

UNIVERSITY OF TASMANIA

Modern Slavery Statement 2022

Introduction

Modern slavery is a broad term used to describe human trafficking, slavery and slave-like practices, often in situations that are used to exploit victims and undermine or deprive them of their freedom.

The University of Tasmania is committed to protecting and respecting human rights and has a zero-tolerance approach to slavery and human trafficking in all its forms. We ensure that wherever possible we prevent and do not contribute to acts of modern slavery through our supply chains and operations and are committed to the eradication of modern slavery through:

- ensuring that there is no modern slavery within our own operations
- educating our staff and students to build institutional understanding
- providing support for those members of our community who have experienced or been affected by modern slavery
- working with our partner organisations and supply chains with the objective of eliminating modern slavery.

The University of Tasmania Modern Slavery Statement 2022 illustrates the continuous improvement in our reporting on the risks of modern slavery in our operations and supply chains and actions taken to address them. It is made in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) for the reporting period 1 January to 31 December 2022 and is for the University of Tasmania and its controlled entities.

Reporting Entity

The University of Tasmania is a statutory authority constituted under the *University of Tasmania Act 1992* (Tas). The University is also a registered charity under the *Australian Charities and Not-For-Profit Commission Act 2012* (Cth).

This Statement is for the University of Tasmania and its controlled entities (A.M.C. Search Limited, UTAS Properties Pty Ltd, UTAS Holdings Pty Ltd and Tasmanian University Student Association Inc), together referred to as the University.

ARBN 055 647 848, ABN 30 764 374 782. Registered Office – 2 Churchill Avenue, Sandy Bay, Tasmania, 7005.

Modern slavery statement development and approval governance framework



STATEMENT OWNER

University Council



COMPLIANCE OWNER

General Counsel/Executive Director Legal and Risk



APPROVAL

University of Tasmania Council



POLICY ALIGNMENT

Sustainability Policy

Risk Management and Business Resilience Policy

Entities and Affiliated Organisations Policy

Procurement Policy

Compliance Policy

Behaviour Policy

Partnerships Policy



STRATEGIC ALIGNMENT

University of Tasmania Strategic Plan 2019-2024

Strategic Framework for Sustainability



OPERATIONAL OVERSIGHT

Statement Development
Chief Operating Officer (COO) Division (Legal and Risk)

Operational Risks
Academic Division
Future Students Division
COO Division

Continuous Improvement Plan
COO Division (Legal and Risk)

Operations

The University is the sole higher education provider in Tasmania. We are located on a remarkable and distinctive island with unique natural and Indigenous heritages. In 2022, our 34,449 students attended campuses located in three of the State's distinct regions, as well as New South Wales, online, and internationally in collaboration with partner institutions in Asia.

In 2022, the University employed 1827 full-time equivalent (FTE), 874 FTE part-time and around 229 FTE casual staff across diverse operations, supporting our fundamental purpose to deliver world leading teaching, learning and research. Operations in support of our academic endeavours included finance, safety, people, information technology, asset, risk, sustainability and facility management, as well as student services such as scholarships, learning support, library services, student advice, international student support, English language support, counselling, study abroad and exchange, and accommodation. Our cutting-edge research is critical for Tasmania, making use of our unique location, while contributing meaningfully to global priorities. We work to realise the economic, social and environmental impacts from our research outputs, partnering domestically and internationally to use and commercialise University-owned intellectual property. We engage broadly with the Tasmanian community, and directly with all levels of government, other universities, commercial partners, and third parties to deliver learning and teaching and undertake research.

We are connected to alumni across Tasmania, Australia and over 110 countries around the world.

Structure

The University is governed by the University Council which is established under the University's founding act and has responsibility for high-level strategic direction, major financial planning, monitoring management performance, compliance, and the allocation of funds.

The University Council delegates broad powers to the Vice-Chancellor as the managerial and academic leader, to manage the University's operations, and to Academic Senate which advises University Council on all academic matters.

The University receives funds primarily from the Australian Government, but also the state and local governments, to assist with education programs and research activities covering a wide range of disciplines.

