <https://doi.org/10.1016/j.bar.2021.101065>

<sup>2</sup> Katherine L. Christ, Christine V. Helliar, *Journal of Business Research*, <https://doi.org/10.1016/j.jbusres.2021.03.065>

# Impact of COVID-19 on the University's modern slavery program

The COVID-19 pandemic impacted the University in various ways:

- Border closures and travel restrictions prevented many international students from attending the University's campuses.
- Some of the University's activities were conducted online and University staff were, at times, encouraged or required to work from home.
- The University introduced a workforce preservation strategy that included a range of prudence-related measures intended to reduce or avoid non-essential expenditure. This resulted in a reduction in non-salary expenditure and the overall number of suppliers used in 2021.
- A challenging employment market impacted the University's ability to progress its modern slavery risk management program to the extent that was originally intended.

# Operations and structure

## Structure

The University was established in 1991 by the University of South Australia Act 1990 (SA), through the amalgamation of the South Australian Institute of Technology and the Magill, Salisbury and Underdale campuses of the South Australian College of Advanced Education.

The University operates across six South Australian campuses located in the Adelaide metropolitan area (City East, City West, Magill and Mawson Lakes) and the regional areas of Mount Gambier and Whyalla.

The University's community at the end of 2021 was comprised of:



**37,873**

students



**2,598\***

staff (\*FTE)



**233,534**

alumni

The University delivers study programs for an industry-informed curriculum and conducts relevant, informed research through seven Academic Units:

- UniSA Allied Health & Human Performance
- UniSA Business
- UniSA Clinical & Health Sciences
- UniSA Creative
- UniSA Education Futures
- UniSA Justice & Society
- UniSA STEM.

Additionally, UniSA Online offers a suite of undergraduate degrees across all seven Academic Units which are designed specifically for online learning.

The University has a research institute – the Future Industries Institute – and over 30 research centres and concentrations.

The academic enterprise is enabled through 23 professional administrative support units, delivering services across the University including finance, information technology, human resources, facilities management, student and academic support and international services.

Further information on the University's business, including joint operations and joint ventures, can be found in the University's [Annual Review](#).

## Operations

The University operates through a partnered, end-user informed culture of teaching and research with a commitment to outstanding service, continuous improvement and sustainability.

The University offers more than 200 world-class degrees designed in partnership with industry and professions across a wide range of study and career areas. The University educates and prepares global learners from all backgrounds, instilling professional skills and knowledge and the capacity and drive for life-long learning, awarding over 7,500 parchments in 2021.

The University undertakes research that is inspired by global challenges and opportunities, delivers economic and social benefits, and which informs teaching.

The University collaborates with over 2,500 industry partners, including approximately 500 international relationships. These collaborations include partnering with institutions in China, Hong Kong (SAR) and Singapore to deliver University courses.

### UniSA Health Pty Ltd

UniSA Health contributes to quality teaching at the University through the provision of clinical placements for undergraduate and postgraduate students, and provides professional development opportunities to academic staff who are qualified practitioners in their fields.

### UniSA Ventures Pty Ltd

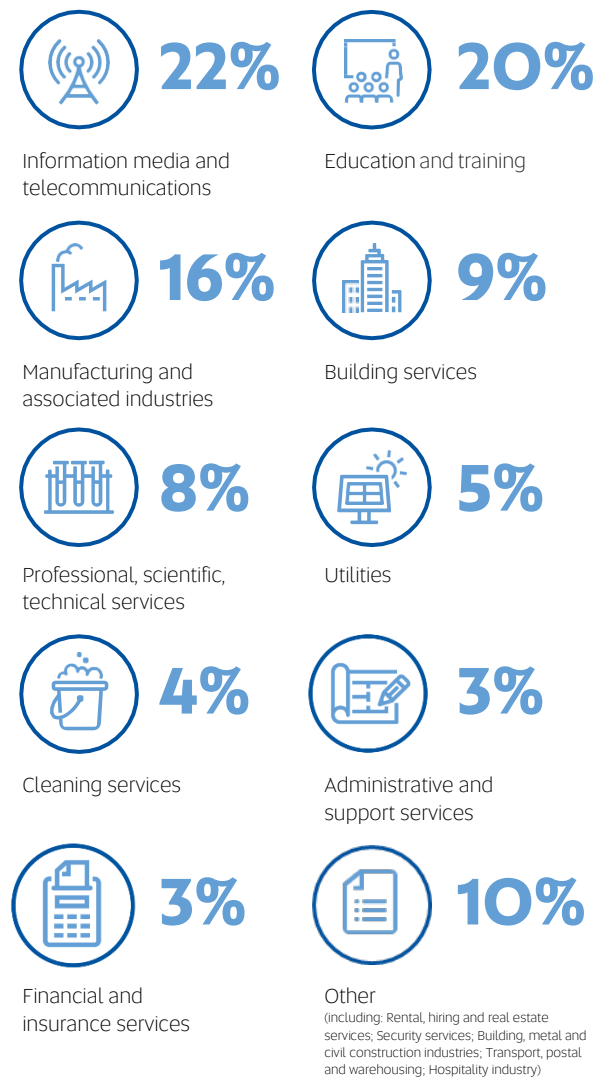
UniSA Ventures is the University's technology commercialisation and investment management company.

