



Modern Slavery Statement 2024

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Acknowledgment of country

UniSC is a place where Aboriginal and Torres Strait Islander people’s perspectives, culture and knowledge is acknowledged, valued, and respected. We share deep pride in, and seek to uplift, empower, and give a voice to Aboriginal and Torres Strait Islander people and perspectives.

If you are an Aboriginal and Torres Strait Islander person, we encourage you to join the long tradition of trailblazers at UniSC, impacting our University and our world.

We acknowledge the Traditional Custodians of the land on which we work and live, and recognise their continuing connection to land, water, and community. We pay our respects to Elders past, present and emerging.

Published by the University of the Sunshine Coast, June 2025

Information contained in this publication was correct at the time of publishing. For the most up-to-date information about the University, visit usc.edu.au

All amounts are in Australian dollars. University of the Sunshine Coast is registered on the Commonwealth Register of Institutions and Courses for Overseas Students. CRICOS Provider Number: 01595D.

Introduction

The Modern Slavery Statement for the University of the Sunshine Coast (The University or the University) sets out the actions taken to identify, assess and address risk of modern slavery across our operations and supply chain in the financial year ending 31 December 2024.

This statement is made in compliance with the *Modern Slavery Act 2018* (Cth). The purpose of this statement is to outline our commitment to be an ethically and socially responsible organisation committed to ensuring our practices combat slavery and human trafficking. We recognise our role in respecting and promoting the fundamental human rights of our people, suppliers and customers.

The University supports the Australian Government's global leadership in preventing modern slavery. By working with our sector, employees, contractors, partners and suppliers on processes and practices to effectively manage modern slavery risk, The University aims to create and maintain an environment in which there is no place for modern slavery, and to contribute to this achievement in the wider Australian community and in the global supply chains of Australian goods and services.

About modern slavery

Modern slavery is defined as slavery that involves exploiting other people for personal or commercial gain. It is a serious global issue and breaches human and labour rights. Modern slavery is an umbrella term for human trafficking, forced labour, child labour, forced marriage, debt bondage, removal of organs and other slavery like practices.

1 Reporting entity

The University is an Australian higher education institution which provides a wide range of teaching, research and education-related activities.

The University is established under the *University of the Sunshine Coast Act 1998* (an Act of Queensland Parliament) and is a statutory body as defined by the *Financial Accountability Act 2009*. The University is parent to a single wholly owned subsidiary whose operations are minimal to dormant and are not classified as reporting entities.

2 Structure, operations and supply chains

Structure

The University was founded by its community in 1996 with the belief that opportunity is everywhere — especially in regional Queensland. As the first greenfield university to open in Australia since 1971, The University has helped unlock the innovation, productivity and potential of its regional communities.

Its impact on economic, social, cultural and environmental development is clear. With more than 18,700 students, 150 higher education programs over five campuses spread across Southeast Queensland and one in South Australia, 2,386 staff, the University has \$700 million invested in infrastructure and more than \$9 billion flowing into the local economy, including through the contributions of more than 39,000 graduates.

Academic schools

The University is organised into five academic groups:

1. School of Business and Creative Industries
2. School of Education and Tertiary Access
3. School of Health
4. School of Law and Society
5. School of Science, Technology and Engineering

Executive Committee

The University has six executive committee members:

1. Vice-Chancellor and President
2. Deputy Vice-Chancellor (Academic)
3. Deputy Vice Chancellor (Research and Innovation)
4. Pro Vice-chancellor (Global and Engagement)
5. Chief Operating Officer (COO)
6. Chief Financial Officer*

More information about UniSC, our activities and performance is available via the University's

Annual Report and at usc.edu.au

* At the date of this report the Chief Financial Officer was also performing the role of Interim COO.

Operations

We provide the hands-on learning and practical skills needed by the people of our diverse regions from Moreton Bay to the Fraser Coast: the nurses, teachers, mental health and medical professionals, environmentalists, scientists, engineers, lawyers, problem solvers, creators and creative thinkers, high-performance athletes, entrepreneurs and the leaders of tomorrow who improve the lives of people at home and abroad.

