Modern Slavery Statement 2020

Insearch Limited ACN 001 425 065

This statement is made pursuant to the *Modern Slavery Act 2018 (Cth)* and is made for the financial year ending December 2020

UTS College | **UNIVERSITY OF TECHNOLOGY SYDNEY**

Introduction

As a global enterprise, we are committed to ethical business practices that help to maintain the highest levels of health, safety and human dignity around the world. We condemn all forms of human rights abuses and the exploitation of children. We are proud of the steps we have taken to combat modern slavery.

1.   Our structure and operations

1.1   Insearch Limited ACN 001 425 065 (**us**, **we**, **our** or **UTS College**) is the reporting entity of this Modern Slavery Statement however, it is not required to report pursuant to the Modern Slavery Act 2018 (Cth). We have not formally opted into the Australian Government's *Online Register for Modern Slavery Statements* and have prepared this statement for transparency and general information only.

1.2   We are a company limited by guarantee and a controlled entity of the University of Technology Sydney (**UTS**). By way of background, UTS is established under the *University of Technology Sydney Act 1989* (NSW) and the operations of UTS include undergraduate and postgraduate programs as well as related educational operations.

1.3   Our corporate headquarters are at 187 Thomas Street, Haymarket, NSW, Australia. We also lease four locations within close proximity to our head office for the delivery of our education programs.

1.4   We are an Institute of Higher Education registered through the Tertiary Education Quality and Standards Agency and since late 2020 have been using the business name *UTS College*. The main purpose of our operations is the provision of pathway programs for domestic and international students to enter degree programs at UTS.

1.5   An overview of our corporate structure is below:

Name	Country	Structure
Insearch Education International Pty Ltd	Australia	Fully owned subsidiary
Insearch (Shanghai) Limited	China	Fully owned subsidiary
Insearch India LLP	India	Fully owned
Insearch Lanka (Pvt) Limited	Sri Lanka	Fully owned subsidiary
Insearch Global Pty Ltd	Australia	Fully owned subsidiary
PT Insearch Karya Indonesia	Indonesia	Fully owned subsidiary
Insearch Limited Representative Office	Vietnam	Representative Office

1.6 We offer the following programs directly at our campus in Sydney, and through our online learning platform:

(a) academic English programs;

(b) diploma programs (Diploma of Business, Diploma of Communication, Diploma of Design & Architecture, Diploma of Information Technology, Diploma of Engineering, Diploma of Science);

(c) graduate certificates (Graduate Certificate in Accounting and Finance, Graduate Certificate in Communication and Graduate Certificate in Technology Practice); and

(d) UTS foundation studies.

1.7 Outside Australia, arrangements include:

(a) delivery of academic English, UTS foundation studies and diplomas (Diploma of Business, Diploma of Information Technology, Diploma of Engineering) at a fully owned campus in Colombo, Sri Lanka; and

(b) third party licencing arrangements in China, South Korea, Myanmar, Vietnam, and Indonesia for the delivery of education programs.

2. Consultation

2.1 We have acted in consultation with our higher risk suppliers, specifically facilities suppliers and IT suppliers (who are defined at section 3.1(a)) and our channel partners (who are defined at section 3.1(b)), in preparing this statement by issuing questionnaires to, and gathering information from and regarding, our major suppliers and channel partners.

3. Our supply chains

3.1 Our supply chains are extensive and global, and incorporate a wide range of products, and services spanning a variety of industry sectors, broadly grouped as follows:

(a) information technology and telecommunications including hardware, software and consulting services;

(b) channel partners who operate as agents to recruit students for UTS College and assist with their application and enrolment;

(c) property, including rent of buildings, property services (cleaning, engineering and maintenance services, security, waste disposal);

(d) human resources;

(e) financial services; and

(f)   marketing and promotional services.

3.2   We work with more than 1,600 first-tier suppliers headquartered in over 74 countries and countless second-tier suppliers. For the purposes of this statement, we have not yet investigated our second-tier suppliers.

3.3   Given our geographic reach, ensuring we avoid any involvement in modern slavery, in particular beyond first-tier suppliers, is a considerable challenge.

4.   Supply chain risk assessment

4.1   In order to assess risk, suppliers were assigned a rating based on the following table.

A	High risk, high spend
B	high risk, low spend
C	High spend, low risk
D	Low spend, low risk

4.2   We then considered the following criteria,

(a)   country/region risk: For countries/regions with a high risk of modern slavery due to poor governance, weak rule of law, conflict, migration flows and socioeconomic factors (e.g., poverty)

(b)   sector/industry risk: For sectors/industries with a high risk of modern slavery because of their characteristics, products and processes.

(c)   commodity/product risk: For commodities/products produced with a high risk of modern slavery because of the way they are produced, provided or used.

4.3   As a result of the above desktop review of our supply chain we identified the following as potentially being susceptible to risks of modern slavery during the reporting period. For our first statement we have focused on first tier suppliers but in future years we plan to continue to explore risks further down our supply chains.

(a)   Property services – cleaning and maintenance.

(b)   Channel partners – with offices in 'high risk countries' (according to the Global Slavery Index). Note: Channel partners are graded in tiers with depending on their level of recruitment to UTS College and other factors. Only those in top tiers with operations in high-risk countries were reviewed.

(c)   Information Technology services.

