



THE UNIVERSITY
of ADELAIDE

2021

Modern Slavery Statement



GROUP
OF EIGHT
AUSTRALIA

make
history.

Introduction

The University of Adelaide (ABN 61 249 878 937) is committed to protecting and respecting human rights and to taking steps to eliminate all forms of modern slavery.

This Statement reflects that commitment and fulfils the obligation of the University of Adelaide (the University) and its controlled entities under Part 2 of the *Modern Slavery Act 2018* (Cth) (“the Modern Slavery Act”). This Statement reports on the steps taken to assess and address the risks of modern slavery within its operations and supply chains during the University’s 2021 financial year (1 January to 31 December 2021).

The University welcomes the opportunity to actively consider the risk of modern slavery and to provide an annual Statement on its efforts to eliminate any connections to modern slavery practices it identifies.



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About the University

The University is constituted by the University of Adelaide Act 1971 (SA) for the purpose of:

the advancement of learning and knowledge, including the provision of university education.

Founded in 1874, it is one of Australia's oldest universities and is a member of Australia's prestigious Group of Eight research-intensive universities. The University consistently ranks in the top 1% of universities worldwide¹.

In 2020, the University's annual consolidated revenue was \$993,277,000.

The University is a diverse institution comprised of students, scholars and professional staff drawn from around the

world. The student body alone consists of more than 23,000 students from over 109 countries. Students, along with over 3,900 members of staff, learn, teach and conduct research across the University's four campuses (three located in and around Adelaide, at North Terrace, Waite, and Roseworthy, and one in Melbourne).

Australia is recognised as a world leader in the higher education sector and, as a part of that sector, the University understands the manifold challenges confronting the

global community today, including the pursuit of sustainability and the impact of globalisation. In this context, the University recognises the shared duty of all Australians to respect and protect human rights, and is committed to understanding and, wherever possible, reducing the risks of modern slavery in its operations and supply chains.

¹ As ranked by the QSD World University Rankings, Times Higher Education World University Rankings, and the Shanghai Jiao Tong's Academic Rankings of World Universities.

The University's structure, operations and supply chains

Structure

The principal governing body of the University is its Council, chaired by the Chancellor of the University, the Honourable Catherine Branson AC QC. Management of the University is the responsibility of the Vice-Chancellor and President, Professor Peter Høj AC FTSE FNAI (US), who has been appointed by the Council to oversee and manage the academic standards, management and administration of the University. The Academic Board oversees the academic standards of the University.

In 2021, the University was organised into five academic faculties and five administrative divisions:

- Faculty of Arts
- Faculty of Engineering, Computer and Mathematical Sciences
- Faculty of Health and Medical Sciences
- Faculty of the Professions
- Faculty of Sciences
- Division of the Provost
- Division of Academic and Student Engagement
- Division of Research and Innovation
- Division of University Operations
- Division of Vice Chancellor and President.

As a research-intensive organisation, the University has seven research institutes and 42 research centres, delivering excellence in research in a large range of fields.

As a leading research and teaching institution, the University enjoys broad and successful relationships with government, industry, communities and research partners.

The University has established seven controlled entities to support its core and strategic purposes. During the reporting period, three of those identified below are actively operating:

- Adelaide Unicare Pty Ltd, ABN 13 056 443 059
- Roseworthy Campus Farm Pty Ltd, ABN 56 007 936 834
- National Wine Centre Pty Ltd, ABN 75 117 597 592
- ACN 008 123 466 Pty Ltd (non-operating), ABN 31 798 859 716
- Innovation and Commercial Partners Pty Ltd (non-operating), ABN 55 008 027 085
- Australian Advanced Materials Manufacturing Pty Ltd (non-operating), ACN 621 994 465
- Australian Centre for Plant Functional Genomics (ACPF) Holding Company Ltd (non-operating), ABN 98 102 769 808.

Each of the operating entities is subject to governance, monitoring and reporting requirements directed and reviewed by various Standing Committees of Council, and is required to regularly report directly to one of the four University's assigned liaison officers (Deputy Vice-Chancellor (Academic), Deputy Vice-Chancellor (Research), the Chief Operating Officer or Chief Financial Officer).

Operations

The University's core business is teaching (including higher education, pathway programs and professional and continuing education) and research. This work is largely undertaken in Australia; however, some University employees and postgraduate candidates travel for work for varying periods or may reside overseas. The University's controlled entities operate in various South Australian locations.

