



2020

University of Southern Queensland  
**Modern Slavery Statement**

ABN 40 234 732 081

# Message from the Vice-Chancellor

The University of Southern Queensland recognises that modern slavery is a global issue and is committed to taking a leading role in improving transparency and addressing the risks of modern slavery in our supply chain and operations. This is the first modern slavery statement published by the University as part of compliance with Australia's Modern Slavery Act (Cth).

At the University of Southern Queensland, we are united by our three values of Respect, Integrity and Excellence. We respect each other and value diversity of people, culture and ideas within our community; we act with transparency, consistency and fairness and apply the highest personal, professional and ethical standards; and we work together to excel in all that we do as a University community.

Through our actions, we live these values and it is against them that we hold ourselves and others accountable. This is why we are committed to operating responsibly and acknowledge our responsibility to better understand the complex global issue of forced labour and the exploitation of vulnerable workers.

In 2019, the University established a Modern Slavery Working Group to identify, address and mitigate the risks of modern slavery in our operations and throughout our supply chains. These steps are further outlined in this statement.

We are aware that these actions require ongoing monitoring and measurement and the University will continue to work with our employees, suppliers and industry partners to mitigate the risks of modern slavery.

There is no place for modern slavery in the Australian community or in the global supply chains of Australian goods and services and the University of Southern Queensland is committed to the long term change required to prevent it from continuing.

This statement was approved by the Council of the University of Southern Queensland on 10 May 2021.



**Professor Geraldine Mackenzie**  
Vice-Chancellor, University of Southern Queensland  
10 May 2021

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## Modern slavery means conduct which would constitute:

- (a) an offence under Division 270 or 271 of the Criminal Code; or
- (b) an offence under either of those Divisions if the conduct took place in Australia; or
- (c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done at New York on 15 November 2000 ([2005] ATS 27); or
- (d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

# About the University

The University of Southern Queensland is a statutory body established under the *University of Southern Queensland Act 1998*. The University of Southern Queensland Act enables the University to deliver the following.

- Provide university standard education;
- Provide facilities for, and encourage, study and research;
- Encourage the advancement and development of knowledge, and its application to government, industry, commerce and the community;
- Provide courses of study or instruction to meet the needs of the community;
- Confer higher education awards;
- Disseminate knowledge and promote scholarship;
- Provide facilities and resources for the wellbeing of the University's employees, students and other persons undertaking courses at the University.

The University of Southern Queensland is headquartered at the Toowoomba campus; has two campuses west of Brisbane – Springfield and Ipswich – and operates the Queensland College of Wine Tourism (QCWT) located at Stanthorpe. The QCWT is a joint venture with the Queensland Government.

In addition to on-campus study, the University builds on over 50 years as a provider of higher education programs to students studying off-campus across Australia and overseas by enabling globally connected education, unconstrained by time and location. Some two-thirds of the University's students study fully online both within Australia and overseas.

The University provides products and services including the delivery of higher education, research activities, health and wellness programs, on-campus residential accommodation and a range of support services for employees and students.

The University of Southern Queensland is registered as a charity with the Australian Charities and Not-for-profits Commission. It employs 1739 full and part-time employees within Australia and four international employees based in the United Kingdom and United States of America.

The University undertakes a range of research activities and specialises in the fields of agricultural, health and medical research. University research follows codes of conduct and has additional human and other ethics approval processes.

# Supply chains

The University's supply chains are a mix of global and domestic suppliers and are generally sourced via a competitive procurement process.

Suppliers range from locally based small to medium enterprises to multinational organisations and where possible the University leverages Queensland whole of government standing offer arrangements. For suppliers of high-volume products, or where a supplier has an identified risk in terms of product, service provision, or geographic risk for quality assurance standards, the University implements comprehensive contractual arrangements.

The University procurement strategy includes recognition of consolidated supply categories for the purposes of applying individual strategies where internal business practices dictate. Supply categories can be grouped as including but not limited to:

- information, communication and technology (ICT);
- facilities management;
- research; and
- general goods and services such as stationery and catering.

The University's procurement planning framework includes a Corporate Procurement Plan, with additional plans sitting beneath it. These plans will include profiles of suppliers, considering their risk and strategic importance. The intent is also to include modern slavery risk considerations.

The University has invested in new systems for better transparency of process and collection of supply data and applies a systematic approach to all procurement practices including risk.

