



# Modern Slavery Statement 2023



University of  
South Australia

# Introduction

The University of South Australia ('University') is pleased to publish our modern slavery statement, which has been prepared for the financial year ending 31 December 2023.

We recognise the inherent risks of modern slavery practices in our business dealings and procurement supply chains. We also recognise our ongoing responsibility to ensure that we do not facilitate modern slavery-like practices.

This statement describes the progress we have made since the commencement of our modern slavery risk management program and continue to make while the University also prepares to amalgamate with The University of Adelaide to establish a new university for the future called *Adelaide University*.

## Reporting entity

The University 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.

# Summary of progress

The University is committed to continually improving its awareness and management of any modern slavery risks in its operations and procurement supply chains. Since the University commenced its modern slavery risk program, it has made the following progress:

- It has updated invitation to bid documents with mandatory questions relating to modern slavery awareness, management programs, identified risks and resultant action.
- It seeks that prospective suppliers confirm their commitment to identifying modern slavery in their supply chains and managing any associated risks.
- It has introduced standard contractual provisions that require all newly-appointed suppliers to take reasonable steps to identify and address risks of modern slavery practices.
- It has updated its procurement instructions to require tender panels to consider supplier responses to its modern slavery questions and how the University will work with the supplier to address any risks.
- Its purchase agreement templates include a range of modern slavery identification and reporting requirements, commensurate with the value of the contract and an assessment of the modern slavery risk profile.
- It has updated its procurement instructions to require University staff to record modern slavery risks in their local risk registers, which are reported through to the Council – the University’s principal governing body – in accordance with the University’s Risk Management Framework.
- It helped to lead sector-wide collaboration through the modern slavery working group for the Australasian Universities Procurement Network (‘AUPN’), which is supporting member universities to meet the challenge of human rights transparency and risk management in their supply chains.
- It further helped to support sector-wide collaboration through representation on an Academic Advisory Board to advise and enrich the AUPN’s approach to mitigating modern slavery risks.
- In collaboration with 33 other participating members, it has implemented the FRDM supply chain mapping solution that uses product genome data, trade databases and global risk indicators to provide tailored insights into the University’s procurement supply chains, including beneath the immediate tier of direct or Tier 1 suppliers.
- It contributed to the Australian Government’s statutory review of the Modern Slavery Act 2018 (Cth) being led by Professor John McMillan AO.
- Two University staff members founded the South Australian Modern Slavery Network. The network brings together stakeholders from industry, academia, government, trade unions, and civil society to help address the problem of modern slavery in South Australia and beyond. In 2023, the network facilitated an in-person event that provided three companies the opportunity to share how their products can help companies address modern slavery risk.
- It is represented on the Federal Government’s Human Trafficking and Modern Slavery Research Network within the Australian Institute of Criminology.
- University staff members and a PhD student attended the Auditor-General’s 2023 Modern Slavery Conference. A University academic staff member published a report at this conference developed with Australian Red Cross titled ‘Hidden Victims, Intergenerational Trauma’.
- Through the University’s Centre for Enterprise Dynamics in Global Economies (‘C-EDGE’), it continues to contribute world-class academic research and collaborate with business, industry partners, government and fellow researchers to progress the global conversation on modern slavery risks and the effectiveness of reporting.

## Creating a new university for the future

In 2023, the Councils of the University of South Australia and The University of Adelaide agreed to support the South Australian Government to take certain legal and legislative steps for the creation of a new university, named *Adelaide University*, by combining the two existing universities. Adelaide University has a planned opening date of January 2026, and the two existing reporting entities – the University of South Australia and The University of Adelaide – are expected to cease operating in March 2026.

Over the coming reporting periods, the two existing reporting entities will work together to establish the fundamental functions and activities required for Adelaide University. This will include the governance, systems of control and accountability, policy and procedural principles, operating model, employment conditions and business processes that will enable the effective performance and management of Adelaide University. These activities will include appropriate consideration for establishing Adelaide University’s modern slavery risk management program.

