



UNIVERSITY OF TASMANIA

# Modern Slavery Statement 2023

## Introduction

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

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

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

*The University of Tasmania Modern Slavery Statement 2023* illustrates the continuous improvement in our reporting on the risks of modern slavery in our operations and supply chains and actions taken to address them. It is made in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) for the reporting period 1 January to 31 December 2023 and is for the University of Tasmania and its controlled entities.

## Reporting Entity

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

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

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## Modern slavery statement development and approval governance framework



### STATEMENT OWNER

University Council



### COMPLIANCE OWNER

General Counsel/Executive Director Legal and Risk



### APPROVAL

University of Tasmania Council



### POLICY ALIGNMENT

Sustainability Policy

Risk Management and Business Resilience Policy

Entities and Affiliated Organisations Policy

Procurement Policy

Compliance Policy

Behaviour Policy

Partnerships Policy

Treasury and Investment Policy

Safety and Wellbeing Policy



### STRATEGIC ALIGNMENT

University of Tasmania Strategic Plan 2019-2024

Strategic Framework for Sustainability



### OPERATIONAL OVERSIGHT

*Statement Development*  
Student Services & Operations Division (Legal and Risk)

*Operational Risks*  
Research Division  
Student Services & Operations Division

*Continuous Improvement Plan*  
Student Services & Operations Division (Legal and Risk)

## Operations

The University is the sole higher education provider in Tasmania. We are located on a remarkable and distinctive island with unique natural and Indigenous heritages. In 2023, our 30,182 students attended campuses located in three of the State's distinct regions, as well as in Victoria and New South Wales, online, and internationally in collaboration with partner institutions in Asia.

In 2023, the University employed 1824 full-time equivalent (FTE), 898 FTE part-time and around 258 FTE casual staff across diverse operations, supporting our fundamental purpose to deliver world leading teaching, learning and research. Operations in support of our academic endeavours included finance, safety, people, information technology, asset, risk, sustainability and facility management, as well as student services such as scholarships, learning support, library services, student advice, international student support, English language support, counselling, study abroad and exchange, and accommodation. Our cutting-edge research is critical for Tasmania, making use of our unique location, while contributing meaningfully to global priorities. We work to realise the economic, social and environmental impacts from our research outputs, partnering domestically and internationally to use and commercialise University-owned intellectual property. We engage broadly with the Tasmanian community, and directly with all levels of government, other universities, commercial partners, and third parties to deliver learning and teaching and undertake research.

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

## Structure

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

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

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

In addition to government funding, the University receives donations, funds and fees from individuals and organisations that contribute to the diverse programs led by the University and the education services it provides consistent with its charitable purpose.

The University is organised into:

### Colleges

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

### Divisions

Vice-Chancellor, Student Services & Operations, Academic, Research, and People & Wellbeing.

### Controlled entities

A.M.C Search Limited, UTAS Properties Pty Ltd, UTAS Holdings Pty Ltd and Tasmanian University Student Association Inc.

## **Governance**

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

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

## **Supply chain**

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

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

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

## University suppliers by location



Goods and services procured by the University include:

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

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

## Risks of Modern Slavery

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

In 2023, we undertook a detailed review of University-wide modern slavery risks to identify those operations and activities most at risk of exposure to modern slavery. This risk assessment again identified that the following functional areas have an elevated risk of inadvertently supporting, contributing to, or being impacted by modern slavery practices:

- procurement of goods and services
- students and staff
- research operations
- international operations
- investment.

Key risks for modern slavery identified within each area remain unchanged and include:

### Students and staff

Risk of:

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

### Research operations

Risk of:

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

### Procurement

Risk of:

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

### International operations

Risk of:

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

### Investment

Risk of:

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

## Australian Universities Procurement Network (AUPN)

A key initiative for identifying and managing risks in our procurement has been our membership of the AUPN. The AUPN is a sector-wide collaboration of 41 Australian and New Zealand universities that supports members to meet the challenge of human rights transparency and assists members to fulfil their reporting requirements under the Modern Slavery Act. The AUPN has dedicated resources that support member universities to collaboratively manage risks, develop processes and support education initiatives in relation to risks of modern slavery.

