



# UNE Group Modern Slavery Statement

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University of  
New England

**2021**



# UNE Group Modern Slavery Statement 2020

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**Acknowledgement of Country**

The University of New England respects and acknowledges that its people, programs and facilities are built on land, and surrounded by a sense of belonging, both ancient and contemporary, of the world’s oldest living culture.

In doing so, UNE values and respects Indigenous knowledge systems as a vital part of the knowledge capital of Australia.

## Our commitment to addressing Modern Slavery

The University of New England, a public Australian university, is committed to contributing to the public good, upholding human rights<sup>1</sup>, freedom of speech, academic freedom and supporting broader societal progress, through its education mandate and through the conduct of its operations in a manner which is lawful and consistent with accepted codes of practice.

In this inaugural Modern Slavery Statement, the University provides an overview of its operations and those of its Controlled Entities and describes the steps it takes to help avoid the risk that its operations and activities contribute to modern slavery practices.

UNE expects to pay fair price for goods and services and chooses to engage with suppliers and other third parties who also act lawfully and in accordance with accepted codes of practice as part of their operations. Through these activities and actions and the continued monitoring and improvement of our management of suppliers, operational activities and partnerships, UNE will support Australian and collaborative global efforts to help dis-incentivise and eradicate modern slavery.

This statement is for the period from 1 January 2020 to 31 December 2020; UNE is continuing to mature its approach to modern slavery. UNE is part of the Australian Universities Procurement Network (AUPN) and leverages this group and its shared resources<sup>2</sup> as part of its response to managing modern slavery risk.

### Part 1 – University of New England (UNE) – the reporting entity

The University of New England ('UNE') (ABN: 75 792 454 315) was established<sup>3</sup> in Armidale in the New England Region of NSW, on 1 February 1954 as the first regional University in Australia. UNE's object 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 founding motivation for an independent regional university was to improve outcomes and alleviate social disadvantage via the opportunity for higher education and learning for persons in remote and rural locations, with a focus on adults in the region including from farming families and persons returning from World War 2.

UNE was and continues to be a pioneer of distance (and online) learning, of quality higher education that is accessible, personal and relevant, and a supporter of research of quality that has impact and is relevant to the communities with which the institution interacts.

The University of New England had in 2020 a number of controlled entities which undertake ancillary activities in the best interests of the University. These include:

- Ag360 Pty Ltd (ABN: 59 639 263 899): Start-up organisation proposing to commercialise software developed in collaboration with partners in a recent Sheep Cooperative Research Centre at UNE;
- Agricultural Business Research Institute (ABN: 59 7813 010 88): Licensing and commercialisation of UNE and partner developed industry renowned BreedPlan software;
- UNE Foundation Ltd (ABN: 42 5362 780 85) & UNE Foundation Trustee (ABN 77 0948 341 07): The Trustee Board for the UNE Foundation Trust receives and invests donated funds

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<sup>1</sup> As recognised by the Australian Government and described on the Australian Human Rights Commission [website](#).

<sup>2</sup> Refer to Part 7 of this statement for more information regarding the Australian Universities Procurement Network (AUPN)

<sup>3</sup> UNE is a body corporate established by NSW legislation, the [University of New England Act \(NSW\) 1993](#) (the 'UNE Act').

which are made available fund student scholarships and teaching and research related activities of the University of New England;

- UNE Life Pty Ltd (ABN 29 0656 484 19): A company which provides the services and facilities that underpin the 'life' of the campus with services for students and the community which complement the activities of the University but fall outside of core business. Services range from managing a world class sports centre and associated community activities, coordination of the student radio station, catering and cafés, managing post office, bookshop, and cinema; and
- UNE Partnerships Pty Ltd (ABN: 74 0030 991 25): Flagship Education and Training organisation delivering professional training, skills development and workplace learning.

## **Part 2 – About UNE structures, operations and supply chains**

### ***UNE Structures***

UNE's peak governance body is the UNE Council which has the control and oversight of the affairs of the University. A number of Council Committees, the Academic Board (the peak academic governance body) and key executive and management committees, support governance and oversight functions and performance monitoring at the institution.

The Vice-Chancellor and Chief Executive Officer is the Principal Officer of the University and is supported by a Senior Executive and Senior Management Team who oversee:

- Education division encompassing three academic faculties and nine academic Schools; education support team, student services and brand, marketing and partnerships functions
- Research Services – including research ethics and administration, higher degree research student support and research institutes.
- Integrated services divisions including corporate support for people, systems, facilities, functions such as legal advice and contracts
- Financial and performance analysis and strategy area
- Governance division supporting governance systems and assurance
- Communications and events teams.

Each of UNE's Controlled Entities have a Board of Directors and/or Members. Controlled Entities are established by and report to the UNE Council.

