



**UTS**  
College

UNIVERSITY  
OF TECHNOLOGY  
SYDNEY


**FY2024**

**Modern Slavery  
Statement**



# Contents

Message from the CEO	3
About UTS College	4
Our structure, operations and supply chain	5
Modern slavery risks in our operations and supply chain	9
Our response to modern slavery risks	12



UTS College 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 2024.

UTS College Limited (formally Insearch Limited trading as UTS College) is the reporting entity of this Modern Slavery Statement. This Statement describes the steps taken by the reporting entity and our owned and controlled entities (outlined below, collectively known as 'we', 'our' or 'UTS College') to assess and address our modern slavery risks.

As a controlled entity of University of Technology Sydney (UTS), a New South Wales state-owned corporation, UTS College is bound by the NSW *Modern Slavery Act 2018* and is required to voluntarily submit a Modern Slavery Statement in accordance with section 6 of the *Modern Slavery Act 2018* (Cth).

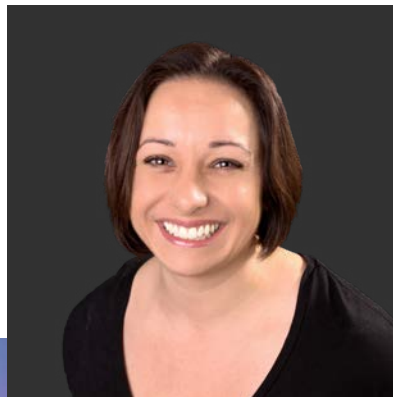
# Message from the CEO

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, and we are proud of the steps we have taken to combat modern slavery.

We recognise our responsibility in helping to build a world where every person is treated with dignity and afforded their fundamental rights, and as such, we take a proactive stance against modern slavery. We assess and mitigate potential risks of modern slavery throughout all areas we operate in - whether within our supply chain, employee base, agent relationships, or educational partnerships. Our approach extends beyond legal compliance, reflecting our intention to lead with integrity and set a high standard for ethical conduct.

As a higher education provider, we are uniquely positioned to raise awareness of modern slavery and human rights issues among our staff and students, and we are committed to embedding this awareness through staff onboarding, professional development, and the design and delivery of our programs, as well as throughout our culture. We believe this contributes to a learning environment that not only informs but empowers our community to uphold and advocate for human dignity.

Our actions in this area support our culture and reinforce our role in contributing to a more just and equitable global society. We remain committed to continual improvement and regularly review and strengthen our practices to ensure they are effective and aligned with best practice standards.



**Morwenna Shahani**

Chief Executive Officer  
UTS College





# About UTS College

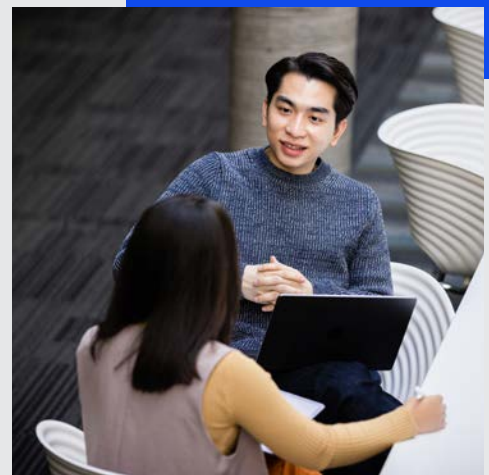
As one of the first pathway colleges in Australia, for more than 35 years UTS College has enabled thousands of students – both international and domestic – to achieve their educational dreams and career aspirations. We continue to empower students both at our UTS College Sydney and UTS College Sri Lanka campuses, and via our programs administered by nine transnational education (TNE) partners across five countries.

We have achieved this by consistently focusing on the quality of our academic teachers and leaders who deliver our vision of quality international education every day. Our unique, engaging and integrated model of learning puts our students at the centre of everything we do and focuses on their emotional and social wellbeing as well as their academic success and diverse skill development.

In addition, UTS College focuses on ensuring a balance of international and domestic student recruitment to enhance all our students' learning experiences. We understand the global nature of pathway education and foster a culture that adapts to ongoing change and opportunities within that environment.

Our culture is purpose-driven and collaborative, and we are dedicated to our students and proud of their achievements. We are committed to continuous improvement and aspire to be a place where our values of integrity, honesty, courage, compassion, respect and imagination are alive and tangible in our everyday interactions, in our teaching and learning, in our planning and execution, in our commercial relationships, and in the way others see us.