## Products

Products purchased by the University range from daily consumables through to small and large assets and are sourced from the local South East Queensland region, nationally and overseas. A number of research related products are sourced from overseas where appropriate, and are generally specialised pieces of equipment which may require fabrication.

## Services

Services procured by the University include but are not limited to various disciplines of professional services, maintenance services and employment contract hire.

## Products and services used by indirect suppliers in the entity's supply chains

Products and/or services procured by indirect suppliers in the University supply chain are governed by head agreements which may require the supplier to comply with University procurement requirements as if they were a party to the head agreement.

# Modern slavery risks in operations and supply chains

The University assessed its modern slavery risks through consultation with internal stakeholders, combined with knowledge of universal risks documented by the Australian Border Force, Anti-Slavery Australia and the Global Slavery Index. The following table outlines key risks identified through the process.

	Description of modern slavery risk
<b>Operations</b>	<p>The University of Southern Queensland is a global organisation that primarily conducts business within Australia and areas where modern slavery risk is considered low, however our business dealings with organisations and companies from around the world may expose us to regions that have a higher risk of modern slavery.</p> <p>The University may be exposed to modern slavery through activities such as international teaching, international research, international consulting, and international student recruitment as examples. The University has policies and procedures to reduce risk and provide standard operating protocols.</p> <p>Research activities are widespread and varied across numerous sectors. Visibility and management of these activities are reliant on strict adherence to University policies, research ethics, Australian and international customs, laws and directives, contractual obligations as well as the research objectives. Risks are additionally mitigated through licensing, training, supervision and ongoing contract management.</p> <p>The University increased awareness and sought to identify risks during 2020.</p>
<b>Supply chain</b>	<p>Lack of visibility of supply chains is a key risk for the University. The following modern slavery risks were identified.</p> <p><b>Cleaning</b> Cleaning is considered a high-risk industry due to the vulnerability of many workers in this profession. They frequently belong to at-risk groups such as women and girls, migrants and refugees and have low visibility or legal protection. Although cleaning activities at the University are managed through contractual arrangements and follow the University's standard procurement process, the University recognises this remains a high-risk area.</p> <p><b>Construction</b> Construction industry risks exist through the procurement of high-risk products such bricks, carpet and timber. The University's construction risks are mitigated through mandatory assessment criteria which require successful service providers to attain Quality Assurance to AS9001 Standard for major capital projects.</p> <p><b>Garment and textiles</b> The University procures a range of garments and textiles including, but not limited to, employee uniforms, student uniforms, personal protective equipment and laboratory garments. Due to the prevalence of cotton in many garments and textiles, this is a risk for the University.</p> <p><b>Technology</b> The University has a moderate spend in technology goods and services. Given its reliance on technology and the geographic and other associated risks with technology, this is an area of the University's supply chain which requires further investigation.</p>
<b>Operations and supply chain</b>	<p>Working in a competitive global market has created potential modern slavery risks related to offshore business arrangements for the provision of goods or services from other countries. The University has appropriate arrangements with educational partners, suppliers, recruitment agents, marketing and promotional suppliers and general goods and services providers, all of whom provide services for conducting successful international operations in education. The University procurement processes are followed in the engagement of international service providers and additional support is offered through the overseeing University business units to provide intelligence relating to risks identified in location.</p>

# Actions taken to assess and address risks

The following actions were taken to mitigate modern slavery risks within the University's operations and supply chains.

