



Modern Slavery Statement 2020



University of
South Australia

Introduction

The University of South Australia ('University') is pleased to publish our first modern slavery statement, which has been prepared for the financial year ending 31 December 2020.

We recognise the inherent risks of modern slavery practices in our business dealings and procurement supply chains. We also recognise our responsibility to ensure that we do not facilitate modern slavery-like practices. This statement describes the steps we are taking to identify and address modern slavery risks.

Reporting entity

The University of South Australia 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.

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 the regional areas of Mount Gambier and Whyalla.

The University's community at the end of 2020 was comprised of:



37,941

students



2,740*

staff (*FTE)



226,434

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 undergraduate degrees across all seven Academic Units which are designed specifically for online learning.

In 2020, the University also had two research institutes – the UniSA Cancer Research Institute and the Future Industries Institute – and over 30 research centres and concentrations.

Our academic enterprise is enabled through 23 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 7,300 parchments each year.

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), Malaysia and Singapore to deliver University courses.

UniSA Health Pty Ltd

UniSA Health contributes to quality teaching at the University through the provision of clinical placements for undergraduate and postgraduate students, and provides professional development opportunities to academic staff who are qualified practitioners in their fields.

UniSA Ventures Pty Ltd

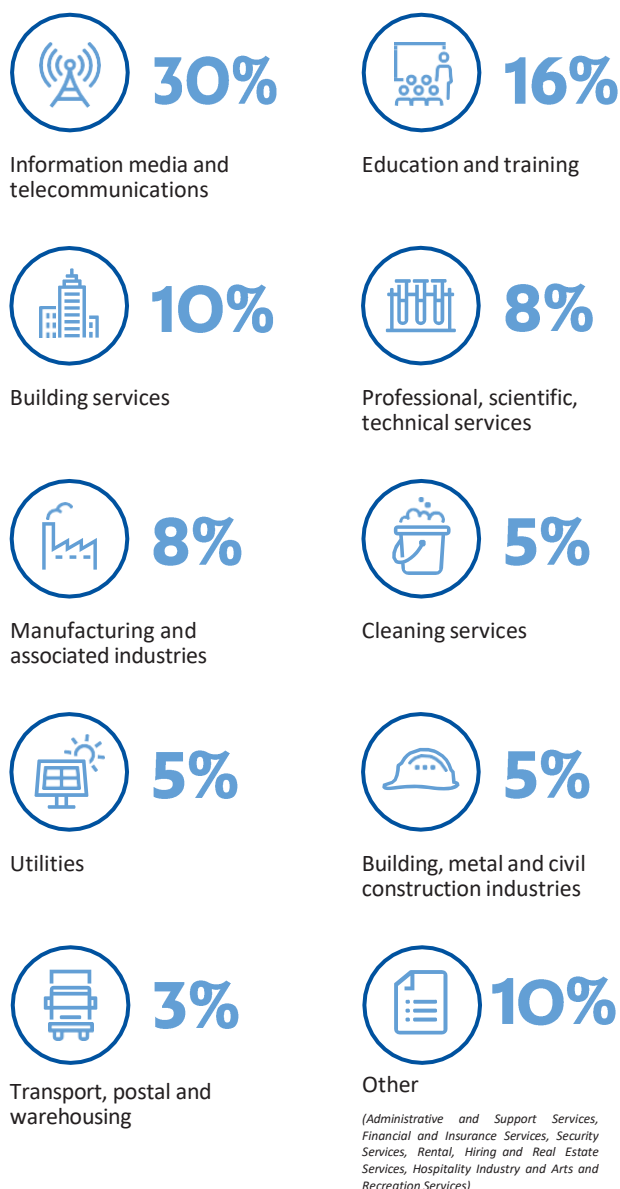
UniSA Ventures is the University's technology commercialisation and investment management company.

Supply chains

University of South Australia

A variety of industries support the University's delivery of teaching and research. In 2020, the University transacted with approximately 4,900 suppliers within Australia and overseas.

Distribution of spend by industry (2020)



Over 90% of the University's spend was with Australian-based suppliers, with the remainder being with suppliers predominantly located in the United States, the United Kingdom, Germany, the Republic of Ireland, Singapore, Hong Kong (SAR), India and China.

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 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 and include an annual performance review.

