

University of Technology Sydney

2023 Modern Slavery Statement





Acknowledgement of Country

University of Technology Sydney (UTS) acknowledges the Gadigal people of the Eora Nation, the Boorooberongal people of the Dharug Nation, the Bidiagal people and the Gamaygal people upon whose ancestral lands our university stands. We would also like to pay respect to the Elders both past and present, acknowledging them as the traditional custodians of knowledge for these lands.

Introduction

This statement has been prepared pursuant to the Modern Slavery Act 2018 (Cth) and outlines actions taken by the University of Technology of Sydney (UTS) to identify, assess and address modern slavery risks in its operations and supply chains over the period of 1 January 2023 to 31 December 2023.

Criterion 1: The reporting entity

UTS (ABN 77 257 686 961) is a statutory corporation established in NSW pursuant to the University of Technology Sydney Act (1989) NSW (UTS Act). UTS is registered with the Australian Charities and Not-For-Profits Commission and our CRICOS (Commonwealth Register of Institutions and Courses for Overseas Students) provider number is 00099F.

UTS is located primarily at its city campus, which comprises three main precincts: Broadway, Haymarket and Blackfriars. The UTS city campus includes a variety of precincts and buildings providing teaching, learning, research, social and administrative activities. Our principal address is 15 Broadway, Ultimo NSW 2007. Facilities are also located at the Moore Park and Botany precincts.

The full university structure and the responsibilities of each portfolio can be found on our website at [this link](#).

The statement is made by UTS following consultation with our controlled entities (established pursuant to Section 16A of the UTS Act):

- accessUTS Pty Limited¹ (ACN 55 098 424 312)
- Insearch (Trading as UTS College) (ABN 39 001 425 065), and
- UTS Global Pty Ltd (ACN 32 154 014 481).

Criterion 2: Structure, operations and supply chains

In 2023 UTS:

- had approximately 48,000 students enrolled, including more than 13,000 international students
- offered over 130 undergraduate and 210 postgraduate courses across traditional and emerging disciplines
- employed 4,184 full-time equivalent (including casual) staff members
- had a total expenditure on operating activities in 2023 of \$1.25 billion
- engaged with more than 3,700 suppliers with an annual spend of close to \$421M.

UTS Council is the governing body of the university, established in accordance with the UTS Act and By-law and relevant UTS Rules. Council comprises 20 elected and appointed members and its powers and functions include management and control of the university's affairs, concerns and property.

Supply chains

The UTS supply chain includes procurement required to support university operations in teaching, learning, research and professional support services, as well as downstream partners (eg subcontractors and those supporting the delivery of international research programs).

¹ accessUTS continued the process of winding up in early 2023. During this time no new business was conducted. accessUTS will be formally disestablished by mid-2024.

The categories of goods and services UTS procures are displayed below:

| Category | Goods and Service |
|----------------------------------|---|
| Business Services | <ul style="list-style-type: none"> • Human resources • Corporate professional services • Marketing & media • Travel & entertainment • Office related supplies & service • Logistics & storage |
| Property & Facilities | <ul style="list-style-type: none"> • Buildings & grounds • Construction, refurbishment & works • Property management • Utilities & renewables • Plant and equipment |
| Research and Training | <ul style="list-style-type: none"> • Laboratories & research • Lecturer & teaching expenses • Library services • Student services |
| Technology | <ul style="list-style-type: none"> • IT Software • IT Hardware • IT Professional services • Telecommunications • Audio visual |

Supply chain risk profiling tools

UTS recognises the existence of modern slavery risk across its supply chains. These risks may be elevated in certain supply chains, due to factors such as geographical location and / or source locations for materials and products procured.

In 2023 UTS continued collaborating with the Australian University Procurement Network (AUPN) and using tools such as FRDM and the Anti-Slavery Dashboards as part of a sector-wide program to address modern slavery risk.

