



2022 Modern Slavery Statement

University of
Technology Sydney

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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.



A message from our Vice-Chancellor



At UTS, we have a long history of working to combat human trafficking, forced labour and forced marriage. We believe that responding to the harms of modern slavery is more than meeting our obligations under the *Modern Slavery Act 2018* – it shows our dedication to the abolition of all forms of modern slavery.

Universities are uniquely positioned in the ways they intersect with modern slavery. As global education providers, we recognise that some groups of people – including our international students, asylum seekers and migrants on limited working visas – may be particularly vulnerable. We are often connected to long and complex supply chains, some of which have points of potential exposure to exploitation. Ensuring that members of our community are aware of their rights and can seek meaningful support is vital.

We are also able to draw on evidence-based research to raise awareness of modern slavery in the community and ensure that all our students and staff develop an understanding of modern slavery, how to minimise the risks of modern slavery and how to support victims and survivors.

In developing our 2022 Modern Slavery Statement, UTS recognises the importance of partnerships in this work. We are committed to working with our partners across government, industry, the community and other universities as part of the global movement to eradicate modern slavery and ensure freedom, dignity and respect for all.

A key partner in our work on modern slavery is Anti-Slavery Australia (ASA), based in the UTS Faculty of Law. ASA are leaders in the anti-slavery movement, and are the only modern slavery-focused specialist legal practice and research and policy centre in Australia.

Working with ASA allows UTS to draw on the expertise of world-leading legal practice, policy and research. The insights offered by ASA help us ensure our work focuses on the most effective ways to tackle modern slavery, including through raising awareness, embedding anti-slavery measures into policy and procedure, and supporting victims.

This Statement has a dual purpose. It has been developed not only to comply with the legislation but to help increase awareness of modern slavery and of the work that ASA and many others across UTS are undertaking to tackle it. I look forward to that work continuing into 2023 and beyond.

Professor Andrew Parfitt

Combatting modern slavery

2022 Key achievements at UTS

During 2022, UTS made significant progress on the priority actions identified in 2021 including:



Increasing the visibility and awareness of modern slavery at UTS through establishing ***Eradicating Modern Slavery web pages*** as a single visible point of engagement around our work to combat modern slavery.



Developing **targeted and bespoke modern slavery awareness training** for UTS staff, students and community partners.



Creating a streamlined **centralised reporting process** to strengthen and better integrate identification and response to the spectrum of possible modern slavery complaints across UTS.



Formally becoming a member of the **Cleaning Accountability Framework** – the first university to join.



Developing **procurement and purchasing training** for UTS managers and supervisors which includes responsibilities related to modern slavery.



Continuing work with the **Australian Universities Procurement Network** to improve our capacity to identify and action modern slavery risks, and drive more effective changes through our supply chains to ensure leading practice management of supplier questionnaires, grievance mechanisms and remediation processes and pathways.



Ensuring all contracts for **UTS preferred suppliers** now contain a specific clause related to modern slavery.



Introducing a **new Supplier Code of Conduct** which details a minimum set of expectations and behaviours for doing business with UTS. These specifically include labour and human rights abuses such as forced and child labour.

Our approach and commitment

At UTS, we recognise our legal, ethical and moral responsibility to ensure our operations, research activities, supply chains and investments are scrupulous in avoiding modern slavery and other human rights harms. Upholding human rights and preventing human rights abuses, including modern slavery, are central to our mission to be a public university recognised for our positive social and environmental impact. We are determined to use our voice to advocate for an end to modern slavery globally and to support victims and survivors of modern slavery. In all our endeavours, we are guided by principles of dignity, equality and mutual respect within a human rights framework.

We are taking an integrated approach to modern slavery that ensures it is part of our core business and consistent with related frameworks we are seeking to progress, including the Protect, Respect, Remedy framework set out in the UN Guiding Principles on Business and Human Rights and the United Nations Sustainable Development Goals (SDGs).

UTS is proud to have been one of the first Australian universities to become a signatory to the University Commitment to the SDGs. The SDGs provide a framework for the community, businesses, government, and nations to work towards solving the planet's biggest challenges. Agreed to in 2015 by all countries that make up the United Nations, the 17 goals with 169 targets and 232 indicators provide a roadmap to guide and measure progress.

Universities have a vital role in helping achieve the SDGs through research, facilitating innovation, leading by example, and collaborating with community partners. UTS has a dedicated Sustainable Development Goals Project Manager whose role is to raise awareness of the UN SDGs across the academic and professional areas of the university, map sustainability/SDGs expertise, identify strengths and opportunities, measure impact and communicate outcomes.

Our work in modern slavery is a key part of our efforts to address SDG 8 *Decent Work and Economic Growth* and progress against SDG8 indicators, including our work to tackle forced labour, modern slavery, human trafficking and child labour. UTS has participated in the Times Higher Education Impact ranking (based on the UN SDGs) for the past two years and, in 2022, was the 15th best-performing university in the world and the 2nd best in Australia.

UTS will continue working to ensure that our students, staff, suppliers and partners respect and share our commitments to human rights through an ongoing program of dialogue, awareness raising, and due diligence.

Within the UTS community, we recognise that certain groups, including international students, may be at higher risk of exploitation. We will mitigate this risk by ensuring information, advocacy and support mechanisms are part of the student experience and assisting those at risk.

In making these commitments, we acknowledge that our actions to address modern slavery are evolving. While this Statement provides an opportunity to reflect on the success of our activities to date, it also highlights areas in which we can strengthen our responses: including governance, operational activities and practices, and better integration of due diligence across our operations and supply chains. We will focus on these areas of improvement, striving to continually strengthen and embed actions across our organisation to address instances of modern slavery effectively.



Criterion 1: The reporting entity

This Statement outlines University of Technology Sydney (UTS's) commitment and approach to identifying and addressing modern slavery risks in our supply chain, operations and investments, including those of the entities we control as required by the Commonwealth Modern Slavery Act 2018 (the Act).

This is the third UTS Modern Slavery Statement and identifies actions our organisation and controlled entities have undertaken during the year ended 31 December 2022, in response to mandatory reporting criteria of the Act.

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.

The UTS City campus encompasses a variety of precincts and buildings providing teaching, learning, research, social and administrative activities. Our principal address is 15 Broadway Ultimo NSW 2007.

The main City campus precincts – Haymarket, Broadway and Blackfriars – are located at the southern gateway to Sydney's CBD, with newer precincts situated within the elite sporting zone at Moore Park and on an industrial park at Botany.

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

- accessUTS Pty Limited
- Insearch (Trading as UTS College)
- Kilimanjaro Learning Solutions Pty Ltd
- UTS Global Pty Ltd

The UTS 2022 Modern Slavery Statement was approved by the UTS Council on 21 June 2023.



Criterion 2: Structure, operations and supply chain

2.1 Structure and operations

UTS is a public university of technology defined by our support for the economic, social and cultural prosperity of our communities. We are measured by the success of our students, staff and partners and are committed to research, innovation and the dissemination of knowledge of public value. We are, and always will be, an inclusive university.

UTS was established in 1988, and in 2022, more than 44,615 students were enrolled at our university, including 11,180 international students.

UTS offers over 130 undergraduate and 210 postgraduate courses across traditional and emerging disciplines. The university's world-leading research centres span a range of disciplines providing practical and relevant solutions to issues of national and international importance and equipping graduates with the latest discipline-specific skills and practices. The university also maintains strong relationships with the local community, industry, business and the professions through a wide range of partnerships, projects and events. As a public purpose institution, UTS is committed to supporting positive social change within and beyond our campus.

Student-based programs, focused research and innovative teaching approaches aim to create a more just and equitable world. In 2022, UTS employed 3,836 full-time equivalent (including casual) staff members.

UTS 2027, our decadal strategy, was launched in 2018 with the vision for UTS to be a leading public university of technology recognised for our global impact. Despite the challenges of the global COVID-19 pandemic, the first four years of the implementation of UTS 2027 have led to significant achievements against the goals and targets set out in the plan. The 2022 year saw the continued evolution of new forms of learning, including the growth of online learning and enterprise learning alongside a return to on-campus learning for most students.

