



Modern Slavery Statement 2024



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 2024.

We 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 the commencement of our modern slavery risk management program and continue to make while the University also prepares to amalgamate with The University of Adelaide to establish a new university for the future called Adelaide University.

Reporting entity

The University 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.

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Identify the reporting entity covered by this statement Reporting Criteria 1 & 2	2, 4
Describe the structure, operations and supply chain of the reporting entity covered by the statement Reporting Criteria 1 & 2	3-7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls Reporting Criteria 1, 2 & 3	8, 11
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes Reporting Criteria 4	9-10
Describe how the reporting entity assesses the effectiveness of actions taken to assess and address modern slavery risks Reporting Criteria 5	11-12
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Summary of progress

The University is committed to continually improving its awareness and management of any modern slavery risks in its operations and procurement supply chains. Since the University commenced its modern slavery risk program, it has made the following progress:

- It has updated the invitation to bid documents with mandatory questions relating to modern slavery awareness, management programs, identified risks and resultant action.
- It seeks that prospective suppliers confirm their commitment to identifying modern slavery in their supply chains and managing any associated risks.
- It has introduced standard contractual provisions that require all newly appointed suppliers to take reasonable steps to identify and address risks of modern slavery practices.
- It has updated its procurement instructions to require tender panels to consider supplier responses to its modern slavery questions and how the University will work with the supplier to address any risks.
- Its 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.
- It has updated its 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.
- It helped to lead sector-wide collaboration through the modern slavery working group for the Australasian Universities Procurement Network ('AUPN'), which is supporting member universities to meet the challenge of human rights transparency and risk management in their supply chains.
- It 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.
- It contributed to the Australian Government's statutory review of the Modern Slavery Act 2018 (Cth) being led by Professor John McMillan AO.
- Two University staff members founded the South Australian Modern Slavery Network. The network brings together stakeholders from industry, academia, government, trade unions, and civil society to help address the problem of modern slavery in South Australia and beyond. In 2023, the network facilitated an in-person event that provided three companies the opportunity to share how their products can help companies address modern slavery risk

- It is represented on the Federal Government's Human Trafficking and Modern Slavery Research Network within the Australian Institute of Criminology.
- University staff members and a PhD student attended the Auditor-General's 2023 Modern Slavery Conference. A University academic staff member published a report at this conference developed with Australian Red Cross titled 'Hidden Victims, Intergenerational Trauma'.
- Through the University's Centre for Enterprise Dynamics in Global Economies ('C-EDGE'), it continues to contribute world-class academic research and collaborate with business, industry partners, government and fellow researchers to progress the global conversation on modern slavery risks and the effectiveness of reporting.

During 2024, the University Increased its education and awareness of Modern Slavery through:

- A free micro-credential educational module delivered in partnership with Flinders University.
- A lunchtime seminar addressing key modern slavery issues.
- Transitioning to the ArcBlue modern slavery risk mapping tool in 2024, alongside 35 universities through the AUPN. This tool applies global risk indicators and predictive algorithms to identify supply chain risks and provide sector-wide insights.
- Participating in a sector-wide initiative to assess high-risk suppliers – 47 of 72 invited responded, resulting in a pilot program with five suppliers to support continuous improvement.

Creating a new University for the future

On 1 July 2023, the University of Adelaide and the University of South Australia began their historic integration, creating the new Adelaide University. Under the Adelaide University Act 2023, (SA) this integration aims to redefine higher education in South Australia and globally by leveraging the collective heritage and pursuing forward-thinking strategies. While transitioning to Adelaide University, with a planned opening on 1 January 2026, the University will continue with its existing initiatives related to the Modern Slavery Act. Any costs incurred by the University and activities undertaken through the integration process will be included in the University's modern slavery risk analyses and reporting.

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 in the regional areas of Mount Gambier and Whyalla.

The University's community in 2024 was comprised of:



34,087

students



2,987

staff



254,582

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 programs and courses across all seven Academic Units which are designed specifically for online learning.

In 2024, the University had two research institutes – the Future Industries Institute and the Centre for Cancer Biology – and 22 research centres and concentrations. The academic enterprise is enabled through the University's 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 7,400 parchments in 2024.

