



University of
**Southern
Queensland**

Modern Slavery Statement **2024**

ABN 40 234 732 081

Message from the Vice-Chancellor

The University of Southern Queensland acknowledges the global challenge of modern slavery and is steadfast in its commitment to identifying and mitigating these risks within our operations and supply chains. In 2024, we continued to progress a comprehensive program aimed at raising awareness and preventing modern slavery, underscoring our dedication to education, integrity, and ethical practices.

The University of Southern Queensland must play a pivotal role in the education, awareness, and preventive action needed in the fight against modern slavery.

Activity in 2024 included incorporating modern slavery considerations into University policies and procedures, and the development and approval of a University Modern Slavery Prevention Procedure. University-wide communications, training and engagement activities continued to provide the information and tools needed to raise awareness and identify risks associated with modern slavery across our operations.

This statement details our continued efforts to collaborate with employees, suppliers, and industry partners to reduce risks of modern slavery and reflects our promise to ensuring that every individual is treated with dignity, respect, and understanding.

The Council of the University of Southern Queensland approved this statement on 16 June 2025.



Professor Karen Nelson
Vice-Chancellor, University of Southern Queensland
27 June 2025

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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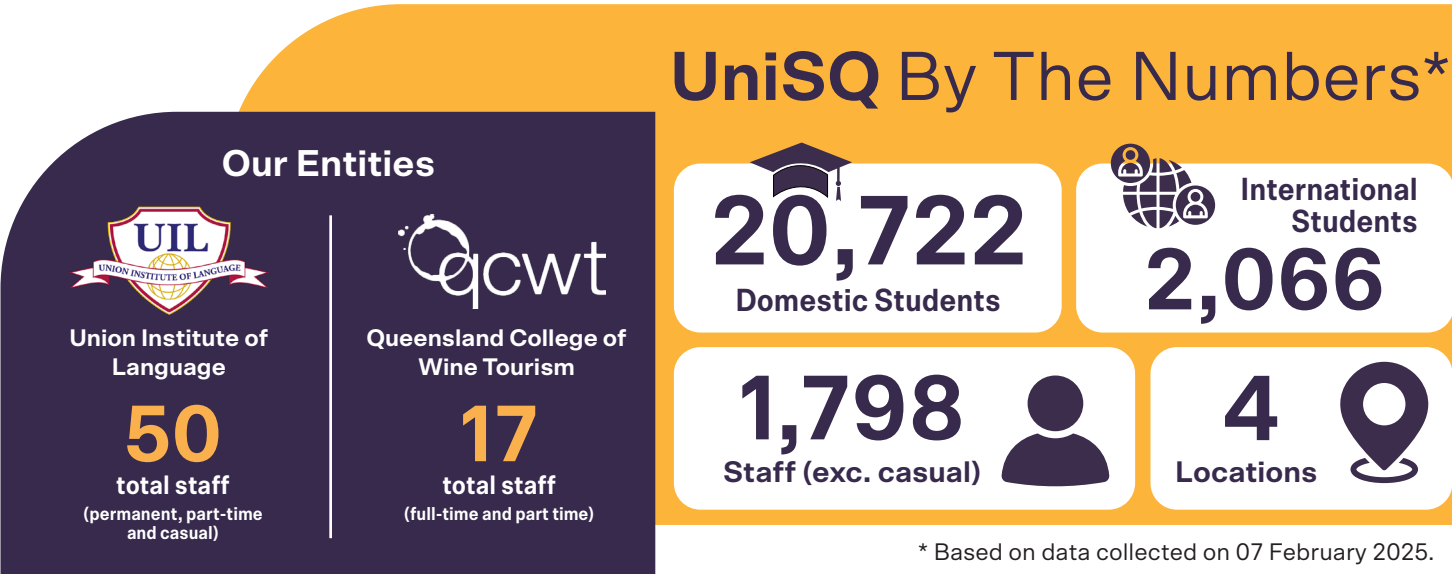
Under the *Modern Slavery Act 2018*, **modern slavery** means conduct which would constitute:

- (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).

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.

