MODERN SLAVERY STATEMENT

Reporting Period 1 January 2024 to
31 December 2024

The University of Canberra's statement of compliance with the *Modern Slavery Act 2018* (Cth).

Approved by the University Council on 15 May 2025.

UNIVERSITY OF
CANBERRA

CONTENTS

Introduction

The University of Canberra (**University**) prepared this Modern Slavery Satement (**Statement**) in accordance with section 13 of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

Modern slavery refers to situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. This includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and child labour. Modern slavery and human trafficking are crimes and a violation of a person's fundamental human rights.

Figure 1 illustrates the umbrella term, "Modern Slavery" as provided by the Walk Free Foundation's Global Slavery Index 2018[1] (**Global Slavery Index**).
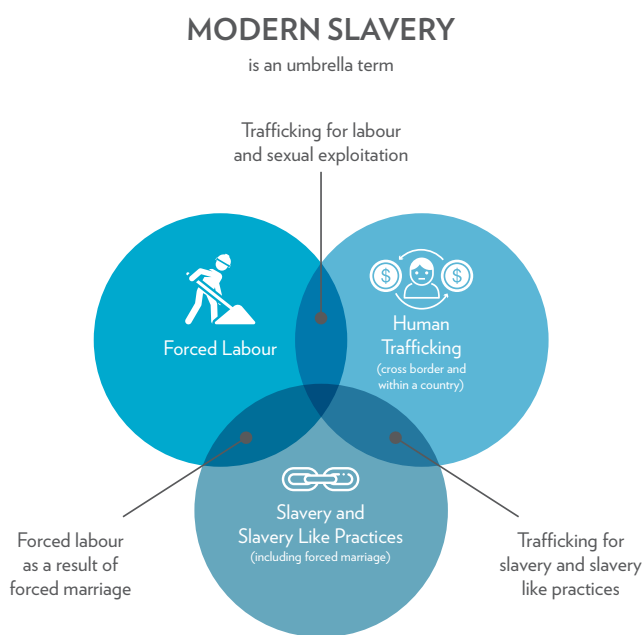
MODERN SLAVERY

is an umbrella term

Figure 1

Our Commitment

The University's ambition, as outlined in *Connected*, the University's decadal strategic plan 2023-2032 is to be the most accessible university in Australia and a global leader in driving equality of opportunity.[2]

The University ranked number one in the *Times Higher Education* Impact Rankings 2021[3], 2022[4], fourth in 2023[5] and seventh in 2024[6] for reducing inequalities. This

included the University's research on social inequalities, policies addressing discrimination and commitment to recruiting staff and students from under-represented groups.

The University is committed to actively addressing modern slavery by continuously reviewing and assessing its operations and supply chains to prevent any involvement in, contribution to, or facilitation of modern slavery. Additionally, the University expects its suppliers, collaborators and business associates to share and uphold this commitment to reducing the risk of modern slavery.

About UC

The University is a body corporate established by the *University of Canberra Act 1989* (ACT). **The Act** defines the functions and powers of the University. The functions of the University are set out in Section 6 of the Act. The University has its primary campus located in Bruce, in the Australian Capital Territory (ACT). In addition, in 2024, a University of Canberra degree could be studied in Sydney, Brisbane or internationally in China, Vietnam, Singapore, and Bhutan through our global partnerships with international institutions. Certain courses can be studied online, as well as in person through our Third-Party Providers.

The University is a young and well-regarded Australian higher education institution. The *Times Higher Education* (THE) World University Rankings for 2024 ranked the University 65 for young universities in the world and within the top 400 of all universities globally. [7]

The University's decadal strategic plan supports the University to continue pursuing success and build on its achievements. The Plan weaves together three overarching themes: partner for community wellbeing and sustainability; becoming the future workforce provider of choice; and enhancing research and local impact.

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1 Walk Free Foundation, **The Global Slavery Index (Report, 2018)**

2 University of Canberra, **Connected, A Decadal Strategy 2023-2032**

3 Times Higher Education, **Impact Rankings 2021 by SDG: reduced inequalities**

4 Times Higher Education, **Impact Rankings 2022 by SDG: reduced inequalities**

5 Times Higher Education, **Impact Rankings 2023 by SDG: reduced inequalities**

6 Times Higher Education, **Impact Rankings 2024 by SDG: reduced inequalities**

7 Times Higher Education, **Explore Rankings Data for University of Canberra**

Structure, Operations and Supply Chain

Our Organisational Structure

The University's organisation chart is **attached** and labelled Annexure A.

Council

The University's governing body, the Council, is established under the Act and is responsible for University governance, management and setting strategic direction.