The FRDM tool supports UTS to manage these risks by:

- allowing suppliers to be assessed, scored and profiled based on industry data
- providing an Anti-Slavery dashboard with insights into supplier's risk modelling, utilising data from The Global Slavery Index and the Guidance on Reasonable Steps issued by NSW Anti-Slavery Commissioner
- analysing and modelling more than 89,600 suppliers risk based on country, category and spend
- monitoring any companies with commercial relationships with our suppliers (eg Tier 2 trading partners), such as suppliers to our direct suppliers and parent companies of our direct suppliers.

Data analysis indicates that 3,441 UTS direct suppliers and trading partners are monitored, which represents approximately 100 per cent of our total supplier base (with any unmonitored smaller suppliers to be considered for further investigation).

Criterion 3: Risks of modern slavery practices in operations and supply chains

UTS is focused on ensuring that executive and senior managers promote a responsible risk management culture within their areas of responsibility, building awareness and compliance with policy and procedures. UTS maintains a robust risk management framework that complies with *ISO 31000:2018 risk management* standard.

As part of the process of strategic planning, risk assessments are conducted annually and are part of a continuous improvement cycle:

- **Identify** - undertake risk reviews to better understand modern slavery risks and collaborate with other universities through a Community of Practice
- **Remediate** - work with business units to develop plans to address risk areas, implement plans and provide ongoing monitoring of risk
- **Sustain** - take learnings from previous phases to modify future approaches and conduct a maturity assessment on internal capabilities.

During 2023, UTS instigated a review of modern slavery risk assessment practices related to our operations, supply chains and collaborations.

The review focused on four areas:

- Our people
- Our supply chain operations
- Our students
- Our business.

| Area | Modern Slavery Risk Taxonomy | Risk factors |
|------------------------------------|--|---|
| Our people | Employment practices Workers subjected to exploitative conditions, coercion, or other forms of abuse | <ul style="list-style-type: none"> • Exploitation of staff by subjecting them to long working hours, inadequate wages, or unsafe working conditions, particularly by taking advantage of their dependency on visa sponsors or fear of deportation. • Inadequate oversight and monitoring of labor practices within the university, allowing abusive employment conditions to persist undetected. • Exploitation of migrant workers or employees with vulnerable immigration status, subjecting them to discriminatory treatment, and limiting their ability to assert their rights. |
| Our supply chain operations | University Supply Chains and outsourced services Procurement and supply chain management, including suppliers and contractors - sourcing from high-risk regions, outsourced services | <ul style="list-style-type: none"> • Sourcing from regions with weak labour laws or a history of labor exploitation increases the risk of modern slavery within the supply chains. • Local or international suppliers unable to demonstrate compliance with the Modern Slavery Act. • Lack of sufficient due-diligence and oversight over contract services for international student recruitment agencies, cleaning, catering, security, and maintenance contracts. • Contracted workers may be vulnerable to modern slavery conditions. • Decentralised procurement activities that impede oversight of localised due diligence related to modern slavery. |

| Area | Modern Slavery Risk Taxonomy | Risk factors |
|---------------------|---|---|
| Our students | Engagements and interactions with domestic and international students Students subjected to various forms of exploitation, coercion, or abuse | <ul style="list-style-type: none"> Lack of information about workplace risks, rights and support services. Lack of information about other modern slavery-related risks, such as forced marriage. |
| Our business | Research Collaborations International collaborations | <ul style="list-style-type: none"> Collaborating with research institutions in countries with inadequate labor protection laws. Collaborating entity engages in unethical labor practices. Lack of scrutiny in research funding sources resulting in unintended association with unethical and exploitative practices. |
| | Investments and fundraising activities Inadvertently supporting or being associated with entities engaged in exploitative labour practices, human trafficking, or violations of human rights through investment portfolios or fundraising efforts | Investments: <ul style="list-style-type: none"> Investment in companies with supply chain exploitation. Inadequate due diligence on potential investment opportunities may result in investments in companies that have ties to modern slavery or human rights abuses. Investments in industries known for a high prevalence of modern slavery, such as construction, mining, or hospitality. Advancement: <ul style="list-style-type: none"> Accepting donations or funds from individuals, corporations, or foundations with questionable ethical practices, including ties to modern slavery or exploitative labour practices. Insufficient transparency regarding the sources of funding, including investments and donations, can obscure potential connections to modern slavery or unethical practices. |

Risk Management

Framework

Updates to the Risk Management Framework in 2023 have enabled UTS to embed modern slavery as a risk category within the:

- UTS Risk Taxonomy
- UTS Risk Management Procedures, and
- UTS Risk Software.