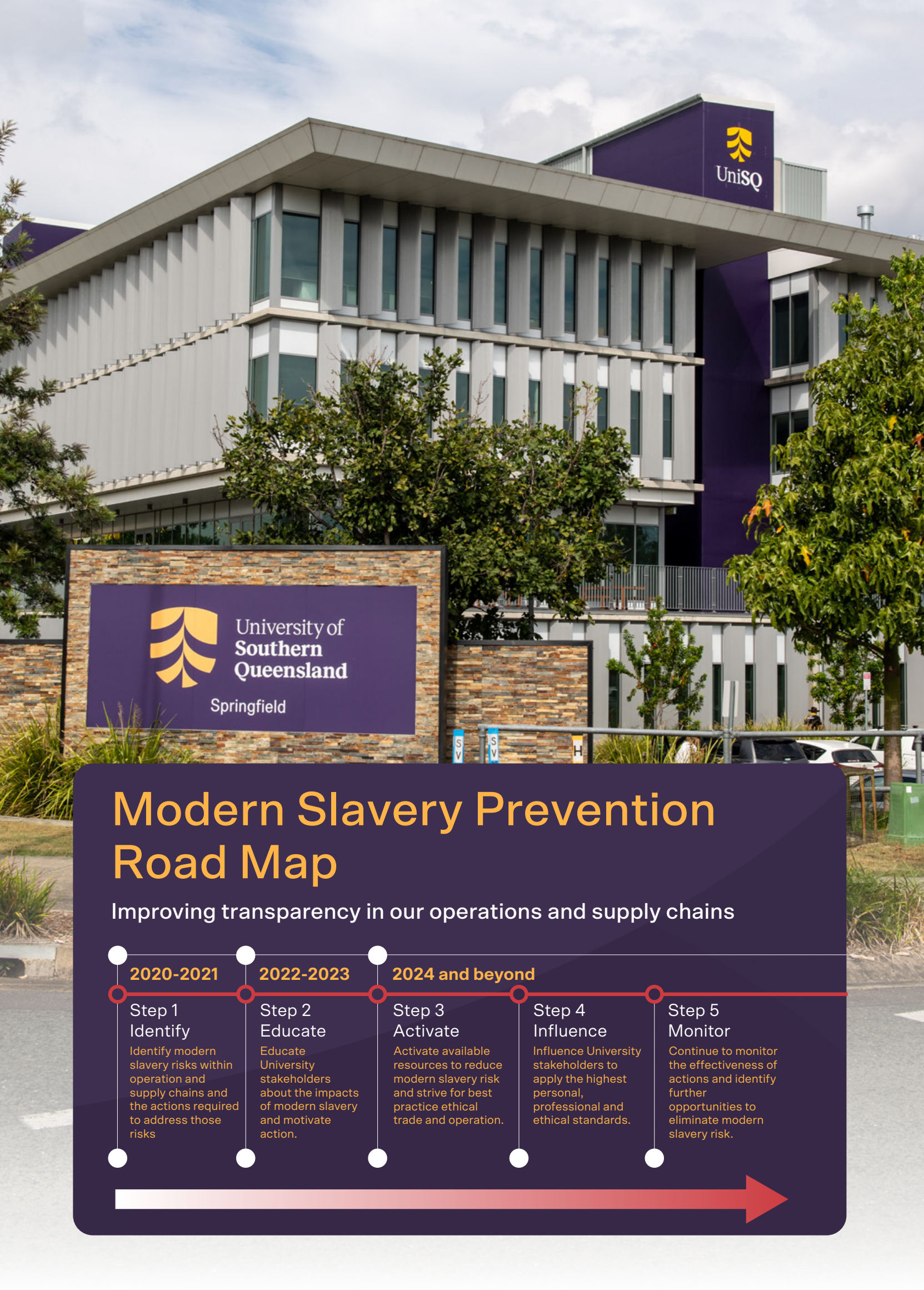
The University of Southern Queensland is headquartered at the Toowoomba campus; has two campuses west of Brisbane - Springfield and Ipswich, a presence in the Brisbane Central Business District (CBD) and operates the Queensland College of Wine Tourism (QCWT) located at Stanthorpe. The QCWT is a joint venture with the Queensland Government and employs approximately 17 full-time and part-time workers.

The University also operates 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. It employs approximately 73 employees comprising full-time, part-time and casual workers.

As a registered charity with the Australian Charities and Not-for-profits Commission, the University employs 1,798 full and part-time employees within Australia. These figures exclude casual workers and those employed through QCWT and UIL.

A range of products and services are offered, including the delivery of higher education, research activities, health clinics and wellness programs, on-campus residential accommodation and support services for employees and students. 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.

In 2024, the University had 20,722 students, 2,066 of whom were international students. QCWT had 92 students studying nationally accredited vocational education and training programs, while UIL had 1,120 students undertaking onshore pathway courses and study tours. The University also 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, in addition to those frameworks and procedures that apply more broadly across the University.