Our Sydney campus is based at UTS in the heart of the city. We enjoy and value our close strategic and operational relationships and course alignment with the University across all areas of our work.



# Our structure, operations and supply chain

## Our structure

UTS College (ACN 001 425 065) is a company limited by guarantee and a controlled entity of the University of Technology Sydney (UTS). UTS was established under the University of Technology Sydney Act 1989 (NSW) and offers undergraduate and postgraduate degree programs and related educational operations. UTS College operates as a pathway provider to UTS.

Our head office is located at Level 13, UTS Building 10 (CB10), 235 Jones Street, Broadway, NSW 2007, Australia. UTS College leases its Sydney teaching campus, located in UTS Building 5 (CB05), 1-59 Quay Street, Haymarket NSW 2000, Australia, from UTS.

### UTS College also has premises, offices and staff in the following locations:

Name	Country	Structure	Functions
Insearch Education International Pty Ltd, 1995	Australia	Fully owned subsidiary and controlled entity	Hold company
Insearch Global Pty Ltd, 2018	Australia	Fully owned subsidiary and controlled entity	Hold company
Insearch (Shanghai) Limited, 2001	China	Fully owned subsidiary and controlled entity	Student recruitment services
Insearch Lanka (Pvt) Limited, 2018	Sri Lanka	Fully owned subsidiary and controlled entity	Sri Lankan campus
Insearch India Limited Liability Partnership, 2017	India	Fully owned entity and controlled entity (closed November 2024)	Student recruitment services
Insearch Limited Representative Office, 2015	Vietnam	Representative Office	Student recruitment services

## Our operations

We are an Institute of Higher Education, registered through the Tertiary Education Quality and Standards Agency (TEQSA). Since late 2020, we have been using the business name UTS College. We provide pathway programs for domestic and international students to enter degree programs at UTS.

Our workforce comprises 228.63 full-time equivalent (FTE) employees, with some team members operating from overseas locations. All policies and procedures established by UTS College Limited apply to all entities it owns and controls, including subsidiaries and overseas operations.

We operate two campuses: one in Sydney and the other in Colombo.

## UTS College Sydney campus programs

At our campus in Sydney, we offer four levels of Academic English (AE2 to AE5), UTS Foundation Studies and seven diplomas: Diploma of Animation Production, Diploma of Business, Diploma of Communication, Diploma of Design & Architecture, Diploma of Engineering, Diploma of Information Technology, and Diploma of Science. In 2026 we will also offer Cambridge International AS and A Levels.



