



Modern Slavery Statement

University of Tasmania
2020

UNIVERSITY of
TASMANIA 

INTRODUCTION

This inaugural Statement is for the University of Tasmania, and its controlled entities for the period 1 January 2020 to 31 December 2020. 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.

The Statement is made in accordance with the requirements in the *Modern Slavery Act 2018 (Cth)* and sets out the actions taken by the University of Tasmania for the reporting period.

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 is committed to ensuring that we prevent and do not contribute to acts of modern slavery within our supply chains and operations.

**GOVERNANCE FRAMEWORK MODERN SLAVERY STATEMENT
DEVELOPMENT AND APPROVAL**



STRATEGIC ALIGNMENT

University of Tasmania
Strategic Plan 2019-2024

Strategic Framework for
Sustainability



STATEMENT OWNER

University Council



**OPERATIONAL
OVERSIGHT**

Statement Development
– COO Division: Legal
and Risk

Procurement Risk – COO
Division: Procurement

Operational Risks - Research
Division, Partnerships &
Future Students Division

Continuous Improvement
Plan - COO Division: Legal
and Risk



POLICY ALIGNMENT

Sustainability Policy

Risk Management
and Business Policy

Entities and Affiliated
Organisations Policy

Procurement Policy

Compliance Policy



COMPLIANCE OWNER

General Counsel, Executive
Director Legal and Risk



APPROVAL

1. University Council
2. Audit & Risk Committee
3. Sustainability Committee



Mandatory Criterion 1 - Identify the reporting entity

REPORTING ENTITY

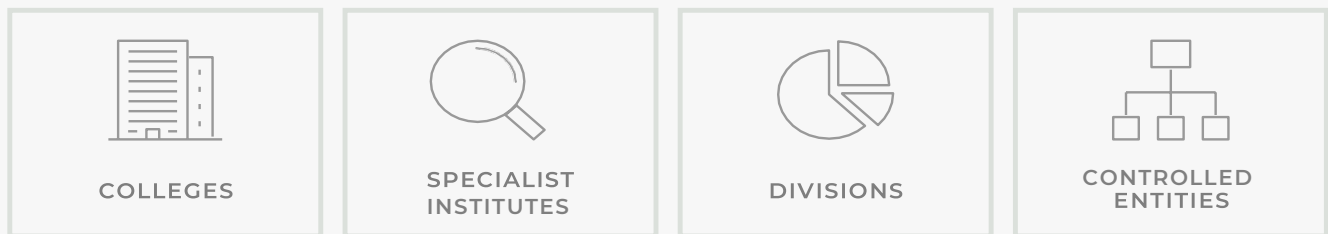
The University of Tasmania is a statutory authority constituted under the *University of Tasmania Act 1992 (Tas)* (UTAS Act). The University is also a registered charity under the *Australian Charities and Not-For-Profit Commission Act 2012 (Cth)*.

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

ABN 30 764 374 782. Registered Office – 2 Churchill Avenue, Sandy Bay, Tasmania.

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Mandatory Criterion 2 - Describe the structure, operations and supply chains of the reporting entity

STRUCTURE

The University is governed by the University Council established under the UTAS 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 who advise University Council on all academic matters relating to the University.

The University receives funds from the Australian Government, as well as the State and Local Governments, to assist with education programs covering a wide range of disciplines across different education qualification levels.

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 provided by it.

The University is organised into:

COLLEGES

College of Arts, Law and Education, College of Health and Medicine, College of Science & Engineering, College of Business and Economics, and University College.

SPECIALIST INSTITUTES

Australian Maritime College, Institute for Marine and Antarctic Studies, Menzies Institute for Medical Research, and the Tasmanian Institute for Agriculture.

DIVISIONS

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

CONTROLLED ENTITIES

A.M.C. Search Limited, UTAS Properties Pty Ltd, Tasmania University Union Inc, UTAS Holdings Pty Ltd, and Sense-Co Tasmania Pty Ltd.

GOVERNANCE

University Council delegates oversight of the Legal Compliance Framework to the University Audit and Risk Committee. The University's Compliance function, reporting to the General Counsel, Executive Director Legal and Risk, is responsible for the development of this Statement and oversight of the implementation of our modern slavery initiatives.

Accountability for addressing modern slavery risk is shared across multiple areas ensuring that our initiatives and supporting processes are embedded broadly. Risks of modern slavery are reported and monitored centrally through the Legal Compliance Framework, and are supported by actions such as education and awareness.

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. Our 33,000 students attend 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.