In addition to government funding, the University receives donations, funds and fees from private organisations and individuals that are used for the different programs led by the University or correspond to the education services the University provides.

The University is organised into:

Colleges

College of Arts, Law and Education, College of Business and Economics, College of Health and Medicine, and the College of Sciences and Engineering. The colleges comprise discipline-based schools including four specialist institutes, the Australian Maritime College, Institute for Marine and Antarctic Studies, Menzies Institute for Medical Research, and the Tasmanian Institute of Agriculture.

Divisions

Vice-Chancellor, Chief Operating Officer, Academic, Research, and Future Students.

Controlled entities

AMC Search Limited, UTAS Properties Pty Ltd, UTAS Holdings Pty Ltd and Tasmanian University Student Association Inc.

Governance

University Council delegates oversight of legal compliance to its Audit and Risk Committee.

The Legal and Risk portfolio, headed by the General Counsel/Executive Director Legal and Risk, has operational accountability for the University's compliance with the Modern Slavery Act and oversees the implementation of modern slavery initiatives and the development of this Statement. Accountability for identifying and mitigating modern slavery risk, however, is a shared responsibility across the University. While monitored centrally under the University's Legal Compliance Framework, it is managed by those with direct responsibility, in particular by the Procurement, Student Life and Enrichment, Research Services and Recruitment and International teams.