## UTS College and TNE partner locations



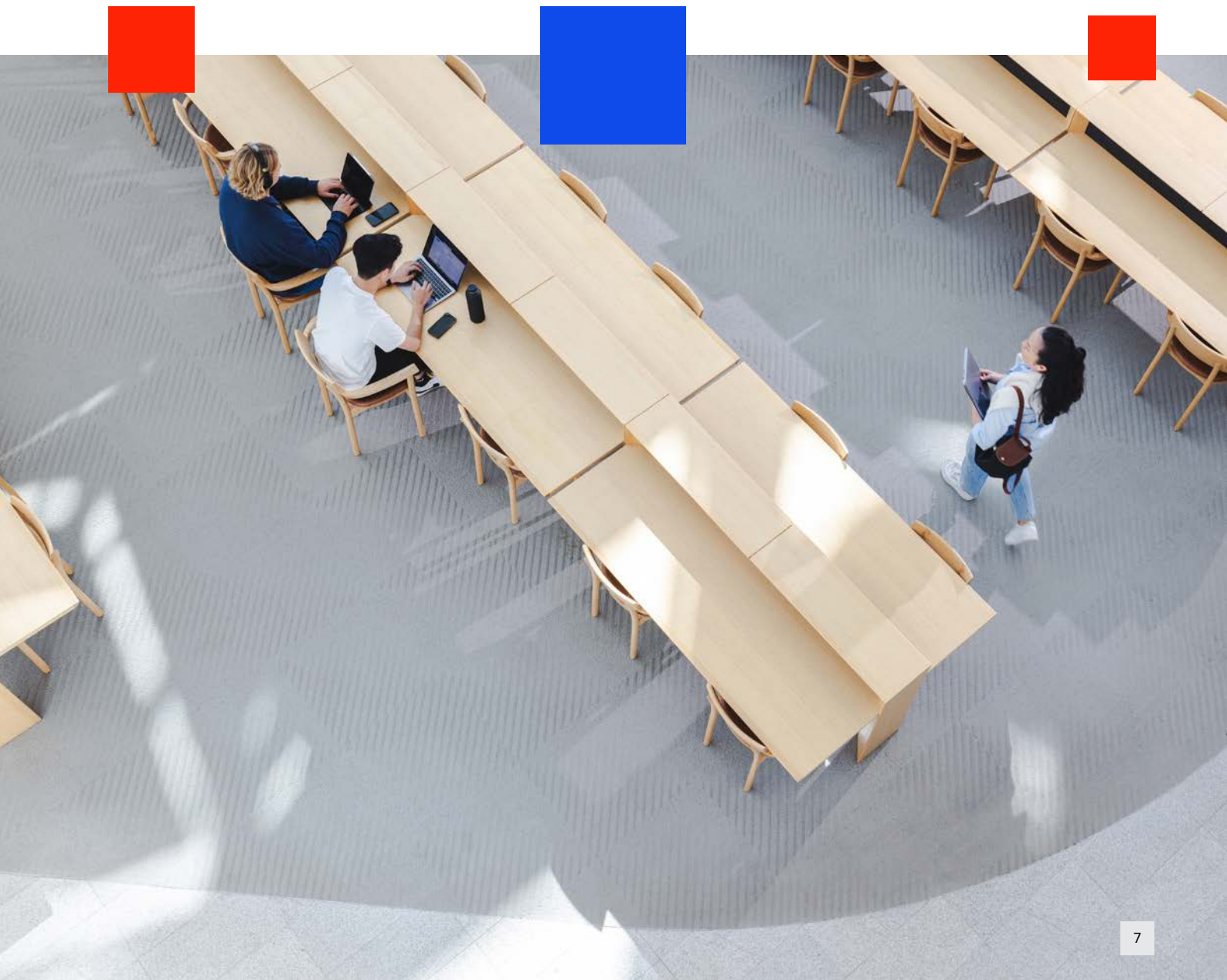


## Our supply chain

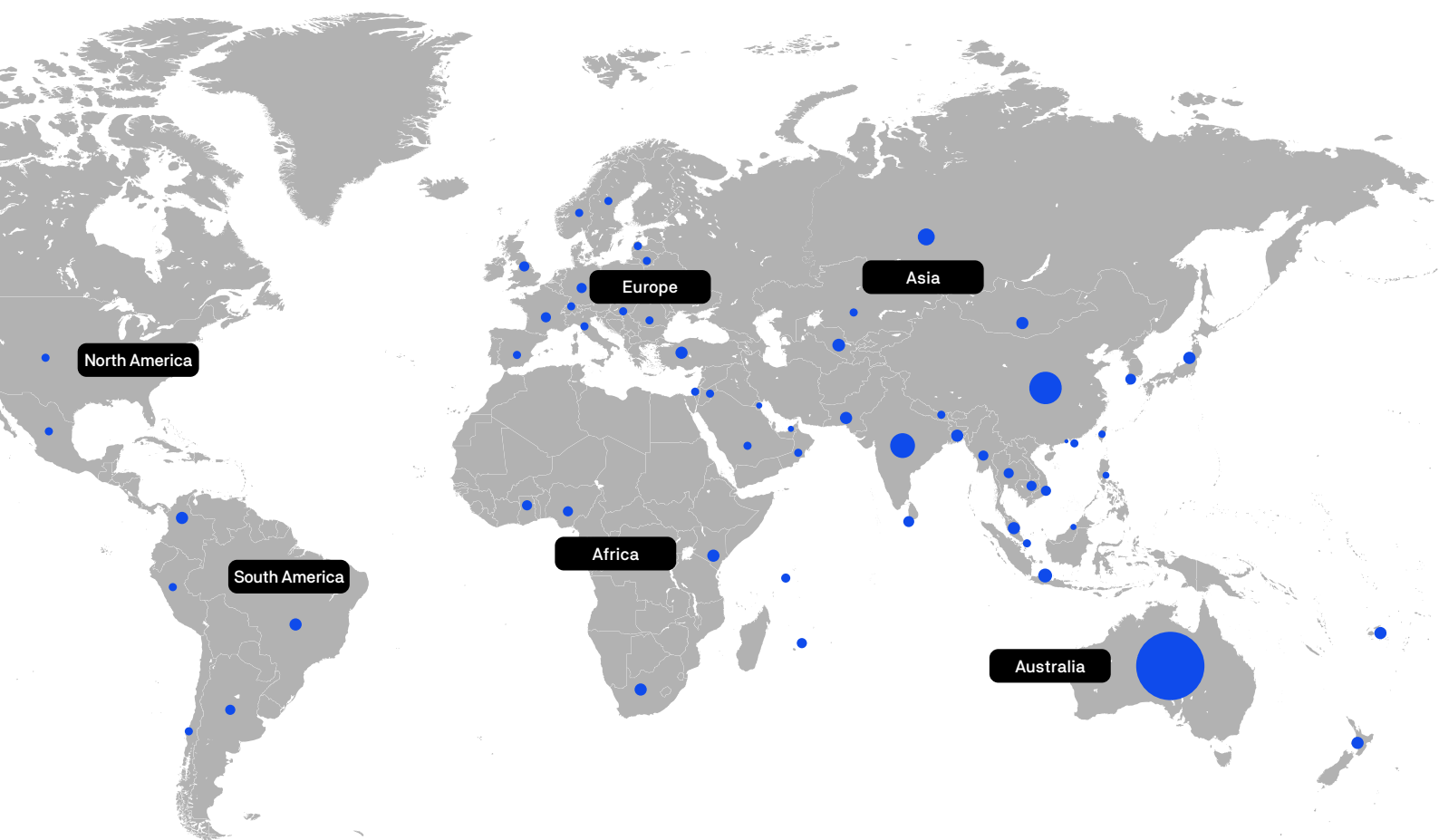
Our supply chain is extensive and global, and incorporates a wide range of products and services spanning a variety of industry sectors, broadly grouped as follows:

- education agents who operate as agents to recruit international students for UTS College. Education agents provide international students with information about options for studying and living overseas and support them with their course and student visa applications. We have 244 contracted education agents across 1861 branches in 87 countries around the world, as outlined on the map below.
- property, including rent of buildings, and property services, including cleaning, engineering and maintenance services, security, and waste disposal
- information technology and telecommunications, including hardware, software, and consulting services
- human resources
- financial services; and
- marketing and promotional services.

We work with more than 581 first-tier suppliers located in more than 32 countries. While we recognise that risks of modern slavery can exist deeper in supply chains, this statement focuses on our first-tier suppliers, as we have not yet extended formal due diligence or risk assessment processes to our second-tier suppliers. We acknowledge the importance of addressing modern slavery risks at all levels of the supply chain and are committed to progressively expanding the scope of our assessments over time.



## UTS College education agents by country



Our **244** contracted education agents have staff located in 1861 branches across 87 countries around the world.

### Consultation

In preparing this statement, we engaged each of our owned entities covered by this statement and consulted the entities we own or control. We have also acted in consultation with our higher risk suppliers, IT hardware suppliers and our education agents, in preparing this statement by issuing questionnaires to, and gathering information from, those suppliers and education agents.





# Modern slavery risks in our operations and supply chain

## Operations risk assessment

The risk of modern slavery within our direct operations has been assessed as low, given the nature of our workforce and operational structure. However, this risk will continue to be monitored regularly to ensure responsiveness to any changes in the operational landscape or external risk factors.

## Supply chain risk assessment

We recognise that analysis of human rights risk does not consider amount of spend as a factor, however, for the purpose of prioritisation of our supply chain, it is a useful tool. To assess risk in our supply chain, we assign all suppliers with a risk 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

In assessing a supplier’s risk rating, we consider the following criteria:

- **Country/region risk:** for countries and 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).
- **Sector/industry risk:** for sectors and industries with a high risk of modern slavery because of their characteristics, products, and processes.
- **Commodity/product risk:** for commodities and products produced with a high risk of modern slavery because of the way they are produced, provided, or used.



## Supply chain risk

Using our risk assessment criteria to review our supply chain, we identified the following first tier suppliers as potentially being susceptible to risk of modern slavery during the reporting period.

