



**Southern Cross
University**

Modern Slavery Act Statement

For the year ended 31 December 2024

Southern Cross University and its Controlled Entities

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Introduction

Southern Cross University (the University) is committed to the prevention of modern slavery and human trafficking in all its forms. This commitment extends across every aspect of the University's operations, including its academic, research, administrative, and commercial activities, as well as throughout its diverse and global supply chains.

The University is a bold, progressive institution with deep roots in regional Australia. Originating from the Lismore Teachers College in 1970 and becoming a university in 1994, The University has consistently championed innovation in education and research. Ranked among the Top 100 Young Universities globally, the University is driven by its mission of "Changing Lives" through transformative learning experiences and impactful research. With a strong commitment to social justice and community engagement, the University's approach to addressing modern slavery reflects its broader values of caring for our people and communities and building trust through actions.

This Modern Slavery Statement provides an overview of Southern Cross University's structure, operations, and supply chains. It outlines the measures taken during the reporting period to assess and mitigate the risk of modern slavery, including due diligence processes, student support, agent management, risk assessments, staff training and supplier engagement initiatives. The University continues to strengthen its governance frameworks and reporting mechanisms to ensure continuous improvement in its approach to modern slavery risk management.

The Southern Cross University Modern Slavery Statement 2024 has been prepared in accordance with the University's obligations under section 13 of the *Modern Slavery Act 2018* (Cth) and section 31 of the *Modern Slavery Act 2018* (NSW).

This statement is made on behalf of Southern Cross University and its controlled entities. It was formally approved by the Southern Cross University Council on 25 June 2025.



Sandra McPhee AM
Chancellor
Southern Cross University



Professor Tyrone Carlin
Vice-Chancellor and President
Southern Cross University

Part 1: Reporting Entity and Structure

The University is established under the [Southern Cross University Act 1993](#) (NSW). The University operates under the *Southern Cross University Act 1993* and the associated [Southern Cross University By-Law 2005](#) (NSW).

The object of the University is the promotion, within the limits of the University's resources, of scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence.

The University is governed by the University Council to which the Vice-Chancellor (who is the Principal Officer), reports. The University has two controlled entities, Southern Cross Campus Services Limited and SCU Ventures Pty Ltd, which undertake activities ancillary to the operations of the University.

Structure

Reporting Entity:

Southern Cross University

ABN 41 995 651 524

The University is a statutory body established under the *Southern Cross University Act 1993* (NSW).

The University is registered as a charity with the Australian Charities and Not-for-Profit Commission.

Controlled Entities:

Southern Cross Campus Services Limited ('Campus Services')

ACN 003 082 406 | ABN 57 003 082 406

Campus Services is an Australian company limited by guarantee, incorporated in 1986, it has been wholly owned and controlled by the University since 1993.

Campus Services is registered as a charity with the Australian Charities and Not-for-Profit Commission.

SCU Ventures Pty Limited ('SCU Ventures')

ACN 165 638 719 | ABN 81 165 638 719

SCU Ventures is an Australian private company, wholly owned and controlled by the University since 1 December, 2023.

SCU Ventures is registered as a charity with the Australian Charities and Not-for-Profit Commission.

The University, as a consolidated group, trades under various business names which are publicly available via a search of the Australian Business Register.

This statement is issued on behalf of Southern Cross University (ABN 41 995 651 524) and its controlled entities (as listed above) under our collective reference as “we”, “us”, “our” or “the University”.

Part 2: Operations and supply chains

Operations

The University’s core activities are teaching and research. The University operates independently within Australia and has campuses in Lismore, Coffs Harbour, Gold Coast, Melbourne, Sydney, Brisbane and Perth.

Through its wholly owned subsidiaries, the University carries out activities which support its core activities.

Campus Services’ operations include the provision of on-campus catering services, management of fitness facilities and managing the University’s residential accommodation portfolio.

SCU Ventures’ operations include delivery of education services on behalf of the University at its metropolitan campuses in Brisbane, Melbourne, Sydney and Perth.

Supply Chains

The University maintains a diverse and complex supply chain that supports the delivery of education, research, and student services. With over 2,000 suppliers, the University sources a broad range of goods and services in accordance with legislative requirements and the University’s internal procurement policies.