UniSA Health Pty Ltd

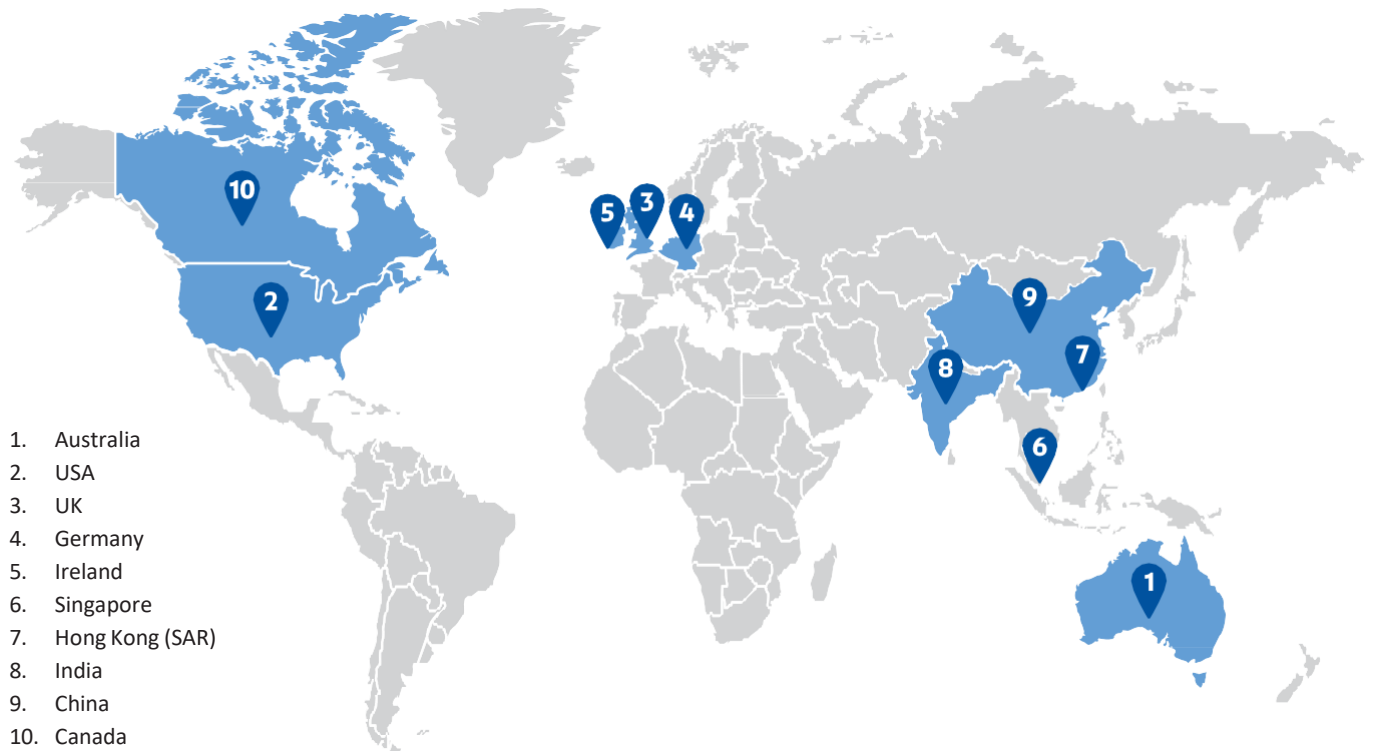
In 2020, UniSA Health primarily dealt with five main suppliers of medical equipment, medical supplies and office supplies. All of these suppliers are based in Australia.

UniSA Ventures Pty Ltd

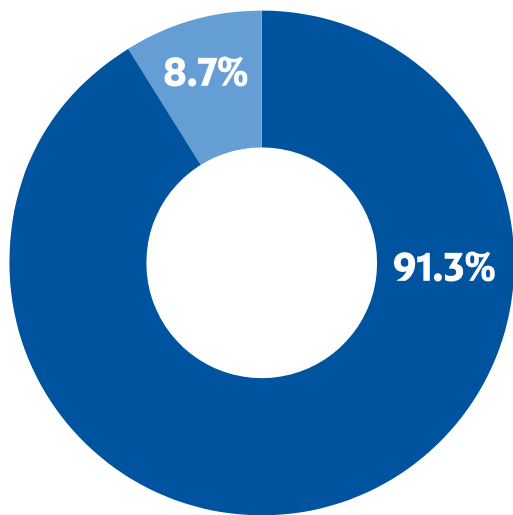
UniSA Ventures' supply chains include intellectual property management, investment management, customer service, marketing, finance and corporate services.

In 2020, UniSA Ventures engaged with 58 suppliers in Australia and overseas. UniSA Ventures' suppliers are predominately located in Australia, with other suppliers being located in the United Kingdom and China.

Top 10 Countries by Spend (2020)

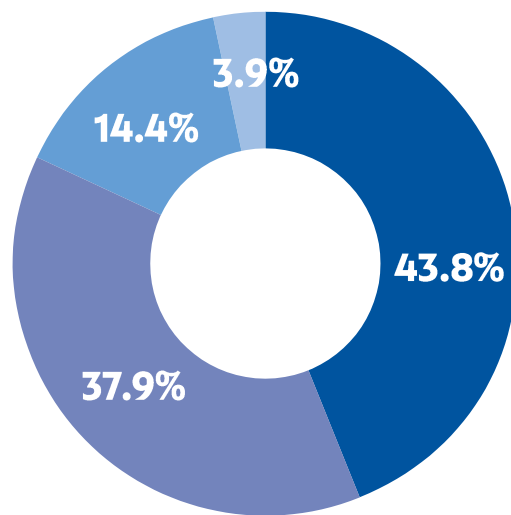


Domestic vs International Spend (2020)



■ Domestic ■ International

International Spend by Region (2020)



■ North America ■ Europe ■ Asia ■ Rest of the World

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'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's Enterprise Agreement. 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 other relevant legislation, including the Defence Trade Controls Act 2012, the Foreign Influence Transparency Scheme Act 2018, the Autonomous Sanctions Act 2011 and Australia's Foreign Relations (State and Territory Arrangements) Act 2020. All research undertaken by the University involving human research must be reviewed and approved by a Human Research Ethics Committee.