	Actions taken
<b>Operations</b>	<p><b>Memberships</b></p> <p>The University maintains memberships with several independent organisations such as the Australian Higher Education Industrial Association, Australian Universities Procurement Network (AUPN), the Council of Australian University Librarians and the Council of Australasian University Directors of Information Technology who provide specialist advice, assistance and representation within other key industry entities nationally.</p>
<b>Supply chain</b>	<p><b>Sector networking and collaboration</b></p> <p>The University has actively participated in the AUPN Modern Slavery group to collaborate, identify and assess modern slavery risks within Australian university supply chains. Through this group, the University has been able to access tools to support category and geography risk identification. The University's membership with the AUPN has also enabled the University to adopt a coordinated approach to gathering and analysing procurement data through a dashboard, assessing risks, developing training materials, supplier questionnaires and various other resources.</p> <p><b>Contractual clauses</b></p> <p>Key performance indicators (KPIs) surrounding ethical sourcing of products have been incorporated into some contractual arrangements, with some suppliers exceeding obligations through extensive documentation, and visits with University representatives to ensure they are adhering to ethical sourcing of products.</p> <p><b>Commenced supplier profiling/segmentation</b></p> <p>After communication with all suppliers, the University has commenced initial stages of screening the supplier base to identify high-risk products and services. This will support future targeted activities on a category basis.</p>
<b>Operations and supply chain</b>	<p><b>Assembled Working Group</b></p> <p>The University established a Modern Slavery Working Group in late 2019 to develop approaches to identify risks of modern slavery in supply chain and operations, identify stakeholders, gather data requirements and support Modern Slavery Statement preparation activities. This group met regularly throughout 2020 to consider risks, source and develop components for the toolkit to support employees and suppliers and raise awareness across the University. Raising awareness of the Act and potential modern slavery risks has been a key activity during 2020. A range of risk assessment templates has been developed, and work has commenced on creating a template for suppliers to undertake self-assessments of their supply chains. In conjunction with internal Legal Services, contract clauses have been identified to increase supplier compliance with modern slavery requirements.</p> <p>In sourcing and developing content, the University has considered information from:</p> <ul style="list-style-type: none"> <li>• Anti-Slavery Australia</li> <li>• Australian Border Force (including the Modern Slavery Business Engagement Unit)</li> <li>• Australian Universities Procurement Network (AUPN)</li> <li>• Queensland Government Procurement.</li> </ul> <p><b>Policy development</b></p> <p>The University has a comprehensive Policy and Procedure Framework for the development and regular review of policies and procedures. A review of the Policy Library indicated several key policies which may be amended to better include human rights risks. References to the Modern Slavery Act 2018 have been added to various instruments throughout the Policy Library.</p>

# Actions taken to assess and address risks

## Cont.

	Actions taken
<b>Operations and supply chain</b>	<p><b>Legislative compliance</b></p> <p>The University complies with its legal obligations and has embedded employment frameworks and practices into its operations. The University is committed to providing a work environment that is free from all forms of discrimination, bullying and harassment, and which is safe and secure. The University's Assurance Services team (Risk and Compliance function) works with the relevant stakeholders to ensure employees and contractors are aware of the University's compliance and legislative requirements regarding modern slavery and ensuring that there is a process in place to mitigate associated risks. Regular compliance reports are presented to the Audit and Risk Committee for additional oversight.</p> <p><b>Training and education</b></p> <p>Procurement training now includes a modern slavery topic. Work continues to embed modern slavery into other University training programs. As a separate activity, some University employees have completed the Anti-Slavery Australia training module <i>A Practical Guide to the Modern Slavery Act</i>. In early 2021, this training will be expanded to more employees.</p> <p>To support employees, suppliers and partners, a publicly available Modern Slavery webpage was developed, comprising communications, complaints management and reporting responsibilities, supplier and partner information and links to additional resources. This webpage will be progressively enhanced to ensure University suppliers have access to the latest information and resources.</p>

## Actions taken as a result of COVID-19

The University took the following approach to ensure continued progress on addressing modern slavery risks.

- All working group meetings shifted to video conference format.
- All training sessions were delivered online.
- All other awareness activities were communicated through email and short video formats.
- Engagement with suppliers to explain additional protocols related to COVID-19.
- Student Support Package provided financial assistance to students during the pandemic.
- Upfront payment of suppliers, reducing the timeframe for supplier payment processing as recommended in *Modern Slavery Act Information Sheet: Coronavirus*.
- Travel restrictions brought about by COVID-19 resulted in a reduction of onsite visits to international partners.

## Due Diligence

To strengthen the due diligence process, the University undertook the following key actions to identify and assess risks.

- Development of a risk assessment tool and monitoring of identified risks.

- Supplier segmentation activities commenced to ensure greater understanding of top suppliers in each category.
- Review of modern slavery statements and/or related human rights statements where publicly available for top suppliers in each category.
- Request for information during tender processes was limited to construction related activities in 2020.
- Sector related risks identified.

## Remediation Process

The remediation process commences through the organisational Complaints Management Framework. Complaints can be made to specific officers or anonymously. The Director (Integrity & Professional Conduct) will coordinate the University's response.



## Continuous Improvement Approach

Modern slavery risks require ongoing monitoring and measurement. Continuous improvement activities will be based on actions identified through risk assessment reviews, supplier relationships, and in partnership with Government agencies and other third-party organisations.



# Future actions

The following modern slavery prevention activities will be embedded within the University with support from the Modern Slavery Working Group.