### ***Operations***

UNE's annual turnover in 2020 was close to \$350m, with approx. 70% of income from teaching activities; 22% of income from research and grants and approx. 9% being from 'other income'. UNE is a significant contributor (approx. 42% GDP in 2019/2020) to the economy of the New England Region in New South Wales, Australia.

UNE offers a comprehensive higher education curriculum and suite of academic courses consisting of approx. 160 courses and 1700 units of study each year to approx. 26,000 students, 85% of whom study mostly online and the significant majority of which are based in Australia. Of UNE students, just under 6% or 1470 are international students. Some 70% of UNE students are women and the University supports one of the largest cohorts of Australian Indigenous students in the sector.

UNE is committed to research excellence and knowledge creation, and supports academic staff scholarship and research and the education of higher degree research students through the pursuit of strategic research priorities in partnership and through collaborations and application for funded research grants.

UNE has, excluding casual staff, just over 600 professional staff and 570 academic staff, most of whom are based in Armidale, NSW. Depending on area and level of employment UNE Staff are subject to common law contracts, or are employed under one of two Enterprise Agreements (one for Professional staff and the other relating to Academic and English Language Teaching staff). Each instrument sets out terms and conditions of employment.

*University of New England Group – Modern Slavery Statement - 2020*

## **Locations**

The University of New England ('UNE') (ABN: 75 792 454 315) is based in Australia and is active nationally with international connections in higher education program delivery, in undertaking scholarship and research, in making contributions to education partnerships collaborations and engagements in multi-discipline areas where UNE has expertise and in the undertaking of support activities that enable scholarship and engagement, including corporate services operations. Each of UNE's controlled entities are also based in Australia.

*Online reach/location:* UNE was a pioneer of distance learning for remote and regional students in Australia and in 2020 with 85% of UNE's students studying online or in mixed mode, UNE's reach includes those communities of students who access UNE's high quality online higher education program offerings across Australia. A small proportion of students are based overseas in country, and it is noted in response to COVID-19 pandemic and restrictions on travelling to Australia, this proportion increased in 2020.

*Primary operations:* UNE is Australia's first and one of its leading regional universities. Operating from its primary location in Armidale in the New England region in New South Wales Australia, the University has multiple campus-based facilities located across NSW, including campuses at Armidale (includes extensive farm/research facilities and residential colleges), Sydney (Parramatta), Tamworth and Taree; and study centres at Coonabarabran, Glenn Innes, Gunnedah, Guyra, Inverell, Moree, Narrabri and Tenterfield. UNE is also a partner in the Country Universities Centre (CUC) network which in 2020 had 8 centres in NSW and plans to open 4 additional centres in 2021 including 1 in New South Wales, 2 in Queensland and 1 in Victoria. UNE also partners with three NSW Health Districts to deliver healthcare (and student practical learning opportunities) online to remote regional areas. UNE host the Smart Regions Incubator (SRI) with operations in Armidale, Tamworth and Moree.

UNE is involved in research and research partnerships located in Australia and overseas. UNE has ongoing research through rural and regional Australia including agricultural/agribusiness related applied research and education based including the flagship *QuickSmart* research project. In 2020, UNE had active international research and or teaching partnerships in many overseas regions including Africa, South and Central Asia, Asia Pacific and Oceania regions. UNE has an active teaching partnership arrangement in Adelaide (South Australia). Also in 2020 UNE and 'IEG Campus' had a partnership to provide education opportunities to students in Asia ( leveraging a Kuala Lumpur, Malaysia study base) and Africa.

## **Supply chains**

UNE is a supplier of education programs, research, scholarly engagement and related services.

UNE is also involved in some ancillary 'producer' activities including agricultural production (UNE's research farms produce livestock and other agricultural outputs) and electricity production (UNE's solar farm generates electricity for its own use).

To support its operations, UNE sources human resources, finished goods and services and some raw materials. UNE also seeks support and funding for its operations including for example via donations and grants.

UNE's key supply chains include:

1. Sourcing of human resources via either direct recruitment or use of recruitment agencies;
2. Student recruitment either via direct marketing activities or via use of admissions centres, third party providers and agents;
3. Sourcing supplies of finished goods via direct sourcing (e.g. via a retailer) or wholesaler/catalogue supplier confirmed via credit card, purchase orders or contract;
4. Sourcing of professional services through direct procurement and/or leveraging prequalified internal or external panels, using credit card (rarely) and purchase orders/contract;
5. Sourcing of raw materials via a wholesaler or retailer (e.g. rural feed store; metal supplier etc) or occasionally direct from producer; and

6. Sourcing funds via fundraising or competitive applications for grants and program funding.

Methods of sourcing are guided by procurement policies, internal delegations and contractual agreements.