The University employs 1869 full-time equivalent staff, 670 part-time and 259 casual staff across diverse operations, which supports our fundamental purpose to deliver world leading teaching, learning and research. Our operations include financial, safety, people, IT, asset, risk, sustainability and facility management, as well as student services such as scholarships, student exchange, library services, English language support, counselling, and accommodation.

Our cutting-edge research is critical for Tasmania, making great use of our unique location, while contributing meaningfully to global priorities.

We are committed to realising the economic, social and environmental impacts from our research outputs, working with domestic and international partners to use and commercialise university owned intellectual property. We engage with the Tasmanian community, State Government, the Commonwealth Government, other universities, commercial partners, and third parties to deliver learning and teaching and undertake research.

We are connected to alumni across Tasmania and around the world, all of whom are deeply committed to Tasmania and the values that are central to our mission.



SUPPLY CHAIN

We purchase a diverse range of goods and services in accordance with the University Procurement Policy. The Procurement 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. This includes specific guiding principles in relation to risks of modern slavery.

Our supply chain is complex and geographically diverse. We procure goods and services from small family businesses through to global multi-national companies. For the reporting period, the University procured \$255.4 million in goods in services from 11,500 suppliers.

PROCUREMENT POLICY PRINCIPLES

All procurement decisions must reflect value for money, are not limited to price, consider sustainable and ethical principles, maximise opportunities for local suppliers, and include managing the risk of modern slavery.

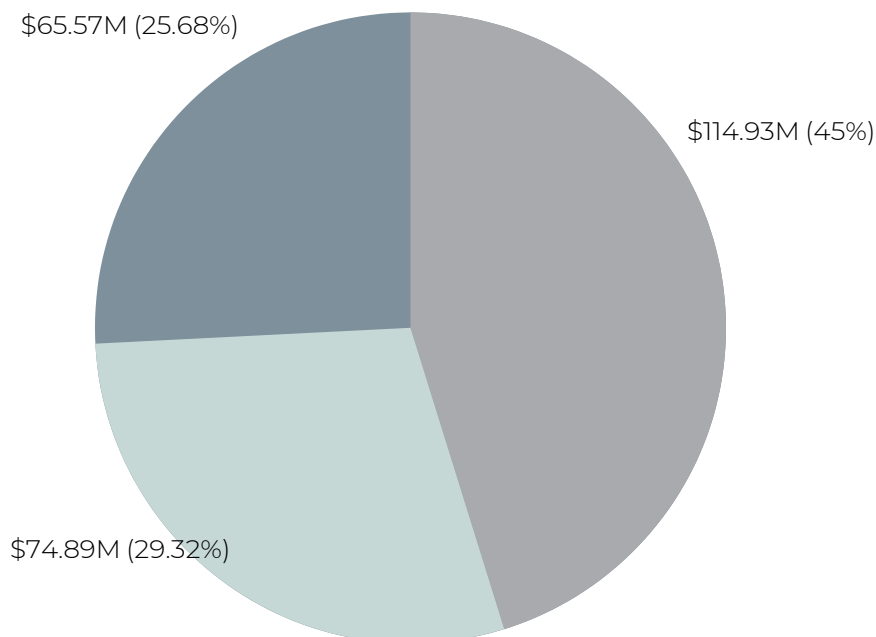
Goods and services procured by the University include:

- 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

The University has preferred supplier arrangements through University-Wide Contracts (UWC's). Preferred suppliers are pre-qualified on a range of criteria, including responses to questions about management of modern slavery risk in their supply chains and operations.

OPERATING, RESEARCH AND CAPITAL EXPENDITURE

■ Operating Funds ■ Capital Works ■ Research and Teaching



RISKS OF MODERN SLAVERY

Management of modern slavery risk, both in our supply chains and operations, is assessed and managed in accordance with the University Risk Management Framework and the University Risk Appetite. The Audit and Risk Committee is responsible for providing oversight on behalf of University Council.

During 2020, the University undertook a risk assessment of its supply chains and operations to identify any risks of modern slavery.

In understanding the risks of modern slavery within supply chains and operations, the University is taking a proactive approach to managing any potential or emerging modern slavery risks. We do this by contributing to and leveraging the work of the Australian University Procurement Network (AUPN) (supply chains), and utilising third party resources including:

- Modern Slavery Registry Global Slavery Index
- Verisk Maplecroft Human Rights indices
- Global Compact Network
- Transparency International Corruption Perceptions Index
- OECD Due Diligence Guidance for Responsible Business Conduct

RISK ASSESSMENT

The University carried out a detailed risk assessment across all of our operations. We have assessed risks that may cause, contribute or are linked to modern slavery practices. Potential risks have then been analysed and evaluated in accordance with the University Risk Management Framework. The three areas identified as having potential risks of modern slavery are:

- Procurement
- Research Operations
- International Operations

Our assessment to date has not identified any cases of modern slavery in either our operations or supply chains. However, we recognise that despite our best efforts to identify modern slavery, it 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 controls, the residual risks of modern slavery are low to moderate.