Until March 2026, the University of South Australia and The University of Adelaide will continue to operate independently within their obligations under various regulatory and legislative requirements. However, as discussed in this statement and to the extent permissible under the legislation, this has prompted the University of South Australia to review its aspirations for the development of its existing modern slavery risk management program, which will be superseded by Adelaide University’s risk management program.



# 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 in 2023 was comprised of:



34,878

students



2,942

staff (actual headcount)



247,886

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 programs and courses across all seven Academic Units which are designed specifically for online learning.

The University has a research institute – the Future Industries Institute – and 24 research centres and concentrations.

The academic enterprise is enabled through the University's 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 7,150 parchments in 2023.

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) and Singapore to deliver University courses.

### UniSA Health Pty Ltd

UniSA Health Pty Ltd ('UniSA Health') contributes to the health and wellbeing of its students, staff and the community by providing medical, nursing and allied health services as well as quality teaching for the University through the provision of clinical placements for undergraduate and postgraduate students.

UniSA Health also provides professional development opportunities to academic staff who are qualified practitioners in their fields.

### UniSA Ventures Pty Ltd

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 2023, the University transacted with approximately 3,600 suppliers within Australia and overseas (excluding payment card merchants).

### Distribution of spend by industry (2023)



Over 89% of the University's spend on goods and services was with Australian-based suppliers, with the remainder being with suppliers predominantly located in United States, India, Netherlands, United Kingdom, Germany, Hong Kong (SAR) and Singapore. Spend with 44 other countries composes less than 2% of the University's total expenditure on goods and services.

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, Kenya 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 including specific reference to modern slavery provisions and include an annual performance review.

### UniSA Health Pty Ltd

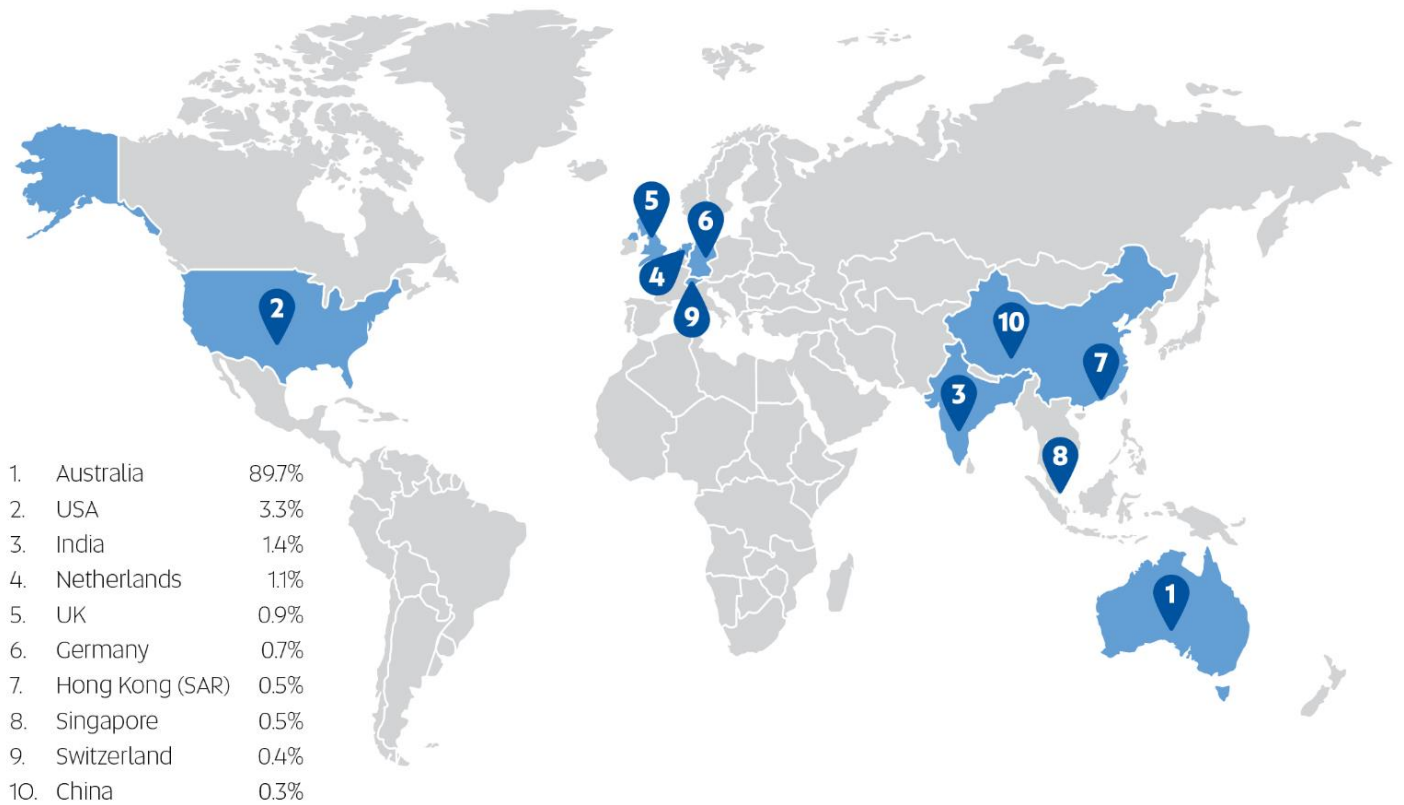
In 2023, UniSA Health primarily dealt with 11 suppliers of medical equipment, medical supplies and office supplies. All of these suppliers are based in Australia.