The Council is required to act on all matters concerning the University in a way it considers will best promote the interests of the University.
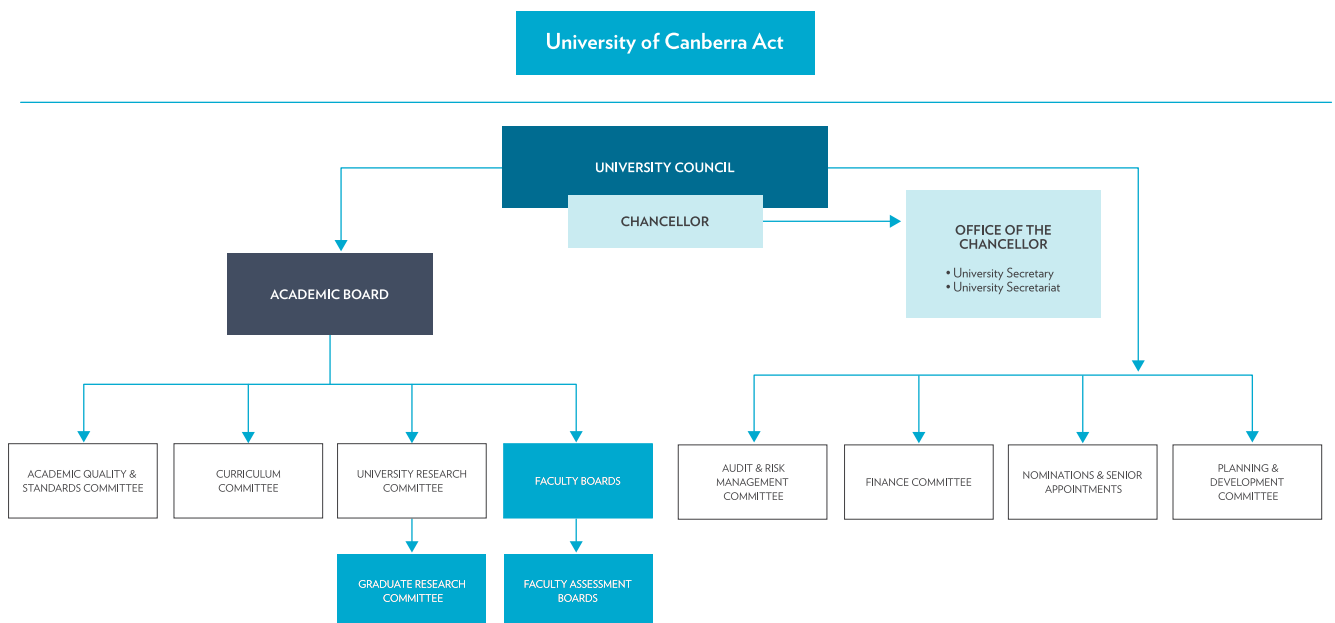
Council is responsible for appointing the Chancellor, Deputy Chancellor, and Vice-Chancellor (and President) of the University. The Vice-Chancellor is accountable to Council for the overall management of the University, within its legislative framework and resolutions of Council, and is the primary source of advice to Council.

Committees of Council

Academic Board (Board) is established under the Act (Division 2.3) and is responsible under the Council for all academic matters relating to the University.

Council and Academic Board have – established sub committees to support the delivery of their responsibilities. The following outlines the committee structure:

UNIVERSITY OF CANBERRA CORPORATE & ACADEMIC GOVERNANCE STRUCTURE

University of Canberra Act

UNIVERSITY COUNCIL

CHANCELLOR

OFFICE OF THE CHANCELLOR
• University Secretary
• University Secretariat

ACADEMIC BOARD

ACADEMIC QUALITY & STANDARDS COMMITTEE

CURRICULUM COMMITTEE

UNIVERSITY RESEARCH COMMITTEE

FACULTY BOARDS

GRADUATE RESEARCH COMMITTEE

FACULTY ASSESSMENT BOARDS

AUDIT & RISK MANAGEMENT COMMITTEE

FINANCE COMMITTEE

NOMINATIONS & SENIOR APPOINTMENTS

PLANNING & DEVELOPMENT COMMITTEE

UNIVERSITY COUNCIL

EXECUTIVE MANAGEMENT

ACADEMIC BOARD

Details at: **canberra.edu.au/about-uc/governance/**
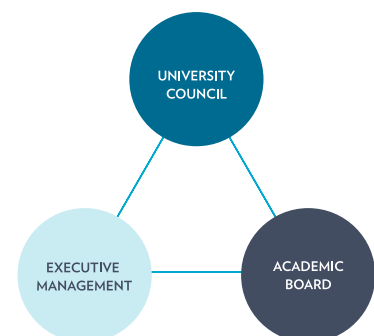
Our Controlled Entities

The University has two wholly owned subsidiary companies, UCX Ltd (UCX) (ACN 119 755 627) and UC Global Pty Ltd (UC Global) (ACN 095 483 686).

Our Operations

The University undertakes academic, research and commercial activities in various countries and works closely with government and the community to educate the future workforce, solve complex research challenges and support the ACT and surrounding region.

