



2021

University of Southern Queensland  
**Modern Slavery Statement**

ABN 40 234 732 081

# Message from the Vice-Chancellor

The University of Southern Queensland recognises that modern slavery is a global issue and is committed to taking a leading role in improving transparency and addressing the risks of modern slavery in our supply chain and operations.

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

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

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

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

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

This statement was approved by the Council of the University of Southern Queensland on 9 May 2022.



**Professor Geraldine Mackenzie**  
Vice-Chancellor, University of Southern Queensland  
9 May 2022

# Contents

<b>Message from the Vice-Chancellor</b>	<b>2</b>
<b>About the University</b>	<b>4</b>
<b>Supply chains</b>	<b>5</b>
<b>Modern slavery risks in operations and supply chains</b>	<b>6</b>
<b>Actions taken to assess and address risks</b>	<b>7</b>
<b>Future actions</b>	<b>9</b>
<b>Assessing effectiveness of actions</b>	<b>10</b>
<b>Consultation</b>	<b>10</b>
<b>Summary</b>	<b>10</b>

## Modern slavery means conduct which would constitute:

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

# About the University

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

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

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

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

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

The University of Southern Queensland is registered as a charity with the Australian Charities and Not-for-profits Commission. It employs 1589 full and part-time employees within Australia and two international employees based in the United Kingdom. These figures exclude casual workerrrs.

The University undertakes a range of research activities and specialises in the flagship areas of Agriculture, Health, Space and Defence as well as regional development. University research is undertaken within a Research Code of Conduct which includes robust frameworks and procedures for the ethical management of animal and human research.

# Supply chains

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

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

The University procurement strategy includes recognition of consolidated supply categories for the purposes of applying individual strategies where internal business practices dictate. Supply categories of goods and services can be grouped as:

- business services;
- property and facilities;
- research and teaching; and
- technology.

The University's procurement planning framework includes a Corporate Procurement Plan, with additional plans sitting beneath it. To support the University's supplier profiling activities, the University initiated a supplier questionnaire strategy with initial roll out to existing University established standing offer arrangements and panel suppliers and will continue integration as part of its standard business processes.

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

## Products

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

## Services

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

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

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

# Modern slavery risks in operations and supply chains

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

	Description of modern slavery risk
<b>Operations</b>	<p>The University of Southern Queensland is a global organisation that primarily conducts business within Australia and areas where modern slavery risk is considered low, however business dealings with organisations and companies from around the world may expose the University to regions that have a higher risk of modern slavery.</p> <p>The University has potential exposure to modern slavery through activities such as international teaching and student recruitment, research and consulting as examples. The University has a comprehensive policy library to provide standing operating protocols and reduce risks in its operations. The library includes, but is not limited to: the Code of Conduct; Recruitment, Selection and Appointment Policy; Procurement Policy; Work Health and Safety Policy; Risk Management Policy and Procedure; and the Contractor Management Procedure.</p> <p>Research activities are widespread and varied across numerous sectors, however high risk industries such as agriculture, are a key focus for the University. Visibility and management of all research activities are reliant on strict adherence to University policies, research ethics, Australian and international customs, laws and directives, contractual obligations as well as the research objectives. Risks may be additionally mitigated through licensing, training, supervision and ongoing contract management.</p>
<b>Supply chain</b>	<p>Lack of supply chain visibility is a key risk for the University, as are the following activities within the supply chain.</p> <p><b>Cleaning</b> Cleaning is considered a high-risk industry due to the vulnerability of many workers in this occupation. They frequently belong to at-risk groups such as women and girls, migrants and refugees and have low visibility, or barriers accessing legal protection. Although cleaning activities at the University are managed through contractual arrangements and follow the University's standard procurement process, the University recognises this remains a high-risk area.</p> <p><b>Construction</b> Construction industry risks exist through the procurement of high-risk products such bricks, carpet and timber. The University's construction risks are mitigated through mandatory assessment criteria which require successful service providers to attain Quality Assurance to AS9001 Standard for major capital projects.</p> <p><b>Garment and textiles</b> The University procures a range of garments and textiles including, but not limited to, employee uniforms, student uniforms, personal protective equipment and laboratory garments. Due to the prevalence of cotton in many garments and textiles, this is a risk for the University.</p> <p><b>Technology</b> The University has a moderate spend in technology goods and services. Given its reliance on technology and the geographic and other associated risks with technology, this is an area of the University's supply chain which requires further investigation.</p>
<b>Operations and supply chain</b>	<p>Working in a competitive global market has highlighted potential modern slavery risks related to off-shore business arrangements for the provision of goods or services from other countries. The University has arrangements with educational partners, suppliers, recruitment agents, marketing and promotional suppliers and general goods and services providers, all of whom provide services for conducting successful international operations in education. The University has a dedicated International portfolio which is responsible for the engagement and management of the University's overseas education service providers.</p>