Supply chains

Supporting the teaching and research activities and campus operations of the University requires a diverse range of goods and services provided by a large and complex supply chain. The University purchases materials required to deliver its core teaching services; construction and facilities management services; office equipment including computers and phones; catering services and meals; accommodation for staff travelling; laboratory supplies including consumables, pharmaceuticals, and scientific equipment; and many more goods and services.

In 2021 the University spent over \$384M on goods and services from over 13,000 suppliers, in 257 goods and service categories.

The University recognises that there are risks of modern slavery in the supply chains of all the goods and services we purchase, and is committed to understanding these risks further.

The risks of modern slavery practices in the operations and supply chains of the University and its controlled entities

How is risk identified?

The Chief Financial Officer (CFO) is responsible for implementing controls for operational risks involving Finance and Procurement Services and for ensuring compliance with regulatory obligations and codes of practice. Lead by the CFO, the University's Finance and Procurement Services Branch has developed a whole of organisation response to modern slavery risks, including the descriptions of risks set out in this statement.

This response has been facilitated by the University's membership of the Australian Universities Procurement Network (AUPN). AUPN members have collaborated on a project to identify key supply chain risks within the higher education sector and to share information about the effective management of these risks. Further details about this collaborative project are set out in the 'Risk in supply chains' section below.

Oversight of all risks at the University is guided by the University's Risk Management Framework and is reported to the University's Council via the Audit, Compliance and Risk Committee, a Standing Committee of Council. During 2021, the University Risk Management Committee monitored management of operational risk.

Risk in supply chains

The University recognises that there are risks of modern slavery in the supply chains of all the goods and services it purchases. The relative risks for any of the goods and services the University purchases can only be determined by assessing factors such as product or service type and manufacturing or operating locations.

The University also recognises that there are additional risk factors for modern slavery in supply chains beyond geography and industry, including in particular business models such as subcontracting and aggressive pricing.

During the 2021 reporting year, the University continued to participate in the AUPN's consolidated data analysis and risk mapping process, in order to better understand the scope of risk of modern slavery in its supply chain.

The resulting analysis allowed the University to identify where supply chains extend into goods and service categories and geographic locations that are of higher risk for the presence of modern slavery.

Goods and services categories identified as being both high risk for modern slavery in the supply chain and proportionally high spend by the University include:

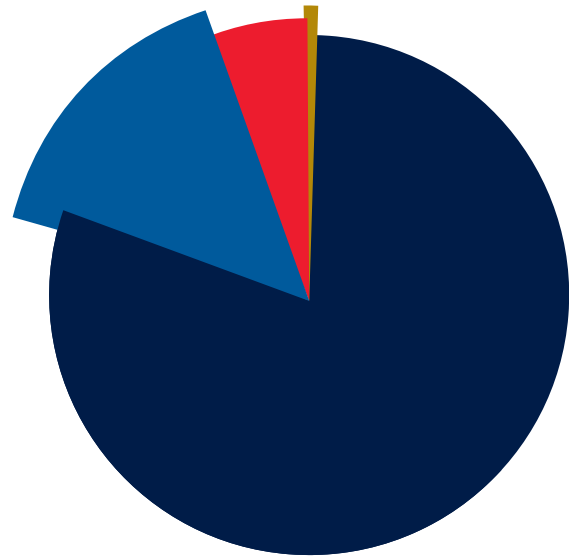
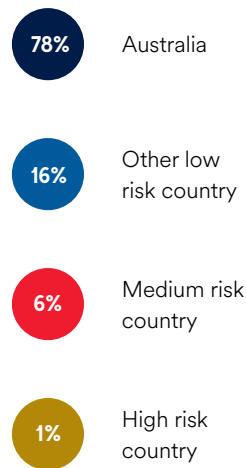
- Commercial cleaning;
- Desktop hardware and IT accessories;
- Building maintenance services;
- Catering and meals; and
- Scientific equipment and laboratory consumables.

In 2021, 20% of the University's total spend was on high risk goods and service categories such as those identified above. More than half (55%) of the University's spend was on product categories at low risk of modern slavery.

In 2021, the majority (78%) of the University's suppliers were located in Australia, and 16% of suppliers were located in countries with a low risk of modern slavery (figure 1). Less than 1% of the University's suppliers were located in countries with a high risk of modern slavery. The University acknowledges that supply chains are global, and expects suppliers located in low risk countries to have supply chains which extend into higher risk countries.

The University will continue to monitor the location of workers as a known risk indicator and, along with others in the AUPN, continue to apply due diligence assessments to its supply chains.

