



# Modern Slavery Statement

---

University of Tasmania  
2021

UNIVERSITY of  
**TASMANIA** 

---

## INTRODUCTION

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 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
- assessing and managing the risks of modern slavery occurring within our partner organisations and supply chains.

The *University of Tasmania Modern Slavery Statement 2021* is an evolution of our inaugural 2020 statement reporting on the risks of modern slavery in our operations and supply chains and the actions taken to address them in the reporting year. It is made in accordance with the requirements of the *Modern Slavery Act 2018* (Cth) for the reporting period 1 January to 31 December 2021 and is for the University of Tasmania and its controlled entities.



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)*. 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.

ABN 30 764 374 782. Registered Office – 2 Churchill Avenue, Sandy Bay, Tasmania, 7005.

## MODERN SLAVERY STATEMENT DEVELOPMENT AND APPROVAL GOVERNANCE FRAMEWORK



### 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)

*Operational Risks*  
Academic Division  
Future Students Division  
COO Division

*Continuous Improvement Plan*  
COO Division (Legal and Risk)



### POLICY ALIGNMENT

Sustainability Policy

Risk Management and  
Business Resilience Policy

Entities and Affiliated  
Organisations Policy

Procurement Policy

Compliance Policy



### COMPLIANCE OWNER

General Counsel/Executive  
Director Legal and Risk



### APPROVAL

University of Tasmania  
Council

## 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 2021, our over 37,000 students attended 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.

In 2021, the University employed 1,827 full-time equivalent (FTE), 776 FTE part-time and around 310 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, IT, asset, risk, sustainability and facility management, as well as student services such as scholarships, learning support, library services, 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 worked 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 engaged 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 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 from the Australian Government, as well as 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 private organisations and individuals that are used for the various 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 Sciences and Engineering and College of Business and Economics. 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 for Agriculture.

### DIVISIONS

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

### CONTROLLED ENTITIES

AMC Search Limited, UTAS Properties Pty Ltd, UTAS Holdings Pty Ltd and Tasmania 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 our modern slavery initiatives and the development of this Statement. Accountability for addressing modern slavery risk, however, is a shared responsibility across the University. Initiatives and the assessment of risks of modern slavery are monitored centrally under the University's Legal Compliance Framework but managed by those with direct responsibility, in particular by the Procurement, Student Life and Enrichment, Research Services and Global teams.

## SUPPLY CHAIN

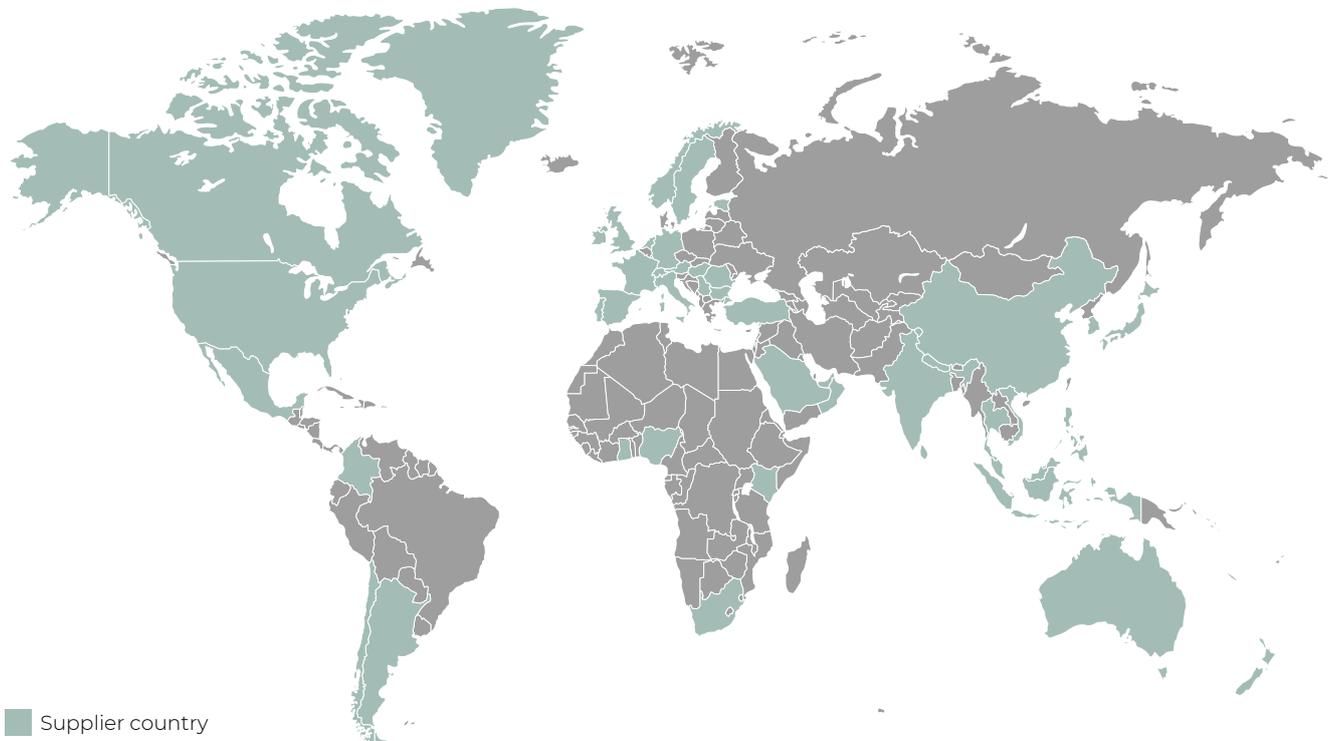
The University purchases a diverse range of goods and services in accordance with our *Procurement Policy*. This policy supports the University's values and guides behaviour in relation to all operational, capital and research procurement-related activities for the purpose of advancing the University's 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. For the reporting period, the University procured over \$290 million in goods and services from 3,823 Australian and 779 overseas suppliers.