	Future actions
<b>Operations</b>	<ul style="list-style-type: none"> <li>Facilitate multi-stakeholder initiatives and workshops with key stakeholders to identify risks and opportunities for mitigation.</li> <li>Further identify risks and rank according to significance, defining both short and long-term actions.</li> <li>Identify thresholds for targeted action e.g., high-risk / high spend suppliers.</li> <li>Develop a comprehensive complaints management process and procedure.</li> <li>Incorporate modern slavery considerations into University policies and procedures where appropriate.</li> <li>Incorporate best practice principles within future modern slavery statements related to mandatory criteria.</li> <li>Deliver more extensive modern slavery training programs to employees.</li> </ul>
<b>Supply chain</b>	<ul style="list-style-type: none"> <li>Enhance supplier segmentation and relationship management strategies and embed within organisational category management plans.</li> <li>Improve supply chain data capture to identify ethical suppliers within the University's financial and contract management systems.</li> <li>Incorporate supplier profiling into the University's procurement planning framework, being mindful of their risk and strategic importance. This will include modern slavery risk considerations to support future targeted activities on a category basis.</li> <li>Review procurement documents in greater detail to engage with the market and introduce supplier questionnaires to understand potential supplier practices.</li> <li>Embed modern slavery prevention considerations into procurement documentation, including sourcing templates prepared by the Queensland Government.</li> <li>Review Queensland Government Ethical Supplier list/resources against University of Southern Queensland suppliers, existing procurement and contractual arrangements, and resources.</li> <li>Develop a supplier pre-qualifier questionnaire to identify preferred small and medium enterprises.</li> <li>Incorporate requirements for cleaning procurements to have an affiliation with the Cleaning Accountability Framework.</li> <li>Address contractual arrangements for uniforms upon expiration of current contracts.</li> </ul>
<b>Operations and supply chain</b>	<ul style="list-style-type: none"> <li>Develop a Modern Slavery Prevention Road Map.</li> <li>Develop a Modern Slavery Prevention Action Plan.</li> <li>Implement KPIs for both the University and its suppliers to measure/mitigate modern slavery risks.</li> <li>Develop additional resources for both employees and suppliers such as Tender Evaluation/ Review committee training, pre-contract guidance documents, reporting requirements for actual and suspected instances of modern slavery, advocacy support tools, supplier templates and questionnaires.</li> <li>Increase monitoring and evaluation activities.</li> <li>Review pre-existing longer-term contracts for compliance and changes considered where required.</li> <li>Undertake further assessment activities to address high-risk services.</li> </ul>

# Consultation

The Modern Slavery Working Group, composed of representatives from Financial Services (incorporating Business Services, Procurement and Contracts), Human Resources, Assurance Services, Communications and Engagement, Legal Services, Integrity and Professional Conduct, the University Secretary and the Chief Financial Officer, undertook extensive consultation with key stakeholders and external agencies to identify the University's inherent risks, its scope of operations and supply chains to report on current practices and future priorities for mitigating modern slavery risk.

In the initial stages of risk identification, a consultation and deployment plan was established to ensure adequate engagement and communication with suppliers, external agencies and University stakeholders. Internal stakeholders were engaged through various committees to explain the impact of the Modern Slavery Act and highlight the prevalence of modern slavery globally.

The following committees were included in the consultation process:

- Enterprise Services Division Executive;
- Vice-Chancellor's Executive;
- Audit and Risk Committee;
- Finance and Facilities Committee; and
- University Council.

Further consultation with the University's senior leadership group was undertaken during preparation of the statement and will be ongoing as identified actions are implemented.

All employees received an introductory communication on modern slavery which highlighted the availability of further training and contact information to address any questions. Additionally, a communication was sent to all suppliers in late 2020, which outlined the University's commitment to supporting suppliers to identify and manage their modern slavery risks.

# Summary

The University acknowledges as its first annual statement, its Modern Slavery Working Group has made progress toward identifying and addressing possible modern slavery risks within its operations and supply chains. The University is committed to future improvement and will continue to work with its employees, suppliers, and industry partners to ensure it continues its ongoing commitment to mitigating modern slavery.



**University of Southern Queensland**

Toowoomba • Springfield • Ipswich

T: +61 7 4631 2579 | E: [Procurement.Enquiries@usq.edu.au](mailto:Procurement.Enquiries@usq.edu.au)

**[usq.edu.au](http://usq.edu.au)**