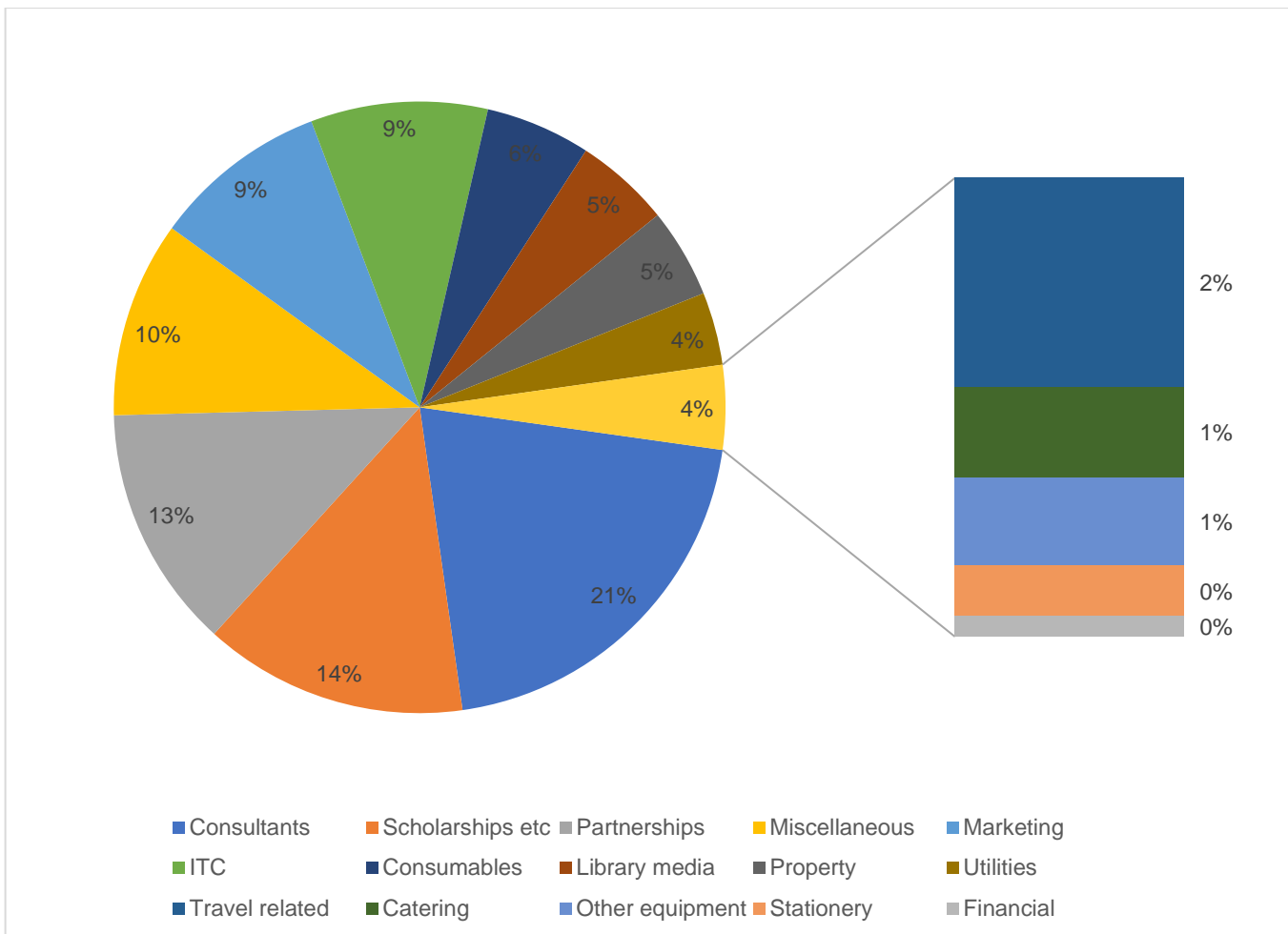
Supplier engagement is supported by UNE’s central procurement team.

Contractual approval processes help support a standard of competitive process or an approved exemption.

UNE is part of the Australian Universities Procurement Network and leverages this network in terms of resources and modern slavery risk assessment and actions.

The majority of UNE Group purchases are of finished goods and services (information technology hardware, consumables, books/media etc) as per Figure 1. UNE also purchases some “raw materials” including utilities (i.e. gas, electricity), food supplies (for catering services), animal feeds (for its farm operations and animal research) and other base products, metals and other materials for maintenance and repairs.

Figure 1 – Categories of Non-Payroll Expenditure UNE Group 2020\*



\*Source: UNE Annual Report 2020

## Part 3 - Modern slavery risks in operations & supply chains of UNE and its controlled entities

### Modern slavery risk and controls

The risk of modern slavery in the UNE Group arises from both its operational activities including engagements with other entities and from expenditure on services and goods.