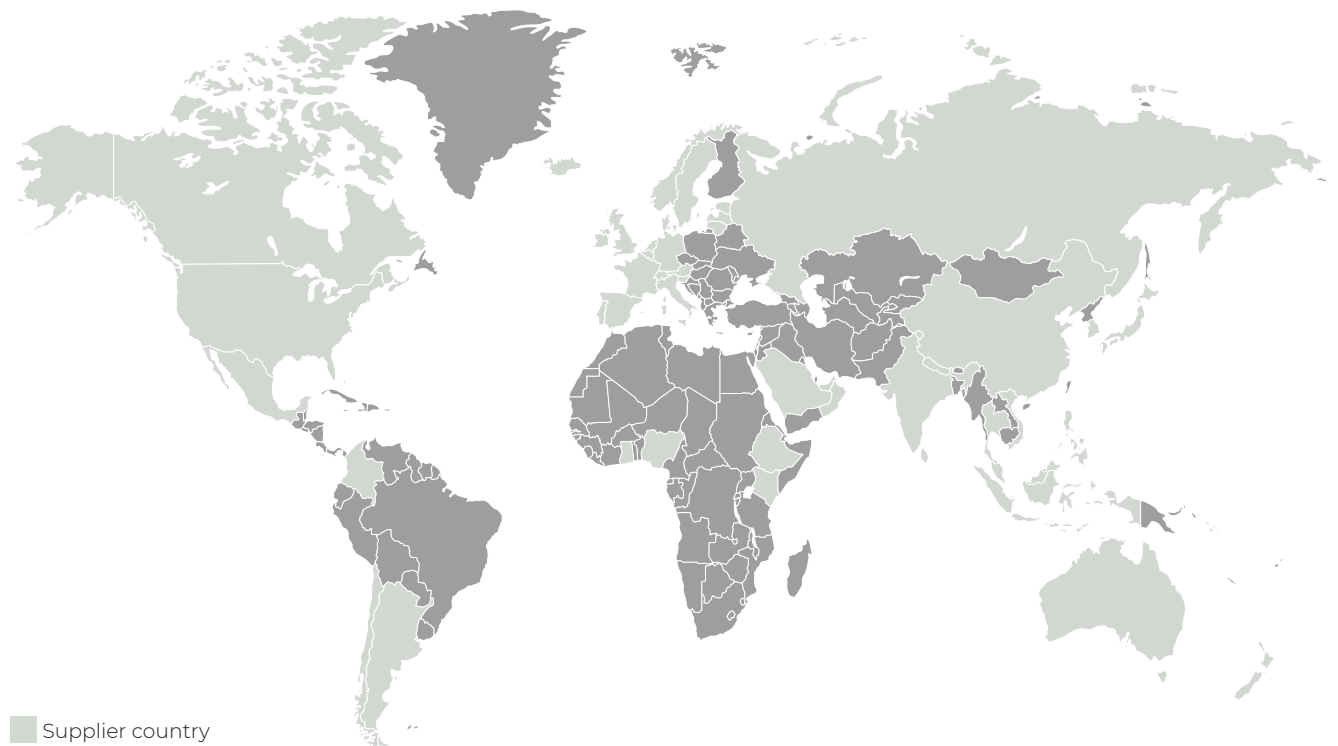
Supply chain

The University purchases a diverse range of goods and services in accordance with our *Procurement Policy*. This Policy supports the University's values and guides behaviour in relation to all operational, capital and research procurement-related activities for the purpose of advancing the University's objectives.

Procurement decisions at the University reflect value for money but are not limited to price; they also consider sustainable and ethical principles, maximise opportunities for local suppliers, and are assessed for risks specific to modern slavery.

Our supply chains are complex and geographically diverse. We procure goods and services from small family businesses through to global, multi-national companies.

University suppliers by country



Goods and services procured by the University include:

- building and construction services and supplies
- electronic goods (server hardware, computers, audio visual equipment, tablets and phones)
- facilities, asset and waste management services
- laboratory supplies (small and large equipment, chemicals, consumables, pharmaceuticals)
- food and catering supplies
- domestic and international travel services
- furniture
- office supplies
- books and printing
- branded clothing

The University has preferred supplier arrangements through University-wide contracts. Preferred suppliers are pre-qualified on a range of criteria, including assessment for modern slavery risk in their supply chains and operations.

Risks of Modern Slavery

The University's approach to the identification and management of modern slavery risk in our supply chains and operations is aligned with the University's Risk Management Framework and Risk Appetite.

In 2022, we built on past progress, embedding practice for identifying, managing and educating our University community on the risks of modern slavery.

Ongoing assessment of our operations identifies the following functional areas as being at higher risk of inadvertently supporting, contributing to, or being impacted by modern slavery practices:

- procurement
- students and staff
- research operations
- International operations
- Investment

Key risks for modern slavery within each area have been identified and assessed. These include:

Students and staff

Risk of:

- low level of awareness about modern slavery in the University community
- students subject to modern slavery by external agents
- individuals unable to report on suspected or confirmed modern slavery
- student-facing staff unable to respond appropriately to modern slavery related enquiries and concerns.

Research operations

Risk of:

- research partners engaging in modern slavery practices (higher in high-risk geographical areas)
- unethical procurement of biological samples
- modern slavery practices in clinical trials (higher in high-risk geographical locations)
- HDR candidates subject to modern slavery by external agents.

Procurement

Risk of:

- procurement of goods and services from suppliers engaging in modern slavery practices (higher in high-risk industries such as technology and textiles and high-risk geographical areas)
- not detecting modern slavery risks and incidents in supply chains.

International operations

Risk of:

- entering contractual relationships (e.g. for recruitment) with global partners engaging in modern slavery practices (higher in high-risk geographical areas)

Investment

Risk of:

- Investment in companies that engage in modern slavery practices or have high-risk supply chains.

Australian Universities Procurement Network (AUPN)

A key initiative for identifying and managing risks in our procurement has been our membership of the AUPN. The AUPN is a sector-wide collaboration of 38 Australian and New Zealand universities that supports members to meet the challenge of human rights transparency and assists members to fulfil their reporting requirements under the Modern Slavery Act. The AUPN supports member universities to manage risks, develop processes and support education initiatives in relation to risks of modern slavery.

The AUPN has partnered with FRDM to embed an industry-wide Modern Slavery Risk Tool. The University uses the data within this tool to provide an indication of modern slavery risk across:

1. spend categories using the AUPN taxonomy, and
2. country locations using supplier head office location.

