



UNIVERSITY OF  
CANBERRA

# MODERN SLAVERY STATEMENT

Reporting Period 1 January 2023 to  
31 December 2023

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The University of Canberra's statement of compliance with the *Modern Slavery Act 2018* (Cth).

Approved by the University Council on 27 June 2024.



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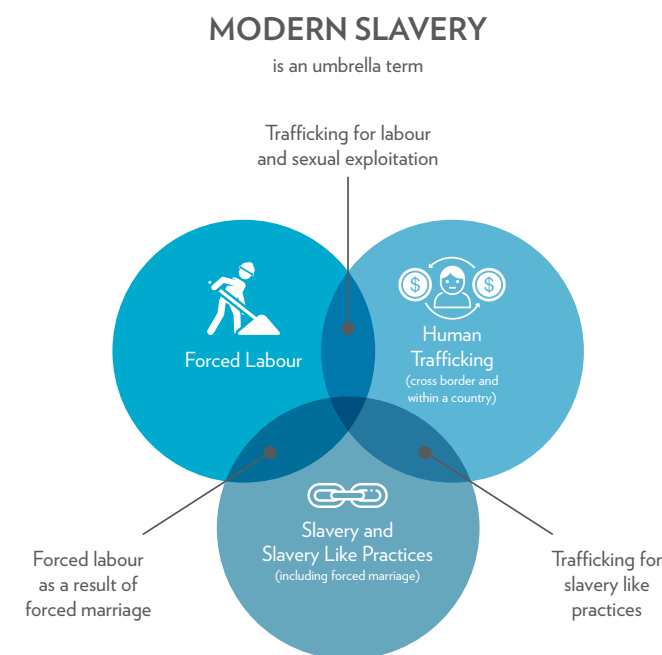
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## Introduction

The University of Canberra (**University**) prepared this modern slavery statement (**Statement**) in accordance with section 13 of the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**).

Modern slavery refers to situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. This includes human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and child labour. Modern slavery and human trafficking are crimes and a violation of a person’s fundamental human rights.

Figure 1 illustrates the umbrella term, “Modern Slavery” as provided by the Walk Free Foundation’s Global Slavery Index 2018<sup>1</sup> (**Global Slavery Index**).



## Our Commitment

The University’s ambition, as outlined in *Connected*, the University’s decadal strategy 2023-2032 is to be the most accessible university in Australia and a global leader in driving equality of opportunity.<sup>2</sup>

The University ranked number one in the *Times Higher Education* Impact Rankings 2021<sup>3</sup>, 2022<sup>4</sup> for reducing inequalities through its research on social inequalities, its policies on discrimination and its commitment to recruiting staff and students from under-represented groups.

The University is committed to delivering a strong response to modern slavery by continuing to review and investigate its operations and supply chains, to ensure they do not cause, involve or contribute to modern slavery.

The University is also committed to ensuring its suppliers, collaborators and others with whom the University does business, respect and share the University’s commitment to minimising the risk of modern slavery.

## About UC

The University is a body corporate established by the *University of Canberra Act 1989* (ACT). The Act defines the functions and powers of the University. The functions of the University are set out in section 6 of the Act. The University has its primary campus located in Bruce, in the Australian Capital Territory (ACT). In addition, in 2023, a University of Canberra degree could be studied in Sydney, Brisbane or internationally in China, Vietnam, Singapore, and Bhutan through our global partnerships with international institutions. Certain courses can be studied online wherever a student is in the world, as well as in person through our Third-Party Providers.

The University is ranked among the top 20 universities in Australia and was ranked number fourth in the world for reducing inequalities in the Times Higher Education Impact Rankings 2023.

The University is a young and well-regarded institution internationally, having risen swiftly up the global university rankings. The Times Higher Education world university rankings for 2023 placed the University in the top 40 young universities in the world and placed the University among the top 20 universities in Australia and in the top 300 of all universities in the world.<sup>6</sup>

The University’s new Decadal Strategic Plan 2023-2032 ‘*Connected*’ will support the University to continue its success and build upon its achievements. The new Strategic Plan weaves together three overarching themes: partner for community wellbeing and sustainability; becoming the future workforce provider of choice; and enhancing research and local impact.

<sup>1</sup> Walk Free Foundation, **The Global Slavery Index (Report, 2018)** 7.

<sup>2</sup> University of Canberra, **Connected, A Decadal Strategy 2023-2032**

<sup>3</sup> Times Higher Education, **Impact Rankings 2021 by SDG: reduced inequalities**

<sup>4</sup> Times Higher Education, **Impact Rankings 2022 by SDG: reduced inequalities**

<sup>5</sup> The Good Universities Guide, **Undergraduate Full-Time Employment university Ratings and Rankings 2022/2023**

<sup>6</sup> Times Higher Education, **Explore Rankings Data for University of Canberra.**

# Structure, Operations and Supply Chain

## Our Organisational Structure

The University's organisation chart is attached and labelled Annexure A.