Procurement categories include construction services and materials, furniture and stationery, IT and audio-visual equipment, telecommunications, food and catering, travel services, laboratory supplies (including chemicals and pharmaceuticals), books and printing, and waste management.

The University recognises that certain categories of procurement carry a higher risk of modern slavery. These include:

- Computer software and hardware
- Apparel and uniforms
- Laboratory equipment and consumables
- Catering and food services

- Construction and building maintenance
- Security and cleaning services

The University has implemented a range of due diligence measures to address higher risk activities, those measures are described in Part 4 of this Statement.

Part 3: Modern Slavery risks in operations and supply chains

Modern Slavery Risk Register

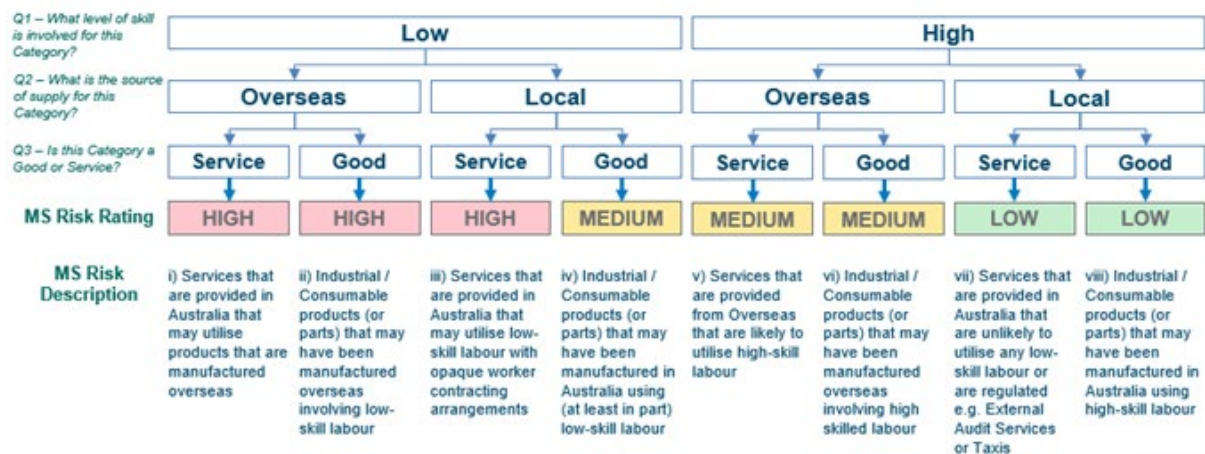
As part of its ongoing commitment to continuous improvement, and as foreshadowed in its Modern Slavery Statement for the 2023 reporting year, the University has developed a Modern Slavery Risk Register (MS Risk Register) to ensure management oversight of material modern slavery risks. The MS Risk Register is monitored and reported in accordance with the University's Enterprise Risk Management Framework. The MS Risk Register compliments the Supplier Risk Ratings through assessment of risks to operations that are not just supply chain related. Specifically, those risks that may affect our student cohort.

Through the development of the MS Risk Register, the University has formalised the identification of modern slavery related risks in the following categories:

- Investments and Assets;
- Student Access and Experience (including student placements, forced marriages and student working conditions);
- Research Operating Model;
- Global Recruitment (International Student Recruitment).

How We Assess Supplier Modern Slavery Risk

Modern Slavery Risk Assessment



Supplier Risk Rating Assessment

Throughout the reporting period, the University monitored supplier risk using spend analytics and dashboard reporting provided by ArcBlue Consulting Pty Ltd (ArcBlue). The monitoring is accessed via our membership in the Australasian Universities Procurement Network (AUPN).

Through the ArcBlue analytics tool, the University integrates category risk, country risk, and expenditure data to arrive at an aggregated risk rating for each supplier. This supports a sector-wide collaborative approach currently involving 38 Australian and 3 New Zealand member institutions.

In total, 33 universities contributed supplier data, enabling risk assessments across approximately 91,000 suppliers.