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 Pty Ltd ('UniSA Health') is endorsed by the ACNC as a health promotion charity that contributes to the health and wellbeing of its students, staff and the community by providing medical, nursing and allied health services as well as quality teaching for the University through the provision of clinical placements for undergraduate and postgraduate students.

UniSA Health also provides professional development opportunities to academic staff who are qualified practitioners in their fields.

UniSA Ventures Pty Ltd.

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 2024, the University transacted with approximately 3500 suppliers within Australia and overseas (excluding payment card merchants).

Distribution of spend by industry (2024)



91% of the University's spend on goods and services was with Australian-based suppliers, 7.7% of spend was with suppliers predominantly located in United States, India, Netherlands, United Kingdom, Germany, Hong Kong (SAR), Switzerland, Singapore and China. Spend with 42 other countries composed only 1.3% of the University's total expenditure on goods and services.

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, Kenya 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

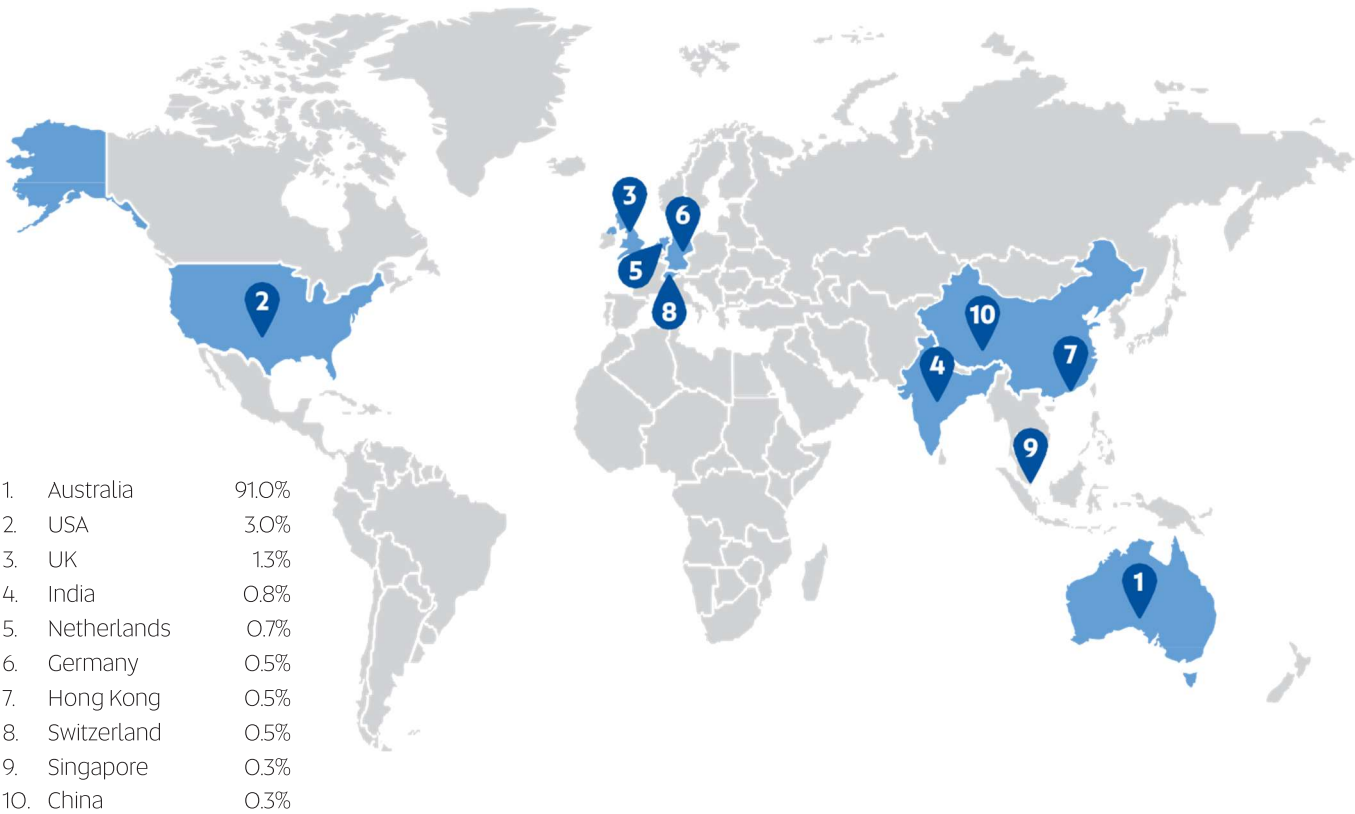
In 2024, UniSA Health primarily dealt with 13 suppliers of medical equipment, medical supplies and office supplies. All of these suppliers are based in Australia.