## Council

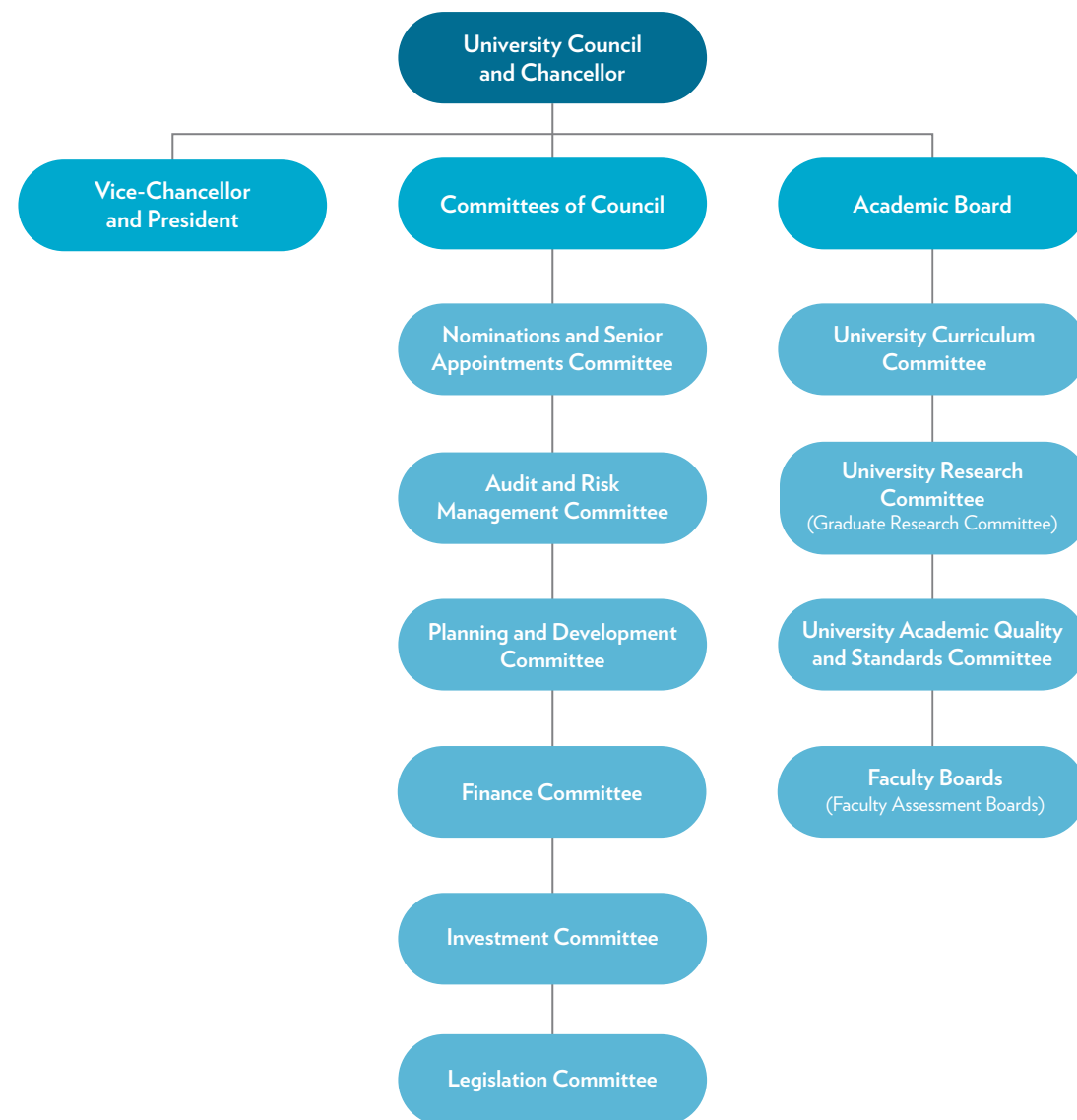
The governing body of the University, the Council, is established under the Act and has the entire management of the University. Council is responsible for the governance of the University and sets the strategic direction of the University.

The Council is required to act on all matters concerning the University in a way it considers will best promote the interests of the University.

Council is responsible for appointing the Chancellor, Deputy Chancellor, and Vice-Chancellor (and President) of the University. The Vice-Chancellor is accountable to Council for the overall management of the University, within its legislative framework and resolutions of Council, and is the primary source of advice to Council.

## Committees of Council

Council has established a number of committees to help it carry out its responsibilities. The following image represents the University's Council committee structure:



## Our Controlled Entities

The University has two wholly owned subsidiary companies, UCX Ltd (UCX) (ACN 119 755 627) and UC Global Pty Ltd (UC Global) (ACN 095 483 686).