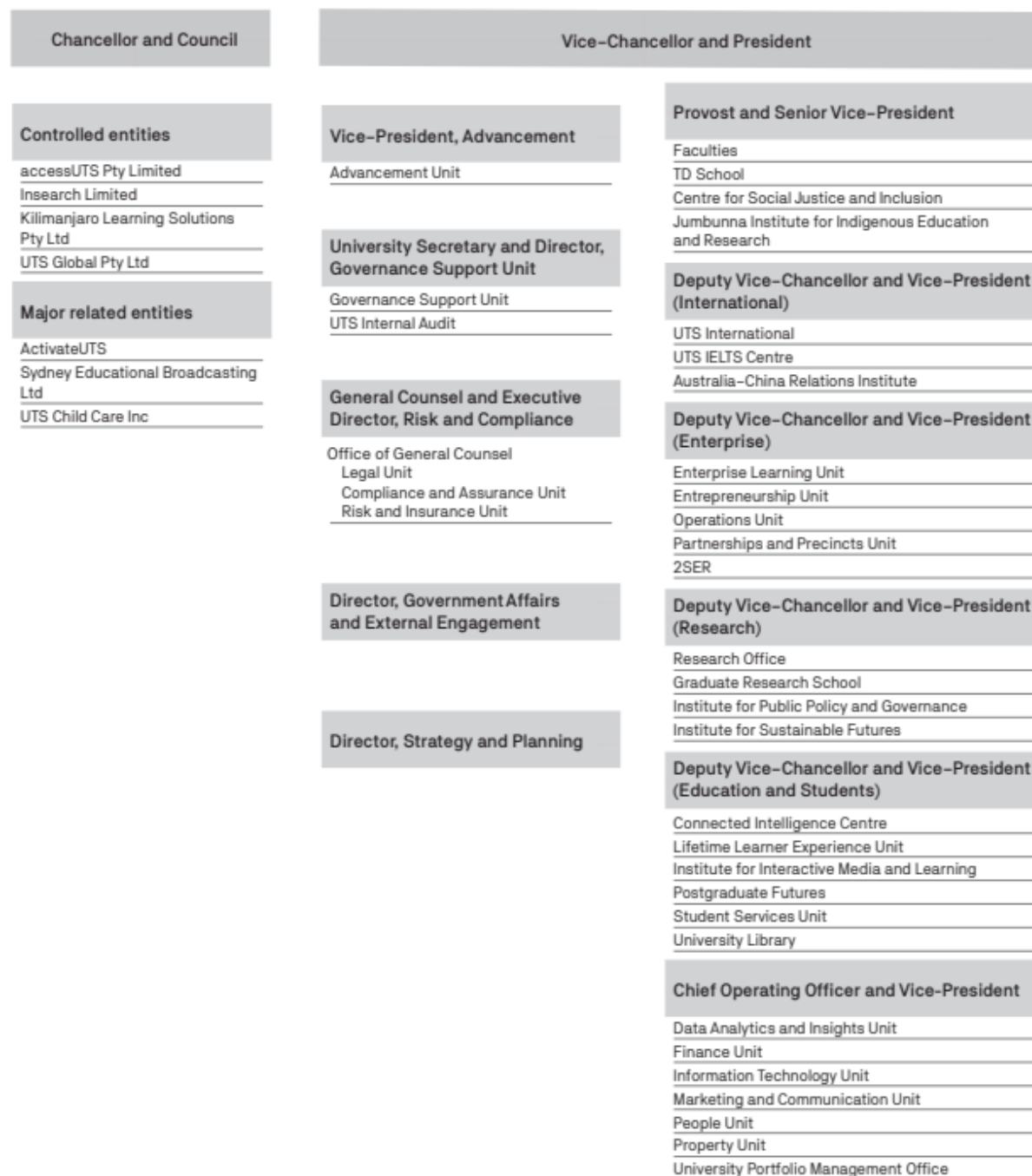
The university has reimagined international education and put in place measures to grow new markets and re-establish existing markets post-COVID. UTS continues to excel in, and expand, its research capabilities in targeted sectors, including health, food and agriculture, defence, space and climate. UTS has committed to further invest in the successful Tech Lab facility at Botany as well as engage in the planning for precincts such as Tech Central and Bradfield in Western Sydney

UTS Council is the governing body of the university, and is established in accordance with the UTS Act and By-law and relevant UTS Rules. Council's powers and functions include management and control of the university's affairs, concerns and property. Council acts in all matters that best promote the objectives and interests of the university.

Council is chaired by the UTS Chancellor, who is elected by the Council. The members of Council are elected or appointed and have expertise and background relevant to the governance needs of the university.

The organisational structure of UTS in 2022 is illustrated in the following diagram, and further details about the structure and operations of UTS and our controlled entities are described below. There were no significant changes in the nature of the activities of the consolidated entity during 2022.

UTS organisational structure



2.2 Our supply chain

The UTS supply chain is diverse and complex, incorporating hundreds of products and services required to support the university's operations including infrastructure construction and maintenance, administration, academic programs and research. Our university currently engages with more than 3,000 suppliers. This represents an annual spend of close to \$250M.

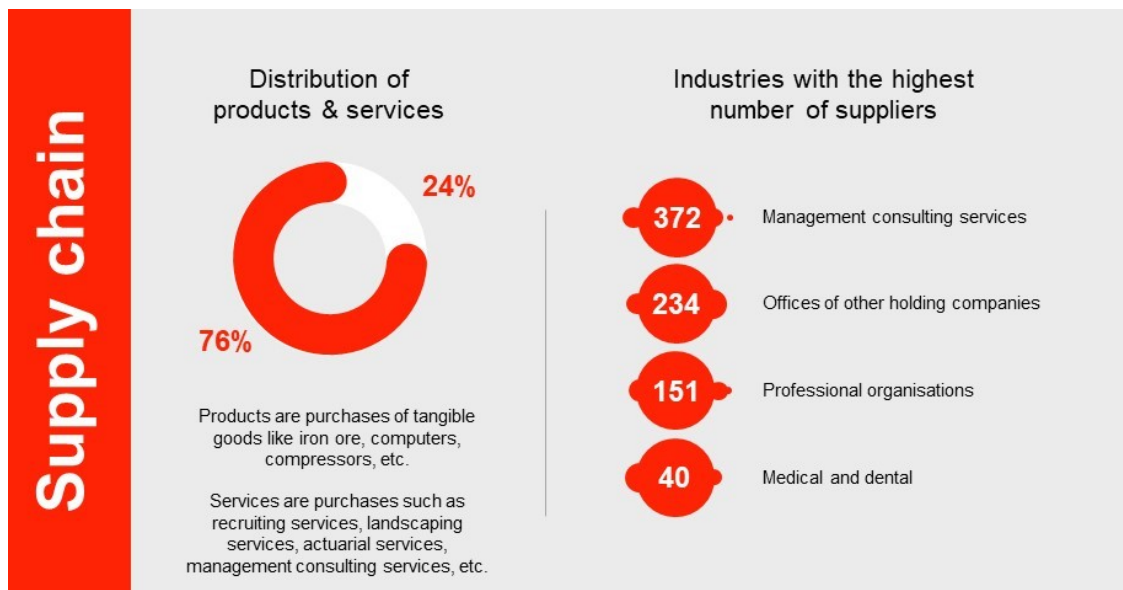
The UTS supply chain includes procurement required to support university operations in teaching, learning, research and professional support services, as well as downstream partners (such as subcontractors including some engaged in supporting the delivery of international research programs).

The supply chain includes research institutions and universities, consultancy firms, local suppliers, self-employed consultants, travel and accommodation providers, security firms and suppliers of medical and IT equipment and consumables.

The broad categories across which UTS procures goods and services are:

- Construction and refurbishment
- Hospitality
- Human resources
- Insurance
- IT: software, hardware, network, telecommunications, security, storage
- Laboratories and research supplies
- Lecturer and teaching expenses
- Library resources
- Logistics and storage
- Maintenance including cleaning and security
- Marketing and communication
- Plant and equipment
- Office-related supplies
- Professional services
- Research infrastructure/equipment
- Student recruitment
- Subscriptions and membership
- Utilities and renewables
- Telecommunications
- Travel
- Workplace health and safety equipment

The following diagram indicates the distribution of products and services at UTS and the industries where we have the highest number of suppliers.



UTS has continued collaborating with the Australian University Procurement Network (AUPN) and using the FRDM tool as part of a sector-wide program to address modern slavery risk.

The FRDM tool algorithmically identifies modern slavery risks allowing suppliers to be assessed, scored and profiled, with 140,000 suppliers now analysed. As many suppliers across the sector are common, participation in this collaboration assists UTS in mapping its supply chain and enables UTS staff to make informed decisions.

Data analysis generated through the FRDM tool indicates that 3,125 UTS direct suppliers and trading partners are monitored via FRDM. While this represents approximately 100 per cent of our total supplier base being monitored, there may be additional smaller suppliers that remain unmonitored, and may require further investigation.

FRDM also monitors any companies with commercial relationships with our suppliers (i.e., Tier 2 trading partners), including those who are:

- Suppliers to our direct suppliers
- Parent companies of our direct suppliers
- Subsidiaries of our direct suppliers and
- Holding companies of our direct suppliers

A list of UTS Preferred Suppliers and Supplier Panels has been developed, with suppliers registered following a public tender process to provide visibility and transparency over the goods and services we buy. UTS Preferred Suppliers and Supplier Panels are bound under contract to abide by UTS terms and conditions. Our Procurement Policy specifically aims to ensure that UTS and our suppliers act ethically and responsibly in the acquisition of goods and services, taking into consideration economic, social and environmental impacts, including in relation to modern slavery.