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

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

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



**Information technology and communications (ICT)**



**Clothing and apparel**



**Food**



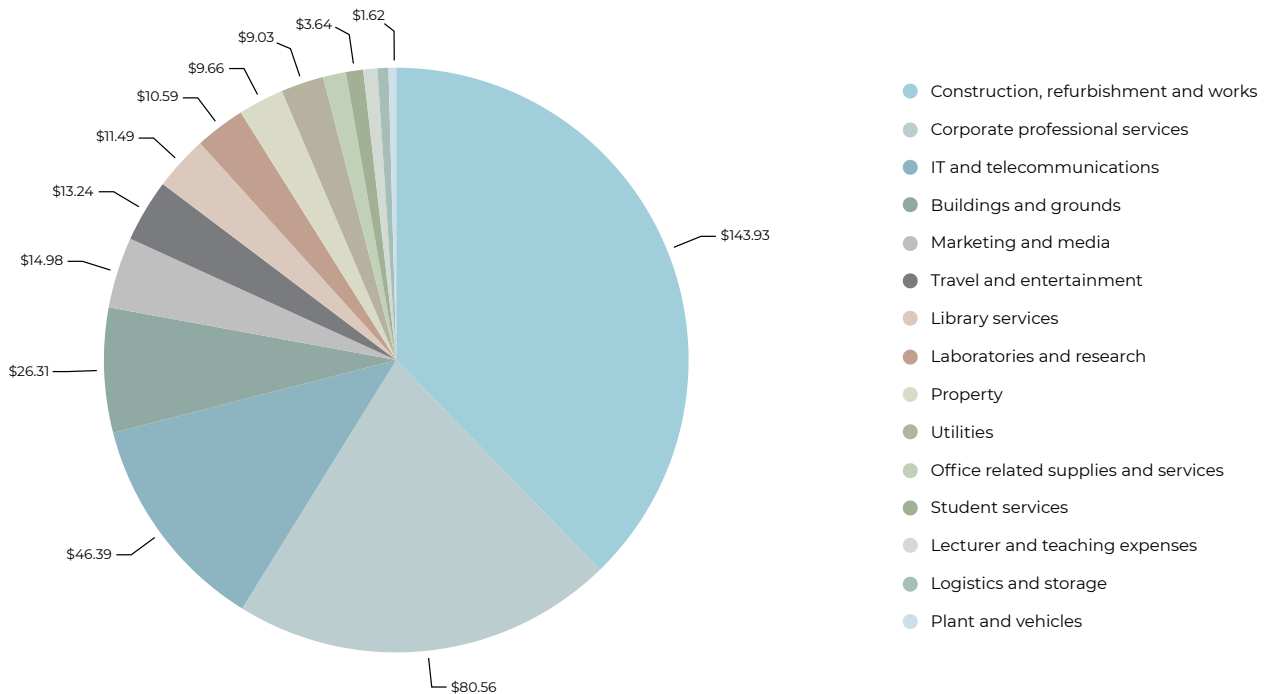
**Construction**



**Cleaning**



## Total University spend by category (\$million)



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

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



### Case study: Building knowledge of the modern slavery risks for solar panels

The Procurement, Sustainability and Facilities Management teams collaborated to engage with the University’s suppliers of solar panels to better understand their own supply chain challenges and risks. Earliest action as part of the procurement process was to screen for values aligned suppliers. The pre-qualified suppliers demonstrated capability and a commitment to sustainable supply. Each had signed a “Solar Industry Forced Labor Prevention Pledge” stating their firm opposition to the use of forced labor within the solar panel supply chain. While full traceability of all panel components continues to prove difficult to investigate for a range of reasons including commercial in confidence arrangements and international manufacturing sites, this process of engaging with suppliers builds our and our suppliers’ understanding of supply chain risks and how they are managed and makes clear the University’s expectations.