# Actions taken to assess and address risks

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

	Actions taken
<b>Operations</b>	<p><b>MSWG membership</b> Membership to the Modern Slavery Working Group was formally identified within the relevant employees' position descriptions.</p> <p><b>Risk workshops</b> The Modern Slavery Working Group continued to liaise with key University stakeholders in 2021 and facilitated several risk identification workshops. These included meetings with Assurance Services (comprising the functions of risk, compliance and internal audit), Facilities Management (comprising the functions of construction, cleaning, safety and security), International (comprising the functions of off-shore partner/agency agreements and student recruitment activities), and the Queensland College of Wine Tourism (QCWT) (comprising the functions of wine making, learning and teaching, and hospitality).</p> <p><b>Stakeholder engagement</b> Further engagement was undertaken through various internal stakeholders and committees including: the Senior Leadership Group, Enterprise Services Division Executive, Vice-Chancellor's Executive, Audit and Risk Committee, and University Council; associated entities including the USQ Student Guild (providing advocacy support services to current and prospective students); and externally through suppliers and professional bodies.</p> <p><b>Good practice trends</b> Good practice trends recommended by the Australian Border Force and Anti-Slavery Australia were incorporated into the modern slavery statement to ensure the University has a comprehensive understanding of its risks and is well positioned to minimise exposures.</p>
<b>Supply chain</b>	<p><b>Sector networking and collaboration</b> The University's ongoing membership with the Australian Universities Procurement Network (AUPN) has enabled the University to adopt a coordinated approach to gathering and analysing procurement data through a dashboard, assessing risks, developing training materials, supplier questionnaires and various other resources. This was complemented by the University's engagement of an external consultant to provide modern slavery analytics, converting University spend data to an output categorised according to AUPN taxonomy (a hierarchy of spend categories), enabling upload to the AUPN Modern Slavery Tool.</p> <p><b>Supplier questionnaires</b> A supplier questionnaire was developed and issued to standing offer arrangement providers. The University also completed several third party questionnaires regarding its own modern slavery risks and actions taken to address these risks. Data captured through the supplier questionnaire was incorporated into the University's Contract Management System, enabling enhanced supplier segmentation.</p> <p>Modern slavery clauses were also incorporated into construction contracts and tender evaluation criteria and were reviewed by the University's legal advisers prior to implementation.</p> <p><b>Procurement</b> Modern slavery prevention considerations were embedded into the Procurement Guideline and other procurement documentation, including the use of Queensland Government templates.</p>

# Actions taken to assess and address risks

## Cont.

	Actions taken
<b>Operations and supply chain</b>	<p><b>Roadmap and Action Plan</b> The University commenced drafting a Modern Slavery Prevention Roadmap and Action Plan. These instruments will continue to be reviewed and enhanced over time.</p> <p><b>Partner and Agency agreements</b> The University's Partner and Agency agreements are subject to strict selection criteria and undergo an annual review process. Although not specific to modern slavery, the task includes review of the third party's ethical performance and complaints management frameworks among other operational processes.</p> <p><b>Training and education</b> Targeted information regarding human and work rights is communicated to students and front line responders through various methods including student recruitment/agencies, orientation (O-week) activities, and student onboarding.</p> <p>Key University stakeholders within priority groups completed the Anti-Slavery Australia training module <i>A Practical Guide to the Modern Slavery Act</i>. Participants included members of the Governance Office, Tender Evaluation / Tender Review committee, Legal Services, Assurance Services, Facilities Management, Finance and Business Solutions, Planning and Performance Support Services, Research and Innovation, and the People Portfolio. Supplementary modern slavery training is available to all University employees and students</p> <p><b>Webpage</b> The Modern Slavery webpage, comprising communications, complaints management and reporting responsibilities, supplier and partner information and links to additional resources has been regularly reviewed to ensure University suppliers have access to the latest information and resources.</p>

## Actions taken as a result of COVID-19

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

- During peak outbreaks, the Vice-Chancellor's Executive and University Pandemic Preparedness Working Group met daily to monitor and control business continuity requirements.
- A review of critical supply requirements was initiated to identify potential impacts to the University's operations.
- Upfront payment of suppliers was continued in 2021, reducing the timeframe for payment processing.
- Refunds were issued where events were unable to proceed due to current restrictions or government advice.
- Training sessions and stakeholder meetings were facilitated online wherever possible to limit exposure and enable continued progress despite travel restrictions brought about by the pandemic.