# Supply chains

## University of South Australia

A variety of industries support the University's delivery of teaching and research. In 2021, the University transacted with approximately 3,300 suppliers within Australia and overseas (excluding payment card merchants).

Distribution of spend by industry (2021)



Almost 92% of the University's spend on goods and services was with Australian-based suppliers, with the remainder being with suppliers predominantly located in the United States, the United Kingdom, Germany, Switzerland, Singapore, New Zealand and the Netherlands. Spend with all other countries compose 1% of the total spend.

The University also engaged overseas education agents for the promotion of the University's programs to potential students in over 50 countries, including India, China, Vietnam, Sri Lanka, Nepal and Hong Kong (SAR). The University undertakes a rigorous due diligence process in the appointment of new education agents, which includes the taking up of third-party reference checks. Agents are engaged under contracts which impose obligations on the agent to comply with ethical requirements including specific reference to modern slavery provisions and include an annual performance review.

### UniSA Health Pty Ltd

In 2021, UniSA Health primarily dealt with seven main suppliers of medical equipment, medical supplies and office supplies. All of these suppliers are based in Australia.

### UniSA Ventures Pty Ltd

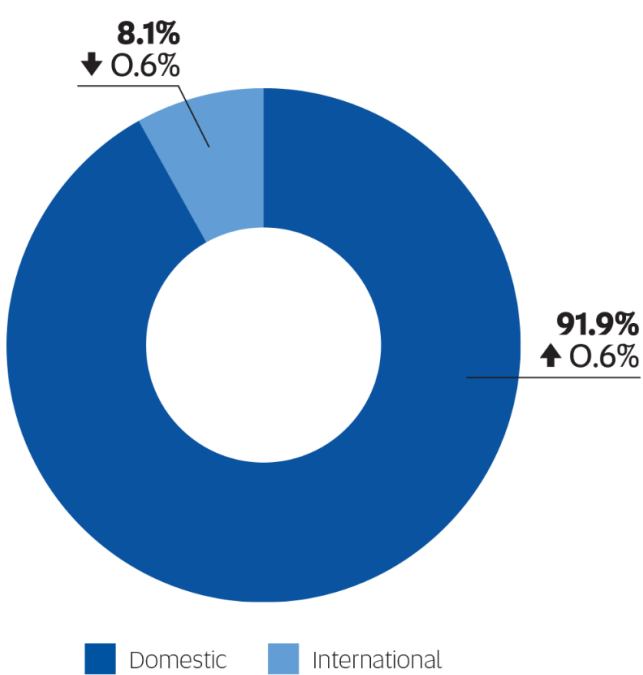
UniSA Ventures' supply chains include intellectual property management, investment management, customer service, marketing, finance and corporate services.

In 2021, UniSA Ventures engaged with 50 suppliers in Australia and overseas. UniSA Ventures' suppliers are predominantly located in Australia, with other suppliers being located in the United Kingdom and China.