During the sourcing stage of a tendering process, staff are required to work on realistic KPIs and to ensure contract clauses include modern slavery, and during onboarding, new vendors will be assessed for modern slavery risks and other ESG risks. Through media notifications, AUPN members are updated on emerging risks related to UTS suppliers/industries.



Criterion 3: Identifying risks

3.1 Recognising modern slavery

UTS recognises modern slavery as a grave abuse of human rights which includes slavery, servitude, forced labour, debt bondage, forced marriage, trafficking in persons, deceptive recruiting for labour or services and child labour.

- **Slavery:** When a person exercises the rights of ownership over another person. This includes the power to make the victim an object of purchase or to use their labour or services in a substantially unrestricted manner.
- **Human trafficking:** The recruitment, harbouring and movement of a person for exploitation through modern slavery.
- **Servitude:** When a victim is significantly deprived of their personal freedom and does not consider themselves free to cease providing labour or services or leave their place of work because of coercion, threats or deception.
- **Forced labour:** Any work or services people are forced to do against their will under threat of punishment and where they are not free to stop working or to leave the place of their work because of coercion, threat or deception.
- **Debt bondage:** Where a person pledges their services as security for a manifestly unreasonable debt. This is the world's most widespread form of slavery, where victims trapped in poverty borrow money and are forced to work to pay off the debt.
- **Forced marriage:** A person is forced to marry through coercion, threats or deception or where they are incapable of understanding the nature and effect of the marriage ceremony.
- **Child labour:** When children are exploited in slavery or slavery like practices or engaged in hazardous work that can harm their health, safety or morals or used to produce or traffic drugs. The worst forms of child labour can occur in different contexts including orphanage trafficking and child labour in factories, mining and agriculture.

Victims of modern slavery become trapped in these circumstances due to poverty, exclusion and a lack of power and choice making them vulnerable to exploitation and forcing them to take risks in search of safety, opportunities to provide for their families or improve their prospects.

3.2 Our approach to identifying risk

During 2022, UTS has continued to develop risk assessment and investigations to establish areas within our spheres of influence where modern slavery risks may occur, the levels of risk and relevant mitigation strategies.

UTS maintains a robust risk management framework that complies with ISO 31000:2019 risk management standard. As part of the process of strategic planning, risk assessments are conducted annually. The university has a zero-tolerance policy for intentional violations of our moral and ethical values.

UTS is in the process of implementing a structured modern slavery risks management process which broadly entails:

1. Identifying of all direct vendors
2. Mapping the location of suppliers, the amount of money the university 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)

Following our preparation of our 2021 Modern Slavery Statement, we have further considered the spheres of influence in which we might work to prevent modern slavery and the relative risks they present. The key areas we have identified as presenting risks in relation to modern slavery are:

1. Procurement and supply chain
2. Awareness of modern slavery
3. The student experience
4. International partnerships
5. Research
6. Investments
7. Fundraising
8. Recruitment

These can occur across our local, national and global operations. Our approach to addressing these encompasses governance mechanisms such as developing and enforcing policies and procedures, raising awareness of modern slavery risks among staff and students, and providing support to victim-survivors.

Governance and oversight of our risk identification activities and actions in relation to modern slavery and remain critical to our ongoing work.

The UTS Modern Slavery Steering Committee convened by the Pro Vice-Chancellor (Social Justice and Inclusion) works with senior representatives from across key areas of the university to ensure:

- broad engagement in risk identification across our operations and supply chain
- progress on priority actions identified in our 2022 (and future) Statements,
- we understand and work towards leading practice in assessing and responding to modern slavery risks within our organisation
- that UTS continues to address the requirements of the Commonwealth Modern Slavery Act

Membership of this group comprises directors (or senior nominees) from critical parts of the organisation and 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.

Reporting and updates on UTS's activities concerning modern slavery are provided to the Vice-Chancellor's Social Justice and Inclusion Committee, which is chaired by the Provost and includes all faculty Deans (or their senior nominees) as members, as well as the University Leadership Team, including the Vice-Chancellor.

This further facilitates engagement with our responsibilities in relation to modern slavery and identification of risk across the organisation.

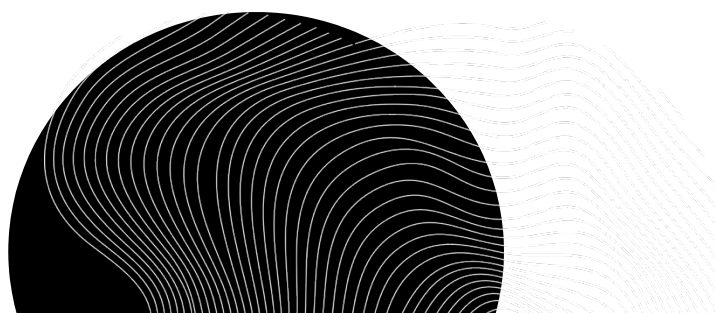
Each year, deans and directors are required to undertake a review process to assist UTS in identifying risks, ensuring the university's safety, integrity, reputation and meeting our compliance obligations.

This process (known as the Annual Management Sign-Off) included a question for the first time for the year ending 2021, requiring all deans and directors to indicate whether they had taken steps to identify and address modern slavery risks in their own operations and supply chains.

Follow-up from this activity during 2022 has provided additional information about the extent to which different areas are aware of their responsibilities and where additional awareness raising or other supplementary remediation may be required. It has also highlighted several areas where additional attention to supply chain risk requires further identification, For example, procurement of food and beverages from local precinct small businesses and collective purchasing of supplies through groups such as the Australian Council of University Libraries.

It is proving particularly valuable as a tool to identify potential risks in an environment of de-centralised procurement and devolved financial delegations where large numbers of staff are involved in external purchasing. In addition, this process assists in ensuring that all staff (including fixed term and casual staff), who may come into contact with students who could be vulnerable to or experiencing modern slavery, understand how to recognise and report suspected incidences.

The outcomes of this process are reported to the Audit and Risk Committee of Council each year. Further information about risk assessment methodology concerning procurement and supply chain is provided in the following sections.



3.3 Risks addressed in UTS policies and procedures

The UTS Governance Support Unit (GSU), with support from the Modern Slavery Working Group, completed a program of work in 2022 to ensure modern slavery is appropriately considered and referenced in relevant policies and procedures.

Policies and procedures that have been amended through this process are:

- Child Protection Policy
- Code of Conduct
- Equity, Inclusion and Respect Policy
- Internships Management
- Procurement Policy
- Research Policy
- Scholarships and Prizes Policy
- Staff Travel, Expenses and Credit Card Policy

UTS has also initiated the development of a Modern Slavery Policy following a benchmarking exercise to determine governance responses to modern slavery across the sector. While the current policy settings are generally sufficiently robust to minimise the risk of modern slavery at UTS, the policy will seek to build awareness of existing requirements and modern slavery reporting processes among staff, students and affiliates.

The UTS Code of Conduct (the Code) sets out behavioural standards and professional expectations for anyone who works for or on behalf of the university. This includes a specific reference to the management of modern slavery risks and undertakings made by UTS in our annual Modern Slavery Statement.

The Code further requires, where possible, that staff responsible for contract development, contract management and/or engaging contractors ensure that its behavioural requirements are included in the contract. Where this is not possible, behavioural expectations must be otherwise managed within the contract. The Code will be reviewed to ensure alignment with the Modern Slavery Policy currently under development.

Any behaviour or conduct inconsistent with the Code or relevant Policy is unacceptable and managed as a breach of the Code or a breach of contract (as appropriate). UTS will investigate any unethical or unacceptable behaviour brought to its attention, particularly that which may have an adverse effect on the wellbeing of staff or students and take any necessary action.

Additional awareness-raising activities have commenced with staff and students to encourage members of our community to report any suspected human rights abuses via our existing policies and procedures that provide the reporting mechanism for modern slavery complaints (i.e., the Staff Complaints Policy, Student Complaints Policy and Fraud, Corruption and Public Interest Disclosures Policy). Further updates to the reporting processes will be made in 2023.

Eradicating Modern Slavery web pages were developed in 2022 as a single visible point for reporting modern slavery. The web pages will be further enhanced in 2023, along with drafting a new policy specifically focused on modern slavery.

This aims to strengthen and better integrate identification and response to different types of modern slavery complaints across UTS (i.e., whistleblowing, staff, student and community complaints, reporting incidents of sexual assault etc.).

3.4 Risks in UTS culture

UTS strongly and explicitly supports and promotes a culture grounded in equity, fairness, respect and dignity, and human rights for all.

Any form of modern slavery is an abuse of human rights. As a public institution, we are committed to driving social change within and beyond our campus, and we aim to ensure that our research, education and practice benefit the people who work and study at UTS and the wider community.