University of
Southern
Queensland

Springfield

Modern Slavery Prevention Road Map

Improving transparency in our operations and supply chains



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 seeks to implement contractual arrangements conducive to the requirement. The University procurement strategy is progressing toward 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 has continued its sector-based approach to supply chain risk through its affiliation with the Australasian Universities Procurement Network (AUPN), and more specifically through its University Anti-Slavery Program.

The University continues to invest in better transparency of process and collection of supply chain 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 locally, nationally and overseas. The highest risk locations the University procured products from in 2024 were from Nigeria, Pakistan, and Papua New Guinea.

Services
Services procured by the University include, but are not limited to, various disciplines of professional services, maintenance services and employment contract hire. Services are generally locally based and are covered by contractual agreement with terms appropriate to the associated risks.

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 often 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.



Modern slavery risks in operations and supply chains

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

Area	Description of Modern Slavery Risk
Operations	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 from around the world may expose the University to regions which have a higher risk of modern slavery. The University has potential exposure to modern slavery through activities such as international teaching and student recruitment, research, and consulting as examples. 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 can be additionally mitigated through licensing, training, supervision and ongoing contract management. As risks to international students have rapidly increased, the University has engaged with key stakeholders within its Academic, Research, and International office, as well as its related entities to increase awareness, mitigate risks, provide guidance for identifying those at risk, and developing tools to support them. The University has a comprehensive policy library to provide standard 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. In 2023, the University drafted a dedicated Modern Slavery Prevention Procedure which is anticipated to be published in 2024.
Supply chain	The AUPN identified the top five very high-risk categories by spend within its member universities as: 1. New build works 2. Temporary labour 3. Laboratory consumables 4. Scientific equipment 5. Marketing materials and promotional items. As these categories apply to the University of Southern Queensland, they continue to be monitored and managed through procurement and contractual processes in accordance with University policies and procedures. The following supply chain activities are continued key risks for the University. 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.

Area	Description of Modern Slavery Risk
Supply chain (continued)	Catering Catering has been identified as a risk due to the procurement of high-risk products such as palm oil, fish, cattle, sugar cane, coffee, cocoa and rice through the University's on-campus catering facilities. Catering facilities are provided both in-house and through external suppliers. In-house catering employees are subject to University policies and procedures as well as mandatory annual compliance training. External providers are also subject to University policies and procedures and are managed through contractual arrangements. 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 the University's procurement process and mandatory assessment criteria which require successful service providers to attain Quality Assurance to AS/NZS ISO 9001 for major capital projects. Garment and textiles The University procures a range of garments and textiles including, but not limited to, employee uniforms, student uniforms, personal protective equipment, laboratory garments and merchandise. Due to the prevalence of cotton in many garments and textiles, this remains a risk for the University. Security Similar to the cleaning industry, security is a high-risk area due to the 24-hour nature of the work creating an environment with low visibility. The University's security services are managed through contractual arrangements, with ongoing reviews of key performance indicators. Solar Panels The University has a large number of solar panels at each of its three main campuses. While the vast majority were procured prior to the Modern Slavery Act 2018, procurement for replacement panels and new installations will include a thorough risk assessment to minimise exposure to modern slavery risk. 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 attention.
Operations and supply chain	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 and its controlled entities have 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. Similar activities undertaken by the Union Institute of Language are also managed through close relationships with key suppliers, both on and off-shore.