In assessing modern slavery risk exposure (see Table 3 and 4 below for indicative risk across common types of operational and supply agreements), consideration is given to causal factors including:

- the nature of the activity including the type of goods or services and whether the source of goods or the type of activity/services is related to higher risk industries, labour forces and/or treatment of workers, or specific goods and services considered to carry a high risk of modern slavery;
- the country of supply origination (e.g. prevalence of modern slavery/strength of government response as surveyed by Walk Free; application of UN or Australian autonomous sanctions for specific regimes); and
- understanding of suppliers operations, including ownership, operations, approach or recorded issues related to modern slavery and potential indirect risk or exposure to extended supply chains that might include modern slavery practices.

UNE has a range of measures in place to help manage modern slavery risk include:

- supporting awareness of staff and students regarding their rights and protections and grievance processes. This is embedded in code of conduct policies and grievance policies relevant to staff and students and information provided to staff (re employment) and students (re admission and enrolment);
- supporting awareness of modern slavery risk and controls particularly for those persons who engage suppliers, make purchases and approve contracts. This includes ability for staff to engage with procurement team and share of information about modern slavery risk and high risk suppliers via the Australian University Procurement Network (AUPN);
- sourcing campaigns which target responsible suppliers as well as calls for supplier responses which require assurances regarding modern slavery risk management;
- procurement policy and checklists and processes which include requests for supplier information;
- use of closed envelope tendering consistent with policy to ensure procurement outcomes focus on fit for purpose solutions rather than an assessment of bids wholly on price.
- template contractual/engagement agreements which include standard clauses to support supplier modern slavery compliance;
- review of modern slavery at contract review points including periodic licence renewals and/or contract review stages;
- monitoring of small supplier activity including expenditure via credit card and preferred purchasing methodologies which support visibility of suppliers and spend (see Table 3 and 4 below); and
- contact with high risk suppliers regarding modern slavery assurance.

Table 3 – Modern Slavery Exposure Risk across key operations and agreements

Common Operational agreements	Description	Modern Slavery Risk considerations	Risk Exposure / Control comments
Adjunct and honorary roles and volunteer workers arrangements.	UNE has the facility to offer adjunct roles to eligible persons, and to award titles, such as Emeritus Professor to eligible candidates. Such persons may access UNE facilities while contributing to research or other scholarly or engagement activities at UNE. The UNE Group has relatively few general 'volunteer' workers though some examples are select controlled entity's boards volunteer their time as Directors, and volunteers may help with community or sporting events hosted by controlled entity UNE Life.	Adjunct, titled and volunteer persons determine the level of activity they contribute and can discontinue the arrangement at any time.	Low. Risk is generally low due to nature of engagement and activity and the level of control of volunteers.
Agency Agreements	Agency agreements include those where UNE makes an agreement for another entity to act as an agent for UNE, often in promotion of UNE academic programs to potential students including those from overseas.	Agency agreements have potential for some risk of modern slavery exposure due via indirect linkages to agency operations. While the majority of UNE's agreements are via an Australian based agency subject to Australia laws, some agencies may have offices and employment/supply structures in other countries that are not immediately visible to UNE. Review of agency indirect linkages has been flagged as a low medium risk and will be a focus for review in 2021 and 2022.	Low to Medium Risk. Majority of agreements are subject to Australian laws but there is potential for some indirect exposure operational linkages chains.
Articulation Agreements	Agreements which recognise academic learning outcomes of another institution's programs. Those students who have achieved certain outcomes at another institution may be eligible for advanced standing or credit point equivalence in units of an academic program at UNE.	The majority of UNE articulation agreements are with Australian based providers or with other universities both nationally or internationally. Importantly direct risk of modern slavery is very low as the terms of an articulation agreement are only triggered by student action (i.e. application and agreement to enrol in an academic program at UNE) and fundamentally provide a benefit to the student.	Very Low. Control to participate in education services offered by UNE is held by the prospective student, terms of study are transparent.
Contracting In Services ( including Independent Contractor Agreements)	UNE may engage consultants and third parties via independent contractor agreements to provide specific services or goods to the University. Examples including building/construction services, professional services consultants, project	These forms of arrangements cover a broad range of the supply of software or services. Risk within these agreements is typically low and controlled by procurement processes. Transparency of terms and standard agreements requiring modern slavery disclosure helps to reduce risk. Some independent	Overall Medium. Risk may range from low to high with cause of higher risk being organisations whose directly operating or with links to countries