This identified that the highest risks within the higher education sector supply chains are:



Information technology and communications (ICT)



Clothing and apparel



Food

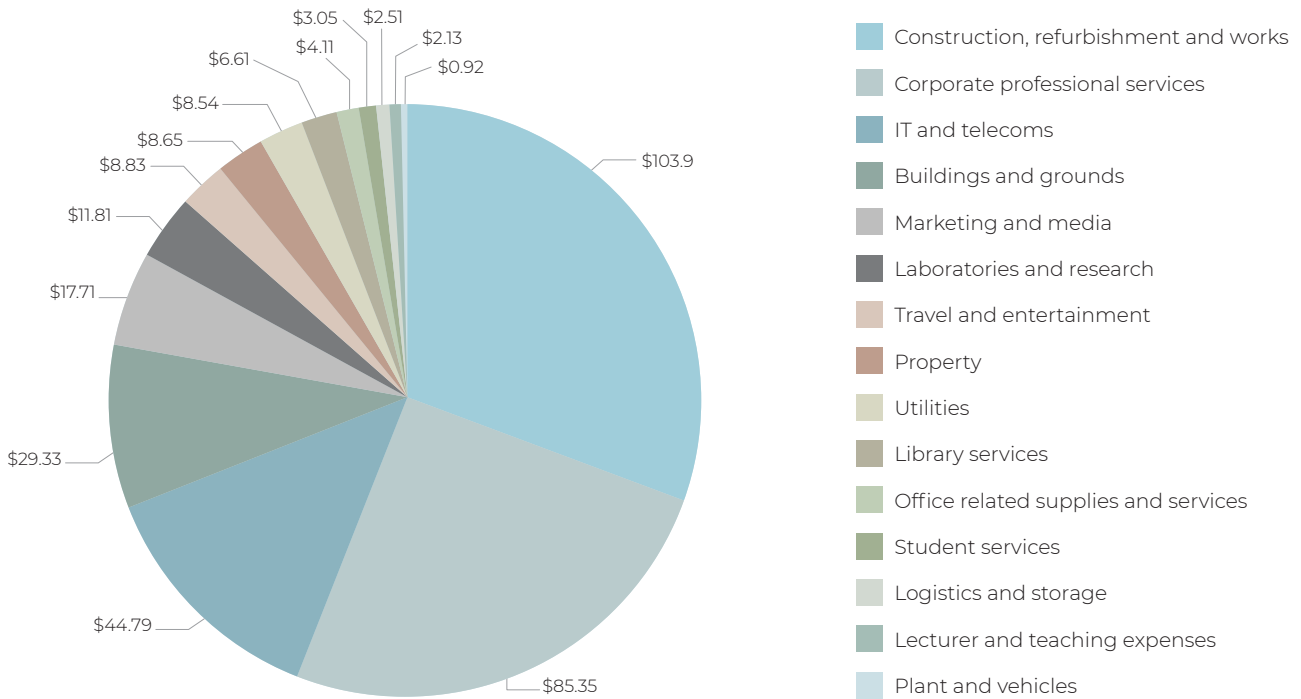


Construction



Cleaning

Total University spend by category (\$million)



The University will continue to utilise internal procurement data and the AUPN technology solution to understand our supply chains, identify risk, focus resources and inform actions around modern slavery risk management.

While our endeavours to date have not identified any cases of modern slavery in either our operations or supply chains, we recognise that despite our best efforts, these crimes may be associated with the goods and services we procure due to the complex and diverse nature of our supply chains. By its nature, modern slavery can be difficult to detect given it often sits in 'legitimate' industries. Due to the effectiveness of the University's controls, the residual risks of modern slavery are assessed as low to moderate based on the University's Risk Framework.



CASE STUDY

A sustainable and ethical approach to clothing

The University's Procurement team refined its modern slavery risk assessments for tender evaluations for high-risk industries, such as manufacturing. In one instance, the Procurement team worked collaboratively with our local clothing suppliers to investigate how their suppliers are managing the risks of modern slavery. Through this process we also ensure goods are produced sustainably in keeping with our Sustainability Policy and our values. This approach is not only helping us manage our supply chain risks, but is building a closer relationship with our suppliers.

Actions taken to address risks, due diligence and remediation

The University has a continuous improvement approach to identifying and managing risks of modern slavery focussed on activities and areas of highest risk. This is documented and managed through the *Modern Slavery Continuous Improvement Plan*. In 2022, the University also established a *Modern Slavery Act 2018 Legal Compliance Plan* to ensure understanding of and compliance with all obligations of the Act that impact the University and to better facilitate oversight of the continual improvement process that is the foundation of the University's response to the risks of modern slavery.

