



Modern Slavery Statement 2023

UTS College Limited ACN 001 425 065

This statement is made pursuant to the *Modern Slavery Act 2018 (Cth)* and is made for the financial year ending December 2023

Introduction

As a global enterprise, we are committed to ethical business practices that help to maintain the highest levels of health, safety, and human dignity around the world. We condemn all forms of human rights abuses and the exploitation of children. We are proud of the steps we have taken to combat modern slavery.

1. Our structure and operations

- 1.1 UTS College Limited (formally Insearch Limited trading as UTS College) ACN 001 425 065 (**us, we, our** or **UTS College**) is the reporting entity of this Modern Slavery Statement. As a controlled entity of a New South Wales state-owned corporation, UTS College is bound by the NSW *Modern Slavery Act 2018* and is therefore required to voluntarily submit a Modern Slavery Statement in accordance with section 6 of the *Modern Slavery Act 2018* (Cth).
- 1.2 We are a company limited by guarantee and a controlled entity of the University of Technology Sydney (**UTS**). By way of background, UTS is established under the *University of Technology Sydney Act 1989* (NSW) and the operations of UTS include undergraduate and postgraduate programs as well as related educational operations.
- 1.3 Our corporate headquarters are at Level 13, UTS Building 10 (CB1) 235 Jones Street Broadway NSW 2007, Australia. We also lease two locations within close proximity to our head office for the delivery of our education programs.
- 1.4 We are an Institute of Higher Education registered through the Tertiary Education Quality and Standards Agency and since late 2020 have been using the business name *UTS College*. The main purpose of our operations is the provision of pathway programs for domestic and international students to enter degree programs at UTS.
- 1.5 An overview of our corporate structure is below:

Name	Country	Structure
Insearch Education International Pty Ltd	Australia	Fully owned subsidiary
Insearch Global Pty Ltd	Australia	Fully owned subsidiary
Insearch (Shanghai) Limited	China	Fully owned subsidiary
Insearch Lanka (Pvt) Limited	Sri Lanka	Fully owned subsidiary
Insearch India Limited Liability Partnership	India	Fully owned entity
Insearch Limited Representative Office	Vietnam	Representative Office

- 1.6 We offer the following programs directly at our campus in Sydney, and through our online learning platform:

- (a) academic English programs
- (b) diploma programs (Diploma of Animation Production, Diploma of Business, Diploma of Communication, Diploma of Design & Architecture, Diploma of Engineering, Diploma of Information Technology, and Diploma of Science)
- (c) graduate certificates (Graduate Certificate in Student Centred Learning, Graduate Certificate in Accounting and Finance, Graduate Certificate in Communication, and Graduate Certificate in Technology Practice)
- (d) UTS Foundation Studies.

1.7 Outside Australia, arrangements include:

- (a) delivery of academic English, UTS Foundation Studies and diplomas (Diploma of Business, Diploma of Information Technology, Diploma of Engineering, Diploma of Science) at a fully owned campus in Colombo, Sri Lanka
- (b) third party licensing arrangements in India, Bangladesh, China, South Korea, Myanmar, Vietnam, and Indonesia for the delivery of education programs.

2. Consultation

- 2.1 In preparing this statement, we engaged each of the reporting entities covered by this statement and consulted the entities we own or control (see section 1.5 above). We have also acted in consultation with our higher risk suppliers, IT suppliers and our education agents, in preparing this statement by issuing questionnaires to, and gathering information from, those suppliers and education agents.

3. Our supply chains.

- 3.1 Our supply chains are extensive and global, and incorporate a wide range of products, and services spanning a variety of industry sectors, broadly grouped as follows:
- (a) information technology and telecommunications including hardware, software, and consulting services
 - (b) education agents who operate as agents to recruit students for UTS College and assist with their application and enrolment
 - (c) property, including rent of buildings, property services (cleaning, engineering and maintenance services, security, waste disposal)
 - (d) human resources
 - (e) financial services; and
 - (f) marketing and promotional services.

- 3.2 We work with more than 527 first-tier suppliers headquartered in over 33 countries and countless second-tier suppliers. For the purposes of this statement, we have not yet investigated our second-tier suppliers.
- 3.3 Given our geographic reach, ensuring we avoid any involvement in modern slavery, beyond first-tier suppliers, is a considerable challenge.

4. Supply chain risk assessment

4.1 To assess risk, suppliers were assigned a rating based on the following table.

A	High risk, high spend
B	High risk, low spend
C	High spend, low risk
D	Low spend, low risk

4.2 We then considered the following criteria.

- (a) Country/region risk: for countries/regions with a high risk of modern slavery due to poor governance, weak rule of law, conflict, migration flows and socioeconomic factors (e.g., poverty).
- (b) Sector/industry risk: for sectors/industries with a high risk of modern slavery because of their characteristics, products, and processes.
- (c) Commodity/product risk: for commodities/products produced with a high risk of modern slavery because of the way they are produced, provided, or used.

4.3 As a result of the above review of our supply chain we identified the following as potentially being susceptible to risks of modern slavery during the reporting period. For this statement we have focused on first tier suppliers but in future years we plan to continue to explore risks further down our supply chains.

- (a) Education agents – with offices in ‘high risk countries’ (according to the Global Slavery Index). Note: Education agents are graded internally in tiers representing their work with the College. The tiers largely relate to their level of recruitment to UTS College. Only those in top tiers with operations in high-risk countries were reviewed.
- (b) Information Technology services.

4.4 The suppliers we had identified as ‘high risk’ were issued modern slavery questionnaires to seek further insight into the risks of modern slavery for those suppliers.