Our Students

In 2024 the University reported a total of 18,256 students across its campuses and online programs, including 4889 international students.

Female	Male	X Gender	Unknown
10741	7416	98	1

Our People

The University employed a total of 2,588 employees on either a continuing, fixed term, casual or sessional basis, of which 155 employees were UCX staff.
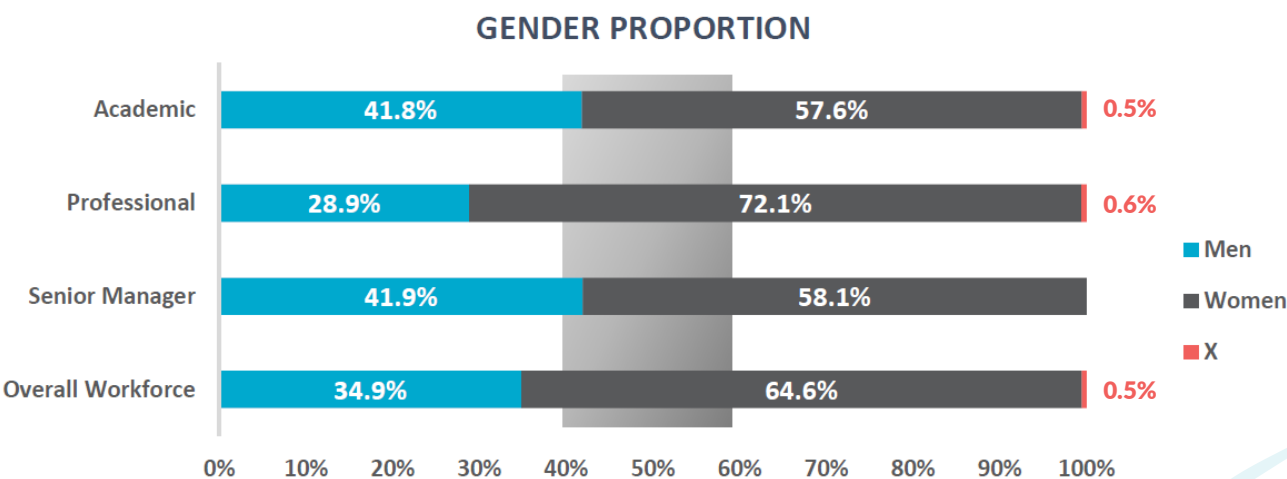
Our Supply Chain

The University procures a wide range of goods and services from both domestic and international suppliers to support its operations. This supply chain includes suppliers, contractors, partners and affiliates.

In the 2024 calendar year, the University engaged in financial transactions with approximately 1,711 suppliers across five (5) countries.

GENDER PROPORTION

	Men	Women	X
Academic	41.8%	57.6%	0.5%
Professional	28.9%	72.1%	0.6%
Senior Manager	41.9%	58.1%	
Overall Workforce	34.9%	64.6%	0.5%

Risks of Modern Slavery Practices

Operational Risks

Academic excellence, as measured by the quality of our education programs, the success of our students and the impact of our research is at the heart of everything the University of Canberra does. To deliver this continued academic excellence, the University has collaborative partnerships across the globe.

International Students

In 2024, the University had 4,889 International students. The table below shows the top 15 International source countries[*].

Home Country	Student Count
1. China (excludes HK SAR and Taiwan)	929
2. India	839
3. Bhutan	690
4. Nepal	519
5. Vietnam	379
6. Bangladesh	148
7. Philippines	128
8. Hong Kong (Sar of China)	107
9. Pakistan	103
10. Sri Lanka	86
11. Korea, republic of (south)	68
12. Singapore	59
13. Indonesia	51
14. Saudi Arabia	46
15. Kenya	39

[*]The table excludes 339 students where no information on country of birth has been provided.