Based on the University's supplier profile, the University is considered low to moderate risk for modern slavery exposure. The rationale for the rating is:

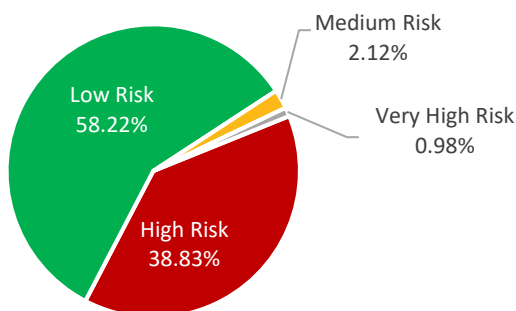
- Less than 1% of our suppliers are classified as “Very High Risk” which is a strong indicator that University procurement practices and supplier base are well managed.
- The majority of the University's 2,035 suppliers fall into the “Low Risk” category (approximately 59%) based on spend analytics and risk profiling.
- The University sources many goods and services through NSW Government contracts and collaborative frameworks like the AUPN, which include modern slavery requirements.

In relation to areas of moderate risk, approximately 2% of suppliers are rated 'Medium Risk', and 39% are rated 'High Risk', particularly in categories such as:

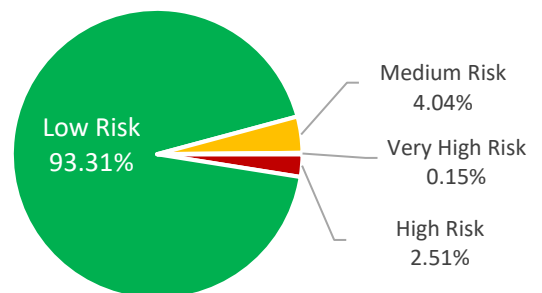
- Commercial cleaning
- Construction
- Catering
- Security services
- ICT and laboratory equipment

These categories are globally recognised as higher risk for modern slavery due to complex supply chains and subcontracting practices. In recognition of those higher risk categories, the University's use of ArcBlue dashboards, quarterly supplier reviews, and ISO standards for categories such as security services, demonstrate a proactive approach to managing these risks.

Overall SCU Anti-Slavery Supplier Risk



SCU Supplier Risk by Country



Source: ArcBlue Consulting Analytics Tool

Part 4: Actions taken to assess and address risks

Due Diligence and Screening

The University takes steps to embed best practice due diligence across its supply chain and operations. Those steps include supplier questionnaires, contract management tools, benchmarking and collaboration.

Supplier Questionnaires

As part of its due diligence framework, Southern Cross University requires suppliers to complete a mandatory questionnaire that collects critical information about their business practices. This includes:

- Whether they are required to report under the *Modern Slavery Act*
- Their internal policies, procedures, and contractual safeguards
- The structure and risk profile of their supply chains
- The actions they have taken to identify and address modern slavery risks

These responses are evaluated as part of the University's supplier assessment and procurement processes. Where responses indicate a higher level or risk, further due diligence is undertaken. As an example, further due diligence was completed prior to the supply and installation of solar panels across University campuses.

Through its membership in the AUPN, the University participates in a sector-wide initiative to assess supplier practices. In the reporting period, 72 suppliers were invited to complete the questionnaire, with results analysed via ArcBlue Consulting's dashboard. SCU-specific supplier responses are also tracked to inform targeted engagement and risk mitigation strategies.

This supplier approach by category will continue throughout 2025. The ArcBlue portal provides access to all supplier detailed responses.

Industry Benchmarking and Collaboration

Southern Cross University continues to be a member of the AUPN, which represents the Australian higher education sector, working together to uplift Australian universities' procurement capabilities.

The University has continued its involvement in AUPN's University Anti-Slavery Program and actively participates in regular workshops and performs ongoing monitoring of program outcomes.

The key areas of focus for the 2024 program included:

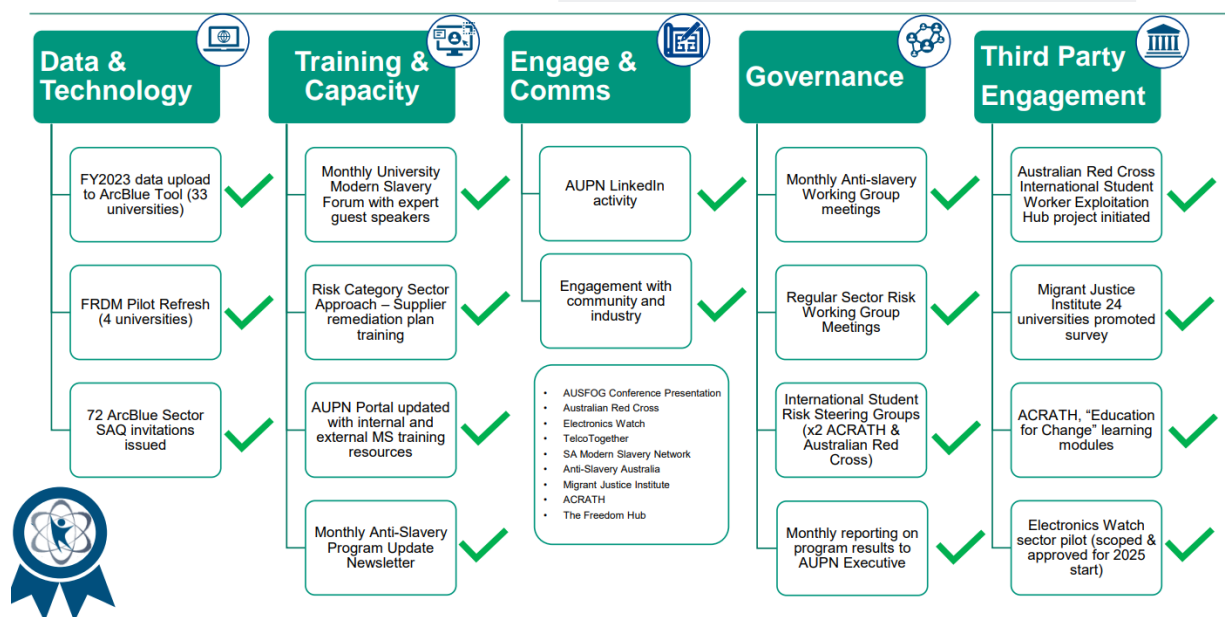
2024 Program Pillars

Key areas of focus for the program



 Risk Software	 Capability Uplift	 Engagement	 Issues/Risks Collaboration	 3rd Party Program Support
• FRDM refresh pilot • ArcBlue risk dashboards & SAQ implementation, training & support • Data uploads & quality	• Monthly University Anti-Slavery Forums including expert insights • Risk insights • Media alerts • Third party program resources (e.g. Education for Change) • Monthly newsletter update	• Supplier remediation & education • Participating in external collaborations • Student education programs – ACRATH and Australian Red Cross • Migrant Justice Institute survey participation	• Supplier questionnaires & analysis rollout • Subgroups to act on category risks & issues – Medical Equipment / Laboratory Consumables • International Student Risk Working Group	• Ongoing Cleaning Accountability Framework Pilot (CAF) • Australian Red Cross – Student Work Right Hub • ACRATH – “Education for Change” Modern Slavery Modules • Migrant Justice Institute

AUPN University Anti-Slavery Program key achievements throughout the 2024 reporting year:



Agreements, Policies, and Procedures

The University continued to review and update its suite of policies and procedures throughout the reporting year. Respect for Human Rights, including alignment with applicable legislation, are embedded throughout all University policies and procedures.

Policy	Relevant references
International Education Agent Management Policy and Procedures	This Policy sets out Southern Cross University's requirements for the appointment, management, and termination of its international education agents (Agents). It requires taking reasonable steps to identify, assess and address risks of Modern Slavery practices in the operations and supply chains used in the recruitment of international students, as outlined in the Agent Agreement.
Research Collaboration Procedures	Ensure that any research collaboration complies with obligations under the Modern Slavery Act.
Code of Conduct	Integrity demonstrated through advancing human rights and our commitment to provide opportunities for students and staff in an inclusive, culturally safe environment – clause (5) b Respect for Law and University Governance – clauses (7) – (8) Ethical decision making – clause (31)
Harassment, Bullying, and Discrimination Prevention Policy	The policy sets out the University's commitment to ensuring all staff and students are treated fairly and with dignity and respect and providing an environment free from harassment, bullying, and unlawful discrimination.
Sexual Misconduct (Prevention and Response) Policy	The University aims to provide an environment where all members of the University are treated fairly and with dignity and respect, free from Sexual Misconduct.
Work Health and Safety Policy and associated procedures	The policy promotes the health, safety, and welfare of all University employees, students, contractors, and visitors to the University.
Whistleblowing Policy and Procedures	University is committed to undertaking its activities to the highest standards of honest and ethical behaviour. The policy sets out the support and protection for those who report wrongdoing.
Fraud and Corruption Prevention Policy	The policy outlines how the University detects, reports, assesses, and deals with possible Fraud and Corruption and supports the University's Code of Conduct in promoting a fair and honest working and learning environment.