UTS understands and evaluates the operational risk profile and the controls mitigating the risks identified. Governance and oversight of our risk identification activities and actions in relation to modern slavery remain critical to our ongoing work.

The UTS Modern Slavery Steering Committee works with senior representatives from across key areas of UTS to ensure:

- broad engagement in risk identification across our operations and supply chain
- progress on priority actions identified in our Modern Slavery Statements

- we understand and work towards leading practice in assessing and responding to modern slavery risks within our organisation
- that UTS continues to comply with the requirements of the Commonwealth Modern Slavery Act and NSW Modern Slavery legislation.

Membership of this group comprises of directors (or senior nominees) from critical parts of UTS. It has facilitated a thorough and coordinated approach to identifying and addressing the risks of modern slavery across our operations and assisted in increasing awareness of modern slavery across UTS.

Process

UTS has implemented a structured modern slavery risks management process in relation to procurement and supply chains, which broadly entails:

1. Identifying all direct vendors.
2. Mapping the location of suppliers, the amount of money UTS spends with them and the products and services they provide the university.
3. Developing supplier risk profile using 'Modern Slavery and Trafficking Supplier Questionnaire' and risk factors such as industry, product / service, geography and entity risk.
4. Evaluating the severity / probability of a risk.
5. Relationship to this risk (causes, contributing factors, or direct University impacts).

As a global education provider, UTS is particularly focused on the significant risk faced by international students. Our actions to address this risk are detailed in the following sections.

Criterion 4: Actions taken to address risks, due diligence and remediation processes

UTS undertook a program of actions in 2023 to mitigate potential modern slavery risks across our key identified risk areas.

Our People

Raising awareness of modern slavery

UTS continues to build on a program of activities, events and communications designed to increase awareness of modern slavery among staff and students. UTS staff are provided with an 'Anti-Slavery Awareness' online course which includes information about modern slavery and labour exploitation risks among students, as well as referral options.

UTS also shares information about educational initiatives including resources, forums and podcasts developed by ASA designed to raise awareness of forced marriage and other forms of modern slavery which can impact on students.

Some recent examples include:

1. The ASA Freedom Awards, held in March 2023 in a partnership between Anti-Slavery Australia (ASA) and UTS, were an opportunity to focus our community's awareness on modern slavery and recognise the importance of collaboration between organisations across government, business, civil society, academia and media, who share the mission to abolish modern slavery in Australia and the world today. Mr Moe Turaga, a leading voice in the antislavery sector and Modern Slavery Survivor Advocate, delivered a keynote at the Freedom Awards ceremony.
2. In October 2023, the UTS Centre for Social Justice and Inclusion hosted a webinar as part of our Signature event series 'Modern slavery – Amplifying survivor voices.' This well attended

event featured a panel who shared how a survivor-led approach can help combat modern slavery through meaningful, ethical and trauma-informed engagement.

3. Professor Jennifer Burns' award in the 2023 Australia Day Honours for her services to preventing modern slavery provide- recognition of her work in the field, and an opportunity to promote increased awareness of modern slavery at the university.