- (a) Two (2) questionnaires were issued to IT services providers; and
 - (b) 11 questionnaires were issued to education agents.
- 4.5 Several suppliers did not return the questionnaires to us. For those that did, the responses varied significantly with some providing us with detailed information and relevant policies and others not comprehensively completed.

Education agents

- 4.6 Of the education agents that returned the questionnaires:
- (a) only one has developed a policy on modern slavery with a few partners also incorporating modern slavery considerations into other policies or employee handbooks.
 - (b) all demonstrated that they practiced ethical employment practices and did not engage in practices that restricted employees.
- 4.7 As education agents are a significant provider to us, we continue to monitor risks of modern slavery in their practices through annual reviews.

IT Services

- 4.8 While most IT services suppliers are Australian based, their broader supply chains may be overseas and, in our view, are subject to modern slavery risk. Our main supplier of IT Services demonstrated that they did have extensive policies and practices in place to review and address modern slavery risks in their supply chains.

5. Our policies on slavery

- 5.1 We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. We have a vision, purpose and code of ethics statement providing overarching principles to our business conduct and staff actions. The annual staff Code of Conduct also outlines expectations on staff behaviour. Both align with the sentiments of ethical behaviour at UTS College.
- 5.2 In future, we intend to consider developing a specific policy regarding addressing modern slavery risks in our supply chain and the inclusion of modern slavery specific principles in our procurement policy.
- 5.3 We have public interest disclosure/whistleblower and procurement policies also designed to ensure we maintain a responsible approach to doing business.

6. Due diligence processes for slavery

- 6.1 As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain, we take actions including those set out below:

Action	Description
Periodic supplier reviews	Each year we undertake a review of selected suppliers from high-risk countries and/or who are high value suppliers.
Questionnaire	We intend to issue a questionnaire to all suppliers with total contract value of greater than \$100k. We will use the responses to this questionnaire to determine if we renew and/or sign with that supplier, or whether further engagement is needed regarding issues of concern.
Procurement guidance	Include principles designed to mitigate the risk of modern slavery in our procurement policy (or similar policy) to ensure modern slavery risks are considered during the procurement process.
Strengthened contractual provisions for suppliers and business partners	<p>New high value supplier contracts will include a modern slavery clause which addresses the following:</p> <ul style="list-style-type: none"> (a) compliance with all Australian Modern Slavery Law and Foreign Modern Slavery Laws applying to the supplier in any location in which the supplier operates (b) using best endeavours to ensure that there is no modern slavery in the supplier's supply chain or operations (c) notification to us if any material risk of modern slavery is identified (d) maintenance of records in relation to the supplier's supply chains and operations – which must be provided to us on request.
Strengthened contractual provisions for low transaction value suppliers (who are considered high risk)	<p>Require low value suppliers to warrant that:</p> <ul style="list-style-type: none"> (a) they comply with all Australian Modern Slavery Law (b) they use best endeavours to ensure that there is no modern slavery in their supply chain or operations (c) if the supplier identifies any material risk of modern slavery in its supply chain or operations, the supplier must promptly notify us.

7. Supplier adherence to our values and ethics

7.1 We have zero tolerance of slavery. To ensure all those in our supply chain and contractors comply with our values we follow the procedures as outlined in this statement.

8. Training

- 8.1 To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, we intend to:
- (a) implement mandatory onboard training for relevant roles
 - (b) make available yearly training to all staff on modern slavery and human rights (on an optional basis).
- 8.2 This will be delivered by way of on an online course run by UTS online. The course has the functionality to record who undertakes this and we intend to review these results to ensure that all requisite personnel carry this out.
- 8.3 To the extent possible we require our business partners to provide training to their staff and suppliers and providers.

9. Our effectiveness in combatting slavery

- 9.1 Over this reporting period, we have measured the effectiveness of our actions to identify and address instances of modern slavery using the following key performance indicators (KPIs).
- (a) Supplier screening: the number and type of issues identified on screening suppliers and subcontractors.
 - (b) Contract clauses: the number of major contracts with modern slavery provisions.
 - (c) Public interest disclosure/whistleblowing: the number of reported breaches in the past year.
 - (d) Reviews: the number of reported breaches from annual education agent reviews.
 - (e) Remedial action: the instances of remedial action being needed.
- 9.2 Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement.

10. Further steps and remediation

- 10.1 Following a review of the effectiveness of the steps we have taken to ensure that there is no slavery in our supply chains we intend to take the following further remedial steps:
- (a) Undertake further investigations into our supply chains.
 - (b) Build our awareness and understanding of the issue including by rolling out more education and training for staff.
 - (c) Enhance our ability to risk assess including by utilising external resources, experts, and software to assist with modern slavery risk assessment.

10.2 We have been advised that UTS has recently submitted a Modern Slavery Statement to the Australian Border Force. While we are not covered by the UTS Statement and are a separate legal entity with a different procurement and supply chain profile, we will continue to consult with UTS on an annual basis going forward.

11. Board approval

This modern slavery statement is made by UTS College Limited ACN 001 425 065 for the financial year ending December 2023.

This statement was approved by our Board of Directors on 19 June 2024.



Signature of Chief Executive Officer

Morwenna Shahani

Name

24 June 2024

Date

UTS College Limited ABN 39 001 425 065 | CRICOS Provider Code: 00859D / TEQSA Provider Identification No: PRV12022, Provider Category: Institute of Higher Education.
University of Technology Sydney (UTS) CRICOS Provider Code: 00099F / TEQSA Provider Identification No: PRV12060, Provider Category: Australian University.
UTS College Limited is a controlled entity of the University of Technology Sydney (UTS), and as an institute of higher education, UTS College provides pathway courses to UTS.