The diagram below illustrates the global distribution of University of Canberra international student nationalities in 2024[*]:
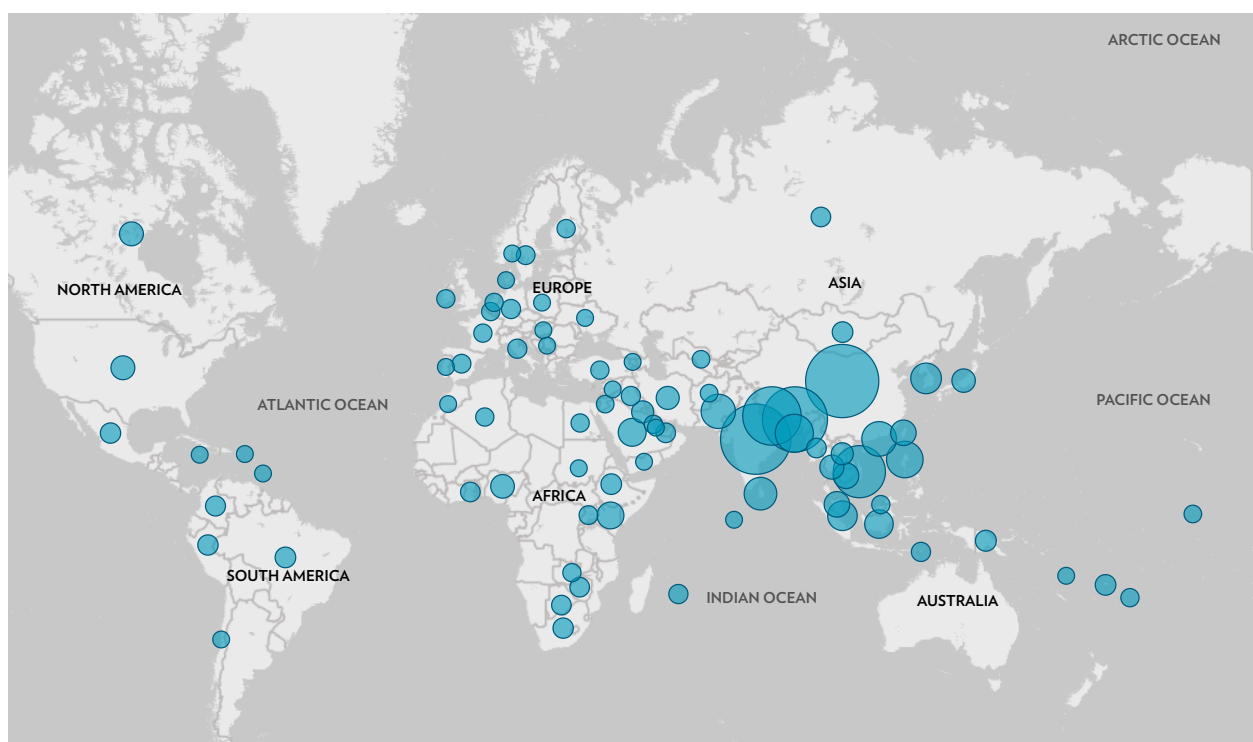
*The diagram excludes 339 students where no information on country of birth has been provided.

Student Recruitment

The University acknowledges that some international students come from countries where modern slavery is highly prevalent and are therefore vulnerable to either direct or indirect exposure to, or involvement in incidents of modern slavery.

A report by the NSW Anti-slavery Commissioner in 2023 highlighted the vulnerability of international students to modern slavery. This vulnerability is present within student recruitment, placements and international student worker exploitation.

Identified risks include **human trafficking, poor labour practices and working conditions, forced labour.**

Enterprise Partners and Agents

The University conducts a wide scope of partnership activities with its partners including research cooperation and joint research, the delivery of courses, education pathways for international students, staff and student exchange opportunities, study abroad and study tours. We acknowledge that some our partners operate in countries where modern slavery is highly prevalent, which poses a risk that university staff in these countries

may directly or indirectly experience or become involved in incidents of modern slavery. The identified risks are **human trafficking, poor labour practices and forced labour.**

Employees are bound by the University's Charter of Conduct and Values. The Charter is enforceable and seeks to provide an ethical framework that outlines expectations of its employees and clarifies the University's obligations and commitments. These standards are supported by the University's values and strategic direction of fostering an ethical, collaborative and innovative environment.

The University's Partnership Governance Framework provides whole of University guidance, to support partnership development practices and ongoing partnership management, evaluation and renewal.
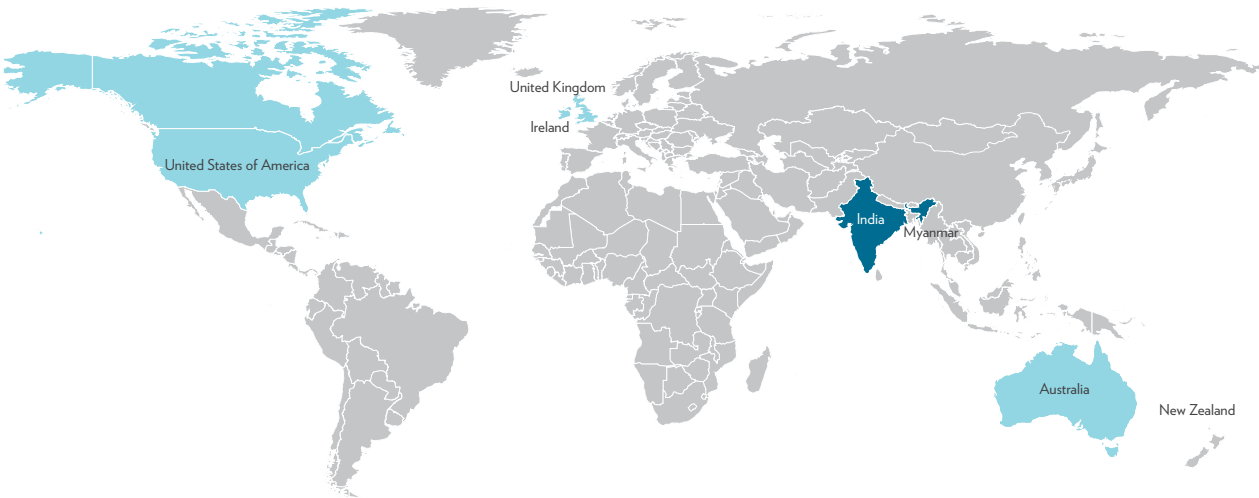
Supply Chain Risks