SPOTLIGHT ON OUR INVESTMENT PORTFOLIO

Our investment portfolio spans Australian and international equity markets, infrastructure, private equity investments, and across a number of sectors.

The assessment of modern slavery risks in the investment portfolio is considered through our assessment of environment, social, and governance (ESG) factors in our investment decision process.

Our Treasury and Investment Policy mandates a positive screen that considers the United Nations Sustainable Development Goals. The key elements underpinning the United Nations Principles of Responsible Investment (PRI) are embedded within our investment decision process, with fund managers required to be signatories to the PRI or have equivalent policies in place.

We also undertake an annual strategy review, including a performance assessment of fund managers. To this extent, the University does not knowingly invest directly or indirectly in organisations that are in breach of the *Modern Slavery Act 2018 (Cth)*.

AUSTRALIAN UNIVERSITY PROCUREMENT NETWORK (AUPN)

The University is a member of the AUPN, which is leading a sector-wide collaboration to support all member universities to meet the challenge of human rights transparency and assist members to fulfil the reporting requirements of the *Modern Slavery Act 2018 (Cth)*.

The AUPN provides support to assist member universities to manage risks, develop processes and support education initiatives in relation to

risks of modern slavery.

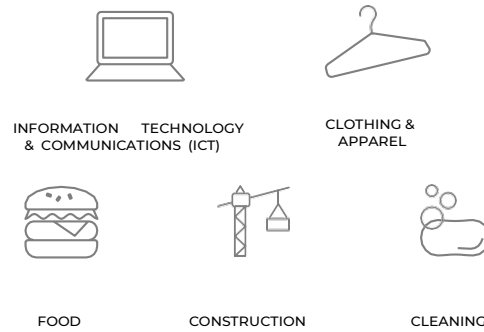
Our university has provided the AUPN with spend data for 2018 and 2019. This data has been combined with more than 27 other member universities, which reflects the broad supply chains of the sector. Initial

analysis of the aggregated spend data covers more than \$24.1 billion annualised spend across more than 304,205 individual suppliers.

Using this data, the AUPN have developed a Modern Slavery Risk Dashboard, which the University is using as the first step to provide an indication of risk across two different lenses:

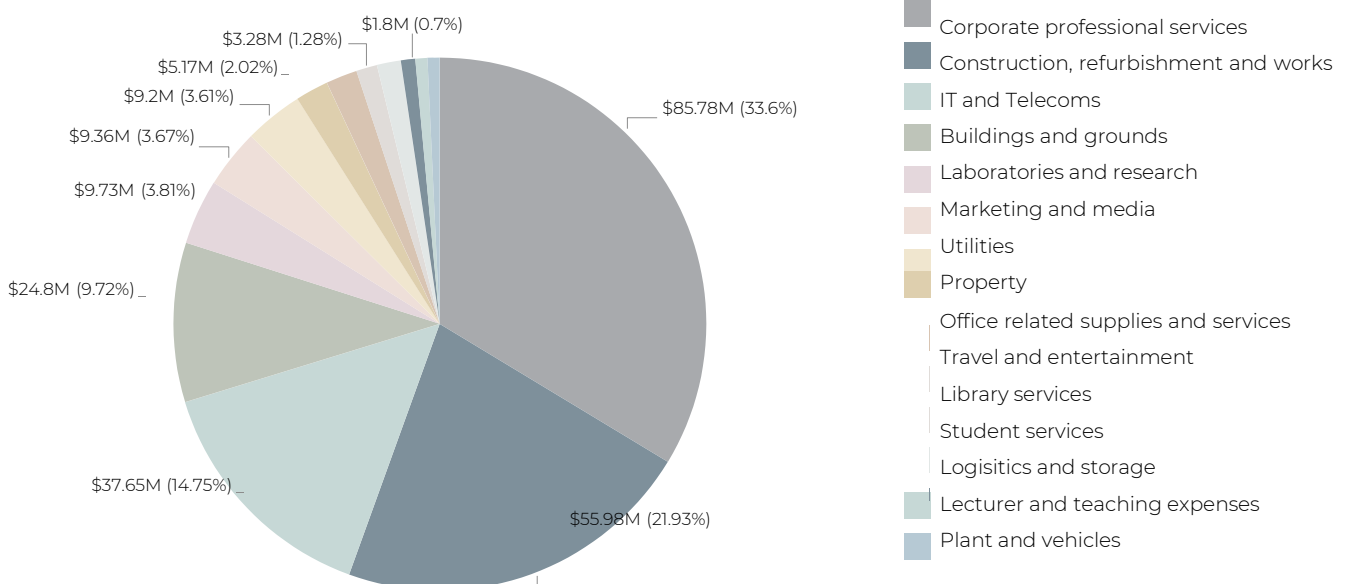
1. Potential risks of modern slavery applied against spend categories using the AUPN taxonomy, and;
2. Potential risks of modern slavery applied against country locations using supplier head office location.