Figure 1:
Proportion of University suppliers in 2021 by country risk level



Risk in operations

The University has assessed the likelihood and consequences of modern slavery in core operations to be low. That is, given the nature of the University's workforce and procurement needs, modern slavery risks are possible but are not expected to routinely arise and are capable of being monitored and controlled by a targeted management strategy.

The basis for this assessment and the management measures that mitigate modern slavery risk is described in detail in the following sections.

Risk in the management of human resources

The University's operations and staffing profile do not exhibit any of the characteristics that might indicate a higher risk of modern slavery². The nature of the University's workforce is highly skilled and all on-going, contract and casual staff

are recruited using transparent, recognised processes. In performing their duties, staff are generally highly connected to the workplace and operational processes designed to achieve consistency in performance.

Continuing, fixed term, and casual employees of the University work under the University of Adelaide Enterprise Agreement 2017–2021, which has been approved by the Fair Work Commission. The Enterprise Agreement covers all aspects of employment, including working conditions, remuneration, leave and other benefits.

The University does not use overseas labour brokers to recruit staff, and no staff of the University are subject to recruitment fees or personal or property security deposits. University employees are typically employed directly by the University; where labour hire companies are used, these are Australian-based.

The University is diligent in checking that all new employees have the right to work in Australia. Most employees are based in Australia, however where work is undertaken overseas, University employees remain covered by Enterprise Agreement conditions.

In addition to the Enterprise Agreement, the University has a range of other policies, procedures, and supporting documents in place to help manage the risks of modern slavery in its operations:

- [Recruitment Policy and Procedure](#)
- [Behaviour and Conduct Policy](#)
- [Code of Conduct](#)
- [Whistleblower Policy](#)³.

² Walk Free Foundation, The Global Slavery Index 2018, globalslaveryindex.org/

³ The Whistleblower Policy is under review at time of writing.



Risk in research operations

The University's research operations are primarily service based. The scope of research services conducted by University staff may include developing prototypes and field demonstrable products, as a proof-of-concept stage in the application of knowledge to real world endeavours; however, the University is not a commercial producer or manufacturer of goods.

Most research services are undertaken by employees of the University, who are protected by the policies and procedures outlined above. Subcontractors are used when required, and these may be based either in Australia or overseas. When subcontractors are engaged, standard template agreements are used, and in the case of research funded by government sources, the terms of the University's agreement with its subcontractor will mirror those set out in the Government funding agreement. Complex or unusual contracts are reviewed by the University's in-house legal counsel.

The University's research operations also include international research collaborations, in which academic research leaders create and foster collaborations with universities, companies, and other entities outside of Australia. The outcomes of these collaborations (which include grants, academic papers, intellectual property, and student recruitment) are of benefit to the University. These collaborations may be governed by formal agreements, but typical academic-to-academic collaborations are often informal. University staff are routinely required to complete a foreign engagement compliance review and report details of the scope and purpose of any international arrangements to the University.

The University's Responsible Conduct of Research Policy adopts the principles embodied in the Australian Code for the Responsible Conduct of Research 2018.

Risk in teaching operations

University teaching operations are also service based, with the majority of teaching services delivered by continuing or casual employees who are protected by the policies and procedures outlined above. Contractors are used occasionally.

The majority of the University's teaching operations are based in Australia; however, some are conducted overseas, through joint ventures with partner universities. Employees of the University who are located outside of Australia are still protected by the Enterprise Agreement and the suite of policies and procedures that apply to all University staff.

The University recognises that temporary work visa holders in Australia, including holders of international student visas, are at higher risk of exploitative working conditions including underpayment of wages⁴.

The University recognises the vulnerability of international students and provides a range of support services and information as required under the Education Services for Overseas Students Act⁵. The University is committed to ensuring that the whole international student experience while in Australia is as positive as possible and will continue to raise the awareness of international students of their rights and where to get help if they experience exploitative working conditions and/or modern slavery-like practices.

Risk in controlled entities

The University's five operating controlled entities and the risks of modern slavery in their operations and supply chains are detailed below:

Adelaide Unicare Pty Ltd

Adelaide Unicare is a general practice healthcare service operating in four practice locations in South Australia. Its mission is to deliver quality primary healthcare to its patients while providing a quality primary healthcare teaching network for medical, nursing and allied

⁴ Walk Free Foundation 2018, Modern Slavery Index Country Profile: Australia, [globalslaveryindex.org/2018/findings/country-studies/australia/](https://www.globallslaveryindex.org/2018/findings/country-studies/australia/)

⁵ international.adelaide.edu.au/life-on-campus/working-while-studying





health students. Adelaide Unicare is a limited liability proprietary company entirely controlled by the University of Adelaide.

