



Australian
National
University

Modern Slavery Statement

2023

The Australian National University

Canberra ACT 2600 Australia

www.anu.edu.au

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Introduction

The Australian **Modern Slavery Act** 2018 (the Act) defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The ‘worst forms of child labour’ means situations where children are subjected to slavery, or similar practices, or engaged in hazardous work.

This is the fourth Modern Slavery Statement of the Australian National University (ANU) and covers the period 1 January 2023 to 31 December 2023. This statement is made pursuant to section 13 of the Act and is guided by the mandatory criteria under section 16. It reflects our commitment to identifying and addressing modern slavery risks in our operations and supply chains. We recognise that modern slavery offends against the most fundamental of human rights. It is never acceptable, in any form.

Section 1: The reporting entity (Criterion A)





ANU is located in the Australian national capital, built on Ngunnawal-Ngambri land, which has been a place for sharing knowledge for two millennia.

Our core activity¹ is to advance and transmit knowledge, by undertaking teaching and research of the highest quality.

The University was founded by an Act of the Commonwealth Parliament in 1946 and is established as a body corporate under the **Australian National University Act** 1991 (Cwth). ANU is considered a ‘corporate Commonwealth entity’ under the **Public Governance, Performance and Accountability Act** 2013 (Cwth).

ANU is not required to produce a stand-alone public statement under the Act but is included in the process undertaken by the Commonwealth towards its composite report under section 15. Nevertheless, consistent with our values, and as in previous years, we seek to make an annual public statement in our own right.

University details

	2997 professional staff 1911 academic staff		7 research and teaching colleges
	25, 055 students		\$1.6 b revenue (\$0.7b Commonwealth grants) (\$0.6b student fees and charges)

Details as of 31 March 2023

¹ Full details of ANU functions can be found in s. 5 **Australian National University Act** 1991.

Section 2: Structure, operations, and supply chains (Criterion B)

Structure

Under the 1991 legislation, the governing authority of the University is its Council which comprises the Chancellor, the Hon. Julie Bishop, members appointed by the Commonwealth Minister for Education and members elected from within the ANU community of staff and students.

The Council oversees the strategic direction of the University and ensures that it has effective governance and responsible financial and risk management of its operations. The Council appoints the Vice-Chancellor (Professor Brian Schmidt AC was Vice-Chancellor during this reporting period), and save where prevented by the ANU Act, delegates management of the University to the Vice-Chancellor, as principal academic and Chief Executive Officer of the University.

For the purposes of the Act in terms of approving a modern slavery statement, the Council is the 'principal governing body' of the University.

Subsidiary entities

ANU Enterprise Pty Ltd (ANUE)

121 Marcus Clarke Street, Canberra, ACT. ACN, 008 548 650

The University owns and controls ANU Enterprise Pty Ltd (ANUE) which in addition to providing the services of business development and project management to ANU, itself holds two controlled entities: Australian Scientific Instruments Pty Ltd and The Social Research Centre Pty Ltd.

ANUE, as a consolidated entity, exists to market the research and skills of ANU and provide data collection, data analysis, business development, research consulting and project management services. ANUE employed nineteen staff during the reporting period. It has a board of directors that comprises Deputy Vice-Chancellors of the University, senior members of ANU staff as well as independent members with appropriate skills and experience in business, governance, contract research, accounting and higher education.

ANU International Holdings Pty Ltd (ANUIH)

E1 Tower, No. 1 East Chang'An Avenue, Dongcheng District, Beijing, China 100005

Operates as ANU China Centre

ANU has also established a wholly owned and controlled entity for the purposes of operating in China: ANU International Holdings Pty Ltd (ANUIH). ANUIH is the 100% owner of Beijing ANU International Business Consulting Co. Ltd., a wholly owned foreign entity (WOFE) incorporated in China in 2021- WOFE was established in Nov 2021. Beijing ANU International Business Consulting was established to raise ANU profile in China through working with partners in various sectors, conduct student support and recruitment activities in China and has two directors drawn from the University's senior staff.

ANUIH had ten employees, employed by the WOFE in China, during the reporting period.

ANU (UK) Foundation

c/- Chapel & York Ltd., Unit 12 Ladycross Business Park, Hollow Lane, LINGFIELD, RH7 6PB

The ANU (UK) Foundation operates for the purpose of facilitating grants, donations and bequests, in alignment with the strategies of the Australian National University, that may arise in the United Kingdom. The Foundation is governed by a volunteer Board comprising a mix of senior ANU staff and independent external directors with appropriate skills and experience in business, development, accounting and higher education. The Foundation does not maintain employees, and charity management is supported by Chapel & York Ltd.

The Foundation operates under its own name, is registered with the UK Charity Commission (Registered Charity Number 1123279), and is a company limited by guarantee registered in England and Wales (Registered Company Number 6436055).