Campus locations

The University operates from six campuses in Australia:

1. Sunshine Coast (Sippy Downs)
2. Moreton Bay (Petrie)
3. Caboolture
4. Gympie
5. Fraser Coast (Hervey Bay)
6. Adelaide

Research and teaching centres

1. K'gari Research and Learning Centre (Dilli Village)
2. Thompson Institute (Birtinya, Sunshine Coast)
3. Sunshine Coast Health Institute (Birtinya, Sunshine Coast).

The University's teaching operations are delivered in Australia through an on-campus experience complemented by technology-enabled learning. The University partners with industry, institutions and all levels of government to deliver innovative and high-quality research with real impact. Research operations are largely undertaken in Australia with some overseas delivery, particularly in the Pacific and Southeast Asia regions.

Ranking

As a university with a strong commitment to achieving sustainability in terms of teaching, research and how we operate, we are the top ranked Queensland university in the 2024 THE Impact Rankings. The **Times Higher Education Impact Rankings** are the only global performance tables that assess universities against the **United Nations' Sustainable Development Goals (SDGs)** and measure the social and economic impact of an institution:

- The University ranked **first place in Queensland** in two categories – Zero Hunger and Climate Action – and **second in Australia** for Zero Hunger.
- Overall, the University placed among the **top four percent of universities around the world** for impact, ranked equal 77th out of 1,963 institutions, and placed 16th globally in the Life Below Water category.

Among public universities, the University is number one in Queensland for undergraduate overall educational experience, and number two in Australia for postgraduate teaching quality.

The University moved 97 places to be in the top 110 institutions in the prestigious Times Higher Education (THE) Young University Rankings (2024).

Students

In 2024, the University had a total of:

- 18,911 Students headcount (up from 17,843 in 2023)
- 2,291 International students (up from 1,927 in 2023)
- 699 First Nations students (up from 657 in 2023)
- 68 percent female students, 32 percent male students

Staff

In 2024, the University had a total of:

- 2,386 staff (down from 2,497 in 2023)
- 1,321 are full time and part time (up from 1,245 in 2023)
- 1,065 are casual staff (down from 1,252 in 2023)
- 986 are Academic staff (down from 1,099 in 2023)
- 1,368 are Professional staff (down from 1,369 in 2023)
- three percent of staff are Aboriginal and Torres Strait Islanders

Key facts

 **≈ 18,911** students

 **≈ 2,386** staff

 **5** schools

 **6** campuses

 **2,271** suppliers

Supply chains

The University purchases goods and services from a wide range of suppliers across a number of categories and countries. In 2024 we engaged with more than 2,200 suppliers across 44 countries. Our supply chain is varied and includes individuals, small-to-medium enterprises (SMEs) and multi-national organisations. We are committed to responsible purchasing and ensuring that the procurement practices of our suppliers avoid elements of modern slavery in their supply chains.

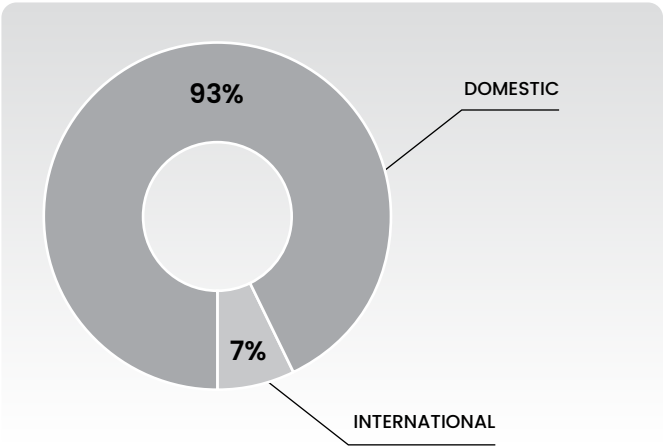
We acknowledge that our supply chains are global and, in cases involving multi-tier suppliers, inherently complex. As such, we prioritise the analysis and monitoring of key expenditure categories to minimise risk and continually strengthen our due diligence processes.

Supplier engagements are monitored in accordance with the University's obligations under the *Modern Slavery Act 2018* (Cth). The University Procurement Framework consists of policies and procedures adhering to the requirements of the Queensland Procurement Policy (QPP). While considering the traditional aspects of procurement in value for money, integrity, probity and accountability, the framework reflects the expectations of advancement of economic, environmental and social objectives, particularly for Queensland communities.