Education and awareness raising

Building understanding of modern slavery in the University community and awareness of its existence, even in modern day Australia, has been central to our activities focussed on mitigation of risk. With increased awareness comes changes in behaviours both in the workplace and in personal lives such as purchasing choices.

Awareness raising and education activities in 2022 for our communities and our partners included:

- enhancing the public-facing University of Tasmania Modern Slavery web page with additional information about modern slavery, University actions and links through to reporting pathways for instances of modern slavery
- development of an internal-facing staff intranet page, including training materials and advice on how to report suspected modern slavery
- identifying existing Partners and Agents in high-risk geographical areas and issuing them with Modern Slavery Questionnaires
- establishing ongoing due diligence practices for assessing Partners and Agents in high-risk geographical areas to better identify modern slavery concerns
- including modern slavery questions in the 2022 Sustainability Surveys for both students and staff to raise awareness of modern slavery and assess our community's experiences of modern slavery
- educating students on modern slavery risks and available support resources through regular direct communications to students across multiple digital platforms.

A significant focus in 2023 will be increasing University Community awareness of modern slavery risks through the development of an online training module and the delivery of targeted training for at-risk areas of the University.

Procurement

We continued to leverage the due diligence work the AUPN carried out on high-risk global companies to inform our approach to modern slavery risk management, mitigation and remediation internationally, and concentrated our internal due diligence resourcing efforts on identified local high-risk suppliers.

We continued to utilise the AUPN technology platform to inform our due diligence assessments and use data across each category or by location to identify potential risks with the supplier. In our procurement tendering process we required suppliers to provide relevant assurances, internal policies and procedures or audit reports to build our knowledge of their supply chains.

Our sector-wide collaboration has been strengthened through use of the AUPN's FRDM tool, which went live in early 2022. The tool combines data science with artificial intelligence to identify modern slavery risks within supply chains which helps us meet the challenges of supply chain transparency.

Through our processes for sustainable procurement of University-branded clothing and merchandise we continued to build brand specific awareness of manufacturing of our clothing lines as a means of mitigating risk in this high-risk industry, and we continue to manage modern slavery risks in procurement of ICT products through our relationships and contracts with our suppliers. The University acknowledges that these industries remain higher risk and work with suppliers to understand their supply chains is ongoing.



CASE STUDY

Talking modern slavery risk with tech giants

In 2022, the Procurement team pursued close relationships with the account management, national and global representatives of our major technology supplier to gain a deeper understanding of the activities they are taking to combat modern slavery in their operations and supply chains. This provided us with confidence in our choice of supplier in this high-risk supply chain.

Requests for tender

In 2022, modern slavery questionnaires continued to be incorporated into the University's request for tender documentation for all procurement over \$200,000. These questionnaires provide ongoing identification and management of risk but also serve as an educative tool for prospective suppliers.

Similarly, contracts continued to embed our expectations regarding modern slavery including in:

- international agreements and partnerships
- general MOUs
- general and construction contracts
- leases
- work integrated learning.

Contracts containing modern slavery provisions:

- require certain disclosures and notifications
- require evidence about how risks of modern slavery are managed and mitigated
- provide for termination where modern slavery is identified and the party refuses to remediate or address (last resort).

Investments

Our investment portfolio spans public markets (Australian and international equities) and private markets (infrastructure and private equity). Our Treasury and Investment Policy mandates a positive screen to consider outcomes consistent with the United Nations Sustainable Development Goals and an assessment of modern slavery risks is undertaken as part of the investment due diligence process, including a review of relevant modern slavery policies, statements and direct questioning of fund managers. Monitoring of the investment portfolio to manage investment and fund manager risk is undertaken in accordance with the governance framework and includes an annual strategy review. To this extent, the University does not knowingly invest directly or indirectly in organisations that support or perpetrate modern slavery.

Staff and students

It is possible that our staff, students, or their family members may know or suspect someone is a victim of modern slavery or even be subject to it themselves. We know that modern slavery exists in Australia today in many forms. Educating staff and students about modern slavery and what to do about it as well as providing a mechanism and support for it continues to be a significant risk mitigation activity.