---

## UNIVERSITY SUPPLIERS BY COUNTRY



Goods and services procured by the University include:

- building and construction services and supplies
- professional services
- 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

Identification and management of modern slavery risk in our supply chains and operations is now embedded in the University Risk Management Framework and Risk Appetite.

In 2021 we built on our 2020 foundation year, embedding new practice for identifying, managing and educating our University community on the risks of modern slavery.

The University has taken a proactive approach to managing any potential or emerging modern slavery risks within our supply chains and operations. We do this by contributing to and/or leveraging:

- Australian University Procurement Network (AUPN) (supply chains)
- Modern Slavery Registry Global Slavery Index
- Verisk Maplecrafter Human Rights indices
- Global Compact Network
- Transparency International Corruption Perceptions Index
- OECD Due Diligence Guidance for Responsible Business Conduct.

We have also developed internal due diligence guidance across investment decision making to properly identify modern slavery risks.

An assessment of our operations identified the following functional areas as being at higher risk for inadvertently supporting, contributing to, or being impacted by modern slavery practices:

- procurement
- students and staff
- research operations
- international operations.

Key risks for modern slavery within each area were identified and assessed. These included:

### 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:

- 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 (eg. for recruitment) with global partners engaging in modern slavery practices (higher in high-risk geographical areas).

---

## AUSTRALIAN UNIVERSITY 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 32 Australian 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 supports member universities to manage risks, develop processes and support education initiatives in relation to risks of modern slavery.

We provided our 2018-2020 spend data to the AUPN contributing to aggregated data of the network covering more than \$32.9 billion annualised spend with more than 290,000 individual suppliers.

The AUPN has developed a Modern Slavery Risk Dashboard based on this data which the University used 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**