- Education agents with offices in 'high risk countries' (according to the Global Slavery Index). Our education agents are graded internally in tiers, representing their work with the College. The tiers largely relate to their level of student recruitment to UTS College. Only agents in top tiers with operations in high-risk countries were reviewed.
- Information technology vendors that supply us with IT hardware.

To seek further insight into the risks of modern slavery for these suppliers, we issued modern slavery questionnaires to the suppliers identified as 'high risk', as follows:

- two (2) questionnaires were issued to IT hardware suppliers. This remains unchanged from the previous reporting period. We continue to rely on a single major supplier for our IT hardware, which significantly reduces supply chain complexity.
- 36 questionnaires were issued to education agents. This is a higher number than in the previous reporting period, as we lowered the threshold for which education agents were subject to the questionnaire.

In this reporting period, several suppliers did not return the questionnaires 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. We plan to follow up with those who failed to respond or did not comprehensively respond, to obtain more information.



## Education agents

Education agents have been under public scrutiny for some time due to the risks they pose. International students are recognised as being socially, legally and financially vulnerable to education agents, vulnerabilities that can and have been exploited by the improper actions of education agents. The Australian Government's 2023 Rapid Review into the Exploitation of Australia's Visa System observed that around 75 per cent of international students engage education agents to assist with entry into the Australian education system, many of whom are based overseas.

Education agents pose modern slavery risks due to the responsibilities that their job entails (including migration, study and working rights, and financial responsibilities). Specifically, education agents could restrict an individual's movements, place people into forced labour by virtue of their visa requirements, or act in a deceptive manner towards their staff. Additionally, education agencies may engage in practices that restrict employees or promote products that are pathways into modern slavery.

We have long-standing relationships with our education agents. Our experienced staff know these agents well. We conduct annual reviews to monitor and maintain these partnerships. Our small class sizes mean we know our students personally. This close engagement helps us remain alert to potential risks related to modern slavery.

Of the education agents who returned our questionnaires:

- one had developed a policy on modern slavery, with a few agents also incorporating modern slavery considerations into other policies or employee handbooks.
- all demonstrated that they practiced ethical employment practices and did not engage in practices that restricted employees.

Education agents are a significant provider to us, and as such, we continue to monitor risks of modern slavery in their practices via annual reviews.

## IT hardware suppliers

We source our hardware supplies primarily from one large, established supplier that has a robust and transparent modern slavery policy in place. A second, much smaller supplier is used occasionally, but their role in our supply chain is minimal by comparison.

These first-tier IT hardware suppliers are based in Australia. However, we recognise that their extended supply chains often involve offshore manufacturing and component assembly in regions where heightened modern slavery risks exist. This is particularly due to complex subcontracting, low-cost labour, and known industry risks in electronics production.

We engaged with our main IT hardware supplier to review their approach to managing these risks and confirmed they have established policies and processes aimed at assessing and addressing modern slavery within their own operations and supply chain.





# Our response to modern slavery risks

## Our policies on modern slavery

We are committed to taking meaningful steps to identify, assess, and address modern slavery risks in our operations and supply chains. Our Vision, Purpose and Code of Ethics statement provides overarching principles to our business conduct and staff actions. It reinforces our commitment to ethical conduct and human rights, supporting modern slavery prevention through integrity, respect, and accountability.

Our staff Code of Conduct outlines expectations for ethical behaviour and now includes specific provisions on Modern Slavery awareness for all staff, volunteers, contractors, subcontractors, and affiliates. It also provides information about the College's Public Interest Disclosure Policy, which supports a safe and confidential process for reporting concerns about unethical or unlawful conduct. All staff are required to acknowledge and agree to comply with the Code of Conduct annually, reinforcing our commitment to transparency, accountability, and ethical practices across all levels of our operations.

Our public interest disclosure and procurement policies are also designed to support responsible business practices and are particularly relevant to modern slavery by encouraging transparency, ethical sourcing, and the reporting of any suspected misconduct or exploitation.

In future, we intend to engage Anti-Slavery Australia (ASA), to support the development of a dedicated policy for addressing modern slavery risks in our supply chain, incorporating modern-slavery-specific principles into our procurement policy, and staff awareness initiatives.