In 2024, the University goods and services spend was over \$114 million with suppliers worldwide:

- 93 percent (\$106 million) with first-tier domestic suppliers
- 7 percent (\$8 million) with first-tier international suppliers.

Domestic vs international spend 2024



3 Modern slavery risk

In accordance with the Act, the University has considered the potential to cause, contribute to, or be directly linked to modern slavery. Given that the University's operations are largely undertaken in Australia, a country rated by the Global Slavery Index as low in prevalence of and vulnerability to modern slavery practices, it considers itself low risk in this respect. However, the University recognises the potential risk of being directly linked to modern slavery practices through its business relationships and the possible increased risk from downstream supply chains.

University approach

The University's approach to implementing the Modern Slavery Act is based around a three-stage process: identify, address and maintain.

Identify

- Understand modern slavery risk as a whole
- Collaborate with the AUPN and similar networks
- Identify high risk industries and geographical locations
- Identify areas within the University to be reviewed

Address

- Review policies, procedure, tender process
- Preventative contract clauses
- Review suppliers base and onboarding process
- Analyse data available in MS tools and address risk areas as required
- Increase staff knowledge of potential risks

Maintain

- Continue, maintain, and adapt from previous stages to address the future approach
- Develop ongoing initiatives
- Continue to collaborate with industry networks and utilise capture and reporting dashboards
- Continuous review and improvement

Risk within operations

UniSC considers the risk of modern slavery occurring within its direct operations to be low. This assessment is based on the robust legislative and regulatory frameworks that govern the University's operations, as well as the internal safeguards embedded across policies, agreements, and institutional practices.

These frameworks and safeguards promote ethical conduct, fair treatment, safe working conditions, and protection for vulnerable individuals – key elements in preventing modern slavery. While approximately 7 percent of UniSC's supply chain spend is associated with international suppliers, the majority is domestic and assessed as low risk. The University's commitment to these principles is reflected in the following governing documents, listed in order of relevance to addressing modern slavery risks:

- ☑ **Working with vulnerable people (including Child Protection) – Governing Policy**
- ☑ **Anti-discrimination and Freedom from Bullying and Harassment Staff – Governing Policy**
- ☑ **Equity, Diversity and Inclusion – Governing Policy**
- ☑ **Staff Code of Conduct – Governing Policy**
- ☑ **Health, Safety and Wellbeing – Governing Policy**
- ☑ **Student Complaints Resolution – Governing Policy**
- ☑ **Student Conduct – Governing Policy**
- ☑ **Enterprise Agreement 2023**

Together, these policies reinforce a culture of integrity and accountability, and articulate clear principles for preventing, identifying, and responding to risks of modern slavery. UniSC remains committed to upholding human rights and continually strengthening its approach to ethical and responsible operations.