	management services, software licences providers etc.	contractor agreements may expose UNE to supply chain linkage risk where services are conducted in countries where there is higher risk of modern slavery. Further leveraging of the AUPN network and review of high value suppliers and third party supply chain risk will be a focus in 2021 and 2022.	of high value risk (generally for labour or goods manufacture) low with UNE paying market rates and services that meet quality requirements. Large number of agreements are domestic. Nevertheless indirect risk may arise from a supplier's operational arrangements.
Contracting Out Services	Under these commercial activities of the University, goods or services are provided by the University for a fee. A service example could include, UNE being paid for a staff member to provide a consultancy or run a workshop/training program or receiving a payment for hiring or other access to UNE research or built facilities for a period of time.	Risk of Modern Slavery is considered very low. Most such arrangements require UNE to agree terms of engagement and provision. Staff involved typically identify or instigate such arrangements, and agreements require review by UNE's Legal Office and approval by relevant UNE delegate.	Very low. UNE has control of which agreements it enters into and acquiescing with terms and review of terms is required.
Credit Card Transactions	Credit Card transactions are typically used for one off relatively small value purchases. Transactions may relate to a wide range of purchases (see Table 4) for common spend categories.	Risk from credit card expenditure arises partly as a result of the convenience of these transactions and lack of supplier review. At UNE in 2020, changes to the preferred approach to spending (i.e. moving away from credit cards) has helped to reduce the volume of credit card transactions, and increased use of purchase orders and pre-qualified category suppliers where supplier controls are improved.	Medium - High due to the ease of credit card spending does not always rely on an understanding of suppliers.
Donations/ Bequests Agreements	Donations and Bequests to UNE or UNE Foundation to support student scholarships and teaching and research.	Donated funds to UNE Foundation represent a low risk of modern slavery. Most donations are from within Australia and from local communities in which UNE operates and focus on supporting students or specific teaching or research initiatives. UNE has ethical guidance in policy for acceptance or otherwise of donations and bequests.	Very low. UNE has controls for entering into any agreements.
Enterprise Agreements or Common Law contracts	UNE staff are employed either under one of two Enterprise Agreements (includes casual staff) or via a common law contracts. Staff terms and	Modern slavery risk is considered very low. Staff employment agreements at UNE or separately offered by controlled entities, require agreement of terms	Very Low. Agreements in place for employees. Employment

	conditions are outlined in the offer of employment and are subject to prospective employee agreement. Staff of UNE Controlled entities are employed on terms relevant to the specific industry award (e.g. security services).	between employees and the organisation, and are regulated by the NSW Fair Work Ombudsman. Facilities are provided to for complaints and appeals including with support of staff advocate groups. UNE Group employment conditions are subject to audit and independent scrutiny and in the event an issue is found it is disclosed and rectified as a priority.	conditions subject to oversight by independent regulator. Staff have access to advocates and have avenues for complaints and appeal against unfair conditions.
Letters of offer for students and enrolment confirmation	Prospective students who apply to study at the University and who are eligible for admission receive a letter of offer outlining the terms and conditions of study and access information regarding course and unit fees or terms of higher degree research study. Prospective students have the option to accept or reject an offer and actively choose when to enrol to study. Students who enrol may exit before census date or equivalent without financial penalty.	Prospective and admitted students are active decision makers in the admission and enrolment stages and have control over the outcome. There is some potential risk for students whose tuition or research may be funded by an organisation or government sponsor where those entities or sponsors might have linkages to modern slavery practice. UNE has relatively small numbers of such circumstances and has processes including autonomous sanctions checks of sponsors and entities to help control this risk. Some risk may arise as a result of incidental expenditure (travel, accommodation etc) in areas where modern slavery is present.	Very low. The majority of UNE study in Australia. Students have control over enrolment / withdrawal decisions. Controls are also in place for sponsored students.
Loans	Financial or Non-Financial (e.g. Loan of equipment or a part of a collection) Agreement	UNE loans financial loan arrangements are limited and are generally within the UNE Group made are generally to UNE controlled entities for specific purposes and with the focus or to students.	Very Low. UNE has few arrangements of this nature, they are based domestically and parties are well known to UNE.
Memorandum of Understanding (MoU)	Agreements which seek to establish a framework for engagement and collaboration with another party – often a University or industry body. A MoU which is generally non-binding may have associated partnership, collaboration or research schedules or sub-agreements.	Most UNE MoUs relate to agreements between Educational Institutions or industry bodies here and often overseas for collaboration around academic programs. They generally carry a relatively a low risk of Modern Slavery by the nature of the ‘activity’ being non-binding agreement to collaborate. More complex arrangements (including those where there are secondary agreements) can carry higher risk.	Low. While most MoUs are very low risk given the nature of the exchange being relationship, some MoUs can provide for more specific engagements which may carry some indirect risk that need to be assessed on a case by case basis.
Partnerships, Education and Research Collaboration Agreements	Partnerships and/or collaboration agreements involve UNE and one or potentially multiple other parties who have made an agreement to collaborate generally on academic	The majority of UNE’s partnership and collaboration agreements are with other educational institutions or associations both in Australia and overseas and focus on the delivery of research or academic programs. Research related	Low. The activity itself typically involves a service/time contribution from UNE, which it has agreed to provide.