### UniSA Ventures Pty Ltd

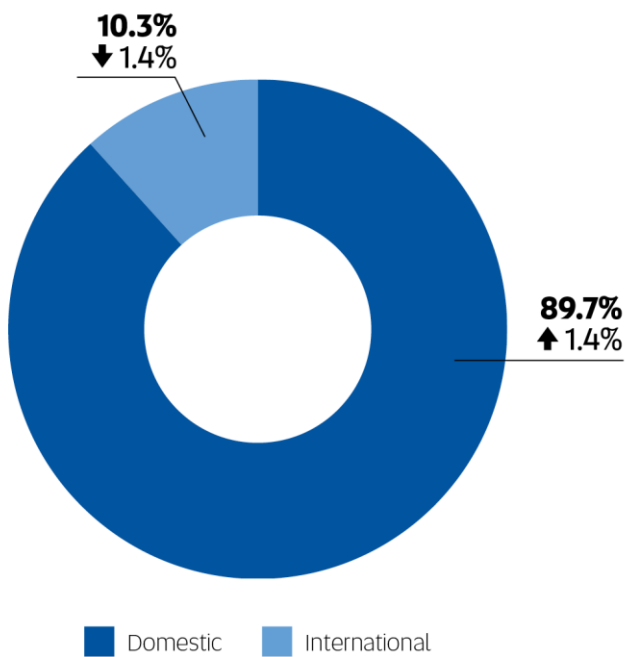
UniSA Ventures' supply chains include intellectual property management, investment management, customer service, marketing, finance and corporate services.

In 2023, UniSA Ventures engaged with 13 suppliers, of which all 13 were located in Australia.