In 2024, the University partnered with AUPN and the independent ArcBlue Inherent Risk Assessment tool to evaluate supply chain risks among its tier one suppliers. The tool consolidated spend data from 33 universities and correlated it with an aggregated AUPN risk rating—based on supplier category, country, and spend amount. This combined data was then used to determine the University's perceived modern slavery risk level.

UC Global Supply Chain Risk Analysis

In 2024, the University engaged with 1479 suppliers across its supply chain. The diagram below represents a summary of the University's global supply chain risk analysis.

The risk analysis identified 51 high risk categories of goods purchased by the University. It also identified that three of its suppliers had an inherent risk rating of very high and 591 had a high-risk rating. These suppliers represent the University's "tier one" suppliers.

Country Risk

3
Very High Risk Suppliers (0.20%)

591
High Risk Suppliers (39.96%)

2
Medium Risk Suppliers (0.14%)

1,012
Low Risk Suppliers (68.42%)

Category Risk by Suppliers

High	588 (39.76%)
Medium	621 (41.99%)
Low	444 (30.02%)

Country Risk by Suppliers

High	2 (0.14%)
Medium	8 (0.54%)
Low	1,469 (99.32%)

Spend Risk by Suppliers

Very High	109 (7.37%)
High	64 (4.33%)
Medium	299 (20.22%)
Low	1,007 (68.09%)

1,479
Unique Suppliers

1,168
Unique ABNs

51
High Risk L4 Categories

1
High/Very High Risk Countires

Location

99% of the University's suppliers are based in Australia. While the vast majority of suppliers are located domestically, the University acknowledges that some of its local suppliers rely on offshore suppliers who produce goods from the countries where there is prevalence of modern slavery. The University's second largest supplier is based in India, which is reported to have a high/very high risk of modern slavery.

The table below represents the University's inherent risk by country.

Very high/high	0.14%
Medium	0.54%
Low	99.32%

Industry

The University's top ten categories based on financial value interact with many of the goods listed as being at higher risk of being produced by modern slavery. The University considers that there is a risk that its suppliers in these industries may be directly or indirectly engaging in incidents of modern slavery.

The table below represents the University's inherent high-risk categories.

IT Services	34%
Facilities Maintenance	26%
Property Management	8%
Student Services	6%
Corporate Services	6%
Security Equipment & Services	5%
Marketing & Events	4%
Contracted Services/Advice	3%
Recruitment	3%
Laboratories & Research	2%

Ongoing Actions Taken

Treatment Actions

The University continues to include actions within its processes that are designed to minimise the risks of modern slavery.

Due Diligence

Supply Chain Visibility

The University has a strong understanding of its supply chain. This enables us to work with and influence suppliers to take proactive measures to reduce the risks. In instances where a modern slavery risk is identified as very high, or has occurred, the University takes action to work with the supplier to remediate and reduce the risk.

- 2024 actions
  - Engaged with very high-risk supplier to mitigate modern slavery risk, conducted a site visit and review of their modern slavery policy.
  - Membership of FRDM Supply Chain Management portal. Alerts generated by FRDM provide the University with access to real-time information and insights on emerging risks and challenges within the sector.

- 2025 actions
  - Membership of ArcBlue Risk Assessment tool.
  - Increases level of engagement to include very high risk and high-risk suppliers.
  - Monitoring of proposed mitigation for very high-risk suppliers.
  - Review of policy for high-risk suppliers.

Raising Awareness and Understanding of Modern Slavery

The University is working to enhance awareness and education across all areas. By disseminating information, insights and providing training, the University seeks to empower staff working in identified operational categories and supply chains that may be at risk of modern slavery, to make informed decisions and effectively mitigate potential challenges.

- 2024 actions
  - Introduction of the Partnership Governance Framework where initial 'Know your Partner' due diligence was conducted against all new

and continuing partners prior to progressing to contractual negotiations.
  - Comprehensive assessment of student applications where applications are received from "high risk" countries, and subsequent actions taken if a concern or issue arises.
  - Partnership information and contracts reviewed on an ongoing basis.