	<p>program scholarship, facility use or research programs. These agreements often assign roles and responsibilities to the different parties, and collaboration or contribution may be in-kind (resource effort, facility usage) or financial, and set out arrangements relating to intellectual property.</p>	<p>activities are subject to ethics review and approval and engagement of participants in research requires consent. Conditions and expectations of parties is generally set out in the agreement, noting there may be some in-kind contribution or income or cost or intellectual property associated with such agreements.</p>	<p>Some risk may arise relating to the location of activities, ancillary support services to the collaboration.</p>
Property Leases	<p>Agreement to lease a UNE property or facility. UNE may make agreements regarding lease of property or sections of property to community or commercial tenants.</p>	<p>UNE has a small number property lease arrangements within Australia and these are subject to Legal review and UNE approval. Leases are subject to benchmarked pricing and agreement by both parties and are considered very low risk of modern slavery.</p>	<p>Very low. Lease agreements subject to acceptance and are often market driven.</p>
Research Grants	<p>Research Grant Agreements are generally awarded via a competitive process and provide funding for agreed resources and research. These grant agreements typically outline scope of research, IP ownership and progress milestones and party roles (e.g. set out researcher or research team effort and time and/or use of UNE research facilities).</p>	<p>Research Grant Agreements are subject to legal review and UNE approval and would generally have very low exposure to modern slavery risk, with controls and compliance expectations generally built into grant conditions and performance monitoring and research activities subject to ethics review and approval. Some grants may involve incidental expenditure on research materials, equipment, travel accommodation or other relevant expenditure that could provide some indirect supply chain exposure.</p>	<p>Low. Activity risk is low though some potential ancillary expenditure may introduce risk.</p>
Student Exchange Agreements	<p>Agreement to support student learning experience at another University or equivalent educational institution. The student's study experience at another institution (national or more typically international) is relevant to their studies and is recognised as part of achievement of learning credit points at the primary organisational course or program.</p>	<p>Most student exchange agreements are relatively low risk of Modern Slavery. There is a potential risk exposure from associated expenditure including travel and accommodation and living expenses where the country has a high prevalence of modern slavery.</p>	<p>Low. In 2020 COVID-19 pandemic travel restrictions curtailed student exchanges.</p>

Table 4 – Credit Card Spend by Category<sup>4</sup>

Credit Card Spend - Category	Modern Slavery Risk Exposure
1. Accommodation	Medium
2. Professional services	Low
3. Research equipment and Supplies	High
4. Business services not elsewhere classified - UNE Life, Tenderlink, scientific supplies (high as above*)	Low
5. Regulatory fees and Government charges	Low
6. Miscellaneous & specialty retail stores	Medium
7. Utilities, electricity, gas, water, sanitary Etc	Low
8. IT software licensing and maintenance	Low
9. Education – Tertiary	Low
10. Catering services and supplies	High

## Part 4 - Actions taken to assess & address modern slavery risk(s)

In 2020 UNE’s activities to address modern slavery risk(s) focused on:

- establishing a framework for reviewing modern slavery risk and understanding risk exposure areas
- developing and sharing expertise about responses to modern slavery risks within key UNE support areas, supported by engagement with the Australian University Procurement Network
- increasing awareness of modern slavery risks and obligations internally via Academic Board, UNE Controlled Entities and Council
- telegraphing to new suppliers the need for assurance re modern slavery risks
- analysing existing contract information
- undertaking preliminary supplier and third party contract reviews considering risks associated with geographical location, specific activity/industry/goods and services
- establishing preventative controls as part of sourcing activities, including response evaluation criteria, standardising contractual controls around modern slavery assurance
- reviewing and changing policies on expenditure, moving from low control purchasing methodologies such as credit cards to higher control options such as purchase orders and contracts (see Table 5 below)
- identifying Modern Slavery as a key compliance driver for government reporting and assigning responsibilities for actions across key UNE areas and controlled entities
- Taking active steps to update contractual terms with key suppliers commenced, with annual review checklists and extension approval processes changed to include checks relevant modern slavery.

<sup>4</sup> UNE Group have categorised its credit card spend and aligned the risk profile of these categories with those which have been developed by the [Australian Universities Procurement Network](#) (AUPN) and the [Walk Free Foundation](#). Table 4 above analyses top ten spend by category in early 2020 (pre COVID-19 impact) and these results are consistent with 2018 and 2019 expenditure.