In 2021, the University resolved to sell Adelaide Unicare; as of early 2022, all practice locations have been sold.

Employees of Adelaide Unicare are covered by employment agreements underpinned by the relevant professional award, or for particular employees, by an Enterprise Agreement which is registered with the Fair Work Commission.

The supply chain of Adelaide Unicare includes pharmaceuticals and medical consumables, as well as facilities management services such as cleaning, and operational goods including IT equipment. Some goods purchased by Adelaide Unicare, including desktop computers, are purchased from the University's preferred and contracted supplier.

Roseworthy Campus Farm Pty Ltd

Roseworthy Campus Farm (named Martindale Holdings Pty Ltd prior to October 2021) manages the cropping, sheep and cattle operations of the University's farm at Roseworthy. The University farm is crucial to its teaching programs and research priorities. The farm is run as a commercial farming operation, with income earned allocated towards the research projects that will improve understanding of Australian agricultural and livestock management practices.

Employees of Martindale Holdings are covered by employment agreements underpinned by the relevant professional award. Some contract labour is hired at peak demand times.

The supply chain of Martindale Holdings includes animal food supplies, as well as facilities management services such as cleaning, and operational goods including IT equipment. Some goods purchased by Martindale Holdings, including desktop computers, are purchased from the University's preferred and contracted supplier.

National Wine Centre Pty Ltd

The National Wine Centre of Australia is one of the country's most awarded venues for conferences, meetings and events. A showcase for the Australian wine industry, the venue offers a unique atmosphere for events, a range of tours and cellar experiences, and a chance to experience the wine making process from the vine to the bottle.

Employees of the National Wine Centre of Australia are covered under the Hospitality Industry (General) Award 2010, and adherence to the pay and other conditions set out in this award are audited internally. Temporary staff may be hired through an Australian based external labour hire agency. All employee contracts, for both permanent and casual employees, are modelled on templates created and approved by the University. The supply chain of the National Wine Centre of Australia includes food and beverages for resale, as well as facilities management services such as cleaning, and operational goods including IT equipment. Some goods and services purchased by the National Wine Centre, including desktop computers and cleaning services, are purchased from the University's preferred and contracted suppliers.

Actions taken by the University to assess and address risks

During 2021, the University's actions relating to modern slavery risk were focussed in two initiatives: continuing to follow the supplier due diligence processes created in the prior reporting year, and contributing to a sector-wide supplier engagement platform which will enhance supply chain analysis in future.

The supplier due diligence processes followed by the University in 2021 are described below.

Contracts

Since 2019, the University's contracts relating to the purchase of goods and/or services have included standard contract clauses making clear its position on modern slavery and its expectations of suppliers. This due diligence strategy requires any organisations providing goods and/or services to:

- Comply with the intent and the requirements of the Modern Slavery Act;
- Include similar modern slavery clauses in contracts with their own suppliers and subcontractors;
- Notify the University as soon as the supplier becomes aware of any actual or suspected slavery in a supply chain connected to the contracted goods and/or services; and
- Remedy any identified instances of modern slavery within a reasonable timeframe.

During the 2021 reporting year, new and renewing contracts have included Modern Slavery clauses.

Supplier Code of Conduct

In 2020, the University created and implemented a Supplier Code of Conduct ("the Code"). This Code conveys the public commitment that the University has made to undertake procurement activities in an environmentally, socially, ethically, and economically responsible manner, and sets out the University's expectations for its suppliers.

During the 2021 reporting year, the University's standard contracts for purchase of goods and/or services were updated to include a clause requiring the supplier to comply with the Code. In instances where an alternate contract was used (for example, supplier's own contracts), suppliers were requested to sign the Code and confirm they agree to it and understand their expectations as a supplier to the University.

Market approach documentation

When undertaking formal approaches to market in 2021, the University asked suppliers to respond to questions relating to their reporting status under the Modern Slavery Act; their policies, education, and training practices relating to modern slavery; and the steps they have taken to ensure the risks of modern slavery have been identified and addressed in their supply chains and operations.

Training and Engagement

Strategic Procurement and Purchasing are centralised activities at the University. In 2021, all staff in the Strategic Procurement and Purchasing teams had received training in modern slavery, ensuring these key staff are aware of the University's pro-active approach to addressing modern slavery risks and the meeting its obligations under the Modern Slavery Act.