UniSA Ventures Pty Ltd

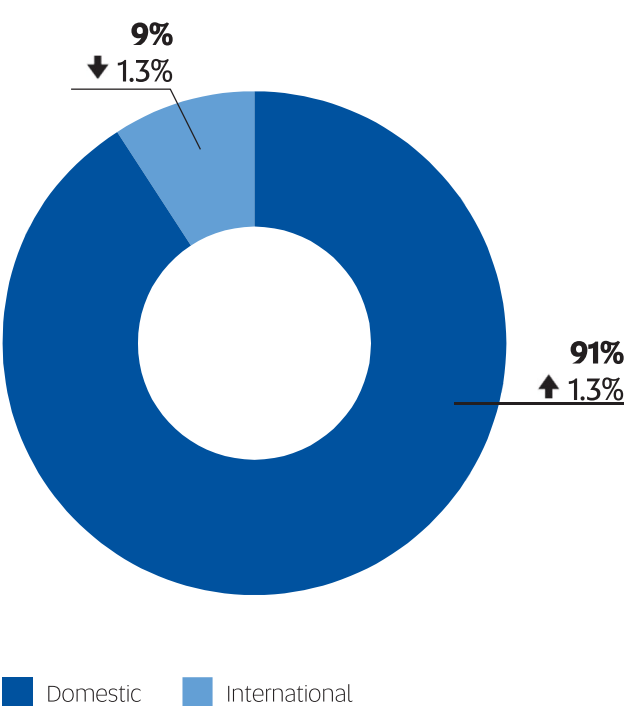
UniSA Ventures' supply chains include intellectual property management, investment management, customer service, marketing, finance and corporate services.

In 2024, UniSA Ventures engaged with 14 suppliers, all located in Australia.

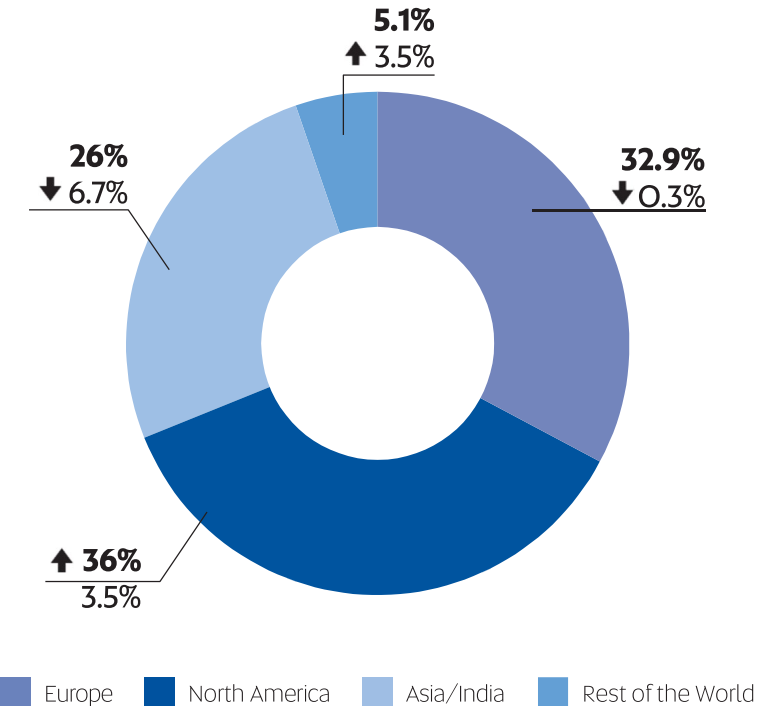
Top 10 Countries by Spend (2024)



Domestic vs International Spend (2024)



International Spend by Region (2024)



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 2023* and *Senior Staff Employment Conditions Policy*. 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 relevant legislation, including the *Defence Trade Controls Act 2012* and *Defence Trade Controls Amendment Act 2024*, the *Foreign Influence Transparency Scheme Act 2018* (Cth), the *Autonomous Sanctions Act 2011* (Cth) and *Australia's Foreign Relations (State and Territory Arrangements) Act 2020* (Cth). All research undertaken by the University involving human research must be reviewed and approved by a Human Research Ethics Committee.