UniSQ Anti-Slavery Supplier Risk

\$114.45M
Total Spend

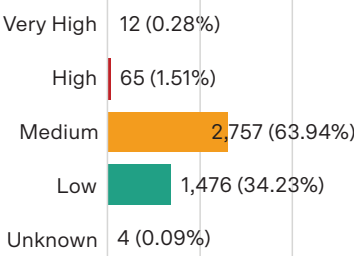
4,312
Unique Suppliers

1,125
Unique ABNs

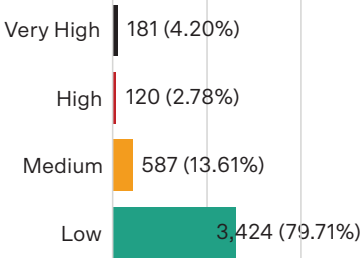
100
High Risk L4
Categories

13
High/Very High
Risk Countries

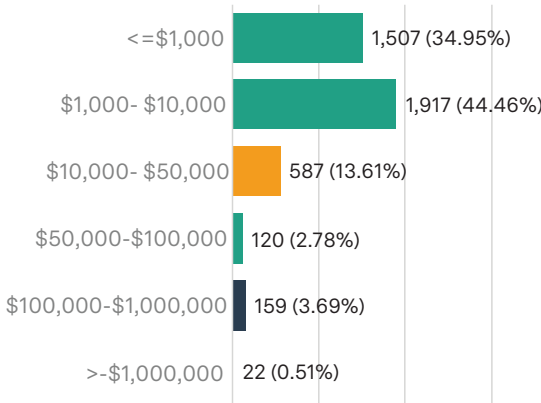
Country Risk by Suppliers



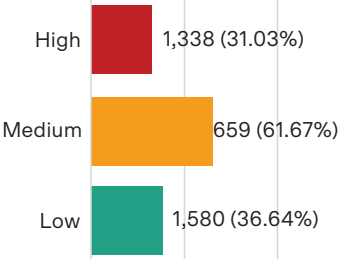
Spend Risk by Suppliers



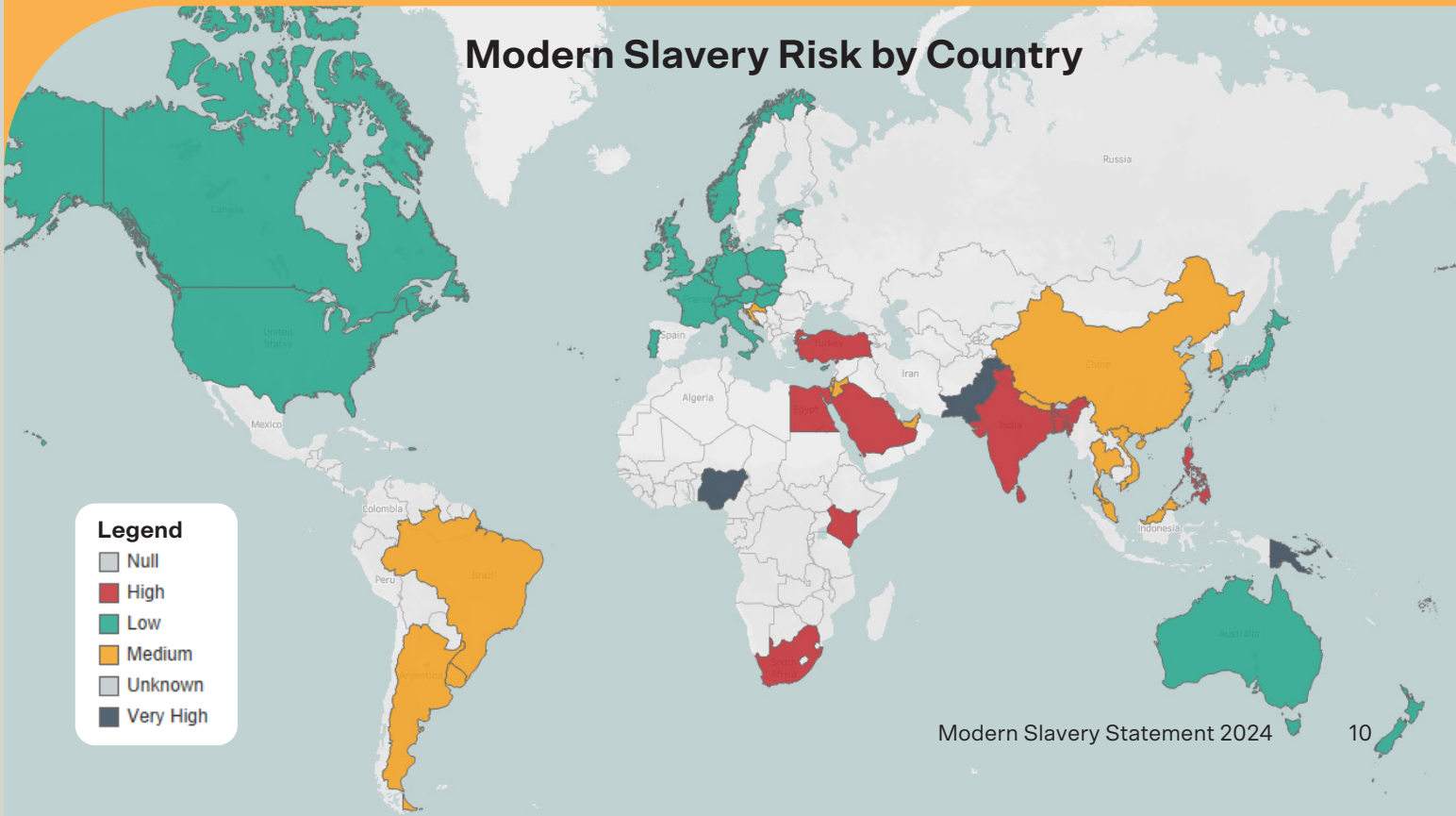
Spend Level by Suppliers



Category Risk by Suppliers



Modern Slavery Risk by Country





Action taken to assess and address risks

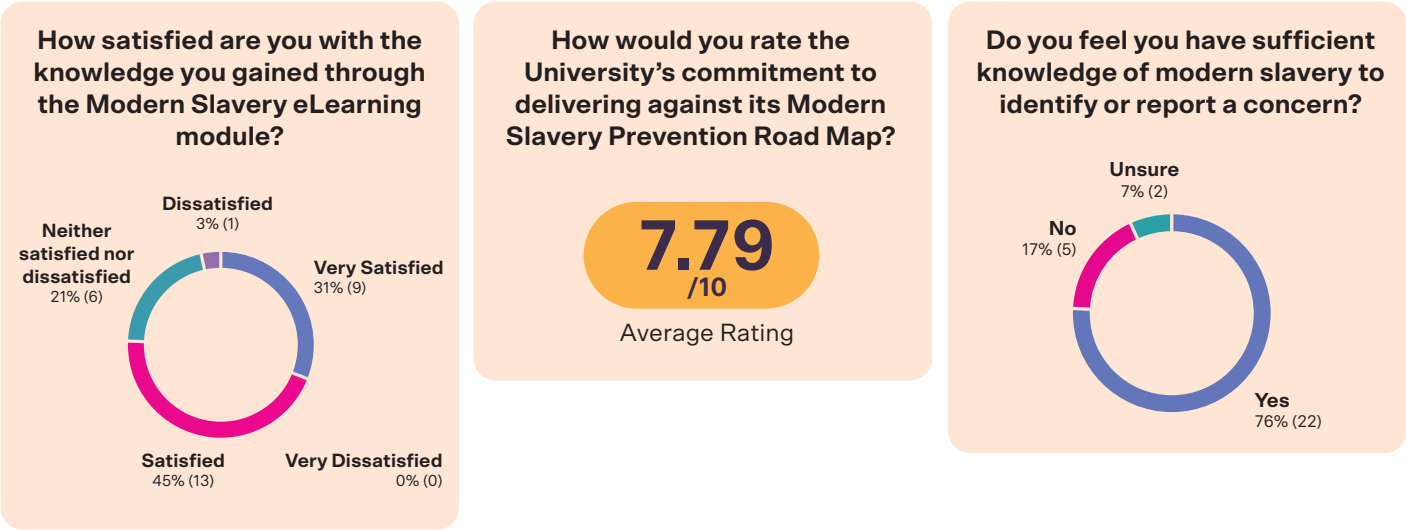
The following actions were taken to mitigate modern slavery risks within the University’s operations and supply chain.

Area	Actions Taken
Operations	Modern Slavery Prevention Procedure A Modern Slavery Prevention Procedure was finalised in 2024 and outlines the University's process for identifying, assessing and managing modern slavery risks within its operations and supply chains. Several other policy instruments were identified for review as part of the deployment of the new procedure, and these will be progressively updated in accordance with the University's Policy Framework. A local procedure for Preparing the University's Annual Modern Slavery Statement was also finalised, providing an ongoing resource to the Modern Slavery Working Group and others involved in producing the University's annual statement.
	Risk workshops and stakeholder engagement The Modern Slavery Working Group facilitated risk identification workshops with the Academic Transformation team and the Union Institute of Language. Regular meetings with the Union Institute of Language's executive leadership team ensure both entities are aware of emerging risks and work together to identify appropriate controls and share resources. Further engagement was undertaken through various internal and external stakeholders