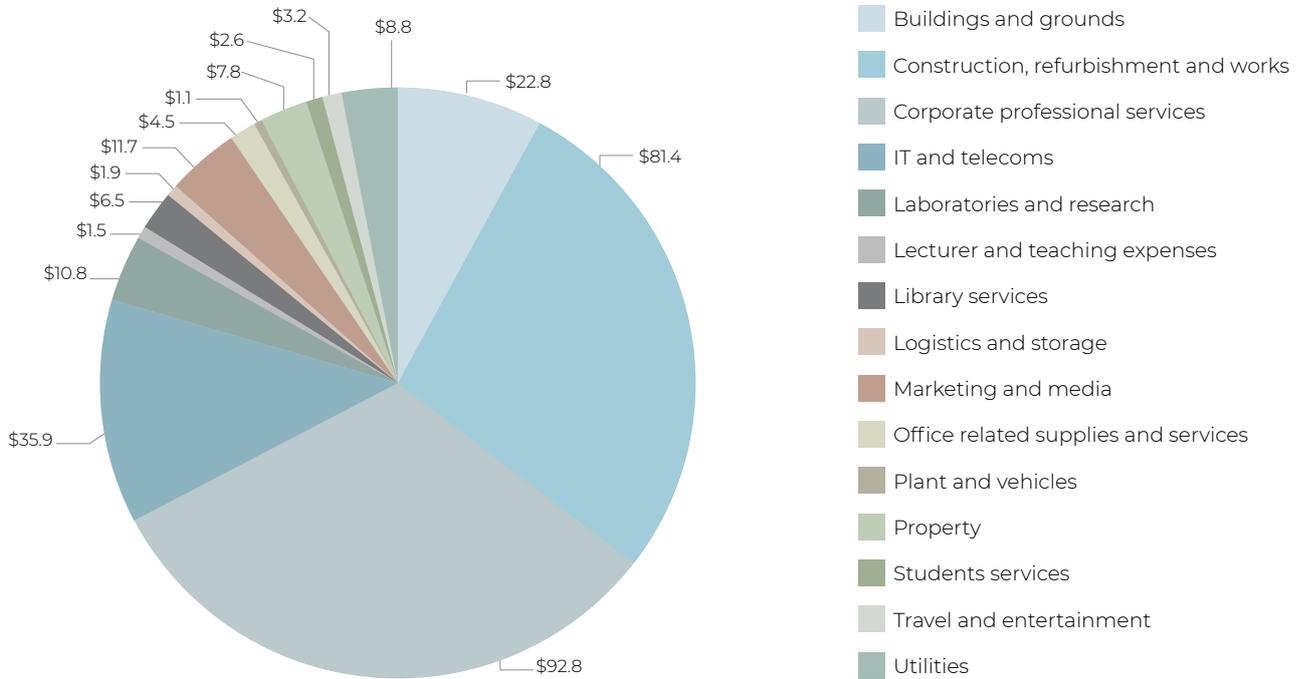


**Construction**



**Cleaning**

TOTAL UNIVERSITY SPEND BY CATEGORY (\$MILLION)



The University will continue to utilise internal procurement data and the AUPN technology solution to understand our supply chain, identify risk, focus resources and inform actions around 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.

---

*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 has a continuous improvement approach to identifying and managing risks of modern slavery. In 2021 we progressed work that commenced in 2020<sup>1</sup> and developed a number of new initiatives.

### **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 focused on mitigation of 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 2021 included:

- workshop for staff and students with Grace Forrest, Founding Director of Walk Free, and Lisa Singh
- awareness raising campaign for students which included regular communications via our digital platforms including through the student portal (quarterly), student direct mail communications (half yearly) and social media (quarterly)
- targeted communication to international students as a high risk cohort
- a public-facing University of Tasmania Modern Slavery web page with information about modern slavery, University actions and links through to reporting pathways for instances of modern slavery
- Anti-Slavery Australia webinar attended by over 130 primarily student-facing staff
- guidelines developed and regular updates provided for the staff in the internal Buyer Network to raise awareness of modern slavery, the University's Statement and the procurement approach across the University
- a Modern Slavery component to the University's sustainability training module for staff.

---

## 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. In 2021 the University had an academic staff member elected to the AUPN Modern Slavery Academic Advisory Board, contributing directly to the national approach as well as supporting the University's efforts.

We continued to utilise 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 require suppliers to provide relevant assurances, internal policies and procedures or audit reports to build our knowledge of their supply chains.

Through the AUPN we committed to the implementation of an industry-wide modern slavery discovery tool and engaged with FRDM in the delivery of the tool. The FRDM tool combines data science with artificial intelligence to identify inherent modern slavery risks within supply chains to inform action, incorporating supplier questionnaires. It monitors and distributes to members, global media alerts about modern slavery and exploitation and provides modern slavery training on a single online platform. Our sector-wide collaboration will be strengthened through use of the tool, which will help us meet the challenges of supply chain transparency and significantly improve our efforts in identifying modern slavery risks. The tool went live in early 2022 just outside this reporting period.

### *Requests for tender*

In 2021, modern slavery questionnaires continued to be incorporated into the University's request for tender documentation for all procurement over \$200,000. These questionnaires aided in identification and management of risk but also served 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).

Our Procurement team investigated our supply chains for technology products (personal computer devices) and established processes for sustainable procurement of University-branded clothing and merchandise. These activities enabled the University to understand the global modern slavery initiatives underway by our ICT suppliers and to build brand specific awareness of manufacture of our clothing lines.