Our Social Impact Framework sets out our objectives in this area, specifically:

- An increased number of equity target groups successfully complete a higher education degree at UTS
- Students have the agency to enact personal and social responsibility
- Staff have the confidence and are supported to maximise their social impact
- Targeted research, teaching and program outcomes have social impact and actively contribute to communities
- UTS is an advocate, critical voice and thought leader on issues that concern and impact communities
- UTS business operations and strategies reflect a long-term independent commitment to social impact

To achieve these objectives, UTS takes an approach focused on ensuring that our executive and senior managers promote a responsible risk management culture within their areas of responsibility, building awareness and ensuring compliance with our policy and procedures. Key to our work is ensuring that our organisation embraces a culture that truly values social justice and human rights for all.

We have identified that a key continuing cultural risk at UTS concerning modern slavery remains ensuring that our objectives to eliminate modern slavery and support victims are communicated and understood across all levels of our organisation. As such, we are continuing work to communicate our objectives and progress across the organisation and beyond.

During 2022, UTS developed a series of nine Social Impact Dashboards, which transparently report on our progress against the Social Impact Framework. These feature data, stories and stakeholder perspectives that capture the university's contribution to social good and help us identify areas where we need to improve to reach our goals.

This framework reporting and our quantitative and qualitative assessment of our progress against it supports faculties and units across UTS to understand how they can progress social justice objectives, including those concerning modern slavery.

3.5 Risks in education and support

Like many higher education providers with a global outlook, one of our specific challenges is to ensure our students, wherever they are based and whatever their communities of origin, are supported through the ongoing impacts of the COVID-19 pandemic, which increased the vulnerability of many students to exploitation and modern slavery. A dedicated international student support team is now positioned in the portfolio of the Deputy Vice-Chancellor (Education and Students) within the Lifetime Learner Experience Unit.

In 2022, more than 11,000 international students were enrolled at UTS. With the continuing impacts of COVID-19, some students could not travel to Australia to commence or continue their studies. At the beginning of the pandemic, UTS recognised these risks and undertook a series of actions to help support vulnerable students, many of which continued into 2022.

We have continued providing a wide range of services to enhance international students' learning, health and wellbeing through our International Student Services team, UTS Housing and the International Student Centre.

Throughout 2022 the UTS Students' Association provided practical assistance through free food services – the Bluebird Breakfast services (Wednesday mornings 8.30am-11am) and Night Owl Noodles (Tuesday and Thursday 5.30pm-7pm) – and a free Food Pantry on campus.

These services aim to assist students facing hardship by:

- Providing a last-minute meal to students
- Helping support students' wellbeing by reducing financial stress
- Continuing to support international students

Increasing the capabilities of all UTS staff to understand how to identify, support and assist vulnerable students is critical, and will continue to be a focus going forward.

Our partnership with Anti-Slavery Australia (ASA) offers particularly valuable expertise to UTS on taking a person-centred approach to supporting vulnerable people and victims of modern slavery and ensuring leading practice training for our staff and students.

Through holistic, trauma-informed practice, ASA helps victims and survivors of modern slavery navigate complex legal processes and build positive futures for themselves and their families.

In 2022, two cases of modern slavery exploitation of our students were brought to the attention of UTS. These involved students who had come to our university on scholarships and disclosed that the external sponsoring organisation required them to undertake unpaid work, including domestic work. In responding to these cases, UTS could draw on ASA's depth of experience in providing trauma-informed support for victims and work across teams to tighten our policy frameworks to ensure such incidents cannot occur again.

Following the adoption of new protocols in 2022, UTS is using the expertise of ASA to triage and provide a first port of call for complaints and queries from staff, students and other members of the UTS community about modern slavery. This ensures a single, clear point of contact for people, both in and outside of UTS, consistency of response, best practice advice and appropriate referral pathways as required.

ASA's work to engage broader at-risk communities (both within and beyond UTS), to raise awareness about what trafficking and slavery mean, and empower communities to take a stand against slavery and respond appropriately to ensure that we are doing everything possible to reach at-risk communities.

UTS also offers a range of support to ensure students are aware of their rights in the workplace. UTS Careers provides information to students about their rights in relation to internships and work experience and allows students to report concerns (including anonymously) about employers. UTS Careers have also developed a targeted International Student Career Guide.

The UTS Student Legal Service provides information about employment rights in Australia specifically targeted to international students and in a number of community languages, and provides free and confidential legal advice to any students that experience difficulties.

Commencing international students are also advised by UTS about their rights to work as student visa holders in Australia.



Beyond Storytelling: Towards Survivor-informed Responses To Modern Slavery

Anti-Slavery Australia is pleased to present a new report 'Beyond storytelling: towards survivor-informed responses to modern slavery'.





Criterion 4: Our actions

Having identified our spheres of influence noted in the previous section, UTS is evolving a program of actions to mitigate potential modern slavery risks across eight identified risk areas. These are:

1. Procurement and Supplier Engagement
2. International Partnerships
3. Awareness of Modern Slavery
4. Student Experience
5. Research
6. Investments
7. Fundraising
8. Recruitment

4.1 Procurement and supplier engagement

UTS recognises the importance of influencing positive change through our procurement. By keeping ethical considerations at the forefront of buying decisions, we can promote decent working conditions and human rights and demonstrate a willingness to work with suppliers to address issues.

We understand that the prevalence of modern slavery in supply chains globally is a significant issue. The due diligence processes that UTS undertakes when selecting and continuing relationships with suppliers and other third parties reflect relevant risk exposure. These take into consideration factors such as:

- the sector in which the third party operates
- the country or countries in which goods are manufactured and from which services are provided
- the measures taken by third parties in relation to modern slavery risks in their own operations and supply chains and
- the complexity and transparency of supply chains, including the extent of sub-contracting

A number of industries are recognised as experiencing a higher risk of modern slavery, including construction, catering and hospitality, security, textiles production and manufacturing (most relevantly of lab supplies, research equipment, and IT hardware). These sectors can pose high risks due to characteristics and processes, such as the widespread use of low-skilled labour or heavy reliance on outsourcing.

Similarly, certain countries and regions are recognised as having a higher risk of modern slavery, principally due to factors that increase vulnerability, such as: poverty; discrimination and marginalisation of groups such as women, children, migrants, refugees, ethnic and religious minorities; civil disruption and armed conflict; weak rule of law and impunity; and natural disasters.

UTS is taking a broad and detailed approach to reduce our likelihood of contributing to modern slavery. This includes implementing as standard practice recommended sustainable supply chain practices such as:

- paying suppliers in fair timeframes
- avoiding undue delays to payments and
- avoiding unreasonable contract variations

In addition, we are working towards identifying and addressing risks of modern slavery in our supply chain across the procurement planning and delivery life cycle. Engaging with suppliers in this work is critical to ensure our suppliers align with UTS values. We are doing this through a range of actions in progress, including:

- Reflecting modern slavery risks in the sourcing strategy (scope of modern slavery concerns that will be considered during the procurement process include addressing the standard required from suppliers; how UTS will manage the risk of modern slavery in the procurement process; and identifying roles and responsibilities for the modern slavery component of the procurement).
- Raising awareness when engaging the market
- Considering conditions of participation during market engagement activities

At the sourcing stage, UTS is:

- Requesting suppliers to respond to tender schedules
- Including modern slavery in contract clauses
- Working with suppliers on realistic KPIs

During 2022, UTS developed a new Supplier Code of Conduct that sets out a minimum set of expectations and behaviours for doing business with UTS. This Code outlines the ethical standards and behaviours we expect from ourselves and our suppliers and aims to ensure we work in partnership with suppliers to deliver the best social and commercial outcomes for UTS and our associated entities, including in relation to modern slavery and other human rights considerations. The Code also reflects the role of our suppliers and their supply chain in terms of taking action across the supply life cycle, such as paying their suppliers and contractors on time and reporting any breaches of the code to UTS.

Australian University Procurement Network activities

Key to our work to mitigate the risk of modern slavery in procurement and supply chain is working with the Australian University Procurement Network (AUPN). As an AUPN member, UTS has been part of the evolving activities during 2022 along with social tech firm FRDM which is working to support 34 participating AUPN universities to build improved supply chain risk transparency across more than 140,000 suppliers.