and committees to highlight and provide guidance on emerging risks, develop and enhance existing resources, and provide updates on potential reporting changes under the Modern Slavery Act. Stakeholders engaged through these activities included: the Enterprise Services Division Executive, Vice-Chancellor’s Executive, Audit and Risk Committee, and University Council; and externally through the Union Institute of Language, suppliers and professional bodies.
	Modern Slavery Prevention Survey An employee survey which aimed to gauge staff awareness of modern slavery, related risks and actions undertaken as part of the University's Modern Slavery prevention program was released in December 2024. The survey received 29 responses with most respondents reporting they were either very satisfied or satisfied with the knowledge they had gained through the Modern Slavery eLearning module and with the content available on the Modern Slavery web page. The majority of employees felt they had sufficient knowledge of modern slavery to identify or report a concern, and many identified various actions undertaken by the University to prevent or control modern slavery risk within its operations or supply chains. Respondents also rated the University's commitment to delivering against its Modern Slavery Prevention Road Map on a scale of 1-10 (with 1 being Poor and 10 being Excellent), with an average rating of 7.79.
Supply chain	Sector networking and collaboration The University participated in several sector networking and collaboration opportunities in 2023. These included training, webinars and workshops with entities such as the Australasian Universities Procurement Network (AUPN), ArcBlue, FRDM, Be Slavery Free, the Mekong Club, and the Supply Chain Sustainability School. The University’s ongoing membership with the Australasian 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