A modern slavery reference group has been established to develop and oversee the implementation of the University's modern slavery risk management program.

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 has contributed to the body of academic research on modern slavery through the development of a Modern Slavery Compass for business.¹

The University is a member of the Australian 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 developing tools to identify modern slavery risks in the higher education sector. These tools will assist AUPN members to independently identify and manage their respective modern slavery risks.

¹ Christ, K & Burritt, R, *Modern slavery compass: a new tool to point business in the right direction*, A report prepared for CPA Australia 2020 (available at: https://www.cpaaustralia.com.au/-/media/project/cpa/corporate/documents/tools-and-resources/environmental-social-governance/cpaam3475_297x210_modern-slavery-act_fa_web.pdf?rev=4e0d201eb6a84375887303fbc7b4acf6).

Actions to assess and address modern slavery risks

Through this reporting period, the University has prioritised the development of a modern slavery risk management program within its broader Risk Management Framework. This program, along with the University's broader policies and procedures, will apply to the University and its subsidiaries, UniSA Health and UniSA Ventures.

Specific actions within the risk management program are discussed below.

Governance

The University has:

- 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 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, and
- participated in awareness sessions across the higher education sector.

In implementing the University Policy Framework, the University is:

- reviewing procurement procedures and associated documentation to address modern slavery, and
- incorporating in the review or development of other policies and procedures, such principles and strategies as are appropriate to addressing modern slavery.

Procurement

Invitation to bid documents (e.g. expressions of interest, requests for quotations and requests for tenders) have been updated to require respondents to identify if they are reporting entities under the Modern Slavery Act and to 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 is undertaking a review of terms and conditions for supplier contracts and is developing standard clauses to deal with identifying, managing and reporting modern slavery risks.

The University is enhancing its supplier evaluation procedures and is developing a dedicated tool to help staff assess and classify any modern slavery risks for prospective supplier arrangements, and to ensure that any risks are appropriately managed in accordance with the University's procedures.

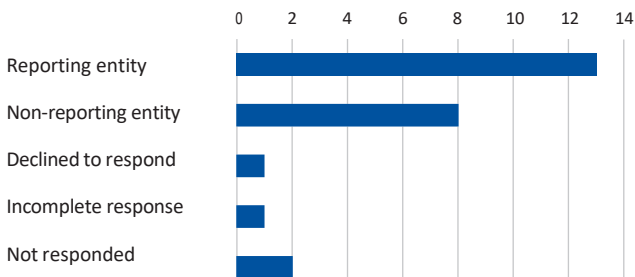
The University will extend information about modern slavery to all prospective suppliers as part of competitive tender processes. Where required, the University will require a bidder's responsible officer to provide a declaration relating to their understanding of modern slavery and their commitment to identifying and managing any associated risks.

Contract Management

The University has developed a Modern Slavery Supplier Questionnaire to identify risks in existing supply arrangements. The questionnaire identifies if respondents are aware of modern slavery, if there are any risks in their operations and supply chains, and whether they have appropriate systems to manage any such risks.

The questionnaire was issued to 25 of the University's top suppliers on the basis of expenditure, representing approximately 43% of annual non-salary expenditure. 21 suppliers (84%) responded to the questionnaire. 13 of these suppliers (62%) had either published a modern slavery statement or, at the time of engagement, were still preparing their first statement.

Supplier questionnaire responses



Two suppliers among the 21 responses acknowledged that they have more work to do to understand if there could be any risks of modern slavery in their supply chains.

The University recognises that these two suppliers are themselves reporting entities under the Modern Slavery Act and have taken steps to further understand and address any risks. As part of scheduled contract management activities, the University will continue to monitor any risks identified by the suppliers and seek updates on their assessment of the risk level and the effectiveness of the actions that each supplier has taken.

During future reporting periods, the University will work with an expanded group of suppliers to understand and address any risks of modern slavery.

Assessing the effectiveness of actions

Although two of the University's suppliers have acknowledged that they have more work to do to understand if they have any risks of modern slavery in their own supply chains, the University has not identified any known risks or instances which necessitate action by the University.

Where known risks are identified, the University will use appropriate review mechanisms, commensurate with such risks, to monitor the ongoing effectiveness of the action taken and, if necessary, consider any supplemental action that should be taken.

Through future reporting periods, the University will:

- develop systems to centrally capture identified risks and corresponding actions, to regularly track the effectiveness of such action and, as appropriate, report risks of modern slavery through to the University's Council, and
- consider modern slavery trends through third-party reporting agencies and their application to the University.

Process of consultation with other entities

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

In overseeing the establishment of its modern slavery risk management program, the University has also consulted with management teams within UniSA Health and UniSA Ventures 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 2021