## Actions taken to address risks, due diligence and remediation

The University has a continuous improvement approach to identifying and managing risks of modern slavery focussed on activities and areas of highest risk. The University's Modern Slavery Continuous Improvement Plan details the identified risks, existing controls, and proposed initiatives to mitigate the risk of modern slavery occurring in our operations and supply chains. In 2023, the University reviewed and updated its Modern Slavery Act 2018 Legal Compliance Plan to ensure understanding of and compliance with all obligations of the Act that impact the University and to better facilitate oversight of the continual improvement process that is the foundation of the University's management of the risks of modern slavery.



### Case study

The University and a third-party learning abroad partner were developing an offshore program of activities for a group of our students who were travelling to Asia. One of the proposed activities was a visit to an orphanage. Following the University's due diligence inquiries and consultation with our partner, it was decided to not proceed with the visit given the potential for contributing to the exploitation of children.

## Education and awareness raising

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

Awareness raising and education activities in 2023 for our communities and our partners included:

- updating the public-facing University of Tasmania Modern Slavery web page with additional information about modern slavery, University actions and links through to reporting pathways for instances of modern slavery
- revising and updating the internal-facing staff intranet page, including training materials and advice on how to report suspected modern slavery
- embedding due diligence practices for assessing Partners and Agents in high-risk geographical areas to better identify modern slavery concerns
- educating students on modern slavery risks and available support resources through regular direct communications to students across multiple digital and other platforms.

## Procurement

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

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

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

## Requests for tender

In 2023, modern slavery questionnaires continued to be incorporated into the University's request for tender documentation for all procurement over \$200,000. These questionnaires provide ongoing identification and management of risk but also serve as an educative tool for prospective suppliers.

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

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

Contracts containing modern slavery provisions:

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

## Investments

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

## Staff and students

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

The University has a dedicated modern slavery reporting pathway for anonymous reporting by vulnerable students and staff. This is supported by information on dedicated internal and external University modern slavery websites. In 2023, no modern slavery-related concerns were reported.

## Partnerships

The University conducts due diligence assessments of all partners and agents in high-risk geographical areas. A mandatory second (and more extensive) round of due diligence is conducted by the Legal, Risk and Compliance team for proposed partners from countries with alleged human-rights, including modern slavery, abuses. In addition, appropriate modern slavery contractual terms are included in written agreements with Research Partners.



### Case study

A University researcher was seeking funding from an Australian funding body to support scientific research. Due diligence inquiries into the proposed funding agreement identified that a portion of the funding originated from a separate (and foreign) funding body. The University subsequently identified allegations of human rights abuses, including modern slavery, against this foreign entity. The University declined to accept the component of the funding that came from that foreign entity.

## Remediation

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

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

## **Assessing Effectiveness**

### **Audit and Risk Committee**

The Audit and Risk Committee provides oversight of the identification and management of modern slavery risks on behalf of University Council. It monitors the implementation and effectiveness of the Modern Slavery Continuous Improvement Plan, and the systems that govern the Modern Slavery Act Legal Compliance Plan. Regular reports are provided to the Committee which include:

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

### **Questionnaires**

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

In 2023, identified Partners and Agents in high-risk geographical areas were issued with Modern Slavery Questionnaires. As no responses to the questionnaires were received, the process for routine due diligence assessments continued for Recruitment and International, as previously mentioned.

### **Community**

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

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

## **Consultation**

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

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

*Mandatory Criterion 7 - Any other relevant information*

## **Reporting concerns**

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

## 2023 statement approval

The University of Tasmania Modern Slavery Statement 2023 was approved by University Council on 03 May 2024.

Signed



**Alison Watkins**  
Chancellor



**Professor Rufus Black**  
Vice-Chancellor