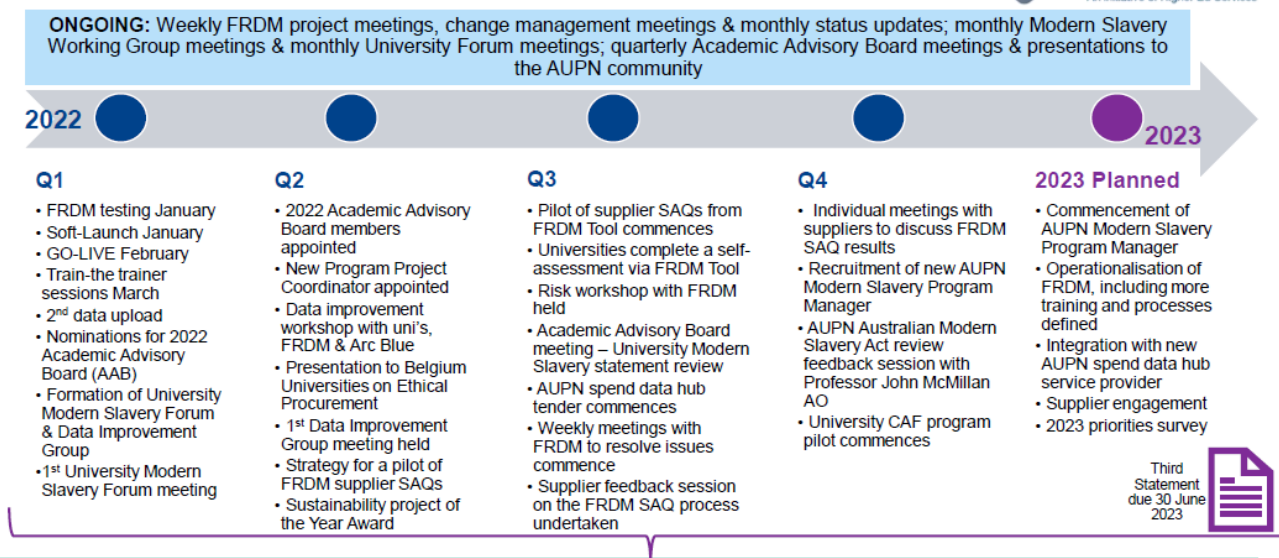
All UTS vendors related to 2022 expenditure have now been assessed and analysed using FRDM tool to assess modern slavery risk.

This major project is delivering an integrated program to reduce the risks of modern slavery in the higher education sector by establishing common suppliers across the sector in higher risk areas, undertaking supplier risk assessment, developing supplier questionnaire assessments and training, and strengthening procurement training and procurement processes.

FRDM supports universities by algorithmically identifying modern slavery risks throughout the universities' global supply chains, enabling each university (and the sector collectively) to make informed decisions and take action to address modern slavery risks in their supply chains.

A timeline of key activities achieved as part of the AUPN FRDM rollout in 2022 is illustrated below.

Events and key deliverables in 2022



Recent amendments to our Procurement Policy clarify requirements for procuring goods and services for or on behalf of UTS to reduce risks of modern slavery and ensure that UTS acts ethically and responsibly in the acquisition of goods and services, with specific reference to modern slavery risks (and the response to those risks) in university operations and supply chains.

Provisions in our procurement contracts aim to ensure compliance by suppliers and identification and reporting of non-compliance. However, decentralised procurement across UTS faculties and divisions means this remains a challenge. The Procurement Policy provides a mechanism for breaches or suspected breaches of contract to be reported to the relevant supervisor, dean or director for investigation and action by the Chief Financial Officer (CFO).

The Cleaning Accountability Framework

UTS continues to prioritise action against modern slavery risks in cleaning contracts and adopted the core principles of the Cleaning Accountability Framework (CAF). The CAF principles, endorsed by Australian Human Rights Commission (AHRC), incorporate ethical procurement, the promotion of decent working conditions, fair and transparent pricing, quality outcomes, engendering employment practices to eliminate exploitation and providing cleaners with the ability to speak up safely.

In 2022, UTS participated in an online briefing for universities organised by CAF focused on cleaning and security contractors. The event was part of a wider pilot project to expand CAF certification to university campuses. The aim of the briefing was to assist relevant stakeholders in the higher education sector to understand their role in promoting good labour practices, and provide guidance on practically how to do this. The event covered topics including:

- Regulatory compliance and the role of lead firms,
- The role and importance of worker voice in supply chain due diligence,
- The particular vulnerabilities of cleaners and security guards who are temporary migrant workers, and are often international students themselves

UTS is extremely pleased to have now formally become a member of the Cleaning Accountability Framework university pilot, the first university to join upon its launch in January 2023. This provides us with access to a range of CAF resources and support to enhance our efforts to address modern slavery risks in cleaning contracts, including: procurement advice; quarterly insight reports (based on data CAF collects as part of worker engagement and identifies key compliance issues and remediation actions); CAF briefings and educational events; and access to all courses on the CAF Learning Hub.

CAF has been working with the higher education sector since 2020, and UTS Central Services and Security Services continued our involvement in the project during 2022 that time to develop a university pilot and supply information to CAF for the development of an evaluation framework. CAF hopes to do a final evaluation of the pilot in 2024 before rolling it out across the wider higher education sector.

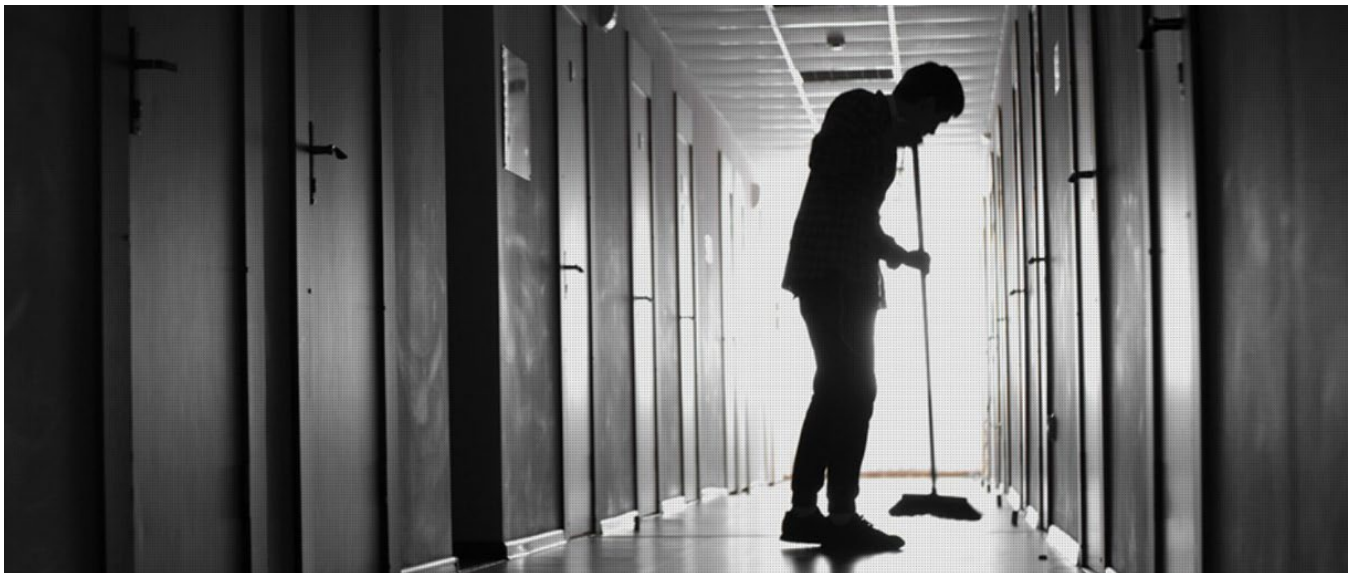


Image source: Cleaning Accountability Framework

4.2 International and domestic partnerships

As a public-purpose university, we occupy a unique institutional position. We are advocates and a critical voice on issues that concern and impact communities, and we use this position to advance the rights of vulnerable communities in Australia and globally.

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.

We seek to positively influence the policies and practices of our partners in relation to modern slavery. Our due diligence and risk assessment process assess all prospective domestic and international partners.

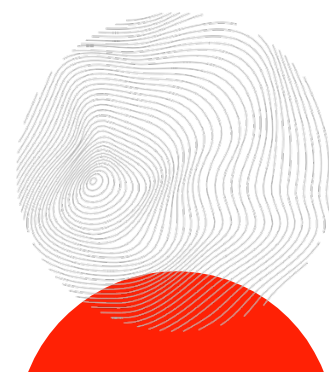
This process includes assessing how the partners have earned their funds and a level of basic due diligence assessing the fit with UTS (both strategic and values-based) and considering any human rights, unethical or unfair activities performed by the potential partner. Depending on the outcome of the 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 be met with respect to offshore activities delivered by UTS or its offshore partners.

We also aim to harness UTS's capacity to further contribute meaningfully to the public dialogue on modern slavery in the global community, driving it beyond a focus on legal compliance towards practical, survivor-centred responses to addressing modern slavery.

In this, we draw on the expertise and leading role that ASA has played, and continues to play, as an advocate for law and policy reform on modern slavery.

We will extend our reach through collaboration with business, government, community partners and other organisations internationally to use our collective influence to minimise modern slavery risks and drive action to address modern slavery.