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 Australasian 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.

In 2024, as part of its membership in the AUPN and in collaboration with 35 other participating universities, the University of South Australia transitioned from the FRDM software solution to the ArcBlue modern slavery risk mapping tool. This tool leverages global risk indicators and predictive algorithms to assess inherent modern slavery risks within our supply chains and provides sector risk insights.

Additionally, 2024 marked the introduction of a sector-wide Self-Assessment Questionnaire (SAQ) initiative, in which University of South Australia actively participated. Medical Equipment and Laboratory Consumables were identified as high-risk categories, accounting for 3% of the sector's overall spend. As part of this initiative, 72 suppliers in this category were invited to complete the SAQ to enhance the transparency of their practices and supply chains. Of these, 47 suppliers responded, representing 22% of the sector's category spend. The results were reviewed by a collaborative cross-university working group, and a continuous improvement pilot was launched with five suppliers to drive further progress.

During 2024, the University did not identify any known risks or instances of modern slavery in its 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 in conjunction with its participation with broader sector-wide initiatives. 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 the 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,
- participated 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,
- updated procurement instructions for the 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, and
- reviewed procurement procedures and included specific provisions relating to the identification and management of modern slavery risks during the preparation and evaluation stages of the sourcing process.

Since the last statement, the University has:

- continued the journey to establish Adelaide University, and
- Participated in the 2024 National Temporary Migrant Survey through the AUPN with the Migrant Justice Institute which seeks to identify international student risks. Sector-wide results are set to be published through the University Anti-Slavery Program in early 2025.

Industry Collaboration

In 2022, University staff members Dr Katherine Christ and Professor Al Rainnie founded the South Australian Modern Slavery Network. The network brings together researchers and practitioners from industry, academia, government, trade unions, and civil society to help address the problem of modern slavery in South Australia and beyond. Since 2022, the network has hosted multiple events, made submissions to parliament, and received exposure via the media activities of its members. The most recent event was a workshop for members on the topic of 'moving beyond tier 1', which was sponsored and hosted by Cowell Clarke Commercial Lawyers. The network continued to expand its activities and influence during 2024.

The University also continues to be 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 has maintained its representation on an Academic Advisory Board to advise and enrich the AUPN's approach to mitigating modern slavery risks. The University Anti-Slavery Program is also part of the SA Modern Slavery Network that is facilitated by Katherine Christ, a University SA academic.

In collaboration with 35 participating AUPN members, the University transitioned from the FDRM software solution to the ArcBlue modern slavery risk mapping tool which provides each of the participating members with:

- a modern slavery dashboard highlighting country risks, industry risks and spend levels,
- modern slavery awareness and understanding across our supply chain
- the ability to issue a single industry-standard supplier assessment questionnaire to common suppliers on behalf of all participating universities, and
- alerts based on University-specific suppliers, industries and countries.

During 2024, the University continued its commitment to combating modern slavery through ongoing education facilitated by AUPN. The University participated in monthly forums organised by AUPN, which featured guest speakers offering valuable insights into best practices.

Additionally, the University engaged with case studies shared by AUPN, highlighting successful initiatives that contributed to fostering a culture of learning and improvement. Through the AUPN Portal and the Anti-Slavery Community of Practice, the University had access to resources and updates, promoting collaboration and the exchange of knowledge.

Research

The University has continued its contribution to academic research and the global conversation on modern slavery risks and the effectiveness of reporting.

Through the Centre for Enterprise Dynamics in Global Economies ('C-EDGE'), the University brings together world-class researchers from a range of research disciplines to provide expert advice on the challenges of dynamic markets, support the growth and development of business and government, and provide research students with real-world experience.