- 2025 actions
  - Update the University's modern slavery questionnaire with a sector-wide Self-Assessment Questionnaire (SAQ).
  - Review of the Partnership information and contracts on an ongoing basis.
  - Explore the introduction of 'Education for Change' micro-credentials by Australian Catholic Religious Against Trafficking in Humans (ACRATH) to educate staff on understanding and identifying modern slavery.
  - Making information on modern slavery available and easily accessible on the University's internal online platforms.

International Student

The University has noted that international students are especially vulnerable to modern slavery. By disseminating information and insights to all students, the University seeks to empower them by raising awareness on how modern slavery may present to make informed decisions and effectively mitigate potential challenges.

- 2025 actions
  - Explore the introduction of 'Education for Change' micro-credentials by Australian Catholic Religious Against Trafficking in Humans (ACRATH) to educate students on understanding and identifying modern slavery.

Collaboration Across Sector

The University is a member of the University Anti- Slavery Group. The monthly forums serve as platforms for knowledge exchange, fostering a community- driven approach to risk management and mitigation. By leveraging combined and collaborative efforts, the group endeavours to encourage suppliers to remediate any identified issues within the supply chain, addressing them at the source and foster a culture of accountability and responsibility.

- 2024 actions
  - Sector supplier SAQ remediation plan response developed to ensure a unified approach and consistent messaging to suppliers. A pilot process was initiated with five (5) suppliers at the end of 2024, with plans to scale further in 2025 following refinement.
  - Sector-wide laboratory consumables and medical equipment risk assessment approach.
  - Established a process to leverage collective university resources to create a transparent, effective, and scalable process to manage and remediate shared supplier's modern slavery risk as a pilot.
  - Reviewed and updated the University's Risk Assessment Tool.
  - Identified and addressed international student worker exploitation risks with ACRATH, Migrant Justice Institute and Australian Red Cross.
- 2025 actions
  - Review, monitor and update 2024 actions.

Governance Framework

The following policies and procedures are in effect and support the University's commitment to mitigating the risks of modern slavery in its operations and supply chain.

Modern Slavery Policy

The *Modern Slavery Policy* codifies the University's commitment to deliver a strong response to modern slavery by seeking to ensure that the University, its partners, suppliers, contractors, and others with whom the University does business, respect and share the University's commitment to minimising the risks of modern slavery in their operations and supply chains.

Human Rights and Discrimination Policy

The *Human Rights and Discrimination Policy* affirms the rights of all people, asserting the University's commitment to act against individuals who engage in conduct that limits the legislative rights of others;[8] affirms that all university decisions will be made, and policies will be written and enacted with due consideration to human rights as expressed in the *Human Rights Act 2004* (ACT). The policy is under review and will be updated in 2025.

Complaints and Grievances

The University has various processes in place to facilitate the handling of grievances and other concerns such as the University's management of human rights issues including an online reporting tool where any matter can be reported by name or anonymously 24 hours a day. Action is taken within 24 business hours of receiving the report.

Students may refer to the *Student Grievance Resolution Policy* and staff may refer to the *Respect at Work (Prevention of Bullying) Policy* and the processes outlined in the *University of Canberra Enterprise Agreement*.

Members of the University or public may express dissatisfaction with decisions of the University or policies and processes of the University by writing to the Vice-Chancellor.

University staff and other persons are encouraged to report suspected corrupt conduct and allegations of maladministration within the University, including conduct contrary to the University's commitments regarding modern slavery and human rights. The *Public Interest Disclosure Act 2012* (ACT) provides specific protections for staff reporting such conduct.

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8 See Human Rights Act 2004 (ACT).

Procurement Framework

The University updated its Procurement Framework in 2024. The Framework is structured around value for money, defines the holistic approach adopted by the University when procuring goods and services. When considering value for money, focus is less on the cost and more on sustainability and risk reduction. The framework consists of policies, guidelines, tools and templates which provide guidance and outline how to conduct due diligence at each stage of the procurement process, and includes the modern slavery questionnaire in all procurement approaches.

The University's contract terms and conditions were updated in 2023 to include a modern slavery clause. The clause outlines the supplier's obligations to managing modern slavery risks. This provides a key control for the University.

Academic Freedom and Freedom of Speech Policy

The *Academic Freedom and Freedom of Speech Policy* supports the University's stance on the ability of anyone to enjoy the human right to freedom of speech and to engage in critical and free enquiry. The University encourages its community to participate in informed intellectual discourse and matters of public importance.

Investment Policy

The *Investment Policy* requires that the University be a socially responsible institution and a socially responsible investor, which includes the requirement to avoid any investment opportunities that could cause social injury. Where an organisation is determined to behave in a manner inconsistent with the *Investment Policy*, the University may exclude that organisation and all associated holdings from the University's investment portfolio.