Using the aggregated sector data, a list of suppliers with potentially high risks of modern slavery presence in their supply chain has identified that the highest risks within higher education sector supply chains are:



We are leveraging the due diligence work the AUPN are carrying out on high-risk global companies to inform our approach to modern slavery risk management, mitigation and remediation. We will concentrate our internal due diligence resourcing efforts on identified local (Australian) high risk suppliers.

TOTAL UNIVERSITY SPEND BY CATEGORY



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

Mandatory Criterion 4 - Describe the actions taken by the entity to assess and address risks, including due diligence and remediation processes

ACTIONS TAKEN TO ADDRESS RISKS, DUE DILIGENCE AND REMEDIATION

The University is taking a risk-based, continuous improvement approach to managing risks of modern slavery.

In 2020, we have undertaken seven main actions:

- Detailed risk assessment in relation to our domestic operations
- Leveraged our AUPN membership to understand the potential risks of modern slavery in our supply chains
- Implemented due diligence processes within our procurement procedures
- Provided academic expertise and advice to the AUPN Modern Slavery Academic Advisory Board
- Commenced an educational program in high-risk areas to support awareness about the risks of modern slavery
- Reviewed all template contracts and purchase order terms to incorporate clauses to identify and manage modern slavery risks
- Implemented a contract management approach to risk management and remediation

CONTRACT MANAGEMENT APPROACH TO RISK MITIGATION AND REMEDIATION

Our procurement processes place an onus on suppliers and contractors to provide the University with certain evidence and information about the management of modern slavery risks within their organisations.

Beyond procurement, our immediate response has been the development of appropriate contract management processes. The University risk assessment identified a number of areas that could potentially be at risk, including some areas in research and our international operations.

Our initial response to this has been to embed our expectations in our contracts to highlight our commitment to the importance of ensuring awareness and visibility about the risks of modern slavery.

This includes:

- International agreements and partnerships
- General MOUs
- General & Construction contracts
- Leases
- Work Integrated Learning

Any contracts or agreements containing modern slavery clauses:

- Require certain disclosures and notifications
- Require annual audit and reviews
- Require evidence to be provided 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 risk (last resort)



DUE DILIGENCE

Suppliers and Contracts

All new suppliers, contractors and partners are subjected to our due diligence process, prior to onboarding or contract award. Suppliers of goods and services with a spend of more than \$200,000 are requested to answer a pre-qualification questionnaire administered as part of the Request for Tender (RFT). Responses to the questionnaire are evaluated by the University procurement team. Questionnaire responses help us identify potential areas of risk, and where identified, the supplier will be referred for further detailed due diligence.

AUPN Data

The AUPN technology platform will assist to inform our due diligence assessments. Initially, we will use data across each category or by location. Where a potential risk is identified, we will investigate the supplier further and refer them for a more detailed assessment that may be undertaken by our Procurement and Compliance teams. Further assessments include requiring the supplier or partner to provide relevant internal policies and procedures or audit reports.

International Partners

The COVID-19 pandemic has presented challenges in carrying out detailed risk assessment and due diligence on high risk international partners. The University will recommence this work once borders reopen and we are in a position to engage with our international partners face to face.

REMEDATION

We have not received any notifications about risks of modern slavery in the reporting period. In anticipation of reports, the University is developing remediation processes that take an educative and collaborative approach to mitigate risks of modern slavery.

In most cases, the University will favour working with suppliers and business partners to resolve or substantially mitigate issues, rather than ending the agreement with the supplier or partner. This is due to the potential adverse effects on the livelihood of the supplier's staff members.