4.4   The suppliers we had identified as 'high risk' were then issued modern slavery questionnaires to seek further insight into the risks of modern slavery for those suppliers.

(a)   12 questionnaires were issued to property services and IT services providers; and

(b)   13 questionnaires were issued to channel partners.

4.5   A number of suppliers did not return the questionaries to us. For those that did, the responses varied significantly with some providing us with detailed information and relevant policies and others not comprehensively completed.

4.6   Our property services suppliers identified Australian based tier 1 suppliers and the majority have in place, or intend to implement, policies and procedures to minimise the risk of modern slavery. This should indicate a low risk of modern slavery but despite this we are considering including contractual provisions in our agreements with property services suppliers designed to mitigate modern slavery risks.

4.7   Of the channel partners that returned the questionnaires,

(a)   only one has developed a policy on modern slavery with a few partners also incorporating modern slavery considerations into other policies or employee handbooks; and

(b)   all demonstrated that they practiced ethical employment practices and did not engage in practices that restricted employees.

4.8   As channel partners are a significant provider to us, we will continue to monitor risks of modern slavery in their practices through annual reviews.

4.9   The IT services suppliers results are consistent with the results of the property services questionnaires i.e. while the majority of suppliers are Australian based, their broader supply chains may be overseas and in our view, are subject to modern slavery risk. A number of suppliers indicated that they did not have any policies or practices in place to review and address modern slavery risks in their supply chains, but were intending to develop these.

5.   Our policies on slavery

5.1   We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. We have a vision, purpose and code of ethics statement providing overarching principles to our business conduct and staff actions. The annual staff Code of Conduct also outlines expectations on staff behaviour. Both of these align with the sentiments of ethical behaviour at UTS College.

5.2   In future, we intend to consider developing a specific policy regarding addressing modern slavery risks in our supply chain and the inclusion of modern slavery specific principles in our procurement policy.

5.3   We have whistleblower and procurement policies also designed to ensure we maintain a responsible approach to doing business.

6. Due diligence processes for slavery

6.1 As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain, we take actions including those set out below:

Action	Description
Periodic supplier reviews	Each year we undertake a review of selected suppliers from high-risk countries and/or who are high value suppliers.
Questionnaire	We intend to issue a questionnaire to all suppliers with total contract value of greater than $100k. We will use the responses to this questionnaire to determine if we renew and/or sign with that supplier, or whether further engagement is needed regarding issues of concern.
Procurement guidance	Include principles designed to mitigate the risk of modern slavery in our procurement policy (or similar policy) to ensure modern slavery risks are considered during the procurement process.
Strengthened contractual provisions for suppliers and business partners	New high value supplier contracts will include a modern slavery clause which addresses the following: (a) compliance with all Australian Modern Slavery Law and Foreign Modern Slavery Laws applying to the supplier in any location in which the supplier operates; (b) using best endeavours to ensure that there is no modern slavery in the supplier's supply chain or operations; (c) notification to us in the event that any material risk of modern slavery is identified; and (d) maintenance of records in relation to the supplier's supply chains and operations – which must be provided to us on request
Strengthened contractual provisions for low transaction value suppliers (who are considered high risk)	Require low value suppliers to warrant that: (a) they comply with all Australian Modern Slavery Law; (b) they use best endeavours to ensure that there is no modern slavery in their supply chain or operations; and (c) in the event that the supplier identifies any material risk of modern slavery in its supply chain or operations, the supplier must promptly notify us.

7. Supplier adherence to our values and ethics

7.1 We have zero tolerance of slavery. To ensure all those in our supply chain and contractors comply with our values we follow the procedures as outlined in this statement.

8. Training

8.1 To ensure a high level of understanding of the risks of modern slavery in our supply chains and our business, we intend to make available yearly training to all staff on modern slavery and human rights (on an optional basis).

8.2 This is delivered by way on an online course run by UTS online. The course has the functionality to record who undertakes this and we intend to review these results to ensure that all requisite personnel carry this out.

8.3 To the extent possible we require our business partners to provide training to their staff and suppliers and providers.

9. Our effectiveness in combating slavery

9.1 We intend to use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery is not taking place in any part of our business or supply chains.

(a) Supplier screening: the number and type of issues identified on screening suppliers and subcontractors.

(b) Contract clauses: the number of major contracts with modern slavery provisions.

(c) Whistleblowing: the number of reported breaches in the past year.

(d) Reviews: the number of reported breaches from annual Channel Partner reviews.

(e) Remedial action: the instances of remedial action being needed.

10. Further steps and remediation

10.1 Following a review of the effectiveness of the steps we have taken to ensure that here is no slavery in our supply chains we intend to take the following further remedial steps to combat slavery in our operations and supply chain:

(a) undertake further investigations into our supply chains;

(b) build our awareness and understanding of the issue including by rolling out more education and training for staff; and

(c) enhance our ability to risk assess including by utilising external resources, experts and software to assist with modern slavery risk assessment.

10.2   We have been advised that UTS has recently submitted a Modern Slavery Statement to the Australian Border Force. While we are not covered by the UTS Statement and are a separate legal entity with a different procurement and supply chain profile, we will continue to consult with UTS on an annual basis going forward.

11.   Board approval

This modern slavery statement is made by Insearch Limited ACN 001 425 065 for the financial year ending December 2020.

This statement was approved by our Board of Directors on 24 August 2021.