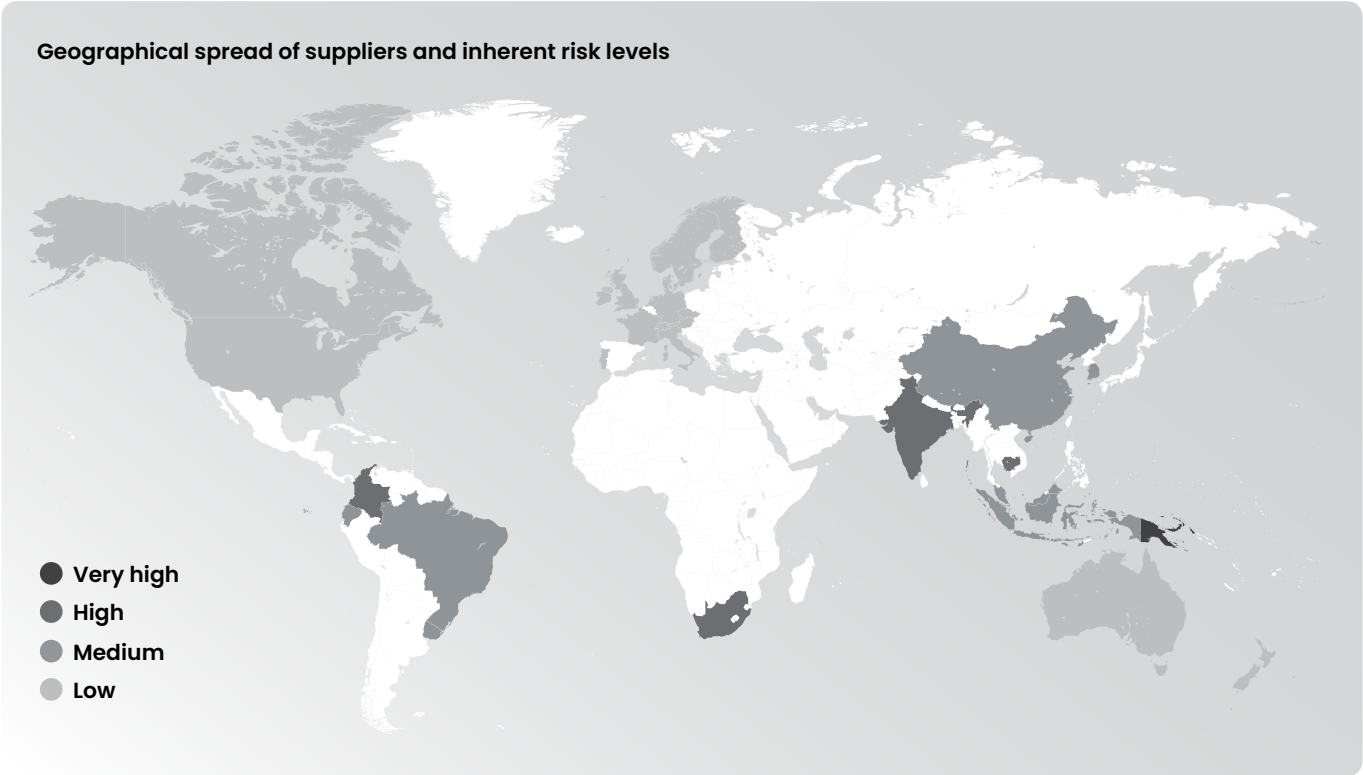
Our modern slavery risks by country

UniSC’s supplier base is predominantly domestic and low risk, with only around 7 percent of total procurement spend directed to international suppliers. Of this, less than 1 percent of total spend is associated with countries rated as high or very high risk for modern slavery.

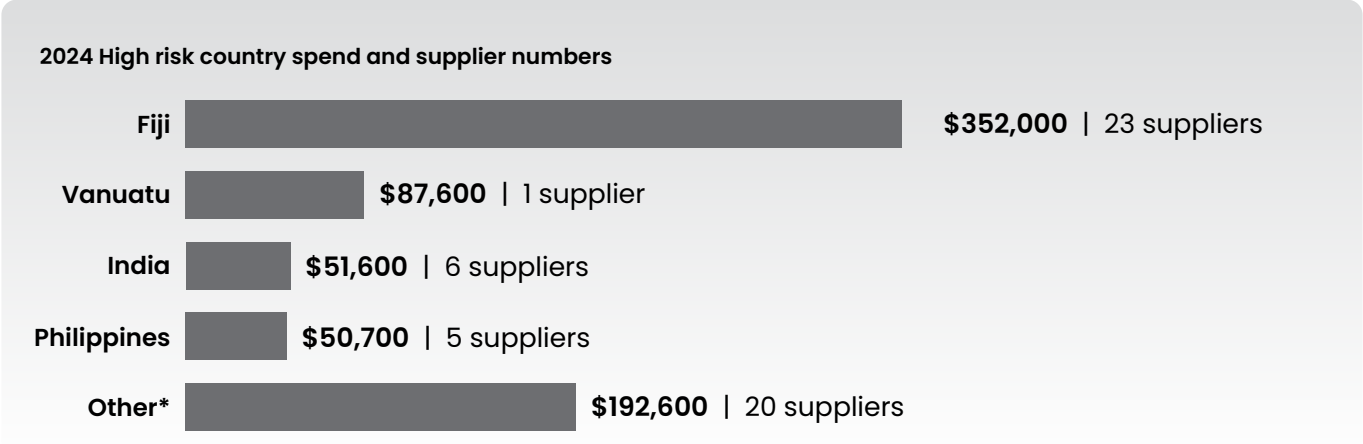
To monitor and assess potential exposure the he Australasian University Procurement Network (AUPN) has engaged with the ArcBlue (part of Bain & Company) modern slavery dashboard. The assessment is based on three key factors: geography, sector and commodity and is determined using source data from:

- Global Slavery Index (GSI)
- Responsible and Ethical Private Sector Coalition against Trafficking (RESPECT)
- Australian Catholic Anti-Slavery Network (ACAN)

The map below outlines the University’s suppliers in 2024 by country in relation to the prevalence of modern slavery risk as per the ArcBlue dashboard.



In 2024, the dashboard’s insights revealed that the university’s procured with 55 suppliers from countries which are inherently high-risk for modern slavery, equating to a spend of \$730,000.



* Includes South Africa, Samoa, Lao PDR, Tonga, PNG, Cambodia, Solomon Island, Tuvalu and Columbia.

Further details of the predominant spend area for the high and very high-risk countries are in the table below.

Breakdown of high-risk country spend areas

High/very high-risk countries	No. of suppliers	Predominant spend areas
Fiji	23	Agency contractors and temporary workers Catering, banquet and food services Medical and lab consumables Outsourced educational services
Vanuatu	1	Clinical trial services
India	6	Agency contractors and temporary workers
Philippines	5	Auditing services Research collaborations
South Africa	5	Agency contractors and temporary workers Travel passes
Samoa	2	Agency contractors and temporary workers
Lao PDR	2	Agency contractors and temporary workers
Papua New Guinea	3	Clinical trial services
Tonga	2	Agency contractors and temporary workers
Cambodia	3	Awards and gifts* Research collaborations
Solomon Islands	1	Research collaborations
Tuvalu	1	Clinical trial services
Colombia	1	Research collaborations

* Hosting of community events.

Our modern slavery risks by category

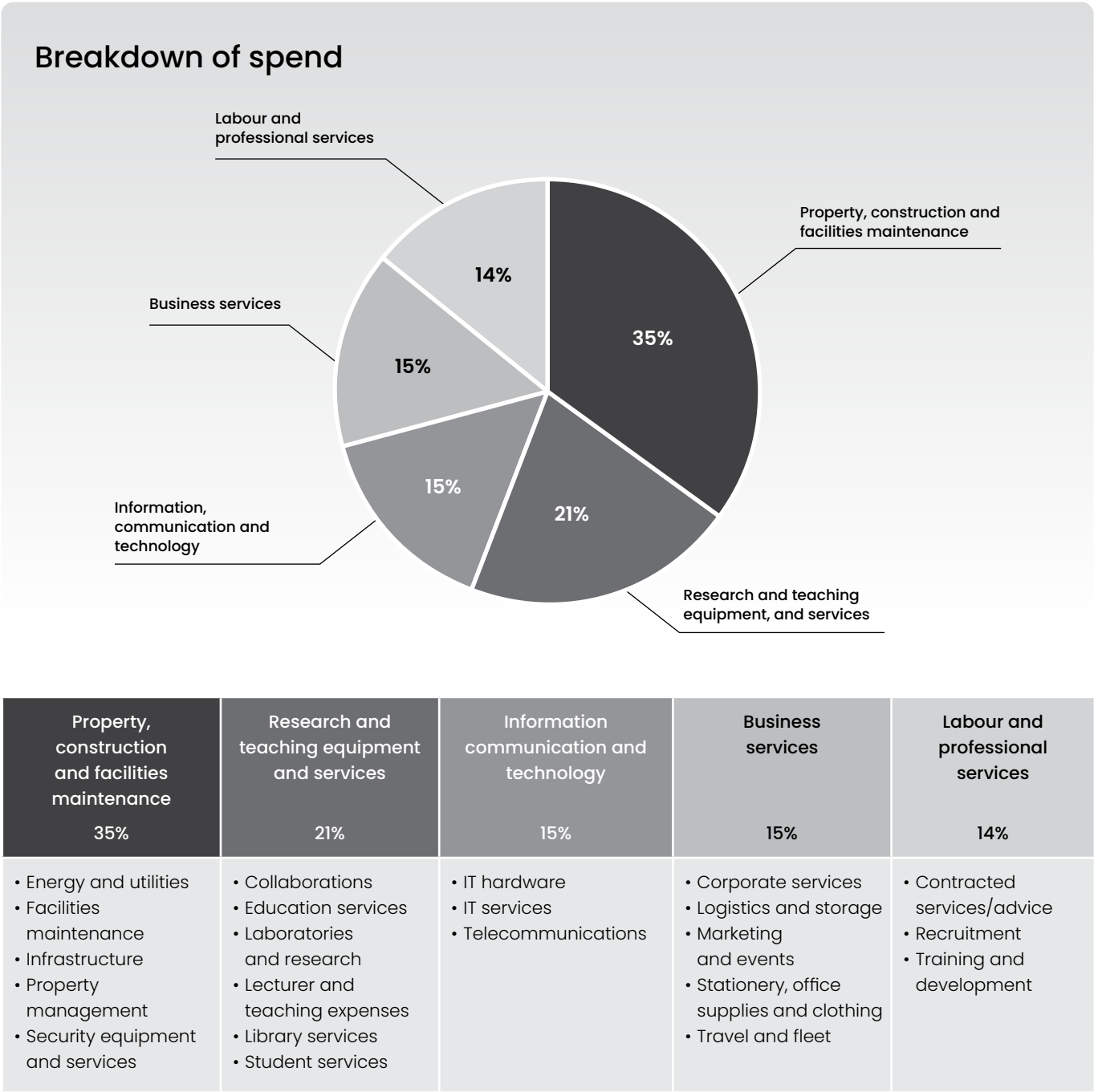
Based on the taxonomy of the Australasian University Procurement Network (AUPN), our procurement spend can be grouped into five broad categories:

- **Property and facilities (around 35 percent)** — eg building construction and maintenance, campus services, utilities and energy.
- **Business services (around 15 percent)** — eg professional consulting services, human resources and staffing services, marketing, travel and accommodation.
- **Technology (around 15 percent)** — eg IT hardware and software, telecommunications services.
- **Research and teaching (around 21 percent)** — eg laboratory equipment and research supplies, library resources, academic conferencing and related expenses.
- **Labour and professional services (around 14 percent)** — eg recruitment, contracted services and training.

Each of these areas has different risk profiles. We recognise that some categories (such as IT hardware or certain facilities services) inherently carry higher modern slavery risks due to the nature of those industries and their supply chains.

In summary, UniSC's structure and operations are those of a growing, regionally-rooted university with an increasing global reach, and our supply chains are diverse and largely low-risk by spend distribution. However, we do not assume low risk equates to no risk — especially deeper in our supply chain — and thus we have established a proactive framework to identify and manage modern slavery risks wherever they may arise.

Based on the AUPN taxonomy codes, the University's spend can be split into five key areas.



4 Actions to assess and address modern slavery risks

As part of this continued annual reporting, the University expresses its commitment to improving the management of its supply chains and to continue to aim to achieve greater transparency and responsibility towards the people working within them.

The University continues to deliver a number of structured awareness and education sessions regarding the Act with buying areas within the University including Information Technology, Campus Development and Services and Academic Support Unit. This training helps to identify areas where active engagement and relevant activity would be required to comply with the requirements of the Act.

The University is focused on ensuring appropriate actions are taken to alleviate risk of modern slavery in its supply chain. The key actions undertaken to date are outlined in the table below.