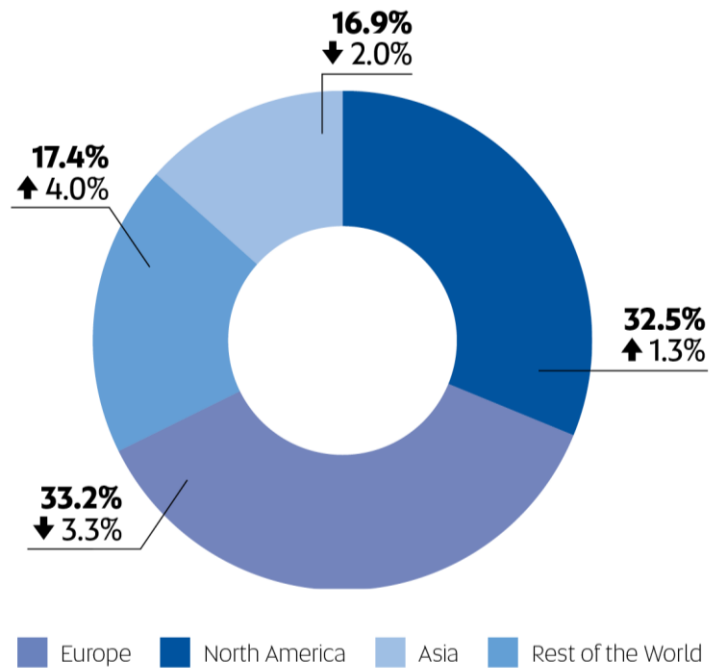
### Top 10 Countries by Spend (2023)



### Domestic vs International Spend (2023)



### International Spend by Region (2023)



# 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 applies a tiered approach to ensure adherence with legislative and compliance obligations for 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 of South Australia Enterprise Agreement 2023* and *Senior Staff Employment Conditions Policy*. 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.

# 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 is a member of the Australasian 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 providing and supporting tools to identify modern slavery risks in the higher education sector. These tools assist AUPN members to independently identify and manage their respective modern slavery risks.

In 2022, through its membership of the AUPN and in collaboration with an initial 33 other participating members, the University implemented an enterprise-grade supply chain mapping solution. The FRDM supply chain management tool uses risk algorithms that include product genome data and trade databases to create a predictive bill of materials for purchased goods and services. When combined with global risk indicators, this helps to identify the inherent modern slavery risks that could be associated with the University's purchasing activities. This tool provides the University with a greater understanding of modern slavery risks in the University's existing and prospective procurement supply chains, particularly beneath the immediate tier of direct or Tier 1 suppliers.

Throughout 2023, the University continued to work with the AUPN to update and further refine the quality of the data within the FRDM tool and the associated sector-wide recommended working practices which inform the University's higher-risk sourcing and contract management activities.



# Actions to assess and address modern slavery risks

Through this reporting period, the University has continued to develop its modern slavery risk management program in conjunction with its participation with broader sector-wide initiatives. This program, along with the University's broader policies and procedures, applies to the University and its subsidiaries, UniSA Health and UniSA Ventures.

Specific actions within the risk management program are discussed below.

## Governance

The University previously reported that it had:

- 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,
- participated in industry updates and sector-wide awareness sessions, including those at which the Australian Border Force has provided feedback on the first round of modern slavery statements and guidance for future statements,
- updated procurement instructions for University staff to record modern slavery risks in local risk registers, which are reported through to the Council – the University's principal governing body – in accordance with the University's Risk Management Framework, and
- reviewed procurement procedures and included specific provisions relating to the identification and management of modern slavery risks during the preparation and evaluation stages of the sourcing process.

Since the last statement, the University has:

- commenced the journey to establish *Adelaide University*, and
- established the Integration Management Office which – together with the Integration & Transformation Partner – is supporting the universities to co-develop the fundamental functions and activities required for *Adelaide University*. These activities include the governance, systems of control and accountability, policy and procedural principles, operating model, employment conditions and business processes that will enable the effective performance and management of *Adelaide University*. These activities will also include appropriate consideration for establishing *Adelaide University's* modern slavery risk management program.