ANU Foundation USA

1350 Avenue of the Americas, Floor 2, Suite 266, New York, NY 10019

The ANU Foundation USA promotes excellence in education and research at the Australian National University, including the exchange of knowledge, faculty and students between Australia and North America. The Foundation does not maintain employees and is governed by the ANU Foundation USA Board, volunteers who work closely with ANU to understand the University's priorities and identify how the Foundation can support them. Currently, the Foundation is focused on supporting a life changing student experience, transformative research, and equitable access to an ANU education. In particular, the Foundation looks for ways to support diversity, equity and inclusion at ANU. The Foundation seeks support for scholarships, ground-breaking research, enhanced student experiences and awards.

The ANU Foundation USA was established in 2014 as a non-profit, tax exempt organisation under Section 501(c)(3) of the US Internal Revenue Code, and operates under its own name.

Operations

The University operates three sites in the ACT; the main campus in Acton, Mt Stromlo Observatory and Spring Valley Farm. There are three other campus locations across Australia; Kioloa Coastal Campus (NSW), Siding Spring Observatory, NSW and the North Australia Research Unit (NARU) in NT. The University also operates several rural clinical schools in NSW (Eurobodalla, Bega, Cooma, Cowra, Goulburn and Young). During the reporting period, the University had offices located in Sydney and Perth, whilst international offices were in Beijing and Washington DC.

The University has 15 student residences located on or near its Acton campus in Canberra. Two of the residences are affiliated, meaning they are owned and staffed independently of ANU. The remaining student residences are either managed by ANU directly, by UniLodge as its contracted operating manager, or jointly managed by ANU and UniLodge. The applicable manager/s is the employer of its staff in the residences.

During the reporting period, the University had a number of commercial tenants that operated on its premises, including 80 on the Acton site, 22 across other ACT locations, and 26 on sites outside of the ACT.

Supply chains

ANU is a major procurer of a wide range of services, goods and capital works necessary to support the functions of the University. Procurement at ANU is guided by our [Procurement Policy](#) and [Procurement Procedure](#).

The University has over 5,000 vendors (excluding staff and students) incorporated both domestically and internationally, however the majority of ANU supplier spend occurs with Australian based companies. The major exception to this is in relation to IT hardware. The University engages in a mix of short-term and longer-term supplier arrangements. A list of University-wide contracts is available on [our website](#).

	Top countries of spend	<ul style="list-style-type: none"> • Australia (86%) • United States of America (5%) • China (1.6%) • Netherlands (1.5%) • Hong Kong (1.4%)
	Property and facilities Spend categories	<ul style="list-style-type: none"> • Construction • Cleaning • Security • Catering • Energy
	Business Services Spend categories	<ul style="list-style-type: none"> • Investment Services • Marketing and Media • Travel • Information Technology Services • Research & Teaching • Laboratory and Animal Care Supplies • Library supplies

Section 3: Modern Slavery Risks assessment (Criterion C)

Operations

ANU understands that modern slavery has the potential to occur in its core areas of operation: teaching and research. Some of this risk is inherent in the supply of goods and services and it is reported on in the supply change section below. However, there are several risks that fall outside these areas and that are unique to ANU as a leading research-intensive university.

Teaching activities, broadly defined, include the recruitment of students domestically and internationally. Students can conceivably be at risk during the recruitment process, if they are induced into paying fees to agents to assist them with their application or fees for visa services in excess of the Australian Government imposed fee. Further risks to students can occur around their relationship with fee and stipend sponsors, if they are induced to enter into arrangements which offer very low levels of financial support in exchange for admission sponsorship.

Research and education activities can be supported by financial or in-kind gifts offered to ANU by third parties and, in cases where these are offered to the ANU, our actions are guided by the

principles and requirements of the Gifts and Fundraising Policy. These resources may potentially have been accumulated as the proceeds of activities that constitute modern slavery.

Many students, both domestic and international, support their university study by obtaining employment. In some instances, degree pathways require a period of employment in a relevant industry. In other instances, work-related learning opportunities are arranged by ANU, as either assessed parts of the degree program or general work experience. In all of these situations there is the potential for students to be vulnerable to very low wage employment and to poor or otherwise exploitative working conditions.

ANU recognises that risks also exist in respect of the conditions of employment offered by its commercial tenants or the external operators of student halls of residence.

ANU holds an investment portfolio. There is a risk that these investments, if not appropriately managed, may support business activities that in varying degrees of directness engage in practices of modern slavery.

ANU has identified that a holistic assessment of modern slavery risks coordinated through a single area can inform a program of work over future years.