In 2021, the University's Safe and Fair Communities Unit (SAFCU) established a dedicated pathway for anonymous reporting for vulnerable students and staff through their website. This is supported by information on the SAFCU website and training for members of SAFCU and all other staff and is advertised on the University's Modern Slavery website and in support materials. In 2022, four concerns in relation to modern slavery issues were reported through the established pathway and resolved through the provision of appropriate information or guidance on services available to offer further assistance.

Partnerships

Following on from the work progressed in 2021 to identify partners and agents in high-risk geographical areas, the University has increased due diligence assessments of all partners and agents in high-risk geographical areas, as well as including appropriate contractual terms in agreements with Research Partners. In 2022, the University introduced a mandatory second (and more extensive) round of due diligence conducted by the Legal, Risk and Compliance team for proposed partners from countries with alleged human-rights, including modern slavery, abuses.



CASE STUDY

When it's ok to say no to research funding

A University researcher was seeking funding from a foreign philanthropic funding body that was established in a country with alleged human rights abuses. Legal, Risk and Compliance's in-depth due diligence on the application assessed the alignment of the foreign partner with the University's values, strategic priorities and legislative requirements, and identified numerous allegations of human rights abuses, including slavery, against the founder of that funding body. The University declined to proceed with the funding application given the high risk of modern slavery.

Remediation

The University uses remediation processes that take an educative and collaborative approach to mitigate risks of modern slavery in supply chains and partner relationships, ending an agreement or relationship only if there is no alternative.

Mandatory Criterion 5 - Describe how the reporting entity assesses the effectiveness of actions being taken to address modern slavery risks

Assessing Effectiveness

Audit and Risk Committee

The Audit and Risk Committee provides oversight of the identification and management of modern slavery risks on behalf of University Council. It monitors the implementation and effectiveness of the Modern Slavery Continuous Improvement Plan. Regular reports are provided to the Committee which outline:

- emerging risks
- incidences of modern slavery and remediation activities
- progress against the Continuous Improvement Plan

Questionnaires

Responses to the procurement modern slavery questionnaires are reviewed. The University will use the FRDM Discovery Tool's built-in questionnaire when this functionality becomes available, the results of which will be accessible through the AUPN's database for all universities to reference. Responses help the University identify potential areas of risk, and where identified, the partner or supplier will be referred for further due diligence.

In 2022, identified Partners and Agents in high-risk geographical areas were issued with Modern Slavery Questionnaires. As no responses to the questionnaires were received, ongoing due diligence assessments were established for Recruitment and International, as previously mentioned above.

Community

Feedback from staff, students and community members continues to form an integral part of assessing the University's effectiveness in relation to modern slavery. We will continue to engage with our community to ensure that our approach meets regulatory compliance and exceeds community expectations.

Mandatory Criterion 6 - Describe the process of consultation with any controlled entities

Consultation

University controlled entities operate in accordance with the University's Entities and Affiliated Organisations Policy. Boards of controlled entities report to University Council and must ensure its functions and activities are carried out in accordance with its constitution and relevant laws.

Boards must also ensure oversight of risk and compliance issues including obligations under the *Modern Slavery Act 2018*. The University consults and works closely with controlled entities to ensure their compliance obligations, including risk management in relation to modern slavery, are met.

Mandatory Criterion 7 - Any other relevant information

Reporting concerns

All aspects of the University's activities are founded in ensuring the protection and respect of human rights across our business and supply chains. Staff and students have a number of pathways to gain access to information about how the University manages risks of modern slavery. The University's processes and mechanisms to investigate any concerns regarding unethical or illegal conduct, including concerns in relation to modern slavery and human trafficking are governed by the Behaviour Policy and Behaviour Procedure with reporting (anonymous if required) through the University's Safe and Fair Community Unit (SaFCU).

2022 statement approval

The University of Tasmania Modern Slavery Statement 2022 was approved by University Council on 27 April 2023.

Signed



Alison Watkins
Chancellor



Professor Rufus Black
Vice-Chancellor