Consultation and collaboration as a sector

The University of Adelaide is a member of the AUPN, the peak body for strategic procurement in the higher education sector in Australia and New Zealand. The AUPN comprises 38 member institutions from Australia and New

Zealand. The University recognises that more meaningful and effective change is achievable through collaboration with other higher education institutions, and, with representation on the AUPN's Executive Committee and Change Management Group, the University has played an active role in shaping this sector response.

During 2021, the AUPN has focussed efforts on the implementation of a third-party technology solution. This tool is designed to support all AUPN members to gather and interrogate relevant expenditure data, identify risks, effectively focus resources, and inform action around modern slavery risk management across the sector. Engaging with suppliers via the tool will also enable the University to start analysing its supply chains beyond Tier 1 suppliers.

In this reporting year, the following milestones towards implementation of this technology solution have been achieved:

- Vendor selected (FRDM) and contract awarded
- \$16.2B procurement spend collated and cleansed
- 98% of this data categorised
- Data and platform configured for more than 100K suppliers by FDRM.

The University participated in a Change Management Group which informed the development of, tested, and validated the platform.

Operational implementation of the platform is scheduled to commence in early 2022.



The University's assessment of the effectiveness of its actions

Routine review of information provided by suppliers

As detailed above, suppliers are asked to provide a response to a returnable tender schedule when participating in market activities, in order for the University to gain greater transparency over its supply chain. This questionnaire allows effective due diligence to be conducted on suppliers before they are contracted to provide goods and services to the University.

The AUPN's FRDM tool will improve the University's current process and allow supplier self-assessments to be incorporated into the routine and ongoing management of current suppliers.



Consultation with controlled entities

The University's controlled entities currently operating were consulted as part of the development of this report.

For this second reporting year under the Act, the consultation process was focussed on further understanding the operations and supply chains of the controlled entities, and identifying the Tier 1 suppliers of particular high risk goods and services used by the entities.

The consultation process for future reports will include identifying how the University can strengthen risk control within its operating controlled entities, including encouraging the use of standard University policies, templates, and processes across controlled entities.



Other information

Next steps

Having identified systems and processes that will collectively support the University's approach to managing modern slavery risks, future activities will focus on:

- Ongoing requirements for contracts with suppliers to include clauses specific to modern slavery, for suppliers to conform with the Supplier Code of Conduct, and for data relating to modern slavery from suppliers participating in market activities to be provided;
- Working to implement contracts and supplier due diligence for high risk goods and service categories not currently under contract;
- Continuing to improve awareness of the risk of modern slavery and responsibilities under the Modern Slavery Act within the central Procurement Services team and across the wider organisation;
- Developing a set of key performance indicators to enable quantitative assessment of the effectiveness of the University's actions, and measurement of progress over time;
- Planning for the ongoing identification and assessment of the risk of modern slavery in all operations and supply chain across the whole organisation, including in controlled entities; and
- Understanding and addressing the risks of exploitative working conditions and modern slavery like practices to international students and developing appropriate support mechanisms.

The University will continue to benefit from participating in the following programmed activities for 2022 as a part of the AUPN:

- Implementing a technology solution to facilitate supplier self-assessments for the region's higher education sector to identify risks in the supply chains and operations of Tier 1 suppliers and gain transparency over other supply chain tiers;
- Continuing to share best practice in addressing modern slavery risks and human rights as they relate to the higher education sector; and
- Continuing to gain insight from academics employed in Australian universities working in research fields related to modern slavery and human rights;
- Continuing to look for best practice in addressing modern slavery risk across industries, including by engaging with third party organisations established to identify and mitigate modern slavery risks, such as the [Cleaning Accountability Framework](#).



Approval

This statement was approved by the University of Adelaide Council in its role as principal governing body on 27 June 2022.



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Vice-Chancellor and President,
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30 June 2022



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Kurna acknowledgement

We acknowledge and pay our respects to the Kurna people, the original custodians of the Adelaide Plains and the land on which the University of Adelaide's campuses at North Terrace, Waite, and Roseworthy are built. We acknowledge the deep feelings of attachment and relationship of the Kurna people to country and we respect and value their past, present and ongoing connection to the land and cultural beliefs. The University continues to develop respectful and reciprocal relationships with all Indigenous peoples in Australia, and with other Indigenous peoples throughout the world.