4.3 Awareness of modern slavery

UTS recognises that actions to increase awareness of modern slavery will be critical to the success of our program of works to reduce the risk of modern slavery in our operations and supply chain and to support vulnerable cohorts and victims.

In 2022 UTS with ASA launched a UTS-specific online Anti-Slavery Awareness training course specifically designed for all UTS staff. The course covers definitions of modern slavery, potential risks at the university and how to report and respond to possible or actual cases of modern slavery.

UTS Marketing and Communications Unit and the Centre for Social Justice and Inclusion have been proceeding with a program of raising awareness of UTS activities around tackling modern slavery through internal channels such as staff notices and student newsletters.

A comprehensive and transparent web presence was developed in 2022, highlighting UTS's work on modern slavery. The web pages, embedded within the UTS website, provide clear guidance to staff, students, suppliers and other members of the UTS community about how to respond to suspected incidents of modern slavery.

Building a comprehensive communications and education program across UTS is particularly important to ensure that students who may be at heightened risk of experiencing modern slavery both in Australia and overseas are protected from and supported in cases of exploitation and deceptive employment practices.

Information for UTS students has focused on raising awareness of modern slavery as a human rights issue, identifying signs of modern slavery, and assisting students to understand what to do if they are experiencing or suspect someone else is experiencing modern slavery.

Information about UTS's program to address modern slavery is raised with senior managers across the university through forums such as the University Leadership Team and Vice-Chancellor's Social Justice and Inclusion Committee.

These communications activities aim to complement other awareness-raising activities with both an internal and external focus.

ASA's free self-paced online courses on Modern Slavery and Modern Slavery in the Home (launched in 2022) are available to all members of the community, UTS staff and students. During 2022, much of our communications was focused on promoting the uptake of ASA's free online course on modern slavery, available on the UTS Open platform. These free courses have been developed in the public interest to increase awareness about all forms of modern slavery, the indicators of modern slavery, and the available protections and supports. To date, approximately 2,500 people have enrolled in these courses.

Images from UTS's bespoke university-wide online Anti-Slavery Awareness training course (following) illustrate some of the content and approach that our university is taking to increase awareness in our community.



Anti-Slavery Awareness



Comply with UTS policies and procedures

Relevant UTS policies have been amended to incorporate modern slavery provisions and additional due diligence requirements. Policies and procedures that have been amended through this process are:

- [Child Protection Policy](#)
- [Code of Conduct](#)
- [Equity, Inclusion, and Respect Policy](#)
- [Internships Management Policy](#)
- [Philanthropic Fundraising Policy](#)
- [Procurement Policy](#)
- [Research Policy](#)
- [Research Management Procedures](#) (staff only, SharePoint)
- [Scholarships and Prizes Policy](#)
- [Staff Travel, Expenses and Credit Card Policy](#)

Ensure you read and familiarise yourself with any additional requirements set out within these UTS policies.
A Modern Slavery Policy is currently being developed.

[CLOSE](#)

42/48

Vice-Chancellor – Professor Andrew Parfitt



28/48



4/48

UTS is committed to addressing modern slavery. This course has been designed to develop your awareness of modern slavery and ways to respond to the risks it poses.

Watch the video welcome from Vice-Chancellor Professor Andrew Parfitt. As you're watching the video, can you think of any modern slavery risks at UTS?

The goods and services in the operations and supply chains at UTS may be impacted by modern slavery.

Operations are activities undertaken by an organisation to pursue its business objectives and strategy. These include employing people, investments and research.

[SOURCES](#)

4.4 Student Experience

As highlighted in the previous section, one of the most significant impacts on UTS students during 2022 was the result of increased vulnerability as a consequence of the ongoing effects of the COVID-19 pandemic.

Students, along with other young people, are at a heightened risk of experiencing modern slavery both in Australia and overseas and can be particularly vulnerable to workplace exploitation, especially those who have fewer support networks, lower English language proficiency, work in the gig economy, or are unaware of workforce laws in Australia.

COVID-19 is compounding the likelihood of exploitation in the workplace for all young people, including both domestic and international students.

Such exploitation can be visible through practices such as:

- employer wage theft, sham contracting, threats of dismissal, unfair dismissal and excessive work hours
- employers taking advantage of international student visa status work limits to underpay staff
- deceptive recruitment or labour services where the person has been deceived about their work and the work involves exploitation through a specific type of modern slavery
- 'paying' students in food and housing instead of paying wages

Such exploitation may also be an indicator of other modern slavery practices, exposing students to risks including:

- debt bondage (e.g., being forced to provide labour or services as security or repayment of an inflated student debt, through deceptive third-party student recruitment practices) and
- forced labour (e.g., feeling unable to stop working or to leave a place of work because of coercion, threat or deception).

UTS has also identified a number of other situations where students may be at particular risk including internships, work placements and forced marriage.

Internships and work placements

Enabling our students to participate in industry experiences to support them becoming job-ready at the conclusion of their course is a priority for UTS. UTS has established systems and processes to deliver high-quality placement and internship experiences to students over a wide range of courses. The two key systems in place are MyPlacement, used for Health, Education and some Business courses and managed at a faculty level, and CareerHub, used by other faculties and managed centrally.

In the Faculty of Health, where there are large undergraduate courses delivering complex high-load placements, MyPlacement processes and workflows have been refined to deliver efficiencies across all Health disciplines, including management of partnership agreements, supervisor checklists, student compliance checklists and partner WHS requirements. Faculty clinical administration staff then use the student profiles in MyPlacement to allocate placements to students.

In CareerHub, processes have been refined to enable the efficient establishment of simple workflows to be created for students, supervisors, and industry partners in any discipline. These systems are one way that UTS effectively manages the quality of the student experience and responds to the various regulatory standards that apply to student

placement and internship experiences in higher education.

Internships are defined in the UTS Student Rules as covering course-related internships which may be:

- mandatory course requirements for credit
- mandatory course requirements and not for credit
- optional and for credit
- optional and not for credit (not course-related).

Any organisation wishing to post an opportunity on CareerHub must complete the compulsory registration process. This includes agreeing to our [Terms and Conditions for Advertisers \(Individuals and Organisations\)](#), which sets out conditions of advertising paid and unpaid opportunities to students and contractual protections for our students to address modern slavery and other risks. When posting unpaid opportunities for internships or placements, the organisation must sign the [UTS - Student Vocational Placement Agreement Terms and Conditions](#) with the student, which contains contractual protections for our students. The student can only commence their placement once the internship has been reviewed and approved by their faculty internships team.

UTS works with local providers of international placements to create contracts that align with Australian domestic arrangements and/or leverage our partnerships to influence the contractual arrangements of the third party and minimise modern slavery risks.

Our UTS Careers team monitors the conduct of the organisations placing opportunities on CareerHub and reviews feedback from students who have undertaken opportunities from this platform. In partnership with the relevant UTS faculty, further action and investigation are undertaken if any ethical, moral or other significant issues are identified.

The UTS Internships Management Policy has also recently been reviewed to clarify that all prospective internship arrangements are to be assessed through a due diligence and risk assessment to ensure that they meet UTS's compliance obligations under relevant legislation including the Modern Slavery Act 2018. This will be implemented on all CareerHub workflows in 2023.

UTS policies and processes require that any instances of suspected modern slavery should be reported to a staff member's relevant manager or supervisor (for escalation as appropriate), Anti-Slavery Australia or the Australian Federal Police. UTS will notify relevant statutory authorities and/or agencies, and a statutory authority make take. The UTS Scholarships and Prizes Policy has been reviewed to ensure adequate protections are in place to prevent scholarship holders from being coerced into activities such as providing unpaid labour.

Forced Marriage

Given the particular vulnerability of students to forced marriage (both in Australia and overseas), UTS has been supporting and promoting the national project, *Speak Now*, launched in 2021 and continuing through 2022, which aims to prevent forced marriage and other forms of modern slavery in the home, through education, awareness-raising and collaboration with service providers, frontline communities and young people from across Australia.

The project is a partnership between ASA, My Blue Sky and UTS, funded through the Commonwealth Department of Social Services (DSS) under the National Plan to Reduce Violence against Women and their Children 2010–2022.

The project emphasises that forced marriage and other forms of modern slavery in the home can happen to anyone from any background. These practices are often hidden and

misunderstood but can have devastating consequences for individuals, families and communities. Best practice research and experience tell us that the most effective approach to achieving positive change is through community engagement and capacity-building.

In 2022, *Speak Now* produced a series of free, publicly available resources following extensive consultations with subject matter experts, frontline workers, young people and people with lived experience. These include:

- Young people’s peer research project established with ASA. The peer researchers worked together to co-design research goals, research methods and data collection tools to better understand the pressures that young people face around marriage and relationships.
- A redesigned [My Blue Sky](#) website with more user-friendly and accessible information for people in or at risk of forced marriage, their friends and family, and frontline workers.
- A research-informed digital Frontline Worker Guide on how to identify and respond to forced marriage.
- A youth-led and co-designed social media campaign and posters to raise awareness with the wider community.
- An online course for frontline workers on identifying and addressing modern slavery in the home.
- Co-designed multi-lingual posters in 18 community languages for frontline workers and youth poster.