Table 5 – Identification of Preferred purchasing methodology

Category	Preferred purchasing methodology
Professional Services and Consultancies	Contract and purchase order, leveraging preferred suppliers arrangement under NSW Government panel and catalogue system where appropriate
Print and Publication services	Preferred suppliers with charge back invoicing and/or purchase orders
Scientific supplies and Lab Consumables	Multiple preferred supplier contracts and catalogue system
Marketing and Media Services	Preferred supplier arrangements with purchase orders
General consumables and stationary	Preferred suppliers arrangement under NSW Government panel and catalogue system

## Part 5 – Assessing effectiveness of actions

UNE is committed to improving its approach to modern slavery, and maturing and systemising its response framework, through increased direct engagement, continued collaboration with the sector and other networks and responsible providers.

Efforts in 2020 have had the impact of increasing awareness and understanding internally of modern slavery risk, actions required and of UNE Group’s risk exposure. The telegraphing of UNE’s requirements regarding modern slavery assurance to existing and new suppliers has also had positive effects and generally positive responses.

UNE’s Controlled entities have taken an active approach to assessing modern slavery risk in supply chains, changing procurement and supplier practice (including sourcing of goods from ethical procurement sources) and embedding an understanding of modern slavery risk within the organisation.

While in 2020 UNE focused on establishing frameworks for supporting modern slavery risk assessments and understanding key exposure areas, efforts in 2021 and 2022 will focus on embedding modern slavery compliance into to a business as usual approach, as well as embedding review processes particularly for high risk exposure areas and having ready a process for intervention for emerging high risk engagements

Key next steps include

- Continue to review agreements and update contract system to support risk assessments and track supplier assurances/reviews.
- Review relevant policies and assigned roles and responsibilities and due diligence steps and strengthen where necessary.
- Further education for the University community about how their spend/contracting/partnering behaviours can relate to Modern Slavery risks and about high risk activities and geographic regions.
- Plan program of direct outreach with potentially higher risk suppliers to seek assurances re modern slavery risk management effectiveness.
- Consider potential targets, metrics to support compliance activities including ‘score’ card approach being developed by AUPN.
- Agree response for direct action to modify contract terms, limit use of services; terminate early or on completion, report issues.
- Sample low risk suppliers to confirm low risk status, using networks as relevant.
- Explore further indirect linkages for key suppliers/third parties.
- Further promote UNE’s approach to managing Modern Slavery to deter suppliers/partners who don’t meet required standards from applying, including advertise UNE’s Modern Slavery Statement on the website and refer to this in all relevant engagements.

- Procurement practice to request adherence to contract clauses
- Procurement standard use of closed envelope tendering for large tenders reduces chances of undercutting techniques influencing purchase based on price alone
- Confirm contact arrangements may be performance reviewed on basis of compliance
- Introduce specific criteria, performance targets for assurance re Modern Slavery for reporting entities (not started)

## **Part 6 – Process of consultation with entities controlled by UNE**

During 2020, UNE Controlled Entity boards received briefings regarding the Modern Slavery Act (Cth) and UNE Group's obligations under the Act. Each of the controlled entity boards, with the exception of start-up Ag360 whose management were briefed separately, included discussion of modern slavery and supplier risk and opportunities for controls in procurement, contracts and specific supplier engagement, on the Controlled Entity board agenda.

Management teams from each of the Controlled entities were provided support by the University including Finance and Procurement teams with assessment of key supplier risks, and review of legal contract terms to flag modern slavery compliance.

All of UNE's controlled entities are wholly owned by UNE and their financial statements are incorporated in the UNE Group's consolidated reporting results each year.

**Agricultural Business Research Institute (ABRI):** ABRI celebrated 50 years in business in 2020, employs agribusiness information specialists (within Australia under Australian compliant employment agreements), who provide information services to the domestic and international livestock industries on a fee for service basis. ABRI also holds some investments which are managed by Russell Investments. ABRI operations are assessed as having a low exposure to low modern slavery risks. ABRI activities and staff are based in Australia and ABRI software is developed, managed and marketed in-house. ABRI supplier profile and information software and subject to and compliant with local laws conditions and undertakes investments via

**UNE Life Pty Ltd:** UNE Life manages many services and amenities across the University campus that add value to the student experience and support community engagement with UNE. These include SportUNE, a student bar and nightclub, a local radio station, restaurant facilities, hairdressers, a post office and newsagent, cinema, graduation, student advocacy and welfare, as well as functions and catering services. UNE life has reviewed its suppliers and targets ethical and sustainable supply networks when sourcing its higher risk supply products such as merchandising items.

**UNE Foundation:** The UNE Foundation receives donations from individuals, corporations and public entities to fund scholarships that contribute to the University's teaching and research priorities. An independent Board of Directors, comprising a group of dedicated professionals who volunteer their time and expertise for the benefit of UNE and its students, is responsible for managing the Foundation, while the University provides administrative support. UNE Foundation engages an external Investment Manager to provide investment advice and services and have sought assurances regarding modern slavery approach. UNE Foundation is deemed to have low modern slavery risks, and monitors the investment portfolio to ensure investments in socially and environmentally responsible organisations.

