

Modern Slavery Act Statement

For the year ended 31 December 2023



Contents

INTRODUCTION	3
ORGANISATIONAL STRUCTURE	4
Reporting Entity.....	4
SOUTHERN CROSS UNIVERSITY OPERATIONS	4
Structure.....	4
Operations.....	4
RISKS OF MODERN SLAVERY PRACTICES IN THE UNIVERSITY'S OPERATIONS AND SUPPLY CHAINS.....	5
2023 Assessment.....	5
ACTIONS TAKEN BY THE UNIVERSITY TO ASSESS AND ADDRESS MODERN SLAVERY RISKS.....	5
Due Diligence and Screening.....	5
Spend Analytics and technology solution	5
Supplier questionnaires and RFx documentation	6
Industry Benchmarking and Collaboration	6
Agreements, Policies, and Procedures.....	7
Training.....	8
Reporting incidents or concerns of modern slavery	8
HOW THE UNIVERSITY ASSESSES THE EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS	8
Next Steps.....	8



INTRODUCTION

Southern Cross University is committed to protecting and respecting human rights and has a zero-tolerance approach to slavery and human trafficking in all its forms. The University's 2023 Modern Slavery Statement describes the actions taken to assess and address modern slavery risks in University global operations and supply chains, and has been prepared in accordance with the obligations set out in section 13 of the Australian *Modern Slavery Act 2018* (Cth) (the Act).

The University recognises its social responsibility to ensure, wherever possible, it prevents and minimises the risks associated with modern slavery within University supply chains.

This statement is evidence of the continued development and evolution of the steps taken address modern slavery risks and is made on behalf of Southern Cross University and its controlled entities, Southern Cross Campus Services and SCU Ventures, and was approved by the Southern Cross University Council on 11 June 2024.

Sandra McPhee AM
Chancellor
Southern Cross University

Professor Tyrone Carlin
Vice Chancellor and President
Southern Cross University



ORGANISATIONAL STRUCTURE

The University is a statutory authority constituted under the *Southern Cross University Act 1993 (NSW)*. The University is also a registered charity under the Australian Charities and Not-For-Profit Commission Act 2012 (Cth).

The objects and functions of the University are set out in section 6 of the *Southern Cross University Act 1993 (NSW)* and include the promotion 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 University's Chief Executive Officer, the Vice Chancellor, reports.

The Council is chaired by the Chancellor and has 13 members: The Chancellor, the Vice Chancellor, the Chair of the Academic Board, two members appointed by the Minister, four members appointed by Council, three elected staff members, and one elected student member.

The Academic Board is the University's principal academic body. It is responsible for establishing and maintaining the highest standards in teaching and learning, and research in the University. It is also the primary advisory committee of the Council on academic matters. Further information on the structure and operation of the University can be found in the University's annual report.

Reporting Entity

Southern Cross University makes this statement for and on behalf of the University and its controlled entities, Southern Cross Campus Services Limited and SCU Ventures Pty Limited.

SOUTHERN CROSS UNIVERSITY OPERATIONS

Structure	Operations
<p>Southern Cross University (ABN 41 995 651 524) is a statutory body incorporated by the <i>Southern Cross University Act 1993 with its registered office at Military Road, EAST LISMORE NSW 2480</i>. The University is registered with the Australian Charities and Not-for-Profit Commission.</p> <p>The University, as a consolidated group, trades under various business names including but not limited to:</p> <ul style="list-style-type: none">- Southern Cross University Health Clinic- The Hotel School- Southern Cross Environmental Analytical Laboratory	<p>The University is a registered Higher Education Provider in accordance with the <i>Tertiary Education Quality and Standards Act 2011</i> and carries out teaching and research activities.</p>



<ul style="list-style-type: none"> - Southern Cross Analytical Research Laboratory - Regenerative Agriculture Alliance - SCU Fitness For You 	
<p>The University has two controlled entities: Southern Cross Campus Services Limited – an Australian company limited by guarantee, wholly owned and controlled by the University since 1986 which provides on-campus amenities and services to students and staff of the University</p>	<p>Through its wholly-owned subsidiaries, the University carries out additional activities, including on campus catering services, fitness facilities, managing residential accommodation and delivering education services at metropolitan campuses.</p>
<p>SCU Ventures Pty Limited – an Australian private company, wholly owned and controlled by the University since 1 December 2023.</p>	<p>SCU Ventures Pty Ltd delivers education services on behalf of the University at metropolitan campuses in Melbourne, Sydney and Perth.</p>

RISKS OF MODERN SLAVERY PRACTICES IN THE UNIVERSITY'S OPERATIONS AND SUPPLY CHAINS

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 and Perth.

An assessment of operations identified the following areas as potentially at risk of inadvertently being impacted by modern slavery practices:

- procurement
- students and staff
- research operations
- international operations.

2023 Assessment

ACTIONS TAKEN BY THE UNIVERSITY TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