EDUCATION & AWARENESS

Our Staff

The Modern Slavery Project Team was drawn from the areas across the University most likely to be at risk. Assessing risk activities required member representatives to engage broadly across their respective area to raise awareness and educate staff about modern slavery. This has resulted in deep engagement and a broad level of understanding across the high risk areas. This work will continue into the next reporting period.

Our Partners

The University will seek to influence suppliers and partner behaviour, working with identified high risk areas to educate and build awareness about the risks of modern slavery. We will set our expectations in accordance with our values, and place people at the centre of our decision making, with a view to ensuring that our activities do not cause or contribute to risks of modern slavery.

Our Students

Our students have indicated that they have strong views about how the University should address issues of sustainability, including human rights risks. The University will continue to engage with students to raise awareness about risks of modern slavery, provide support for students who may be at risk, and provide safe pathways for reporting any suspected modern slavery.

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

ASSESSING EFFECTIVENESS

Audit and Risk Committee

The University Audit and Risk Committee have a key oversight role in assessing and ensuring the effectiveness of the Modern Slavery Continuous Improvement Plan. Twice yearly reports are provided to the Committee which outline:

- Emerging risks
- Incidences of modern slavery and remediation activities
- Progress against the Continuous Improvement Plan

Procurement

In the first reporting period, the University has incorporated mandatory questions to modern slavery criteria within Request for Tender documents. We are assessing responses received to those questions and will utilise this data to inform our approach to supplier engagement and awareness.

Contracts

Our immediate response to mitigation of potential modern slavery risk has been to implement specific contract clauses within a broad range of agreements including with our international partners. We have committed to ongoing monitoring of contracts, and will use this data to inform our review processes and gaps.

Community

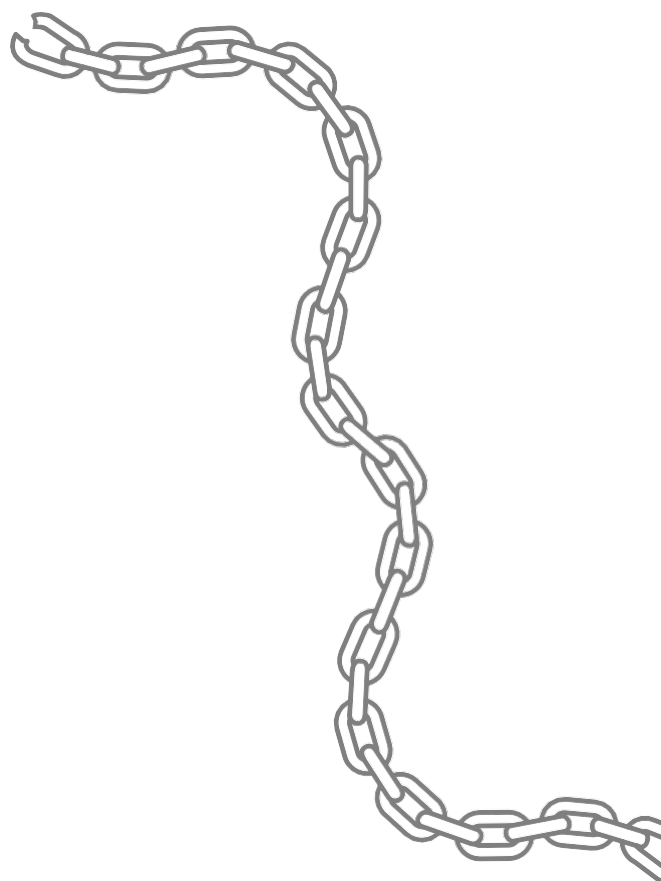
Feedback from staff, students and community members forms an integral part of assessing the University's effectiveness in relation to modern slavery. We will continue to engage with our community to ensure that our approach not only meets regulatory compliance, but also exceeds community expectations.

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

CONSULTATION

University controlled entities operate in accordance with the University Controlled and Associated Entities Governance Principles. 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 (Cth)*. 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

In all aspects of University activities, we are focused on ensuring the protection and respect of human rights across our business and supply chain. Staff and students have a number of pathways to gain access to information about how the University manages risks of modern slavery as well as ways to report (including anonymously) suspected cases of modern slavery.

This includes reporting concerns to the Safe and Fair Community Unit (SaFCU), where we have established reporting procedures and mechanisms to investigate any concerns regarding unethical or illegal conduct, including concerns in relation to modern slavery and human trafficking.

The 2020 University Modern Slavery Statement was endorsed by University Council on 30 April 2021.

Signed



Chancellor



Vice-Chancellor