## Industry Collaboration

In 2022, University staff members Dr Katherine Christ and Professor AI Rainnie founded the South Australian Modern Slavery Network. The network brings together researchers and practitioners from industry, academia, government, trade unions and civil society to help address the problem of modern slavery in South Australia and beyond. Since 2022, the network has hosted multiple events, made submissions to parliament and received exposure via the media activities of its members. The network intends to continue expanding its activities and influence in 2024 and beyond.

The University also continues to be represented on a small team that composes the modern slavery working group for the AUPN, which is supporting member universities to meet the challenge of human rights transparency and risk management in their supply chains.

### Key areas of focus for the AUPN program in 2023



The University has also maintained its representation on an Academic Advisory Board to advise and enrich the AUPN's approach to mitigating modern slavery risks.

In collaboration with 33 other participating AUPN members, the University implemented a new enterprise-grade supply chain mapping solution that overlays the University's purchasing data with information about the inherent risks associated with certain goods or services. The FRDM tool provides each of the participating members with:

- a modern slavery dashboard highlighting country risks, industry risks, trading partner risks and purchase risks for each of its managed suppliers,
- modern slavery awareness and understanding, including global developments,
- the ability to issue a single industry-standard supplier assessment questionnaire to common suppliers on behalf of all participating universities, and
- alerts based on University-specific suppliers, industries and countries.

During 2023, the University participated in two further AUPN working groups – a User Group and a Data Improvement Group - to further improve the utility of the FRDM supply chain mapping solution.

## Research

The University has continued its contribution to academic research and the global conversation on modern slavery risks and the effectiveness of reporting.

Through the Centre for Enterprise Dynamics in Global Economies ('C-EDGE'), the University brings together world-class researchers from a range of research disciplines to provide expert advice on the challenges of dynamic markets, support the growth and development of business and government, and provide research students with real-world experience. In 2023, examples included:

- The poor Australian company response to the Modern Slavery Act and international pressures for improvement<sup>1</sup>.
- Australia's modern slavery law is woefully inadequate – this is how we can hold companies accountable<sup>2</sup>.
- How accountants can support their clients to end modern slavery<sup>3</sup>.
- Modern Slavery: Why it's every Australian's business<sup>4</sup>.

## Procurement

The University previously reported that invitation to bid documents (e.g. expressions of interest, requests for quotations and requests for tenders) had been updated to require respondents to:

- identify if they are reporting entities under the Modern Slavery Act, and
- 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 had also:

- undertaken a review of terms and conditions for supplier contracts and developed a suite of standard clauses for all new contracts to deal with identifying, managing and reporting modern slavery risks. Purchase agreement templates now include a range of modern slavery identification and reporting requirements, commensurate with the value of the contract and an assessment of the modern slavery risk profile. Irrespective of whether a supplier is a reporting entity under the Modern Slavery Act, the University requires all newly-appointed suppliers to take reasonable steps to identify and address risks of modern slavery practices in the operations and supply chains used in the provision of goods or services to the University. When appropriate, prospective suppliers are required to confirm their commitment to identifying modern slavery in their supply chains and managing any associated risks,
- enhanced its supplier evaluation procedures and provided University staff with guidance relating to assessing and classifying any modern slavery risks for prospective supplier arrangements, including giving consideration as to how the University will work with the successful supplier to address any identified risks,
- reviewed and updated the standard clauses to reflect feedback from University stakeholders and suppliers,
- commenced development on an expanded suite of purchase agreement templates to ensure that a greater range of University purchases have appropriate modern slavery identification and reporting obligations, and

<sup>1</sup> Breen, M. (2023), Dr Katherine Christ interviewed by Megan Breen for an article on the poor Australian company response to the Modern Slavery Act and international pressures for improvement, INTHEBLACK Magazine, 17 February 2023, <https://intheblack-magazine.cpaaustralia.com.au/cpa-australia/intheblack-july-august-2023?pid=MzM336927&p=25&v=8.1>