Task	Achievements
Strategic procurement review and investment	Invested in the development of a larger, more capable Strategic Procurement function to uplift procurement maturity across the University. This includes building internal capability to support ethical and sustainable sourcing, improve governance, and strengthen supplier engagement.
Contract clauses	- Established a modern slavery clause across all the University standard agreements. - Incorporated the modern slavery clause into purchase order terms and conditions.
Policies and procedures	Incorporated modern slavery provisions into the existing procurement policies, procedures, and tender documents.
Suppliers	- Strengthened the Supplier Code of Conduct to help suppliers understand the University's expectations. - Enhanced the creditor onboarding process to systematically capture supplier details related to ethical measures, including the Modern Slavery Act (MSA) compliance.
Market approach	Introduced returnable schedules in tender documents to assess suppliers' alignment with the Modern Slavery Act.
University section-wide response	Continued active participation in the sector-wide response to modern slavery through the AUPN (Australian Universities Procurement Network).
Assessment solution	ArcBlue dashboard supports universities in meeting the mandatory requirement by providing a dashboard of inherent modern slavery supply chain risk.
Risk management	- Leveraged industry tools, including annual supplier data imported into the ArcBlue dashboard, to conduct comprehensive risk analysis within the supplier chain. - Monitored, managed and responded to impacts relevant to the MSA environment through the ArcBlue dashboard.
Training	- Continued to improve modern slavery staff training. - Continued to raise staff awareness of modern slavery.
AUPN Anti-slavery Working Group	AUPN established the Anti-slavery Working Group which undertook a discovery exercise leading to the development of the sector-wide Anti-slavery Program. The Working Group continues to meet once every month and is attended by Strategic Procurement. This program of work is ongoing and continues to meet milestones.
Due diligence	- Adopted the Queensland Government's Ethical Supplier Mandate. - Embedded an ethical procurement check within our procurement evaluation process.

5 Evaluating effectiveness

The University plays a key role in leading, guiding, and influencing efforts to address modern slavery, both internally and across the broader higher education sector.

We recognise that our approach must continue to evolve, and measuring our effectiveness is essential to inform and prioritise future actions.

We assess our effectiveness through the following activities:

- **Collaboration:** Continued active participation in the AUPN Modern Slavery Working Group, enabling the exchange of best practices and fostering collective sector-wide action.
- **Awareness and training:** Delivered training sessions and raised awareness among buyers and financial delegates to strengthen understanding of modern slavery risks and responsibilities.
- **Supplier engagement:** Engaged directly with suppliers where modern slavery risks were identified – either via the ArcBlue dashboard or during the tender process – to seek clarification, promote compliance, and encourage remediation.
- **Ongoing risk monitoring:** Conducted continuous evaluation of supplier risk using the ArcBlue Modern Slavery dashboard to inform procurement decisions and track changes over time.

6 Ongoing commitment

The University is dedicated to evolving its practices to embrace leading standards for human rights transparency and mitigate the risk of modern slavery within its operations and supply chain. Planned activities for the upcoming reporting periods include:

- **Staff and student training on modern slavery:** The University will roll out micro credentials to staff and students funded by Australian Attorney General called Education for Change Modern Slavery awareness.
- **Review and change procurement and contract policies/procedures:** We will review all procurement and contract policies and procedures to enable and promote sourcing for good.
- **Strengthening procurement controls:** We will review and refine our procurement and expenditure policies to reduce reliance on purchasing methods that have less oversight (such as direct invoicing and ad-hoc credit card purchases) and encourage use of approved suppliers under formal contracts. By shifting more spend under arrangements that have been vetted and include modern slavery clauses, we increase our control and visibility. This may include adopting tighter rules around procurement methods and expanding our use of systems that require pre-approved suppliers. Continued Sector Leadership: UniSC will maintain active participation in the AUPN Modern Slavery Working Group and related collaborations. We will contribute to any new sector initiatives, such as the development of shared supplier assessment frameworks or collective remediation protocols. Where possible, we will take a leadership role – for example, volunteering to pilot new tools or approaches that the sector is considering. We understand that our contribution helps not just UniSC but all universities to meet their obligations, aligning with SDG 17's call for partnerships.
- **Ethical procurement check:** We will integrate ethical procurement checks into our contract management due diligence process.
- **Focused training for high-risk areas:** We will conduct deep-dive training and guidance sessions for specific departments or project teams that operate in contexts with elevated risk. For example, research groups that work with vulnerable communities or in developing countries will receive tailored guidance on safeguarding against modern slavery. Similarly, units that manage international partnerships will get updated briefings on risk factors to consider. This targeted capacity-building will help ensure that in those activities where risks might be higher, staff are well prepared to manage them. Guidance for assessing modern slavery risks: We will continue to guide the development and application of dashboards to help university officers assess modern slavery risks in both new and existing procurements.

This Statement was approved by the University of the Sunshine Coast Council on 12 June 2025.

Signed



Prof Helen Bartlett
Vice Chancellor and President
University of the Sunshine Coast
12 June 2025



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