## Our Operations

The University works closely with government and the community to educate the future workforce, solve complex research challenges and support the ACT and surrounding region.

The University makes a major contribution to the ACT economy and society with 18,598 students across all campuses in 2023, and 2,334 staff members (as at 31 January 2024).

In the years since its establishment, the University has developed well-recognised, high quality education faculties in a range of areas including education and health and has a growing research capacity and reputation.

The University undertakes various academic, research and commercial activities in various countries. The majority of the University's suppliers of goods are sourced from within Australia, however, the University does have suppliers based offshore who produce goods from the countries in which suppliers are based.

## Our Students

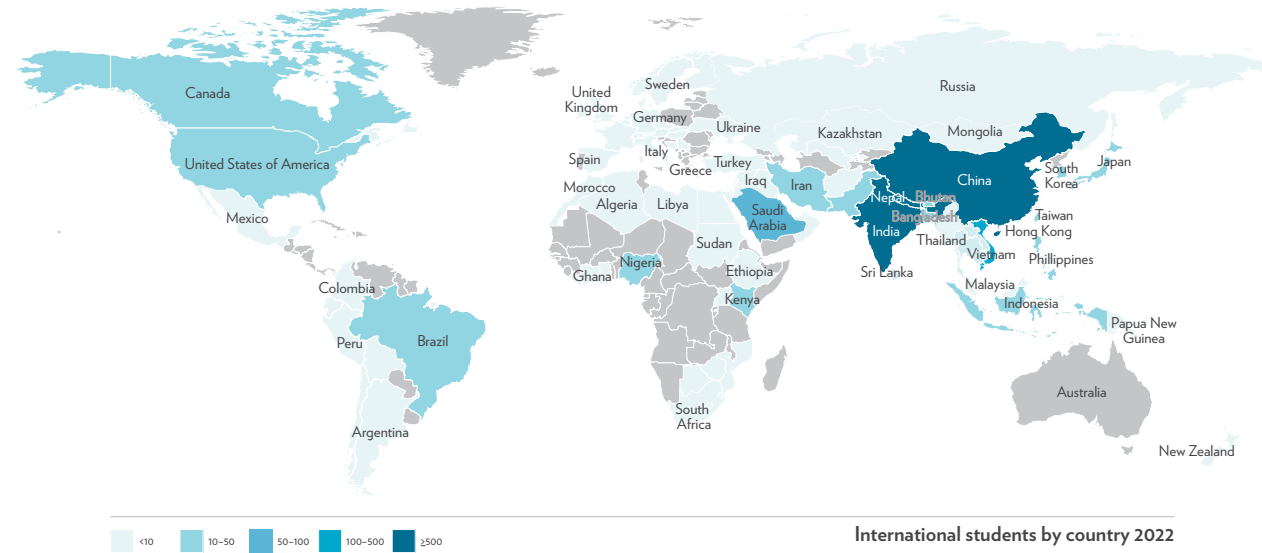
In 2023 the University reported a total of 18,598 students across its campuses and online programs, of this 4,717, were international students.

The ten highest countries/region of origin for these students were:

1. China (excludes SARs and Taiwan)	911
2. India	827
3. Bhutan	635
4. Nepal	507
5. Vietnam	354
6. Bangladesh	133
7. Pakistan	116
8. Hong Kong (SAR of China)	114
9. Philippines	111
10. Sri Lanka	78