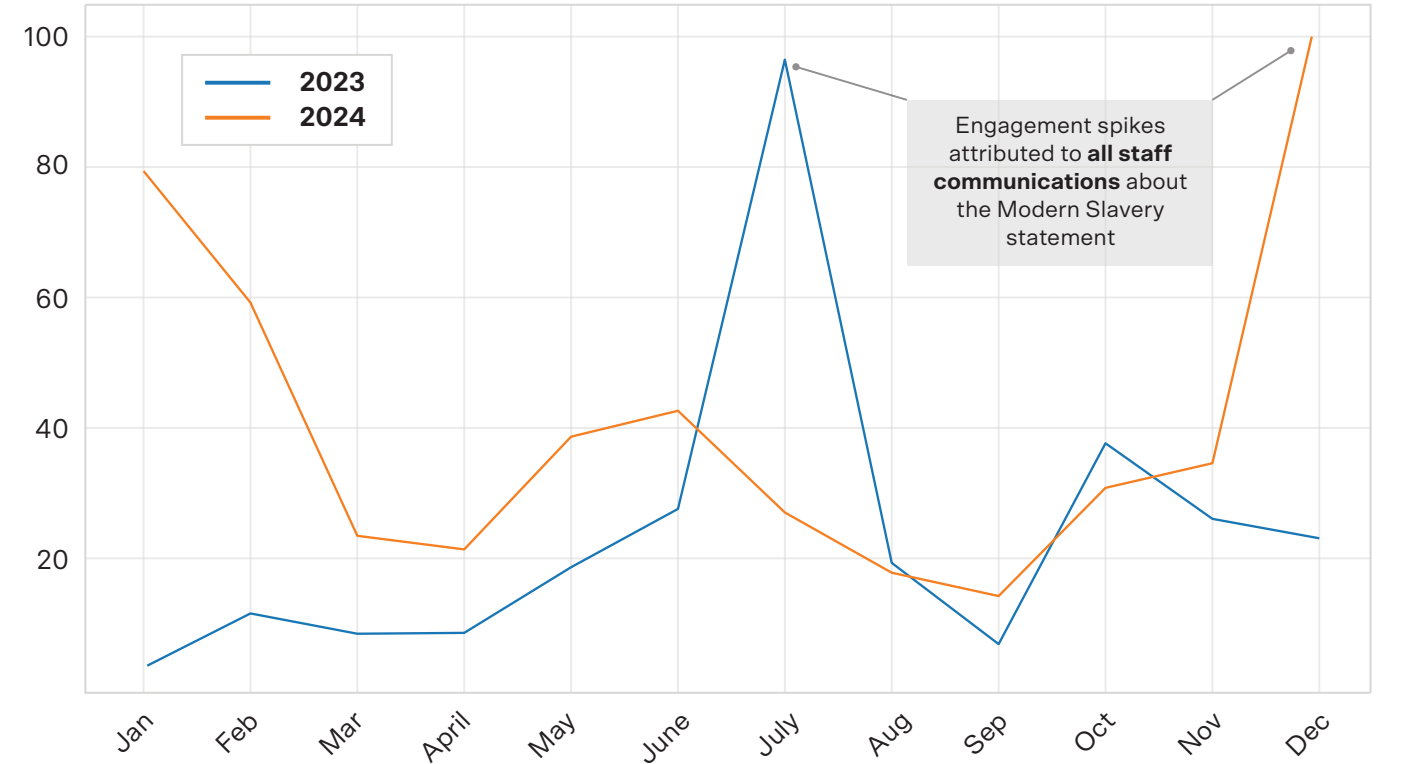
Area	Actions Taken (continued)
Supply chain (continued)	spend data to an output categorised according to AUPN taxonomy (a hierarchy of spend categories), enabling upload to the AUPN Modern Slavery dashboard. Modern Slavery Dashboard The AUPN Modern Slavery tool enables University supply chain data to be monitored through a dashboard view of suppliers, industries, and country risks. This technology provides supplier survey tools, alerts on key risks and a range of analytics. The tool was established to gain a deeper understanding of University supply chains and risks associated with suppliers, their products and geographical locations and allows for sharing of de-identified data to enable efficiencies for supplier engagement and improved sector benchmarking. ArcBlue Modern Slavery Dashboard The Modern Slavery supply chain tool developed by ArcBlue through the AUPN, enables member university supply chain data to be monitored through a dashboard view of suppliers, industries, and country risks. This technology provides supplier survey tools, alerts on key risks and a range of analytics. The tool was established to gain a deeper understanding of university supply chains and risks associated with suppliers, their products and geographical locations and allows for sharing of de-identified data to enable efficiencies for supplier engagement and improved sector benchmarking. Dashboard data is used to gather and analyse procurement data, and assess risks to inform the University's mitigation strategies, including the development of training materials, supplier questionnaires and various other resources. Supplier questionnaires Through the AUPN University Anti-Slavery Program, a supplier self-assessment questionnaire (SAQ) was issued to 72 suppliers across the medical equipment and laboratory supplies sector, with five of these suppliers approached to pilot collaborative remediation plans. This program of work, which will be extended in 2025, will enable members to leverage collective university resources to create a transparent, effective, and scalable process to manage and remediate shared suppliers' modern slavery