## Continuous Improvement Approach

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

## Remediation Process

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





## Due Diligence

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

- Through risk workshops and other engagement activities, additional risks and controls were identified, as were several key stakeholders.
- Supplier segmentation activities continued to ensure greater understanding of suppliers in each category.
- Data captured through the supplier questionnaire was incorporated into the University Contract Management System.
- Sector related risks identified through the previous reporting period were discussed with key stakeholders to consider suitable controls to eliminate exposure.
- The University risk assessment tool was revised, including incorporation of additional risks and actions identified to control possible outcomes.

## Future actions

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

	Future actions
<b>Operations</b>	<ul style="list-style-type: none"> <li>• Further identify risks and rank according to significance, defining both short and long-term actions.</li> <li>• Further develop the complaints management process and procedure.</li> <li>• Incorporate modern slavery considerations into University policies and procedures where appropriate.</li> <li>• Facilitate further modern slavery training for University employees.</li> <li>• Ensure audit findings pertaining to modern slavery risks are shared with the Modern Slavery Working Group.</li> <li>• Review procurement training competencies against position requirements and incorporate modern slavery content where possible.</li> </ul>
<b>Supply chain</b>	<ul style="list-style-type: none"> <li>• Review Queensland Government Ethical Supplier list/resources against University of Southern Queensland suppliers, existing procurement and contractual arrangements, and resources.</li> <li>• Incorporate industry specific framework affiliation requirements into procurement activities e.g. the Cleaning Accountability Framework</li> </ul>
<b>Operations and supply chain</b>	<ul style="list-style-type: none"> <li>• Further develop the Modern Slavery Prevention Roadmap and Action Plan.</li> <li>• Implement additional performance metrics for both the University and its suppliers to measure/mitigate modern slavery risks.</li> <li>• Develop additional resources for both employees and suppliers such as pre-contract guidance documents, reporting requirements for actual and suspected instances of modern slavery, advocacy support tools and supplier templates.</li> <li>• Increase monitoring and evaluation activities.</li> <li>• Strategically review pre-existing longer-term contracts for compliance and consider changes where required.</li> <li>• Undertake further assessment activities to address high-risk services.</li> </ul>

# Assessing effectiveness of actions

Modern slavery controls continue to be assessed and appropriate actions are identified for mitigating residual risks. The effectiveness of these actions is measured through analysis of operational and supply chain data including: risks assessments and regular reporting; performance metrics; ongoing engagement and review of suppliers, internal audits; and independent external reviews.

Ongoing participation in sector and government groups and multi-stakeholder initiatives will enable benchmarking and information sharing to ensure the University's actions are effective.

Through stakeholder workshops and targeted training, the University intends to increase awareness of modern slavery risks in its operations and supply chains. These stakeholder workshops have provided valuable insight into University activities and have validated the effectiveness of actions taken to strengthen its approach.

## Consultation

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

Following the previous reporting period, additional focus was applied to stakeholder awareness to ensure adequate consultation and communication with suppliers, external agencies and University employees.

Internal stakeholders were engaged through training workshops and various committees to highlight the prevalence of modern slavery and identify opportunities for eliminating exposures.

The following stakeholders were consulted during the 2021 reporting period.

- The Senior Leadership Group;
- Enterprise Services Division Executive;
- Vice-Chancellor's Executive;
- Audit and Risk Committee; and
- University Council.

Consultation with University stakeholders will be ongoing as identified actions are implemented.

## Summary

The University acknowledges it is still maturing its processes for identifying and eliminating modern slavery risk and continues to make progress within its operations and supply chains. The University is committed to future improvement and will continue to work with its employees, suppliers, and industry partners to ensure it continues its ongoing commitment to eliminating modern slavery.



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