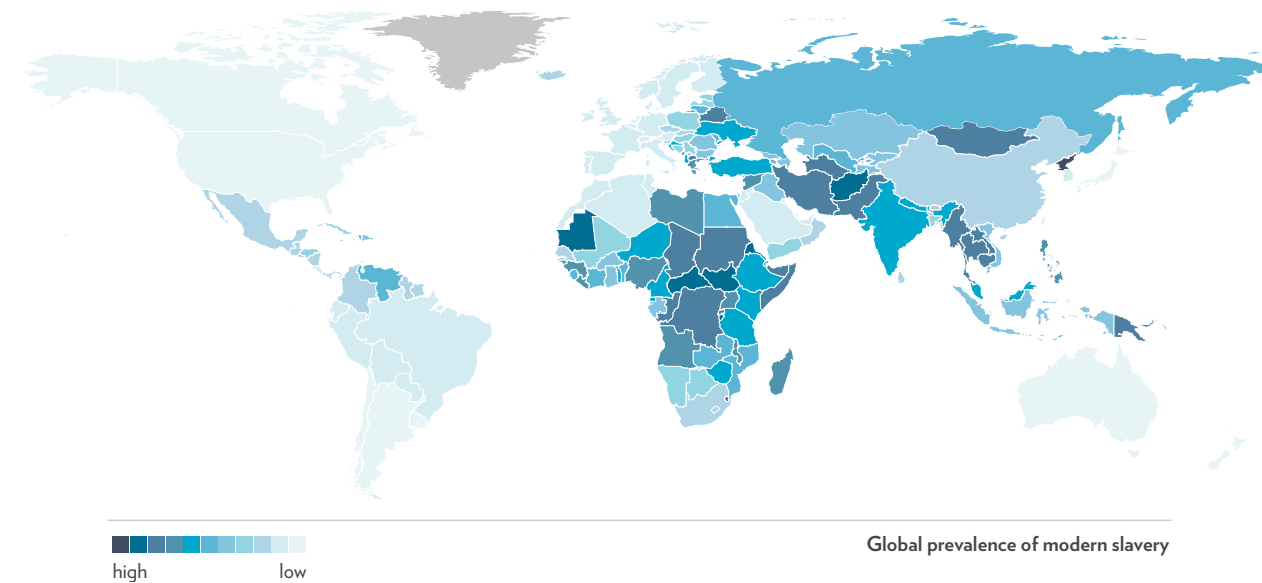


The diagram below illustrates the global distribution of University of Canberra international student nationalities in 2023:



In 2023 the University had 170 students whose nationalities align with thirteen (13) of the countries listed in the 25 countries estimated to have the highest prevalence of modern slavery (per 1,000 population) as identified in the Global Slavery Index (2023) and displayed below.

The diagram below illustrates the global prevalence of modern slavery:



## Our Supply Chain

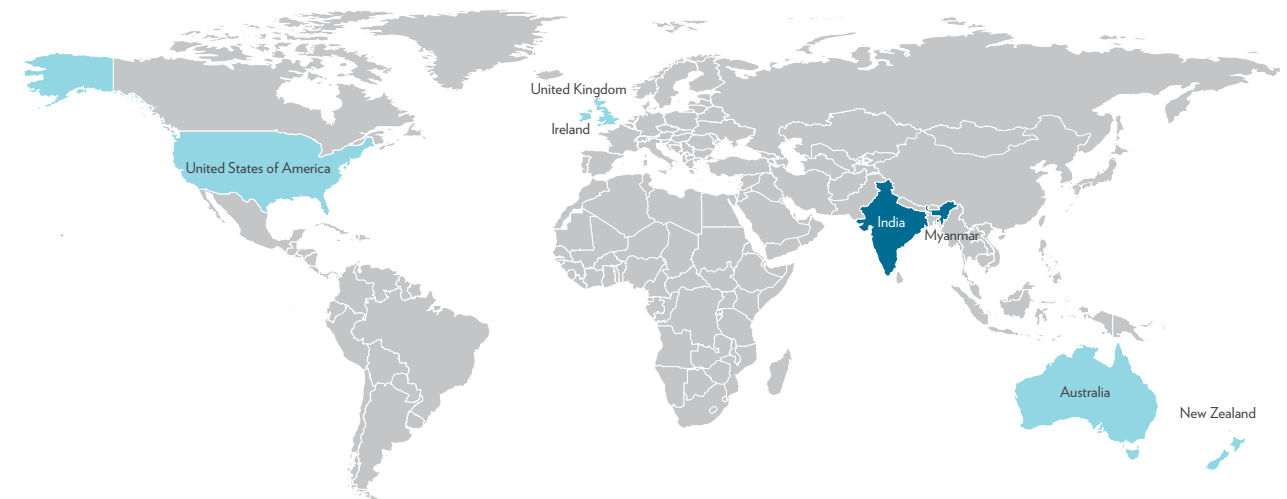
The University procures a wide range of goods and services from both domestic and international suppliers to support its operations.

### Our Suppliers

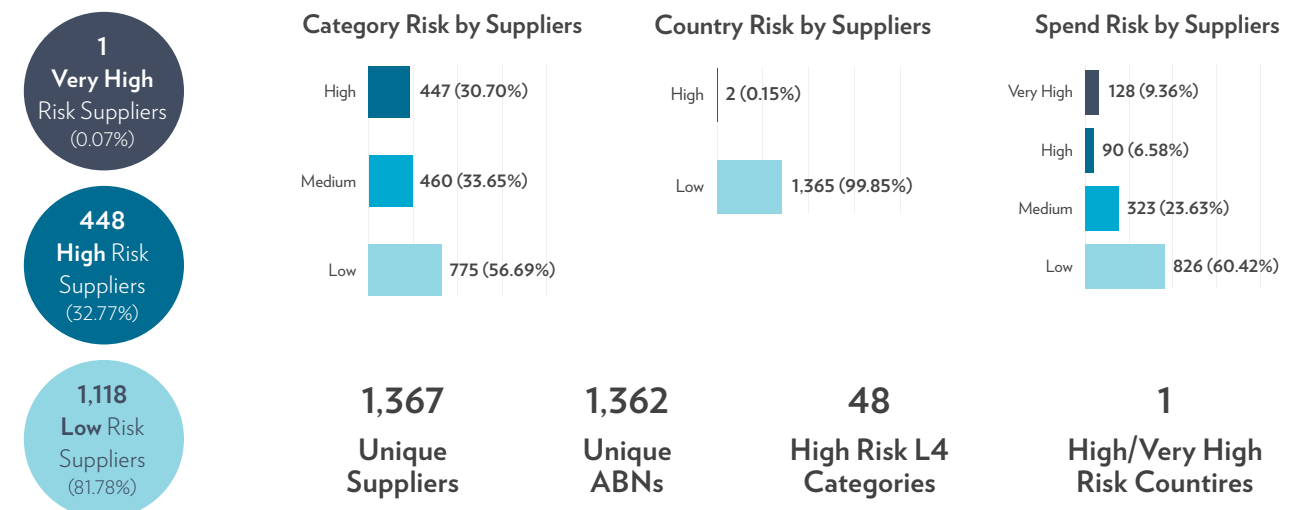
The University's supply chain includes suppliers, contractors, partners and affiliates (collectively, suppliers).