<sup>2</sup> Raby, K. and Christ, K.L. (2023), 'Australia's modern slavery law is woefully inadequate – this is how we can hold companies accountable', The Conversation, 31 May 2023, <https://theconversation.com/australias-modern-slavery-law-is-woefully-inadequate-this-is-how-we-can-hold-companies-accountable-206605>

<sup>3</sup> Hawkes, H. (2023), Dr Katherine Christ interviewed for an article in Professional Accountant Magazine on the topic of modern slavery, Professional Accountant, Institute of Public Accountants, 30 August 2023, <https://www.publicaccountant.com.au/features/how-accountants-can-support-their-clients-to-end-modern-slavery#:~:text=Integrated%20reporting%20that%20increases%20visibility,reporting%20is%20unlikely%20to%20do>

<sup>4</sup> Christ, K.L. (2023), 'Modern Slavery: Why it's every Australian's business', Australian Outlook, Australian Institute of International Affairs, 13 September 2023, <https://www.internationalaffairs.org.au/australianoutlook/modern-slavery-why-its-every-australians-business/>

- reviewed and modified supplier evaluation procedures based on University stakeholder feedback to improve the usability and effectiveness of the procedures for decentralised procurement activities.

Since the last statement, the University has:

- captured over 96% of the University's expenditure on procured goods and services in 2023 for processing and analysis within the FRDM supply chain mapping tool. The remainder represents low value payments for travel and subsistence-related purchases made using corporate credit cards; and
- participated in the AUPN's Modern Slavery Data Improvement Group to further enhance the utility of the utility of the FRDM supply chain mapping solution by improving the quality and accuracy of the data and associated algorithms.

The University continues to make progress with:

- fully integrating the global country, product and industry insights offered by the FRDM solution into the University's supplier evaluation procedures for higher-risk sourcing activities.

### Contract Management

In its first reporting period, the University developed and issued a University-developed Modern Slavery Supplier Questionnaire to an initial tranche of the University's top suppliers on the basis of expenditure.

Since making the commitment to co-invest in the FRDM supply chain mapping solution with 33 other members of the AUPN, the University has reviewed its contract management procedures. The review leveraged the data-driven insights and supplier analysis tools offered by the FRDM solution to identify, prioritise and investigate modern slavery risks within its supply chain, and particularly beneath the immediate tier of direct or Tier 1 suppliers.

As training is cascaded among decentralised procurement activities and the tool becomes more broadly adopted, the University will develop this capability further to expand on the original group of suppliers to further understand and manage risks of modern slavery in the University's existing procurement supply chains.

# Assessing the effectiveness of actions

The University's modern slavery risk management program has established a foundation of governance, procedures, supporting tools and awareness in relation to the identification, management and reporting of modern slavery risks.

The University has not yet identified any known risks or instances of modern slavery which have necessitated action by the University, although it is expected that this may change as the FRDM supply chain mapping solution matures and becomes more broadly embedded in the University's sourcing and contract management activities.

When known modern slavery risks are identified, the University will use appropriate review mechanisms, commensurate with such risks, to develop a management response for the risk, to monitor the ongoing effectiveness of the action taken and, if necessary, consider any supplemental action that should be taken.

The University acknowledges that there continues to be more work to do with identifying risks associated with existing suppliers as well as identifying and managing risks for prospective suppliers. Through future reporting periods, in addition to continuing to work with University staff and incumbent suppliers, the University will:

- develop the FRDM supply chain mapping solution (or equivalent capability) to further expand upon its modern slavery awareness and risk management activities;
- continue to work with the Australasian Universities Procurement Network, the South Australian Modern Slavery Network and similar advocacy groups, trade associations and community organisations to share insights and examples of modern slavery and good practice; and
- together with The University of Adelaide, reflect on the lessons learned from within each institution and give appropriate consideration to establishing effective modern slavery awareness and risk management for Adelaide 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.

The University has consulted with management teams within UniSA Health Pty Ltd and UniSA Ventures Pty Ltd 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  
May 2024