Our Supply Chain and ethical sourcing

UTS has strengthened its commitment to ethical sourcing in the following ways:

| | |
|--------------------------------------|--|
| Preferred Suppliers | Development of a list of UTS Preferred Suppliers and Supplier Panels, which are bound under contract to abide by UTS terms and conditions. Staff should ensure realistic KPIs and include contract clauses that address modern slavery. New vendors are assessed for modern slavery and other ESG risks during onboarding. |
| Standard Terms | A revised Procurement Policy and introduction of Standard Terms. These terms emphasise a supplier's adherence to the Supplier Code of Conduct and have been integrated into all new contract templates to align with the UTS Procurement Policy. |
| Supplier Code of Conduct | Implementation of a legally binding Supplier Code of Conduct, which includes an outline of expectations regarding labour, human rights and implications for non-compliance. |
| Questionnaire for vendors | The UTS Modern Slavery questionnaire, which all UTS vendors are required to respond to as part of their contractual obligations. |
| Mandatory training | A mandatory training module that all supervisors and managers with financial delegation for procurement and purchasing are required to undertake, with guidance on reducing the risks of modern slavery when procuring goods and services. |
| Monthly forums | In collaboration with AUPN, participation in monthly forums and maintaining membership in the Modern Slavery Risk Review subcommittee. The AUPN forum is a key driver of modern slavery risk management. Relevant information or initiatives shared in the forum are considered for action by UTS and the sector to improve procurement process, supply chain risks or other areas of the university who are mitigating risks of modern slavery. |
| Library purchasing agreements | UTS investigated sector wide purchasing agreements with Council of Australian University Libraries to ensure that these also meet UTS standards in relation to modern slavery protections. |

UTS is also aware of the significant identified risk to people, employed either directly or indirectly by UTS, is posed by employment arrangements where staff are sourced through contractors – particularly in the areas of cleaning, security and hospitality. UTS became a foundation member of the Cleaning Accountability Framework (CAF) in 2023 and the first University in NSW to have a CAF 3-star certified building (Moore Park Campus).

CAF provides access to a range of resources and support to address modern slavery risks in cleaning contracts. This partnership has also contributed to increasing awareness of modern slavery among key staff at UTS and in ensuring a pathway for consultation with unions representing staff in the contract cleaning industry.

Our Students

Ensuring vulnerable student cohorts, such as international students, are protected from modern slavery and other forms of exploitation is a key area of action at UTS. UTS is particularly focused on the significant risk faced by international students who may be subjected to various forms of coercion, abuse, or gain employment and may be subjected to exploitative conditions or other forms of abuse in the workplace.

UTS has implemented a wide range of ongoing services for all students to support their learning, health and wellbeing. These are delivered by teams led by the Deputy Vice-Chancellor (Education and Students) including the International Student Services team, UTS HELPS (providing English language and academic support services), UTS Health, Counselling and Financial Assistance Services, and UTS Housing.

Services include:

| | |
|------------------------|--|
| Work rights | <p>Commencing international students are advised by UTS about their rights to work as student visa holders in Australia. UTS Careers has a particular focus on ensuring students understand their rights and entitlements in the workplace. UTS Careers has also developed a targeted International Student Career Guide and an avenue for internship students to anonymously report concerns.</p> <p>UTS expanded its work with the AUPN Anti-Slavery Program to focus on managing risks for international students. This includes joining a project with other AUPN members and the Australian Red Cross to develop a toolkit for international students, highlighting areas such as recruitment scams and workplace rights.</p> |
| Student welfare | <p>The university also works with its student representative organisations to provide practical support and services that support student welfare. The UTS Student Association offers free breakfast and dinner food services several times a week and a free Food Pantry on campus to assist students facing hardship and reduce financial stress.</p> |
| Legal services | <p>The UTS Student Legal Service provides information about employment rights in a number of community languages for international students. It also provides free and confidential legal advice to any students that experience difficulties.</p> <p>In addition, ASA (based in the Faculty of Law) provides free, confidential legal and migration services to people who have experienced, or are at risk of modern slavery in Australia, including forced labour and forced marriage.</p> |

Our Business

Research Collaborations

UTS's external research partners are diverse and include a range of state, national and international organisations. UTS also engages a range of organisations that provide goods and services in support of our research projects. These organisations are engaged in line with UTS Procurement Guidelines. In the context of UTS research contracts, UTS standard agreements include Modern Slavery Terms.