4.5 Research

Research ethics

UTS is committed to carrying out our research, learning and teaching to the highest standards of ethics and integrity. Over the last two years, UTS has revised our research policy frameworks and procedures to ensure they reflect current legislation and our commitment to addressing modern slavery. This included making amendments to the UTS Research Policy to clarify that research funding must be assessed through a rigorous due diligence and risk assessment process to ensure compliance with UTS values, external legislation (including the Commonwealth Modern Slavery Act and other external guidelines (e.g., Guidelines to Counter Foreign Interference in the Australian University Sector).

International research collaboration is critical to UTS's ongoing development as an internationally-engaged research-intensive institution to deliver global impact. International research provides access to funding, industry engagement, research translation, and opportunities for UTS researchers to develop their careers.

In making decisions concerning the research we undertake, who funds it and where it is undertaken, the university adopts a risk /benefit framing to ensure the risk assessment is contextualised in terms of the benefit that work brings to society and the university. This framework ensures a balanced approach if we conduct activities that are higher risk but have a transformative impact on the communities served and have appropriate oversights in place. As required by the UTS Research Policy, before undertaking research activities, all researchers must comply with appropriate due diligence and risk assessments and conduct all research in accordance with the Australian Code for the Responsible Conduct of Research. Risk review is multi-dimensional and has regard to a range of factors such as possible human rights risks, the financial capacity of partners, relevant country(ies) where activities will occur, technology area, legislative compliance requirements including foreign arrangements/ foreign interference, defence export controls and other national security requirements, ethics requirements, health and safety requirements, project scope and scale, involvement of students and other relevant matters.

UTS complies with our responsibilities in the Australian Code for Responsible Conduct of Research and National Statement on the Ethical Conduct of Human Research, establishing a framework for responsible and ethical research practices and principles. The Statement encompasses the values and principles of research merit and integrity, justice, beneficence and respect, including specific reference to vulnerable populations or victims of illegal activities. UTS researchers must be familiar with and comply with the principles and responsibilities outlined in the Australian Code and UTS policy.

UTS Human Research Ethics Committees (HRECs) are Vice-Chancellor's advisory committees that report to the Deputy Vice-Chancellor (Research) and are constituted and operate in accordance with the National Statement on the Ethical Conduct of Human Research. UTS HRECs are registered with the U.S. Department of Health and Human Services (IORG0002284) and the Federal Wide Assurance (FWA) for the protection of human subjects (FWA00004785). The role of HRECs is to undertake an ethical and scientific review of research, to assess and minimise risk, balance risk with benefits, and ensure research participants' privacy, welfare and rights are fully protected.

UTS also complies with the National Statement on Ethical Conduct in Human Research and AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research. Yvette Selim, Senior Research Associate with Anti-Slavery Australia, is a member of the Indigenous Research Advisory Panel (IRAP) to the UTS Human Research Ethics Committees which was established to provide specific advice to applicants proposing to conduct research with Aboriginal and Torres Strait Islander peoples.

During 2021 and 22, the UTS Ethics Secretariat developed and launched a new Research Ethics website to increase accessibility for UTS academics, professional staff and students. The new site was redesigned to improve navigability and consistency across the research ethics domains and UTS privacy pages, as well as provide new and improved resources, guidelines and fact sheets, templates, exemplar applications and FAQ pages. In addition, the Secretariat also conducted a significantly increased number of clinics and consultations during 2022, in requests from students and research staff. These activities support our commitment to ensure our researchers are focused on potential harm arising from their research, including any which may cause or contribute to human rights breaches.

Research funding

The UTS Research Policy requires that research funding must be assessed through a rigorous due diligence and risk assessment process to ensure compliance with UTS values and external legislation, including the Commonwealth Modern Slavery Act.

UTS regularly communicates our expectations of our research suppliers and partners. We seek to positively influence the policies and practices of our research partners concerning modern slavery. We are also developing additional principles and guidelines for accepting research funding, including considerations for ensuring funders do not have any links or affiliations with modern slavery practices.

Before sharing knowledge through collaborations or research activity, we undertake due diligence and risk assessment processes. These assess the potential use or dual use of the knowledge shared, the fit between UTS and the external party (both strategic and values-based) and considers any human rights, unethical or unfair activities performed by the external party and compliance with Australian legislation and regulation.

Depending on the outcome of the initial risk assessment, external due diligence may be sought to help inform any decision to either enter into or decline the knowledge-sharing activity.

Using international research fund sources, UTS international research activity has grown steadily over time. Between 2016 and 2022, the total value of funding awarded was \$70.6M across 563 projects. The average value of funding to UTS is \$125K with only nine projects with funding to UTS > \$1M. International research projects are initiated and established in accordance with the Research Policy and proposals for competitive funding (grant applications) from international funding sources are managed in accordance with the directions and guidance provided by the Research Office.

Research on Modern Slavery

UTS continues to develop our program of academically rigorous research into modern slavery across faculties and through specialist units such as ASA, with research grounded on a unique combination of the practical firsthand experience of survivors. This ongoing body of research includes partnerships and commissioned work into human trafficking, forced marriage, dowry abuse, online sexual exploitation of children, asylum seeker exploitation, survivors' perspectives, and modern slavery reporting requirements.

Key research and advocacy projects undertaken during 2022 included:

Survivor-informed advocacy

Beyond Storytelling: towards survivor-informed responses to modern slavery.

In 2022 ASA launched a ground-breaking report on survivor-led advocacy. The report, 'Beyond storytelling: towards survivor-informed responses to modern slavery' shows how

survivors of modern slavery can contribute to the design, implementation, monitoring and evaluation of Australia's response to modern slavery. The report drew on interviews with survivors, survivor advocates and key organisations working with survivors and highlights how survivors are prioritising advocacy and leadership.

Justice for All: Establishing a national compensation scheme for survivors of modern slavery in Australia.

In 2022 Anti-Slavery Australia led national consultations with the broader Australian community about the need for a national compensation scheme for survivors. The consultations noted that Australia has an obligation to provide an effective remedy to survivors and that the only pathway to a statutory scheme is currently through each of the eight states and territories. This has led to inconsistencies and inequality. The proposal for a national scheme would provide a consistent and fair way for survivors to be recognised for the harm they have experienced through being a victim of a serious crime in Australia. The consultations led to a Joint Statement endorsed by leading advocates and were provided to the Attorney-General in support of the Scheme. The proposal is under consideration and will lead to further advocacy in 2023.

Seeking Freedom

Seeking Freedom is Anti-Slavery Australia's newest initiative to ensure the protection, respect and full realisation of children's rights in modern slavery. Through policy development, collaboration, education and awareness-raising, we aim to increase the identification of children subject to human trafficking, slavery and slavery-like practices, as well as develop a better understanding of and ability to meet the needs of child victim-survivors of modern slavery in Australia.

In addition, during 2022, UTS academics have continued to undertake and publish leading research into the right to housing, disability and slavery and exploitation of migrant workers. This important body of work has included researchers from across faculties, including Law, Business, Health and more. During 2023, this work will be collected and highlighted through the UTS Eliminating Modern Slavery web pages.

4.6 Investments

As a university we have adopted a responsible investment ethos: a broad-based approach to investing which factors in people, society and the environment, along with financial performance, when making and managing investments.

We recognise the responsible investment definition outlined in the United Nations Principles for Responsible Investment as a strategy and practice to incorporate Environmental, Social and Governance (ESG) factors in investment decisions and active ownership (or stewardship).

The university acknowledges the relevance of the UN Sustainable Development Goals in enabling institutional investment to better align investors with broader objectives of society and that this can assist to better manage risk and generate sustainable, long-term returns. When investing funds, ESG factors will be considered in the selection of investments and in the investment process, to ensure socially responsible investment, consistent with the university's values.

In 2022 UTS moved to a fossil free fund to align our investments with the university's sustainability and social justice commitments.

The move comes after a detailed review of our responsible investment strategy to find an investment partner with shared ambitions to integrate ESG (Environmental, Social and Governance) outcomes, and to align with the global United Nations Sustainable Development Goals (SDGs).

This builds on our work to improve the efficiency and performance of our campus operations, including installing solar energy on our city buildings and developing partnerships to build solar farms in rural NSW. In 2021, we achieved our goal to reduce Greenhouse gas emissions by 30 per cent against a 2007 baseline; and work is currently underway on the UTS Climate Positive Plan, charting a pathway to carbon neutrality and beyond.

UniSuper is UTS' key superannuation provider and the largest scheme to which the university contributes on behalf of employees. UniSuper is one of Australia's largest industry superannuation funds with over 450,000 members and more than \$100 billion in funds under management.