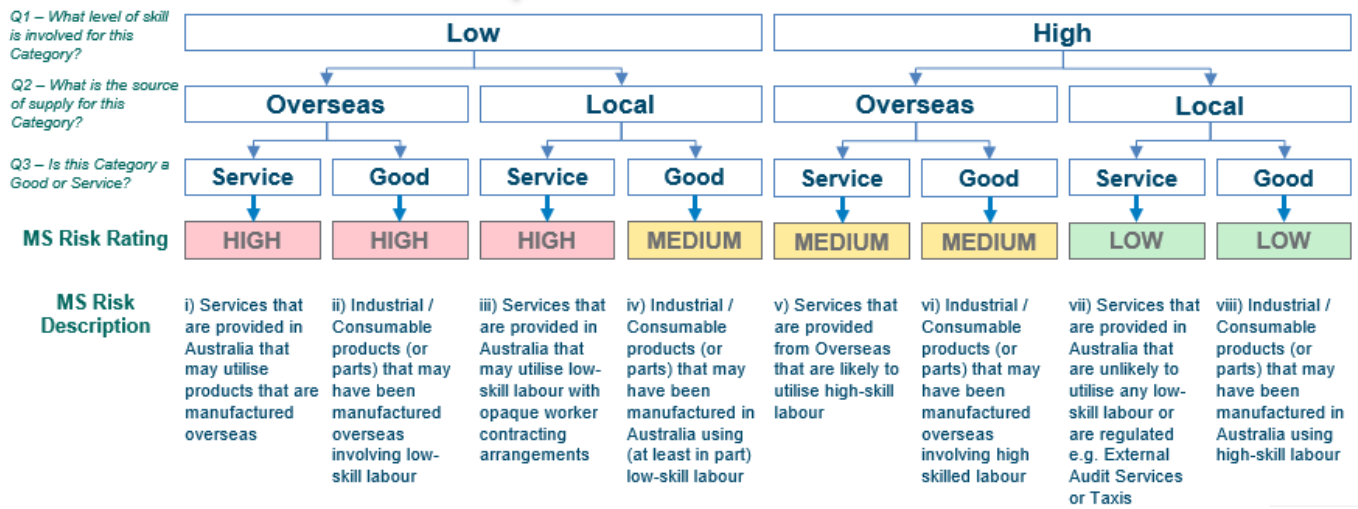
Due Diligence and Screening

Spend Analytics and technology solution

The University continues to refine its methodology, primarily through the use of upgraded spend analytics and dashboards. The Australian Universities Procurement Network (AUPN) on behalf of the University has undertaken an assessment of 2023 spend analytics to determine supplier risk ratings. Risk ratings are set out below using the University risk assessment matrix.



Modern Slavery Risk Assessment



Based on the assessment undertaken through the AUPN, the following table highlights the number of suppliers against their risk rating.

14 Very High Risk Suppliers (0.73%)	661 High Risk Suppliers (34.28%)	39 Medium Risk Suppliers (2.02%)	1,216 Low Risk Suppliers (63.07%)
---	--	--	---

Further assessment of the analytics demonstrate that reported very high risk to high risk rated suppliers fall into the following main categories:

- Marketing materials;
- Laboratory consumables;
- Scientific equipment;
- Freight; and
- Software as a service.

Supplier questionnaires and RFX documentation

The University continues to issue all high-risk suppliers with a questionnaire, which has been updated to capture more detailed information that provides due diligence over the suppliers' supply chain, international operations, labor recruitment practices, and other factors. Additionally, each supplier is required to provide a copy of their Modern Slavery Act Statement.

All University tender/market approach documentation includes modern slavery questions to obtain more detailed information on supplier-specific risks.

Industry Benchmarking and Collaboration

Southern Cross University is a member of the AUPN, which represents the Australian higher education sector, and works together to uplift Australian universities' procurement capabilities.




The AUPN Modern Slavery Act working group was renamed the Anti-slavery group in 2023 and has been established to support the development and implementation of a program of works. It aims at supporting AUPN members to improve supply chain human rights transparency, collaborate on risks, and contribute to the fulfillment of Modern Slavery reporting requirements. The University will actively monitor the outcomes from the AUPN and work closely with the network.

Agreements, Policies, and Procedures

Southern Cross University has a suite of policies and procedures that embed respect for Human Rights, including alignment with the *Modern Slavery Act 2018* (Cth).

Policy	Relevant references
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.
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 Agreement templates – including the Purchase Order Terms and Conditions, Consultant Agreement, Contracts for Goods and Services and Overseas Education Agent Agreements incorporate modern slavery clauses that detail the University's requirements related to modern slavery and compliance with the *Modern Slavery Act 2018* (Cth).



The University has also developed a specific procurement template suite for high-value/high-risk goods and services in its sourcing activities.

Training

The University web site provides staff and students with information on modern slavery risks. Students and staff are able to access information specifically tailored to identifying the signs of modern slavery, and they are provided with further information about support and how to report instances of modern slavery.

Reporting incidents or concerns of modern slavery

Any concerns about modern slavery should and can be reported to the nominated disclosure coordinator in accordance with the Southern Cross University's procedures.

HOW THE UNIVERSITY ASSESSES THE EFFECTIVENESS OF ACTIONS BEING TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

During the 2023 calendar year, the University continued the development of its framework for identifying, mitigating, and remediating risks of modern slavery as well as collaborating and communicating with its stakeholders. The University is following the AUPN Anti-slavery initiative, a sector collaboration to tackle modern slavery in the Higher Education Sector. The AUPN currently has 39 member institutions working together to improve excellence in procurement practice and in the skills of procurement professionals in the higher education sector.

The University Audit and Risk Management Committee provides oversight of the identification and management of modern slavery risk on behalf of the University Council. Material risks, as identified, are reported to University Council.

Next Steps

In 2024 reporting year under the Modern Slavery Act 2018 (Cth), the University plans to:

- Continue the inclusion of clauses specific to modern slavery within contract documentation and collection of supplier data participating in market activities
- Continue discussions started in 2023 with Cleaning Accountability Framework Ltd (CAF) with the intention to register with CAF
- Enhance 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 modern slavery training.
- The University will continue to benefit from ongoing collaborative activities planned for 2024 by the AUPN
 - Sharing best practices for addressing modern slavery risks in the higher education sector
 - Seeking advice and input from academics at universities who specialise in modern slavery
- Develop a modern slavery risk register to ensure management oversight of material modern slavery risks.