University Internal and External Networks

The University is a member of various external networks that provide information and resource sharing opportunities for best practice across the higher education sector, including but not limited to:

- Australian University Procurement Network (AUPN)
- Universities Australia (UA)
- Innovative Research Universities (IRU)
- Student Experience Network (SEN)
- Society of University Lawyers (SOUL)
- Tertiary Education Facilities Management Association (TEFMA)
- Council of Australian Directors of Information Technology (CAUDIT)
- Association of Chief Security Officers – UK (AUCSO)
- Society for College and University Planners – Canada (SCUP)
- University Risk Management & Insurance Association – USA (URMIA)
- Australasian Tertiary Education Management (ATEM)
- Gartner (for Legal, Risk, Audit, Health & Safety and IT)
- ANZSSA – Australian and New Zealand Student Services Association

These groups provide a platform for members to share experiences with suppliers and to discuss and collaborate on other relevant issues, including modern slavery.

Case Study

Renewable Energy - Bruce Campus Rooftop Solar System

Renewable energy supply chains have been identified as one of the high-risk industries for incidents of modern slavery, with evidence linking it to forced labour violations in manufacturing, especially in the Xinjiang Uyghur Autonomous Region (XUAR) in China. Subsequently, a key consideration for the approach to market for the Renewable Energy Request for Proposal (RFP) was supplier analysis to the second tier. A mandatory supplier questionnaire was issued with the RFP, requiring all respondents to answer questions relating to their supply chain, including those of their subcontractors. It specifically requested that the respondents note the components (panels/inverters and roof racks) for the whole system and identify the manufacturers/distributors. The University undertook an in-depth desktop analysis of the proposed renewable energy supply chain, of the proposed solar panels, engaged extensively with the suppliers, reviewed their Modern Slavery Statements, and those of their suppliers to the third tier, and engaged with peers in the industry.

About 45% of the world's solar grade polysilicon is sourced from the Xinjiang region of north-west China. Hoshine Silicon is a major supplier of polysilicon to the largest solar providers including some of those proposed for this project. They have a manufacturing site in Xinjian and there has been evidence that forced and/or child labour is used to produce polysilicon in their factory in Xinjian region.

To mitigate the risks the University undertook the following actions:

- The contract was updated to include clauses on the Contractor's requirements to meet modern slavery mitigation measures, and the expectation that the Contractor's suppliers adhere to the same requirements.
- Mandated that a Certificate of Origin be presented to the University for review prior to the installation of the solar panels.
- Retained the right under the contract to reject solar panels that do not have a Certificate of Origin or whose Certificate of Origin is from Xinjian Province.

Effectiveness of Actions

The University acknowledges that despite adopting these processes, there remains a risk that its partners and agents could directly or indirectly be involved in modern slavery practices, including the use of threats, coercion or deception in order to recruit international students to the University.

The University continues to assess the effectiveness of its actions through:

- The introduction of the Supplier Assessment Questionnaire and updated contract clauses to facilitate discussion and create awareness on modern slavery risks within the supply chain.
- Seeking feedback from staff on the use, effectiveness, and ability to conduct due diligence processes and how these processes could be improved.
- The frequency of discussions around modern slavery in the workplace, including incidences where advice may be sought or consideration required.
- The adoption of appropriate tools, training, and other resources to assist staff in realising the University's modern slavery commitments. This led to the acquisition of the FRDM tool.
- Continued learning from the University's relationship with the AUPN and its member network. The introduction of the training material and information is a result of this engagement.

Work to address modern slavery at the University is ongoing, and will continue to be monitored to ensure the actions are effective through internal governance and oversight mechanisms, including regular reporting to the University's Audit & Risk Management Committee. The University intends to further assess its effectiveness in this area by introducing key performance indicators.

Consultation

During 2024, the University consulted with its controlled entities to raise awareness about the risks of modern slavery, and to gain an understanding of the approaches taken to reduce prevalence.

Though the University has overarching governance, performance and reporting responsibilities for its controlled entities, each controlled entity has its own board and constitution, ensuring statutory obligations and duties are appropriately carried out.