---

## INVESTMENTS

Our investment portfolio spans Australian and international equity markets, infrastructure, private equity investments, and a number of sectors. The assessment of modern slavery risks in the investment portfolio is considered through an assessment of environment, social, and governance (ESG) factors in the investment decision process. In 2021, our Treasury and Investment Policy was changed to mandate a positive screen to consider outcomes consistent with the United Nations Sustainable Development Goals. We 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 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 and COVID-19 has left students financially vulnerable, increasing risks of modern slavery.

Educating staff and students about modern slavery and what to do about it as well as providing a mechanism and support for it to be reported has been a significant risk mitigation activity.

The University's Safe and Fair Communities Unit (SAFCU) established a dedicated pathway for anonymous reporting for vulnerable students and staff through their website. This is supported by information on the SAFCU website and training for SAFCU staff, and is advertised on the University's Modern Slavery website and in support materials.

In addition to the education sessions, information and webinars, student-facing staff were briefed on key messages and provided with resources to aid them in responding to vulnerable students or those impacted by modern slavery.

## PARTNERSHIPS

Work progressed to identify partners and agents in high-risk geographical areas. An online questionnaire was developed to assess risk in our research and other global partnerships including those conducting clinical trials on behalf of the University, and student recruitment agents. The questionnaire was developed in accordance with government recommendations and tailored to suit the needs of individual departments within the University. This was for implementation in 2022.

## REMEDICATION

We did not receive any notifications about modern slavery practice or risks in our community or relationships in 2021. In anticipation of reports, the University has established remediation processes that will take an educative and collaborative approach to mitigate risks of modern slavery in supply chains and partner relationships. In most cases, the University will favour working with suppliers and business partners to resolve or substantially mitigate issues, rather than necessarily ending the agreement if this is likely to have other adverse impacts.

---

*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. Regular reports are provided to the Committee which outline:

- emerging risks
- incidences of modern slavery and remediation activities
- 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. The University will assess response volume and quality in the next reporting period. The feedback from this assessment will inform our approach to due diligence through supplier and partner questionnaires moving forward.

### Community

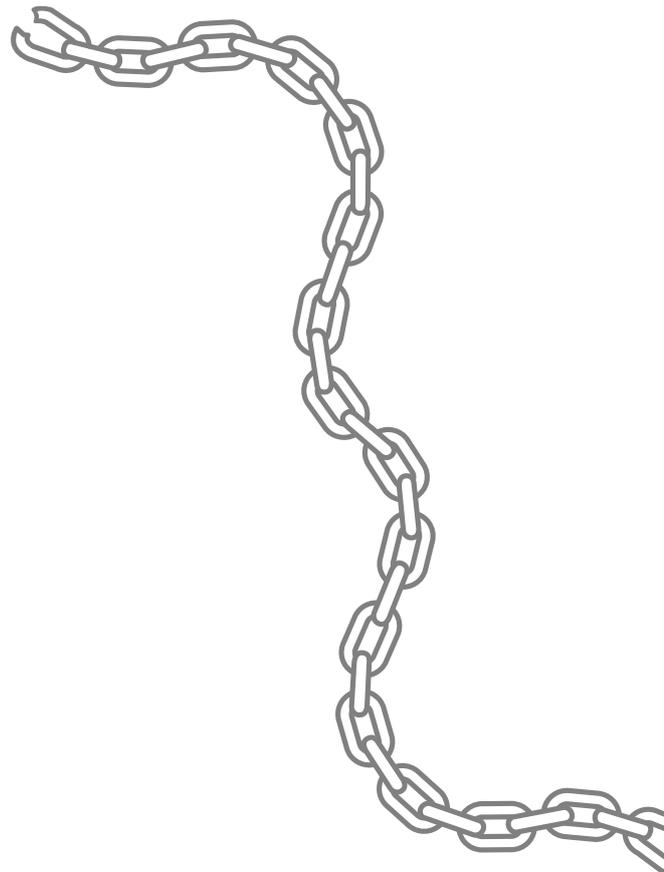
Feedback from staff, students and community members continues to form an integral part of assessing the University's effectiveness in relation to modern slavery. We will continue to engage with our community to ensure that our approach meets regulatory compliance and exceeds community expectations.

*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).

The 2021 University Modern Slavery Statement was approved by University Council on 29 June 2022.

Signed



Chancellor



Vice-Chancellor