In the 2023 calendar year, the University engaged in financial transactions with approximately 1,367 suppliers. These suppliers represent the University's "tier one" suppliers. The majority of the tier one suppliers are located in Australia, representing approximately 99% of the University's supply chain expenditure. The diagram below represents the University's global supply chain risk analysis.

### UC Global Supply Chain risk analysis



Country Risk



## Our People

As at 31 March 2024, the University employs 2,577 staff. Of these staff, 2,430 are employees of the University on either a continuing, fixed term, casual or sessional basis, and 147 are the full or part-time staff, and casual staff of UCX.

Employees of the University are bound by the *Charter of Conduct and Values*, which sets out the values and standards of conduct for the University, and constitutes the basis of decision-making and behaviour in the University community.

The *Charter of Conduct and Values* is enforceable and seeks to provide an ethical framework which outlines the University's expectations of its employees whilst also clarifying the University's obligations and commitments. These standards are supported by the values and the University's strategic direction, fostering an ethical, collaborative and innovative environment.

# Risks of Modern Slavery Practices

Modern slavery is present in every country of the world, including Australia. The 2023 Global Slavery Index estimates that, on any given day in 2021, there were 41,000 people in Australia that were living in modern slavery.<sup>7</sup> There is also an unquantifiable number of modern slavery victims working in the supply chains of Australian companies around the world.

## Operational Risks

The University's supply chain at tier one level is dominated by Australian businesses, with many being owned and operated locally in the ACT, however, the University acknowledges the presence of modern slavery even in Australia. The University prides itself on its global connectivity and operates on an international level every day through various academic and professional activities, including the recruitment of international staff and students.

## Enterprise Partners and Agents

The University engages with international partners for both education and research activities and has arrangements with education agents across the globe.

The University has a wide range of partnerships with organisations including universities and colleges; research bodies; government departments; non-government organisations; and private enterprise. The University conducts a wide scope of partnership activities with its partners including, but not limited to, research cooperation, including joint research, delivery of University of Canberra courses, education pathways for international students, staff and student exchange opportunities, study abroad and study tours.

The University also has an extensive portfolio of education agents across the globe. Education agents play an essential role in promoting the university in international markets and recruiting qualified students who meet the University's entry standards and requirements to study at the university.

The University endeavours to work only with partners and agents who adhere to high ethical standards. The University commenced an Enterprise Partnerships Governance Committee and formally approved a new Partnership Governance Framework in February 2024. To support ongoing partnership management all Enterprise partner information, contract details, and documentation is maintained on a central university Enterprise partnership database. The database currently manages information on 244 active Partnerships and 317 contractual arrangements.

However, the University acknowledges that despite these processes, the risk remains that its partners and agents may directly or indirectly be involved in modern slavery practices, including the use of threats, coercion or deception in order to recruit international students to the University.

## Academic and Professional Activities

The University engages people from all over the world to work both in Australia, and internationally, to undertake academic and professional activities. One way the University engages in these activities is through collaborative partnerships. Some of the University's partners are located in countries considered to have a high prevalence of modern slavery. As a result, there is a risk that staff in these countries may directly or indirectly be involved in, or subject to incidents of modern slavery. For example, the working conditions may not be at the appropriate standard, including excessive working hours and underpayment, and may be considered a form of modern slavery.

<sup>7</sup> Global Slavery Index, [walkfree.org/global-slavery-index/country-studies/australia](http://walkfree.org/global-slavery-index/country-studies/australia)

## Supply Chain Risks

The University is a member of the University Anti-slavery Program, a project of the Australasian Universities Procurement Network (AUPN) supported by HES. The AUPN currently has 38 Australian and 3 New Zealand member institutions working together to improve excellence in procurement practice and in the skills of procurement professionals in the higher education sector. The University Anti-Slavery Program supports members to improve supply chain human rights transparency, reduce individual university costs and resources, collaborate on risks and issues for greater impact, and contribute to reporting requirements.