Academics from the University of South Australia have drawn on their expertise to advise governments in Australia and overseas. This involvement includes voluntary submissions to parliamentary inquiries and giving invited evidence. Staff members are also represented on the Australian Institute of Criminology's Human Trafficking and Modern Slavery Research Network.

The University is also committed to developing the next generation of modern slavery experts via the support of several PhD students from Australia and overseas who are each investigating different aspects of modern slavery as part of their program. PhD projects currently in progress incorporate the following topics: modern slavery in the Ghanaian cocoa industry; the gendered nature of modern slavery in Ghana; modern slavery risk management and reporting in Kenya; and the role of consumers in supporting Australia's legislative effort to combat modern slavery.

Procurement

The University previously reported that the 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.

The University had also:

- Undertaken a review of terms and conditions for supplier contracts and 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.
- 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,
- Reviewed and updated the standard clauses to reflect feedback from University stakeholders and suppliers,
- Commenced development on an expanded suite of purchase agreement templates to ensure that a greater range of University purchases have appropriate modern slavery identification and reporting obligations, and
- Reviewed and modified supplier evaluation procedures based on University stakeholder feedback to improve the usability and effectiveness of the procedures for decentralised procurement activities.

Since the last statement, the University has:

- Captured over 96% of the University's expenditure on procured goods and services in 2024 for processing and analysis within the ArcBlue modern slavery risk mapping tool. The remainder represents low value payments for travel and subsistence-related purchases made using corporate credit cards; and
- Transitioned, in collaboration with 35 AUPN member universities, from the FRDM platform to the ArcBlue modern slavery risk mapping tool. ArcBlue uses global risk indicators and predictive algorithms to assess inherent modern slavery risks within supply chains and provide sector-wide insights.
- Participated in the rollout of a sector-wide Self-Assessment Questionnaire (SAQ) initiative. Medical Equipment and Laboratory Consumables were identified as high-risk categories, representing 3% of sector spend. Of 72 suppliers invited to complete the SAQ, 47 responded covering 22% of the categories spend. Results were reviewed by a cross-university working group, leading to a pilot program with five suppliers focused on continuous improvement.
- Participated in the 2024 National Temporary Migrant Survey through the AUPN with the Migrant Justice Institute which looks to identify international student risks. Sector-wide results are set to be published through the University Anti-Slavery Program in early 2025.

Contract Management

The University developed and issued a Modern Slavery Supplier Questionnaire to an initial tranche of the University's top suppliers on the basis of expenditure.

The University, with other members of the AUPN, had made the commitment to coinvest in the FRDM supply chain mapping solution which in 2023 led the University to review its contract management procedures. The review leveraged the data-driven insights and supplier analysis tools to identify, prioritise and investigate modern slavery risks within its supply chain.

Following the transition to the ArcBlue modern slavery risk mapping tool from the FRDM solution, the university's contract management procedure will continue to be reviewed in 2025. Training will be cascaded among decentralised procurement activities as the tool becomes more broadly adopted. The University will continue to develop this capability further to 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, although it is expected that this may change as the ArcBlue supply chain risk mapping solution matures and becomes more broadly embedded in the University's sourcing and contract management activities.

The University acknowledges that there continues to be more work to do with identifying risks associated with existing suppliers as well as identifying and managing risks for prospective suppliers. Through future reporting periods, in addition to continuing to work with University staff and incumbent suppliers, the University will:

- Continue to work with AUPN to mature the ArcBlue supply chain risk mapping to further expand upon its modern slavery awareness and risk management activities.
- Continue to work with the Australasian Universities Procurement Network, the South Australian Modern Slavery Network and similar advocacy groups, trade associations and community organisations to share insights and examples of modern slavery and good practice.

Process of consultation with other entities

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

The University has consulted with management teams within UniSA Health Pty Ltd and UniSA Ventures Pty Ltd to assist with the preparation of this statement.

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



Professor David G. Lloyd

Vice Chancellor and President, University of South Australia
June 2025



University of South Australia

Australia's University of Enterprise

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Acknowledgement of Country

UniSA respects the Kaurna, Boandik and Bangarla peoples spiritual relationship with their country.

Artist: Ngupulya Purnani

Find out more about the University's commitment to reconciliation at ***unisa.edu.au/RAP***