UniSuper is considered a leader in responsible investment with all investment decisions considering ESG standards and principles. The fund is one of Australia's largest investors in ESG-themed strategies, with more than \$14 billion in funds under management across these investment options.

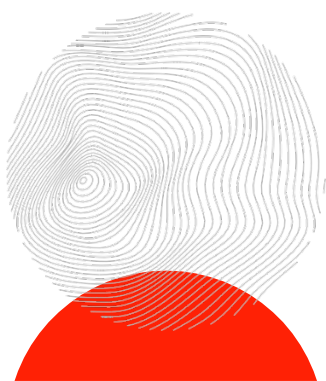
UniSuper has submitted its Modern Slavery Statement for the 2021-22 financial year detailing the activities they have undertaken to identify, assess and address the risks of modern slavery in internal operations and supply chains.

4.7 Fundraising

The UTS Philanthropic Fundraising Policy was reviewed and amended in 2021, ensuring that 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. They consider broader potential breaches of human rights and/or unethical or unfair activities.



4.8 Recruitment

Staff Recruitment

Legislation, collective agreements, common law and university policies, practice and by-laws determine the conditions of employment at UTS. The industrial conditions governing the employment of UTS staff are prescribed in the Academic and Professional Staff agreements and the Senior Staff Group agreement.

A new UTS Recruitment and Appointment Policy was developed in 2021, which sets out the key principles that the university uses to guide its recruitment and selection practices.

These include recruitment and selection:

- being undertaken within the context of achieving a diverse workforce profile capable of achieving the university's vision and strategic objectives.
- being guided by the principles of equal employment opportunity to ensure that the most capable person is selected for a position on the basis of merit and recognises historic and ongoing disadvantage that creates barriers to access to employment for people in equity target groups through such special measures as targeted recruitment programs.
- being conducted in such a way as to protect and enhance the reputation of UTS in the labour market and be fair, equitable, transparent and compliant with relevant legislation.

All candidates must have the right to work in Australia in accordance with the requirements of the Department of Home Affairs. In special circumstances, UTS may sponsor a candidate who does not have a right to work in Australia.

Student Recruitment

UTS student recruitment is undertaken both in Australia and overseas. Arrangements for marketing and the recruiting of international students are managed within the portfolio of the Deputy Vice-Chancellor (Education and Students) within the Lifetime Learner Experience Unit. A range of formalised procedures is in place to ensure the welfare of international students is protected, including through:

- Governance and policy infrastructure that supports:
 - an international network of student recruitment agents
 - international partnerships, MOUs and agreements
 - benchmarking data and reporting requirements for various external organisations, ESOS and regulatory compliance (National Code, Sanctions, Simplified Student Visa Framework (SSVF))
 - compliance risk management and audits and
 - development of policy and support systems and procedures for international recruitment and services, including training programs.
- Monitoring and reviewing admission systems and procedures
- Developing, implementing and reviewing international student recruitment strategies

UTS agreement templates related to international student programs (including partner university articulation agreements; Knowledge Transfer Partnership (KTP) Agreements; MOUs; Study Abroad Agreements; Student Exchange Agreements) specify that UTS and the international partner/s are required to meet certain obligations under Australian State and Commonwealth laws and in the relevant international jurisdiction, including but not limited to sanctions laws; foreign interference and foreign influence laws; export control laws; privacy and data control laws; work, health and safety laws; immigration laws and laws relating to the provision of education to international students

While modern slavery is not currently specified in these agreements, consideration is being given to whether including a modern slavery clause would strengthen our agreements and contracts.

Similarly, while UTS has not yet added a specific clause on modern slavery into our agreement templates for international recruitment agents, this is currently under consideration as part of a review of the templates being undertaken in 2022.

All UTS registered Student Recruitment Agents must complete or have completed the Education Agent Training Course (EATC) from Professional International Education Resources (PIER) to become Qualified Education Agent Counsellors. This is one of the criteria for consideration of agent appointment. This industry-recommended course was developed in collaboration with Australian Education International (AEI) and the Department of Home Affairs.

We have identified that the UTS International Counsellor's Manual presents an opportunity for increasing awareness of modern slavery risks among international recruitment agents.





Criterion 5: Assessing the effectiveness of our actions

UTS monitors the effectiveness of our actions to address modern slavery through a variety of reporting and review processes, including:

- annual risk assessment activities and the development of risk mitigation strategies in line with the UTS Risk Management Policy and procedures.
- reporting and review of student and staff complaints via Safety and Wellbeing Reports to UTS Council as required by the Health and Safety Policy, Office of the UTS Student Ombud Annual Report, and Student Complaints Resolution Office inline with the Student Complaints Policy and Procedures.
- reviews of UTS Procurement Policies and Procedures practices.

The UTS Modern Slavery Steering Committee has responsibility for monitoring progress on actions identified in our Modern Slavery Statements, and has expressly considered the future actions identified in UTS's 2021 Modern Slavery Statement as part of the preparation of the 2022 Statement to ensure progress on their implementation.

A summary outlining the progress of these actions during 2022 can be found on page 5. Updates on the progress of these items have been reported during the year to the University Leadership Team and Senior Executive and included in this Statement.

The UTS Social Impact Framework also measures our progress in key areas and guides our ongoing efforts. It is a key tool to identify gaps and lead to new social justice initiatives.

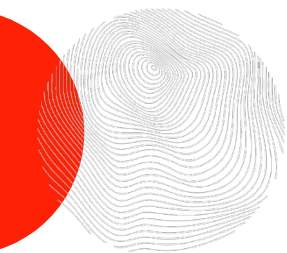
UTS Social Impact Framework, Domain 6 focuses explicitly on UTS business operations and strategies, including key elements of our work to eliminate modern slavery in our operations and supply chains. As outlined in section 3.4, during 2022, UTS developed a series of Social Impact Dashboards which transparently report on our progress against the Social Impact Framework.

This framework reporting and our quantitative and qualitative assessment of our progress against it supports faculties and units across UTS to understand how they can progress social justice objectives, including in relation to modern slavery. The Dashboards will be publicly available via the UTS website in late 2023.

The Dashboards ensure UTS is transparent and accountable in the social impact goals we set for ourselves. Most importantly, they help us identify areas where additional metrics are required and where we need to improve to reach our goals. Developing a suite of metrics to comprehensively track our progress in relation to preventing and responding to modern slavery is part of this current work.

We aim to demonstrate our long-term independent commitment to social impact and understand that driving social change begins on our campus and in our community. We strive to embed human rights, inclusivity, sustainability and accessibility as a key part of our business and employment practices.

UTS also publishes an annual Social Justice Report, which tracks our progress and records and celebrates the achievements of UTS staff and students in the social justice space.



Criterion 6: Consultation

Consultation was undertaken in 2022 with UTS's controlled entities listed below to identify current and/or prospective activities which present risks concerning modern slavery practices:

- accessUTS Pty Limited
- Insearch Limited
 - 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
- Kilimanjaro Learning Solutions Pty 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.

accessUTS Pty Limited

accessUTS Pty Limited is a wholly owned company of the university. Its mission is to provide a professional gateway for government, industry and the community to access UTS's knowledge, expertise and resources.

accessUTS began winding down activities in 2022 to cease operation in 2023.

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.

Kilimanjaro

Kilimanjaro Learning Solutions Pty Ltd is a proprietary company limited by shares, 100 per cent owned by UTS. It was incorporated on 29 September 2021, with the sole initial director the UTS Vice-Chancellor, Professor Andrew Parfitt. The company provides a direct-to-learner marketplace technology platform to deliver new experience-based learning opportunities.

UTS's majority shareholding was sold in late 2022.

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.

The Director of Risk 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.

Under the 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, the Director of Risk will consult with these related entities on an ongoing basis to support them to identify and address modern slavery risks.



Our 2023 commitments

- Further enhancing UTS *Eradicating Modern Slavery* web pages (developed during 2022) as a single visible point for increasing awareness of and reporting modern slavery.
- Developing a new UTS policy that is specifically focused on modern slavery.
- Continuing to roll out training and encourage staff to undertake the new online education module.
- Examining whole-of-government approaches to modern slavery in the NSW public procurement system to explore areas for greater alignment, including learning from current good practice due diligence and emerging developments from the NSW Anti-Slavery Commissioner's work.
- Increasing engagement with UTS researchers working in areas across the spectrum of modern slavery to build the evidence base for our program of work.
- Implementing a benchmarking survey to better understand awareness of and exposure to modern slavery in the UTS community.
- Developing new resources to enhance student awareness and support, including information provided via Canvas (student online learning platform) and training for all internship supervisors.
- Continuing to work with the AUPN to develop remedial measures where high risks of modern slavery have been identified.
- Participating in the Australian Universities CAF pilot.
- Working to further align our current activities with human rights due diligence in line with the United Nations Guiding Principles on Business and Human Rights.