In 2023 UTS revised and updated our relevant policies and processes for human ethics research to ensure that we are in alignment with the updated 2023 guidance provided in the National Statement on Ethical Conduct in Human Research issued by the National Health and Medical Research Council. The Statement is based on values of 'respect, research merit and integrity, justice, and beneficence' and the responsibilities set out in the National Statement are intended to be consistent with the international human rights instruments that Australia has ratified. Changes were introduced to several of our existing processes to ensure that the UTS ethics review model is sustainable, transparent, compliant with the National Statement and adhere to a continuous risk assessment model.

International Collaborations

Activities where UTS operates beyond the borders of Australia may include:

- research collaborations
- research training opportunities
- teaching and learning
- academic arrangements that provide entry to UTS courses in Sydney, and
- provision of professional consultancy services.

The UTS Offshore Policy requires that all UTS offshore courses and activities comply with Australia's and the host country's relevant legal and regulatory requirements.

UTS offshore partners will usually be institutes of higher education with high educational reputations and academic standing. Any other partners must be of such an academic standing and reputation to satisfy the Vice-Chancellor that they are appropriate UTS offshore partners. Offshore partners can also include institutes that provide strategic connections but are not necessarily of high academic standing. These must however, also align with UTS values and ethics. We also partner with organisations where offshore networks are of mutual benefit. All legal agreements and memoranda of understanding now reference our approach to preventing modern slavery.

UTS seeks to positively influence the policies and practices of our partners in relation to modern slavery. Our due diligence and risk assessment processes assess all prospective domestic and international partners including:

- due diligence and opportunity and risk assessments evaluating the fit with UTS (both strategic and values-based), and
- considering any human rights, unethical or unfair activities performed by the potential partner.

Depending on the outcome of the initial risk assessment, external due diligence may be sought to help inform any decision to either agree to or decline a partnership opportunity.

Appropriate academic and other relevant quality assurance standards and practices must also be met with respect to offshore activities delivered by UTS or its offshore partners.

Investments and Advancement

Under the UTS Treasury and Investments Policy, UTS recognises the definition of responsible investment outlined in the United Nations Principles for Responsible Investment (UNPRI) as: 'an approach to investing that aims to incorporate environmental, social and governance (ESG) factors into investment decisions, to better manage risk and generate sustainable, long-term returns.' ESG considerations are factored into the valuation of investments and the investment management process to ensure consistency with UTS values.

The UTS Philanthropic Fundraising Policy was reviewed to ensure it adequately addressed issues relating to foreign interference and modern slavery. This policy sets out the clear expectations of all staff across the university in undertaking fundraising activities.

Prospective donors and philanthropic opportunities (proposal) are guided by Opportunity Assessment and Due Diligence Framework and reviewed through the Opportunity Assessment and Due Diligence Procedure (OA and DD Procedure) developed by UTS and the Advancement Unit. This procedure incorporates a review of the donor's management of any risks of modern slavery in their operations and supply chain and compliance to submitting a modern slavery statement as required by legislation or as voluntarily reported.

In addition, the OA and DD Procedure reviews how the donors' funds were earned and their strategic and values alignment with UTS, including consideration of potential or actual breaches of human rights and / or unethical or unfair activities.

Research and policy advocacy

ASA's research areas include modern slavery, human trafficking, forced marriage, dowry abuse, online sexual exploitation of children, asylum seeker exploitation, survivors' perspectives and modern slavery reporting requirements. During 2023, ASA made multiple policy submissions to government and parliamentary bodies addressing forced marriage, the vulnerability of temporary workers, women's rights and the review of the Commonwealth *Criminal Code Act* (1995).

Policy and reporting modern slavery concerns

In 2023, UTS began developing a standalone Modern Slavery Policy. This policy will, once approved, provide greater clarity about our obligations and intentions related to preventing modern slavery in UTS operations and supply chains and is informed by the United Nations Guiding Principles on Business and Human Rights.