risk. The University also reviewed its own supplier questionnaire in late 2024 and plans to distribute the updated document to suppliers not already captured through the AUPN sector SAQ program of work. Data captured through these supplier questionnaires will be analysed for better supply chain visibility, a deeper analysis of risks, and enhanced supplier segmentation.
	Operations and supply chain Sector networking and collaboration The University's ongoing membership with the AUPN, and specifically through its University Anti-Slavery Program, has enabled the University to adopt a shared approach with the other 37 Australian and three New Zealand member institutions to improve excellence in procurement practice and the skills of procurement professionals in the higher education sector. The program supports members to improve supply chain human rights transparency, reduce individual university costs and resources, collaborate on risks and issues for greater impact, and contribute to reporting requirements. Through this affiliation, the University participated in several sector networking and collaboration opportunities in 2024. These included training, webinars, surveys, and workshops featuring guest speakers such as the Australian Red Cross, Australian Catholic Religious Against Trafficking in Humans (ACRATH), the Ethical Clothing Company, and the Freedom Hub. Training and education A Modern Slavery eLearning module which forms part of the University's annual compliance training program was rolled out in January 2024. The annual compliance training program is a mandatory requirement for all employees to ensure they are aware of their responsibilities and the aspects governing their employment at UniSQ. Supplementary modern slavery training is available to employees through a dedicated Modern Slavery training page, with resources sourced from the Australian Human Rights Commission, Anti-Slavery Australia, the Supply Chain Sustainability School, and the Australian Government. A Forced Marriage Front-line worker training module developed by Anti-Slavery Australia was also distributed to the Students portfolio, International office, and UIL employees in 2024.