Further to the above, the University undertakes ongoing risk assessments relating to its tier one suppliers. While the vast majority of the University's suppliers are located domestically, the University's second largest supplier is based in India, which is reported to have a medium risk of modern slavery.<sup>8</sup> The following provides comfort to the University that the risk of modern slavery activities from this supplier are low:

- regular site visits, (likely to resume in 2023 following the easing of COVID-19 travel restrictions);
- the supplier's sector relies on a relatively skilled workforce and current workforce conditions favour; employees with opportunities to negotiate remuneration and seek career progression; and
- the supplier's corporate policies and processes are designed to minimise the potential for modern slavery practices within its own activities and that of its supply chains.

## Location

Amongst the University's top 50 suppliers, nine (9) were identified as being either a global company with several subsidiary companies, or a global company belonging to a larger parent company also with numerous subsidiaries. The presence of global companies indicates larger and more complex operations and supply chains, which results in a decreased visibility over the operations and supply chains of those suppliers.

The University's supply chain includes China, one of the two countries with the highest estimated number of modern slavery victims according to the Global Slavery Index.<sup>9</sup> The University acknowledges that there is a risk that its suppliers located in these countries may be directly or indirectly involved in modern slavery practices. Where a supplier is from a country with a higher risk of modern slavery activities and/or is involved in a high-risk modern slavery industry, the University has begun undertaking analysis of the relevant supply chains beyond tier one.

## Industry

The Global Slavery Index identifies the top 15 goods<sup>10</sup> at risk of being produced by modern slavery.<sup>11</sup> The University's top four industries of engagement based on financial value (in particular, "information technology and software"), generally interact with many of the goods listed as being at higher risk of being produced by modern slavery. The University considers that there is a risk that its suppliers in these industries, may be directly or indirectly engaging in incidents of modern slavery.

Some of the source countries for these goods are home to suppliers used by the University in 2023. These countries include China, Vietnam, Thailand, Brazil, Pakistan, India, South Korea, Indonesia, Russia, Japan, Nepal, Taiwan and Malaysia. In 2023 the University had five (5) suppliers in these countries.

The University acknowledges the risk that when engaging with suppliers in these countries, those suppliers may be directly or indirectly involved in modern slavery practices.

<sup>8</sup> Walk Free Foundation, **The Global Slavery Index (Report, 2018)** 7.

<sup>9</sup> Walk Free Foundation, **The Global Slavery Index (Report, 2018)** p 178-181.

<sup>10</sup> In order of ranking, cotton; bricks; garments; cattle; sugarcane; gold; carpets; coal; fish; rice; timber; brazil nuts and chestnuts; cocoa; diamonds; and electronics.

<sup>11</sup> Walk Free Foundation, **The Global Slavery Index (Report, 2018)** 220.

# Ongoing Actions Taken

## Treatment Actions

The University continues to include actions within its processes that are designed to minimise the risks of modern slavery.

### Due Diligence

#### Supply Chain

The University, working as part of the AUPN University Anti-Slavery working group, has updated its due diligence approach with the establishment of a dedicated working group aimed at increasing awareness and education within the procurement sector regarding risks and their effects during tendering processes.

#### Objectives:

- **Increase Awareness and Education:** The primary objective of the working group is to enhance awareness and education within the procurement sector. By disseminating information and insights regarding risks associated with tendering processes, the group aims to empower procurement professionals to make informed decisions and mitigate potential challenges effectively.
- **Influence Supplier Action:** In addition to raising awareness, the working group seeks to influence suppliers to take proactive measures where necessary. By leveraging combined leverage and collaborative efforts, the group endeavours to encourage suppliers to remediate any identified issues within the supply chain, addressing them at the source and fostering a culture of accountability and responsibility.

#### Operational Framework:

- **Alert Registration:** All alerts generated by FRDM are registered in the AUPN Portal, providing universities and other stakeholders with access to real-time information and insights. These alerts serve as valuable resources for procurement professionals to review and stay informed about emerging risks and challenges within the sector.
- **Monthly Forum:** The working group facilitates monthly forums where stakeholders convene to discuss registered alerts, share best practices, and collaborate on addressing procurement-related issues. These forums serve as platforms for

knowledge exchange, fostering a community-driven approach to risk management and mitigation.

- **Due Diligence Process:** For shared suppliers identified as requiring action, a collective due diligence process is undertaken by the working group. This process involves thorough assessment and analysis to identify root causes and develop tailored remediation strategies, ensuring effective risk mitigation and supplier engagement.

### Education Partners and Education Agents

Due diligence is conducted prior to contract negotiation and entering any formal partnership activities with any new university partner or overseas entity.

Education Agents are selected after undergoing an extensive selection and assessment process. The University endeavors to work only with agents who adhere to the highest ethical standards required under the National Code of Practice for Providers of Education and Training to Overseas Students (the Code). The Code is a set of nationally consistent standards to support providers to deliver quality education and training to overseas students.