UTS actively encourages the reporting of any concerns related to modern slavery. The university has established confidential reporting mechanisms on its public website for staff, students and stakeholders to report any suspicions or incidents related to modern slavery. In 2023, the [Speak up at UTS](#) webpage was created which includes information about and links to [modern slavery](#) reporting.

No incidents of modern slavery were reported during the 2023 calendar year.

One potential breach in relation to procurement was identified via an 'alert' in the AUPN portal which was immediately followed up. The Australian Federal Police had contacted a construction company in relation to oversights which jeopardised sponsorship visas for overseas workers. While this situation did not meet the criteria for modern slavery, the underpayment of overseas employees had the potential to become modern slavery. Fortunately, the vendor was willing to work with all parties to rectify the errors.

Criterion 5: Assessing the effectiveness of actions taken

UTS is committed to continuous improvement in our efforts to combat modern slavery. These efforts include:

- annual risk assessment activities
- development of risk mitigation strategies in line with the Risk Management Framework
- reviews of UTS Procurement Policies and Procedures practices
- reporting and review of student and staff complaints via Safety and Wellbeing Reports to UTS Council, as required by:
 - Health and Safety Policy
 - Office of the UTS Student Ombud Annual Report, and
 - Student Complaints Resolution Office, in line with the Student Complaints Policy and Procedures.
- monitoring and completing actions identified in our Modern Slavery Statements and documenting modern slavery continuous improvement achievements in our 2023 Statement.

Criterion 6: Consultation with entities owned or controlled by UTS

During 2023 consultation was undertaken with UTS's controlled entities listed below, to identify current and / or prospective activities which present modern slavery risks:

- accessUTS Pty Limited
- Insearch Limited, trading as UTS College
 - Insearch Education International Pty Limited
 - Insearch Global Pty Ltd
 - Insearch India LLP
 - Insearch (Shanghai) Limited
- UTS Global Pty Ltd
 - UTS Beijing Ltd
 - UTS Research and Innovation Institute (Shenzhen) Co Ltd.

The Directors of UTS Global Pty Ltd, UTS Beijing Ltd and UTS Research and Innovation Institute (Shenzhen) Co Ltd comprise current UTS executives and staff who have been briefed on modern slavery risks.

Under the Commonwealth Act, UTS is not required to consult with or report on behalf of our major related entities (ActivateUTS, Sydney Educational Broadcasting Ltd and UTS Child Care Inc), however, in the spirit of the legislation, UTS will consult with these related entities on an ongoing basis to support them to identify and address modern slavery risks.

accessUTS Pty Limited

UTS continued the process of winding up access UTS in 2023. During this time no new business was conducted.

Insearch Limited

Insearch Limited (trading as UTS College) is a registered private higher education provider and a pathway provider to UTS. Insearch operates under the trading name UTS College. Insearch offers academic English programs, UTS Foundation Studies and higher education diplomas.

UTS College prepares its own Modern Slavery Statement, approved by its Board of Directors.

UTS Global Pty Ltd

UTS Global Pty Ltd provides management and administrative services to the university related to UTS representative offices overseas.

Currently, UTS Global Pty Ltd provides services related to the strategic direction and management of:

- a representative office in Beijing, China, UTS Beijing Ltd, which is a wholly foreign-owned entity of which UTS Global Pty Ltd is the only shareholder, and which provides relationship management, market intelligence and profile-building services to UTS, and
- UTS Research and Innovation Institute (Shenzhen) Co Ltd, also a wholly foreign-owned entity of which UTS Global Pty Ltd is the only shareholder which provides business development, technology transfer, consultancy and industry engagement services to UTS, particularly research-focused engagement.

UTS will continue to liaise with these entities to raise awareness of modern slavery and the reporting requirements of the Act, inform them of the actions UTS is undertaking to address the requirements of the Act and provide them with updates on our progress.

Vice-Chancellor

This fourth Modern Slavery Statement provided by UTS is pursuant to Section 13 of the Modern Slavery Act 2018 (Cth) and was approved by University Council on 20 June 2024.



Professor Andrew Parfitt

Vice-Chancellor