Area	Actions Taken (continued)
Operations and supply chain (continued)	Third-party supplier questionnaires The University completed several third-party modern slavery questionnaires as part of establishing new supplier arrangements. This included submissions for grant funding and the evaluation of potential partnerships prior to entering into a supplier arrangement. Resource development The University finalised the development of additional resources to assist employees, students and suppliers to enhance their awareness of modern slavery risks specifically relating to identifying differences between unfair working conditions and potential situations of modern slavery.

Modern Slavery Prevention Survey Results



Modern Slavery Webpage Views (2023 vs. 2024)



Action taken to assess and address risks *Cont.*

Actions taken as a result of COVID-19

While the University adapted numerous operational processes to effectively manage the COVID-19 outbreak, it has predominantly returned to its pre-pandemic operating model. However the University has adopted the following practices to ensure it does not cause or contribute to modern slavery risk as a result of the pandemic.

- Consideration of procurement demands, particularly purchases requiring high volumes and/or expedited time frames;
- Facilitation of online training and stakeholder workshops;
- Availability of digital modern slavery prevention resources; and
- Review of the University's Business Continuity and Crisis Management Plans.

Remediation Process

In 2024, the remediation process was embedded into the Modern Slavery Prevention Procedure and outlined within the Modern Slavery eLearning module which forms part of the University's annual compliance training program.

The remediation process commences when a report is received. Modern Slavery concerns or complaints involving the University are managed in accordance with the University's Complaints Management Procedure.

Modern slavery concerns or complaints reported to the University are triaged by the Director (Integrity & Professional Conduct) and when appropriate, forwarded to the University's Modern Slavery Working Group and relevant University members (as required) for investigation. Circumstances which do not involve the University are reported to the Australian Federal Police.

Circumstances requiring remediation are then actioned by the Accountable Officer, with support from the Director (Integrity and Professional Conduct), the Modern Slavery Working Group and other key stakeholders as required.

No modern slavery concerns or complaints were reported to the University in 2024.



Continuous Improvement Approach

Modern slavery risks require ongoing monitoring and measurement. Through increased training and awareness, enhanced analysis of procurement data through the ArcBlue Modern Slavery Dashboard, and ongoing stakeholder engagement, the University will continue to improve its approach to identifying and mitigating risks. The existing program of work will be reviewed in 2025, commencing with a refresh of the Modern Slavery Prevention Road Map. This will be complemented through additional risk assessments, by strengthening supplier relationships, and through its ongoing partnerships with Government agencies and other third-party organisations.

Due Diligence

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

- Subscribed to third-party communications and global notifications for modern slavery related correspondence;
- Employed updated General and Comprehensive contractual templates where possible;
- Reviewed its supplier questionnaire;
- Enhanced communications with internal stakeholders and University controlled entities;
- Provided advice to key stakeholders on new and emerging risks and potential reporting changes;
- Continued segmentation of suppliers to ensure greater understanding of suppliers in each procurement category; and
- Evaluated and completed third-party supplier modern slavery questionnaires.

Future actions

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

Area	Future Actions
Operations	• Integrate use of the ArcBlue Modern Slavery Dashboard into University processes. • Further identify risks and rank according to significance, defining both short and long-term actions. • Finalise the review of procurement training competencies against position requirements and incorporate modern slavery content where possible. • Enhance awareness to ensure employees are adequately equipped to identify modern slavery risks and report concerns through the appropriate channels. • Refresh the Modern Slavery web page to ensure content is fit for purpose and applicable to its various users.
Supply chain	• Continue to 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. • Distribute the updated University supplier questionnaire to suppliers not already captured through the AUPN supplier self-assessment questionnaire program of work.
Operations and supply chain	• Continue to implement additional performance metrics for both the University and its suppliers to measure and mitigate modern slavery risks. • Continue to develop additional resources for employees, students, 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. • Undertake further assessment activities to address high-risk services. • Consider information received through risk workshops and the Modern Slavery Prevention Survey to address any areas of concern. • Refresh the Modern Slavery Prevention Road Map. • Develop and implement a broader modern slavery prevention strategy.

Assessing effectiveness of actions

The Modern Slavery Prevention Survey was a useful metric for assessing the effectiveness of the University's modern slavery prevention program. It provided valuable insight into employee awareness, attitudes toward its prevention activities, and how it can extend this program of work.

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

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

While the University has increased employee awareness through its modern slavery training program, 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, with assistance from members from the University's senior leadership group, undertook extensive consultation with key stakeholders and external agencies. This consultation aimed to identify the University's scope of operations and supply chains, inherent risks, and to report on current practices and future priorities for mitigating modern slavery risk.

Internal stakeholders were engaged through training, policy and resource development, surveys, risk workshops, committee briefings, and direct correspondence to highlight the prevalence of modern slavery, identify risks and leverage opportunities for eliminating exposure.

The following University groups were consulted during the 2024 reporting period.

- UniSQ employees;
- The Vice-Chancellor's Executive;
- The University Senior Leadership Group;
- Enterprise Services Division Executive;
- Procurement;
- Legal Services;
- The People Portfolio;
- Director (Integrity and Professional Conduct);
- Director (Assurance Services);
- Representatives from Academic Transformation; Support for Learning; Students Portfolio; Office of Research - Research Grants; and International; and
- The Union Institute of Language (UIL) executive leadership team.





Summary

The University continues to mature its processes for identifying and eliminating modern slavery risk within its operations and supply chains. The University is committed to future improvement and will continue to work with its employees, students, 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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