A comprehensive assessment of student applications is conducted where applications are received from “high risk” countries, and subsequent action is taken if a concern or issue arises.

If a recurrent agent issue or concern is identified, the University counsels that agent so the agent can understand the issue and its effect, and how it can be resolved. If the issue continues, the University may terminate the relationship with the agent. The review and management of recruitment practices by the University’s agents is also a Commonwealth legislative requirement.<sup>12</sup>

Under its Partnership Governance Framework the university conducts a new and continuing partnership proposal and approval process which requires completion of an online form and progression through a series of due diligence checks and approvals. Initial ‘Know your Partner’ due diligence is conducted against all new and continuing partners prior to progressing to contractual negotiations. In 2023, 81 proposals were approved to progress. Partnership information and contracts are reviewed on an ongoing basis.

<sup>12</sup> Education Services and Overseas Students Act 2000 (Cth).

### Policy and Procedure

During 2023, the following policies and procedures were in effect and supported the University’s goal to mitigate the risks of modern slavery in its operations and supply chain.

#### Modern Slavery

The *Modern Slavery Policy* codifies the University’s commitment to deliver a strong response to modern slavery by seeking to ensure that the University itself, its partners, suppliers, contractors, and others with whom the University does business, respect and share the University’s commitment to minimising the risks of modern slavery in its operations and particularly its supply chains.

#### Human Rights

The *Human Rights and Discrimination Policy* affirms the rights of all people, asserting the University’s commitment to act against individuals who engage in conduct which limits the legislative rights of others;<sup>13</sup> and affirms that all University decisions will be made, and policies will be written and enacted with due consideration to human rights as expressed in the *Human Rights Act 2004 (ACT)*.

#### Complaints and Grievances

The University has various processes in place to facilitate the handling of grievances and other concerns such as the University’s management of human rights issues.

Students may refer to the *Student Grievance Resolution Policy* and staff may refer to the *Respect at Work (Prevention of Bullying) Policy* and the processes outlined in the *University of Canberra Enterprise Agreement*.

Members of the University or public may express dissatisfaction with decisions of the University or policies and processes of the University by writing to the Vice-Chancellor.

University staff and other persons are encouraged to report suspected corrupt conduct and allegations of maladministration within the University, including conduct contrary to the University’s commitments regarding modern slavery and human rights. The *Public Interest Disclosure Act 2012 (ACT)* provides specific protections for staff reporting such conduct.

<sup>13</sup> See *Human Rights Act 2004 (ACT)*.

### Finance

The University has a well-documented *Procurement Policy* and *Procurement Procedure* which outline due diligence that must be conducted at each stage of the procurement process.

#### Freedom of Speech

The *Academic Freedom and Freedom of Speech Policy* supports the University’s stance on the ability of anyone to enjoy the human right to freedom of speech and to engage in critical and free enquiry. The University encourages its community to participate in informed intellectual discourse and matters of public importance.

#### Investment

The *Investment Policy* requires that the University be a socially responsible institution and a socially responsible investor, which includes the requirement to avoid any investment opportunities which are likely to cause social injury. Where an organisation is determined to behave in a manner inconsistent with the *Investment Policy*, the University may exclude that organisation and all associated holdings from the University’s investment portfolio.

## University Internal and External Networks

The University is a member of various external networks which provide information and resource sharing opportunities for best practice across the higher education sector, including but not limited to:

- Australian University Procurement Network (AUPN)
- Universities Australia (UA)
- Innovative Research Universities (IRU)
- Student Experience Network (SWN)
- Society of University Lawyers (SOUL)
- Tertiary Education Facilities Management Association (TEFMA)
- Council of Australian Directors of Information Technology (CAUDIT)
- Association of Chief Security Officers – UK (AUCSO)
- Society for College and University Planners – Canada (SCUP)
- University Risk Management & Insurance Association – USA (URMIA)
- Australasian Tertiary Education Management (ATEM)
- Gartner (for Legal, Risk, Audit, Health & Safety and IT)

These groups provide a platform for members to share experiences with suppliers and to discuss and collaborate on other relevant issues, which has included modern slavery.

## Remediation

Whilst instances of modern slavery were not identified in the University's operations and supply chain in 2023, the University intends to work with any parties found to have instances of modern slavery in their operations or supply chain by providing education, guidance and assistance as required.

## Effectiveness of Actions

The University has continued to assess the effectiveness of actions taken primarily by seeking the feedback of staff, regarding:

- the use, effectiveness, and ability to conduct due diligence processes and how these processes could be improved;
- the frequency of discussions around modern slavery in the workplace, including incidences where advice may be sought or consideration required; and
- the ideal tools, training, and other resources to assist staff in realising the University's modern slavery commitments which led to the acquisition of the FRDM tool.