Other Information

This statement is made pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and constitutes the Modern Slavery Statement of the University of Canberra for the calendar year ending 31 December 2024 and has been approved by the Council of the University of Canberra at meeting 15/05/2025.
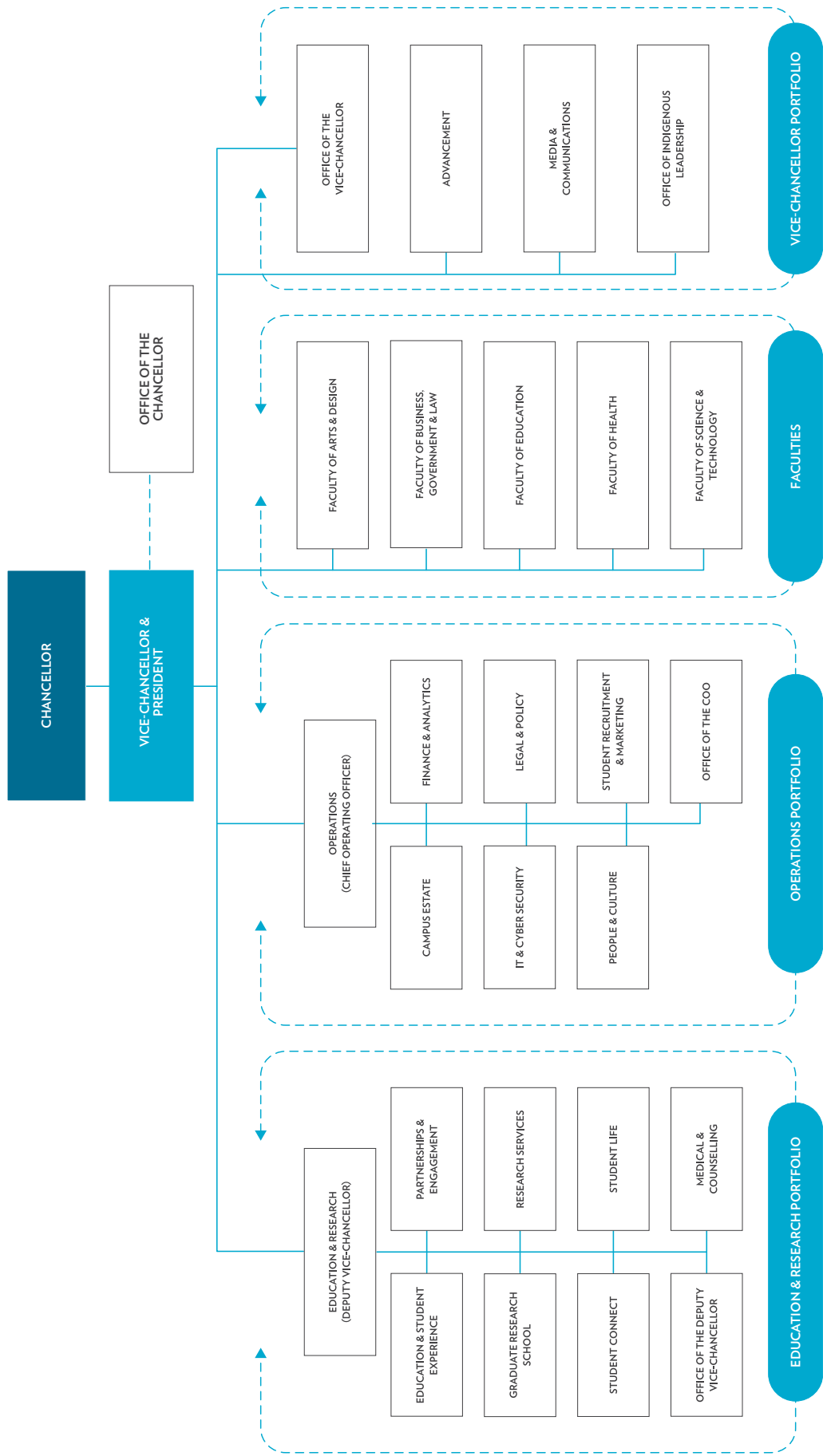
Bill Shorten

The Hon. Bill Shorten

Vice-Chancellor and President

University of Canberra

Annexure A – University Organisation Chart

CHANCELLOR

VICE-CHANCELLOR & PRESIDENT

OFFICE OF THE CHANCELLOR

VICE-CHANCELLOR PORTFOLIO

- OFFICE OF THE VICE-CHANCELLOR
- ADVANCEMENT
- MEDIA & COMMUNICATIONS
- OFFICE OF INDIGENOUS LEADERSHIP

FACULTIES

- FACULTY OF ARTS & DESIGN
- FACULTY OF BUSINESS, GOVERNMENT & LAW
- FACULTY OF EDUCATION
- FACULTY OF HEALTH
- FACULTY OF SCIENCE & TECHNOLOGY

OPERATIONS PORTFOLIO

OPERATIONS (CHIEF OPERATING OFFICER)

- FINANCE & ANALYTICS
- LEGAL & POLICY
- STUDENT RECRUITMENT & MARKETING
- OFFICE OF THE COO
- CAMPUS ESTATE
- IT & CYBER SECURITY
- PEOPLE & CULTURE

EDUCATION & RESEARCH PORTFOLIO

EDUCATION & RESEARCH (DEPUTY VICE-CHANCELLOR)

- PARTNERSHIPS & ENGAGEMENT
- RESEARCH SERVICES
- STUDENT LIFE
- MEDICAL & COUNSELLING
- EDUCATION & STUDENT EXPERIENCE
- GRADUATE RESEARCH SCHOOL
- STUDENT CONNECT
- OFFICE OF THE DEPUTY VICE-CHANCELLOR

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