**UNE Partnerships:** UNE Partnerships is the education and training company of the University. It has designed, developed and delivered customised solutions for organisations and individuals for over 30 years. UNE Partnerships programs suit those who balance life, work and family commitments with study. UNE Partnerships has high level awareness of its modern slavery obligations, has been active in assessing its risk in operations and contracts and has developed a specific Modern Slavery statement to help support and reflect the organisations focus on reducing risk of modern slavery.

**Ag360:** Ag360 is a start-up providing farm management decision support software. Ag360's software was developed within an Australian based research centre and company supplies and


inputs are very small at this stage. Ag360 is considered to have low exposure to modern slavery risk.

## Part 7 - Other relevant information

The University Council as the peak governance body of the parent entity approved this statement on behalf of the UNE Group<sup>5</sup> on 29 June 2021.

UNE continues to engage with the Australian University Procurement Network (AUPN)<sup>6</sup> to support the assessment of suppliers and modern slavery risk. Key benefits include:

- Consultation and collaboration as a sector
- Ability to engage with the Modern Slavery Working Group (MSWG)
- Access to AUPN templates and guidance
- Information and review via AUPN's Academic Advisory Board
- Shared information about high risk identified industries and suppliers
- Future access to the AUPN portal technology solution (procured and in development)



Professor Brigid Heywood  
Vice-Chancellor & CEO  
University of New England

University of New England CRICOS Provider Number 00003G

<sup>5</sup> UNE Group entities include UNE Partnerships Pty Ltd; UNE Life Pty Ltd; Agricultural Business Research Institute, Ag360 Pty Ltd, UNE Foundation Ltd

<sup>6</sup> <https://www.hes.edu.au/australian-university-procurement-network>

## Appendices

### Appendix 1

Table A - UNE Income (source 2020 Annual Report)

University of New England	2020 \$m	%	Modern Slavery Risk Exposure
Teaching income	\$ 240.87	70%	Very Low Risk
Research & Grant income	\$ 75.47	22%	Low Risk
Other income	\$ 29.94	9%	Low to Medium
<b>Total income</b>	<b>\$ 346.28</b>	<b>100%</b>	

Table B - Other Expenses (i.e. Expenses other than employee related expenses)

Other expenses	Consolidated 2020 <sup>6</sup> \$'000	%	UNE 2020 \$'000	%	Modern Slavery Risk Exposure
Consultants and professional fees	\$ 22,638	21%	\$ 21,213	20%	Low risk
Scholarships, grants and prizes	\$ 15,398	14%	\$ 13,829	13%	Low risk
External contributions	\$ 14,183	13%	\$ 16,605	16%	Low risk
Miscellaneous expenses	\$ 11,442	10%	\$ 10,035	10%	Medium
Advertising, marketing and promotional expenses	\$ 10,227	9%	\$ 10,034	10%	Low risk
Information technology	\$ 9,260	8%	\$ 9,217	9%	High*
Consumables and materials	\$ 6,127	6%	\$ 3,817	4%	High*
Books, serials and other library media	\$ 5,562	5%	\$ 5,567	5%	Low risk
Property and facilities	\$ 5,215	5%	\$ 5,164	5%	Low risk
Utilities	\$ 4,247	4%	\$ 3,942	4%	Low risk
Travel, entertainment and staff development	\$ 2,242	2%	\$ 2,140	2%	Low risk
Telecommunications	\$ 1,050	1%	\$ 674	1%	Low risk
Catering services	\$ 969	1%	\$ 966	1%	Low risk
Non-capitalised equipment	\$ 947	1%	\$ 883	1%	Medium risk
Printing and Stationery	\$ 535	0%	\$ 507	0%	Medium risk
Foreign exchange loss	\$ 224	0%	\$ 224	0%	Low risk
<b>Total other expenses</b>	<b>\$ 110,266</b>	<b>100%</b>	<b>\$ 104,817</b>	<b>100%</b>	

<sup>6</sup> Includes UNE Controlled Entities



Table C – International Students

Country of origin	% of International Student enrolments	Modern Slavery Country Risk	Modern Slavery Activity Risk Exposure
Nepal	16.10%	High	Low
Malaysia	14.10%	High	Low
China (excludes SARs and Taiwan Province)	11.60%	Low	Low
India	11.40%	High	Low
South Africa	4.70%	Low	Low
Hong Kong (SAR of China)	4.20%	Low	Low
Saudi Arabia	3.60%	V Low	Low
Bangladesh	2.40%	Medium	Low
Philippines	2.30%	High	Low
United States of America	1.80%	V Low	Low
All other countries	27.90%	Medium	Low

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