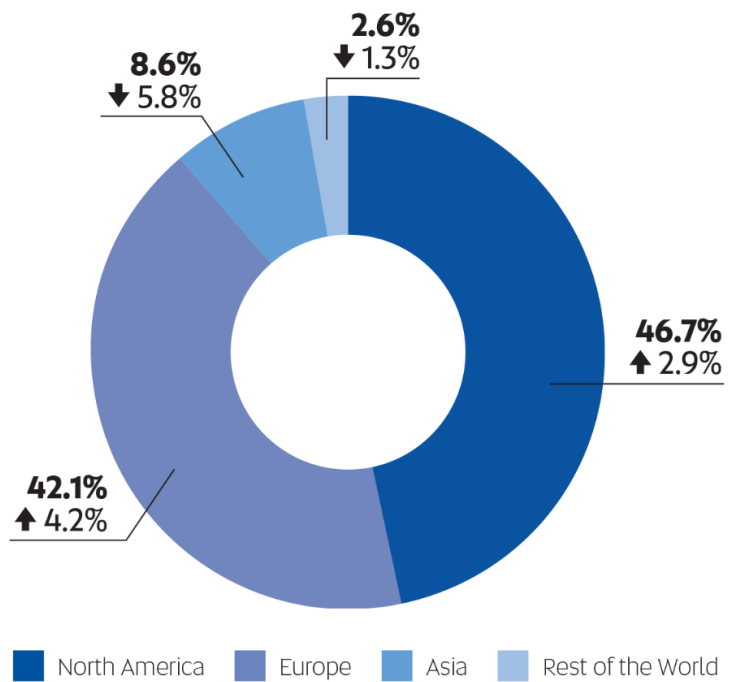
**Top 10 Countries by Spend (2021)**



**Domestic vs International Spend (2021)**



**International Spend by Region (2021)**



# Governance

The University's principal governing body is the Council and the responsibilities of the Council include:

- overseeing and reviewing the management of the University and its performance,
- establishing policy and procedural principles consistent with legal requirements and community expectations, and
- approving and monitoring systems of control and accountability.

The Council has approved strategies to monitor the University's compliance with legislation and other obligations of the University. The University applies a tiered approach to ensure adherence with legislative and compliance obligations for the University.

The University's Risk Management Framework establishes an objective mechanism by which risks can be identified and addressed, with regular reporting to the Council.

The University complies with Commonwealth and State laws relating to employment conditions and the *University of South Australia Enterprise Agreement 2019* and *Senior Staff Collective Agreement 2006* (as amended or replaced). The University also maintains respectful and constructive engagement with the local branches of the National Tertiary Education Union and the Community and Public Sector Union, as well as other relevant industrial parties.

In its research activities, the University complies with the Australian Code for the Responsible Conduct of Research 2018 and the National Statement of the Ethical Conduct of Human Research (updated 2018) and other relevant legislation, including the Defence Trade Controls Act 2012, the Foreign Influence Transparency Scheme Act 2018, the Autonomous Sanctions Act 2011 and Australia's Foreign Relations (State and Territory Arrangements) Act 2020. All research undertaken by the University involving human research must be reviewed and approved by a Human Research Ethics Committee.

A modern slavery reference group oversees the University's modern slavery risk management program.



# Risks of modern slavery practices in our operations and supply chains

The University recognises the inherent risk that modern slavery practices could exist in its business dealings and procurement supply chains, and will continue to refine processes that will identify and address modern slavery-like practices.

The University is a member of the Australian Universities Procurement Network ('AUPN') – an initiative of Higher Education Services Pty Ltd, a subsidiary of Universities Australia.

The University is participating in a dedicated AUPN program focused on providing and supporting tools to identify modern slavery risks in the higher education sector. These tools assist AUPN members to independently identify and manage their respective modern slavery risks.

Since the last statement, and through its membership of the AUPN and in collaboration with 33 other participating members, the University has invested in an enterprise-grade supply chain mapping technology. This will leverage product genome and trade databases with global risk indicators to identify the inherent modern slavery risks for certain purchased goods or services for the University. This tool will be implemented in 2022, and is expected to provide the University with a far greater understanding of modern slavery risks in the University's procurement supply chains.

# Actions to assess and address modern slavery risks

Through this reporting period, the University has continued to develop its modern slavery risk management program. This program, along with the University's broader policies and procedures, applies to the University and its subsidiaries, UniSA Health and UniSA Ventures.

Specific actions within the risk management program are discussed below.

## Governance

The University previously reported that it had:

- established a reference group comprised of senior staff to oversee the University's modern slavery risk management program,
- raised awareness through training and information sessions, and supporting resources for University staff about modern slavery, the Modern Slavery Act, the University's obligations and its multi-faceted approach to identifying modern slavery risks and how they will be managed, and
- participated in awareness sessions across the higher education sector.