UC also continued to learn from our relationship with the AUPN and its member network.

The University intends to further assess effectiveness by considering introducing key performance indicators via the Modern Slavery Policy and its associated Procedure.

The University's work in this space is ongoing, and the University will continue to monitor the effectiveness of actions through internal governance and oversight mechanisms, including through the requirement of regular reporting to its Audit and Risk Committee.

## Consultation


During 2023, the University consulted with its controlled entities to raise awareness within them about the risks of modern slavery, and to gain an understanding of the approaches they take towards reducing its prevalence.

Though the University has overarching governance, performance and reporting responsibilities for its controlled entities, each controlled entity has its own board and constitution, ensuring statutory obligations and duties are appropriately carried out.



## Other Information

This statement is made pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and constitutes the Modern Slavery Statement of the University of Canberra for the calendar year ending 31 December 2023 and has been approved by the Council of the University of Canberra at meeting [2023].



**Professor Lucy Johnson**

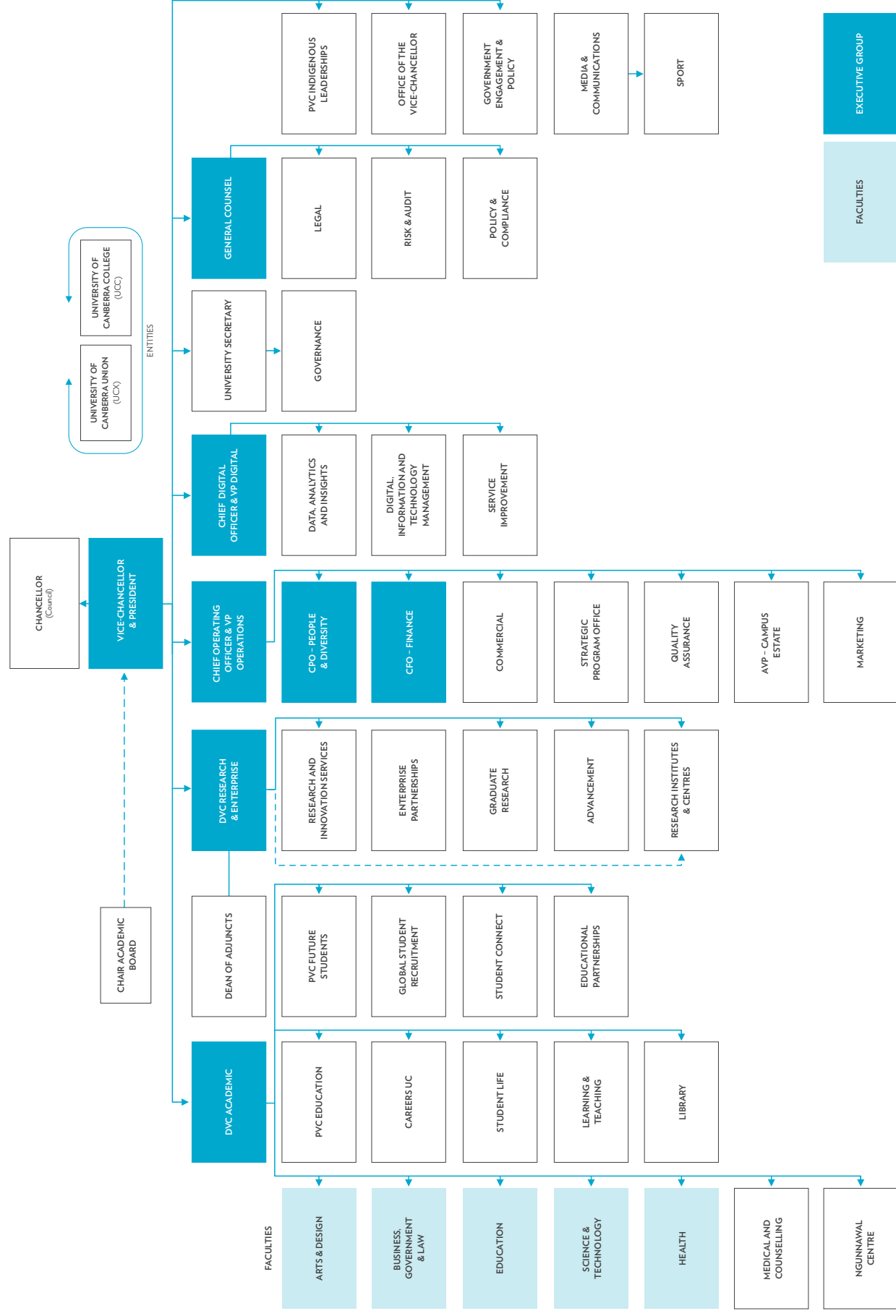
Interim Vice-Chancellor and President

University of Canberra





# Annexure A – University Organisation Chart



Version: Updated 27 June 2024



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