## Our due diligence processes on modern slavery

As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain, we take / will take the following actions outlined below:

Action	Description
<b>Periodic supplier reviews</b>	Each year, we undertake a review of selected suppliers from high-risk countries and/or who are high-value suppliers.
<b>Questionnaire follow up</b>	Follow up with those who failed to respond or did not comprehensively respond to our questionnaire.
<b>Supplier questionnaire</b>	We will issue a questionnaire to all suppliers with total contract value of greater than \$100,000. 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.
<b>Sri Lankan supplier questionnaire</b>	We will distribute a questionnaire to relevant suppliers associated with our Sri Lankan campus.
<b>Procurement guidance</b>	We will 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.
<b>Grievances mechanisms</b>	Strengthen grievance channels to ensure safe, accessible, and effective reporting of modern slavery risks and incidents across all operations and supply chains.
<b>Strengthened contractual provisions for suppliers and business partners</b>	<p>We have begun – and will continue – requiring high-value suppliers to commit that they work toward the following:</p> <ul style="list-style-type: none"> <li>● comply with relevant Australian modern slavery legislation and relevant Foreign Modern Slavery Laws that apply to the supply in the location in which they operate</li> <li>● will use best endeavours to strive for no modern slavery in the supplier's supply chain or operations</li> <li>● will notify us if any material risk of modern slavery is identified</li> <li>● will maintain records in relation to the supplier's supply chains and operations – which must be provided to us on request.</li> </ul>
<b>Strengthened contractual provisions for low transaction value suppliers</b> <i>(who are considered high risk)</i>	<p>We require low-value suppliers to commit that they work toward the following:</p> <ul style="list-style-type: none"> <li>● they comply with relevant Australian modern slavery legislation</li> <li>● they use best endeavours to ensure that there is no modern slavery in their supply chain or operations</li> <li>● if the supplier identifies any material risk of modern slavery in its supply chain or operations, the supplier must promptly notify us.</li> </ul>

## Supplier adherence to our values and ethics

We are committed to identifying, managing, and addressing modern slavery risks in our operations and supply chains, including clear processes to investigate and respond when concerns or allegations arise. We aim to ensure that those in our supply chain and contractors comply with our values.

Our contracts with education agents oblige them to take reasonable action to comply with the relevant provisions of the Modern Slavery Act 2018 (Cth) and other legislation preventing financial crime and terrorism funding, by incorporating specific clauses into partnership agreements. These clauses require education agents to take reasonable steps to identify, assess, and address risks of modern slavery within their operations and supply chains. Education agents must also commit to ongoing due diligence, cooperate with the College's reporting obligations, and uphold ethical standards.

## Training

To ensure a high level of understanding of the risks of modern slavery in our supply chain and our business, we have:

- implemented mandatory awareness training for all staff during the onboarding process
- made yearly training available to all staff on modern slavery and human rights (on an optional basis).

Training is delivered via an online course run by UTS Online. The course has the functionality to record who undertakes it and we may review these results to ensure that all requisite staff complete the training.

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

## Grievances mechanisms and remediation

During the reporting period we received no reports of modern slavery through our grievance channels. However, we recognise that this does not necessarily mean there are no risks or instances of modern slavery taking place. We will continue to monitor and take action to remediate appropriately in the future if required.

## Our effectiveness in combatting modern slavery

Over this reporting period, we have measured the effectiveness of our actions to identify and address instances of modern slavery using the following key performance indicators (KPIs).

- **supplier screening:** the number and type of issues identified on screening suppliers and subcontractors.
- **contract clauses:** the number of major contracts with modern slavery provisions.
- **public interest disclosure:** the number of reported breaches in the past year.
- **reviews:** the number of reported compliance and conduct breaches from annual education agent reviews.
- **remedial action:** the instances of remedial action required.

Over subsequent reporting periods, we will continue to review and enhance these KPIs and develop further metrics to assess the effectiveness of our actions, in line with continuous improvement.

## Further steps

In addition to the steps identified throughout this report, we have identified the following actions. These actions are based on our review of the effectiveness of the steps we have taken to identify, assess, and address modern slavery risks in our operations and supply chains:

- undertake further investigations into our operations and supply chain
- build awareness and understanding of the issue by conducting targeted education and training for staff
- enhance our ability to assess risk by using external resources, experts, and software to assist with modern slavery risk assessment.


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.



# Board approval

This Modern Slavery Statement is made by UTS College Limited ACN 001 425 065 for the financial year ending December 2024.

This statement was approved by our Board of Directors on 6 June 2025.

Signature of Chief Executive Officer	
Name	Morwenna Shahani
Date	6 June 2025





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