Policy	Relevant references
Procurement Policy	The policy articulates a key procurement principle, Social Procurement – that University funds are expended efficiently, economically, and ethically, including respect for stakeholders' interests, the rule of law, and human rights – and the University's commitment to identifying and mitigating the risk of Modern Slavery.

Southern Cross University's Legal Agreement templates – including Purchase Order Terms and Conditions, Consultancy Agreements, Research Agreements and International Student Agent Agreements - incorporate modern slavery clauses that detail the University's requirements related to modern slavery and compliance with applicable legislation.

Training

As part of an AUPN University Anti-slavery program initiative the University continued to work with Australian Catholic Religious Against Trafficking in Humans (ACRATH) to provide a certified online training for staff.

Reporting incidents or concerns of modern slavery

The University's [modern slavery webpage](#), which is available to all staff and students, outlines its commitment to preventing modern slavery in all its forms. The page:

- Defines modern slavery and explains how it can affect students, particularly through coercion, exploitation, or deceptive recruitment practices.
- Encourages awareness by helping students recognise signs of modern slavery, such as threats, restricted movement, or unfair working conditions.
- Provides support pathways, including:
 - Contact details for SCU's Equity and Inclusion team.
 - Links to external support services like the Australian Red Cross and Anti-Slavery Australia.
 - Promotes reporting by encouraging students to speak up if they or someone they know may be at risk.

Part 5: Assessment of actions

Throughout 2024, the University advanced its framework for identifying, mitigating, and addressing modern slavery risks. It also enhanced collaboration with stakeholders. The University continues its alignment with the AUPN Anti-slavery initiative, a sector-wide effort to combat modern slavery risks within Higher Education nationally.

The University's continuous improvement activities relating to modern slavery, continue to be led by our procurement team who regularly attend AUPN run forums and capacity building workshops to ensure that the University keeps pace with industry best practice.

The University monitored and evaluated the effectiveness of our actions throughout the year, this included reviewing our policies, conducting supplier checks, and seeking feedback from stakeholders.

Part 6: Consultation with Controlled Entities

The University's two wholly owned entities: Southern Cross Campus Services Limited and SCU Ventures Pty Limited operate under applicable University policies and procedures. In consultation with the Executive General Manager of SCU Ventures and other senior staff of these entities, the University has ensured that relevant policies are integrated into the activities of the controlled entities, particularly those that relate to international student recruitment and supply chains. Through regular reporting and communication, the University has sought and obtained confirmation from each controlled entity of their compliance with relevant University policies and procedures.

Management teams from each of the University's controlled entities have access to university resources including Governance Services, Finance and Procurement teams for support with assessment of key supplier risks, and to the University Legal Office to assist with review of legal contract terms to support modern slavery compliance.

Part 7: Other relevant information

Next Steps

In the 2025 reporting year, in accordance with the Modern Slavery Act 2018 (Cth), the University plans to:

- Finalise a suite of six 30-minute training modules available to staff and students on understanding and identifying Modern Slavery within school, healthcare, legal, social work and university settings with a downloadable certificate/credential in collaboration with Australian Catholic Religious Against Trafficking in Humans (ACRATH) via AUPN Anti-Slavery Program.
- Continue the inclusion of clauses specific to modern slavery within contract documentation and collection of supplier data participating in market activities.
- Continue to provide awareness of the *Modern Slavery Act 2018* (Cth) and associated responsibilities within the central Procurement Services team and across the University by ensuring staff involved with procurement practices have undertaken appropriate compulsory modern slavery training.
- Complete University implementation of transition to Sievo Analytics, which is a HES/AUPN initiative to move away from ArcBlue Q1/2025.
- Conduct data analysis for the controlled entities.
- The University will continue to benefit from ongoing collaborative activities planned for 2025 by the AUPN;
 - Establish 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 (currently testing via a pilot)
 - Electronics Watch Pilot commencement to reduce modern slavery risks in the ICT supply chains
 - Ability to measure year on year improvement
 - Ongoing educational uplift via the monthly program forum with guest speakers
 - Seeking advice and input from academics at universities who specialise in modern slavery