Since the last statement, the University has:

- continued to participate in industry updates and sector-wide awareness sessions, including those at which the Australian Border Force has provided feedback on the first round of modern slavery statements and guidance for future statements, and
- updated procurement instructions for University staff to record modern slavery risks in local risk registers, which are reported through to the Council – the University's principal governing body – in accordance with the University's Risk Management Framework.

The University continues to make progress with:

- reviewing procurement procedures and associated documentation to address modern slavery, and
- incorporating in the review or development of other policies and procedures, such principles and strategies as are appropriate to addressing modern slavery.

## Industry Collaboration

The University was represented on a small team that composes the modern slavery working group for the AUPN, which is supporting member universities to meet the challenge of human rights transparency and risk management in their supply chains.

The University was also represented on an Academic Advisory Board to advise and enrich the AUPN's approach to mitigating modern slavery risks.

In collaboration with 33 other participating AUPN members, the University has invested in a new enterprise-grade technology that overlays the University's purchasing data with information about the inherent risks associated with certain goods or services. Throughout the next reporting period, participating members will be provided with the following capabilities:

- Modern slavery dashboard and reporting
- Modern slavery awareness and understanding, including global developments
- Supplier onboarding
- Supplier assessments
- Sub-supplier visibility
- Alerts based on University-specific suppliers, industries and countries.

## Procurement

The University previously reported that invitation to bid documents (e.g. expressions of interest, requests for quotations and requests for tenders) had been updated to require respondents to:

- identify if they are reporting entities under the Modern Slavery Act, and
- provide an overview of their modern slavery management programs, including whether any risks have been identified and addressed, and how they are measuring the effectiveness of any action taken.

Since the last statement, the University has:

- undertaken a review of terms and conditions for supplier contracts and has developed a suite of standard clauses for all new contracts to deal with identifying, managing and reporting modern slavery risks. Purchase agreement templates now include a range of modern slavery identification and reporting requirements, commensurate with the value of the contract and an assessment of the modern slavery risk profile. Irrespective of whether a supplier is a reporting entity under the Modern Slavery Act, the University requires all newly-appointed suppliers to take reasonable steps to identify and address risks of modern slavery practices in the operations and supply chains used in the provision of goods or services to the University. When appropriate, prospective suppliers are required to confirm their commitment to identifying modern slavery in their supply chains and managing any associated risks, and
- enhanced its supplier evaluation procedures and provided University staff with guidance relating to assessing and classifying any modern slavery risks for prospective supplier arrangements, including giving consideration as to how the University will work with the successful supplier to address any identified risks.

## Contract Management

In its first reporting period, the University developed and issued a Modern Slavery Supplier Questionnaire to 25 of the University's top suppliers on the basis of expenditure, representing approximately 43% of annual non-salary expenditure.

Since the last statement, the University has prioritised the development of its processes and procedures relating to the appointment of new suppliers, and – as has already been discussed – the establishment of a new supply chain mapping technology that will provide the University with a data-driven methodology for identifying and prioritising modern slavery risks.

Once implemented, the University will leverage this capability to expand on the existing group of suppliers to further understand and manage risks of modern slavery in the University's existing procurement supply chains.

## Assessing the effectiveness of actions

The University's modern slavery risk management program has established a foundation of governance, procedures, supporting tools and awareness in relation to the identification, management and reporting of modern slavery risks.

The University has not yet identified any known risks or instances of modern slavery which have necessitated action by the University.

Where known modern slavery risks are identified, the University will use appropriate review mechanisms, commensurate with such risks, to monitor the ongoing effectiveness of the action taken and, if necessary, consider any supplemental action that should be taken.

The University acknowledges that there is much more work to do with identifying risks associated with existing suppliers. Through future reporting periods, the University will leverage new capabilities to progressively expand upon its modern slavery awareness and risk management activities.

## Process of consultation with other entities

This statement has been prepared on behalf of the University of South Australia and its wholly-owned subsidiaries.

In overseeing the establishment of its modern slavery risk management program, the University has also consulted with management teams within UniSA Health and UniSA Ventures to assist with the preparation of this statement.

This statement has been approved by the University's Council.



**Ms Pauline Carr**  
Chancellor, University of South Australia  
June 2022