Supply chains

The University is aware that its supply chain may potentially indicate instances of modern slavery, particularly with respect to the provision of hardware manufactured offshore in countries with large amounts of low skilled labour, where modern slavery has been identified as occurring or likely to occur.

The University, through its active participation in the Australian University Procurement Network (AUPN) Modern Slavery working group, is aware of key risks in global supply chains, for example, the supply of surgical gloves, building materials and computer chip manufacture.

ANU also recognises that modern slavery may occur with its domestically based supply chains with the highest risk sectors being information technology, food service provision, cleaning and maintenance, and building construction.

Section 4: Actions taken, including due diligence and remediation (Criterion D)

No events or incidents requiring remediation arose in the current reporting period.

Governance

Modern Slavery Working Group

This group, newly established during the reporting period, reports through the Chief Operating Officer to the University's highest body (the Council), which oversees the preparation of the Modern Slavery Statement. The group comprises a mix of professional staff and academics (from law and accounting) with particular interest or expertise in modern slavery and its reporting.

In 2023, this group reviewed our past reporting practices; undertook a study of best practices in modern slavery reporting and activities in the Australian university sector; began planning for activities in 2024 (and beyond) to raise awareness of modern slavery in our student cohort, especially international students, and by engaging with students to participate in the design of those modules or activities; and began consultations with the different units in our workplace that manage student wellbeing and student experience.

Operations

ANU has a clear [policy statement](#) that its international recruitment partners should not charge fees for their services on behalf of ANU. This policy statement includes information for students on how to provide feedback to ANU on the activities of its recruitment partners. ANU reserves the right to terminate the contracts of recruitment partners that breach its operating code.

Student sponsors are also only included on the ANU approved student sponsor list for student admission if the stipend that they offer exceeds the ANU minimum threshold. Students who undertake work related learning that is supported by ANU, either as a required part of their degree program or as work experience, do so within the academic governance framework. Employers are vetted for their suitability and made aware of the conditions of employment for students required by ANU.

Commercial tenancies on the ANU campus fell within the remit of the Deputy Vice-Chancellor (International & Corporate) and, from October, the Chief Operating Officer, via the Facilities & Services Division. Extensive due diligence is conducted on potential commercial tenants prior to acceptance by the Commercial Services team. The Commercial Services team also monitors adherence to the terms of the lease for incumbent tenants, working with the ANU Legal Office as required. Unacceptable employment practices such as offering working conditions that amount to modern slavery would result in the University reporting the matter to the Fair Work Commission.

Where student residences are operated by third parties, ANU expects working conditions for employees, sub-contracted staff and independent contractors to be of a legally and ethically acceptable standard. If this were found not to be the case, ANU would take a risk-based approach in seeking a remedy, terminating the commercial arrangement if that was the only option that presented itself after discussion.

The Advancement Portfolio is responsible for soliciting and stewarding financial and other gifts made to the University. It determines the source of gifts that may be sensitive or precedent setting and their appropriateness for ANU. This judgment includes considering risks of connection to modern slavery.

The ANU Council determines the investment strategy for the University portfolio. In July 2013, the ANU adopted a [Socially Responsible Investment \(SRI\) Policy](#). Council approved the 2023 SRI Report in April 2024. The SRI Policy restricts within the investment portfolio the percentage of revenue that can be derived from coal, gambling, pornography and tobacco. Further, the Policy states that the University will aim to avoid investment opportunities that can be considered likely to cause substantial social injury.

The ANU has a requirement that all asset managers must undertake due diligence on companies they invest in on behalf of the University. During the reporting period, the Investment Office reviewed the most recent Modern Slavery reports from the external asset managers. Apart from 3.65% of the Long Term Investment Pool (LTIP) investments, all managers submitted documentation of their compliance with the Modern Slavery Act 2018.

The University has one asset manager holding 3.58% of LTIP that resides in a jurisdiction without Modern Slavery legislation requiring a statement. The Investment Office assessed the manager's operational and supply chain risks. As a regulated investment manager, that invests in the Financial Services and Insurance sectors, the risk of modern slavery in this manager's operations or supply chains is very low. The less than 0.1% Private Equity investments made prior to the adoption of the Modern Slavery Act 2018 do not provide an annual Modern Slavery statement.

Supply chains

Throughout this reporting period the University Procurement and Contracts Office (UPCO), which is responsible for supply chain due diligence, progressed many initiatives to address supply chain risks.

Standard contracting provisions

Relevant ANU legal precedents (i.e. precedents relating to the procurement of goods and/or services by the University) contain appropriate and up to date Modern Slavery provisions. Where particular contracts are identified as posing a higher risk of modern slavery, optional additional clauses may also be included.

Where possible, when enacting extensions of existing agreements or signing vendor terms, contracts are reviewed, and Modern Slavery clauses are attempted to be added where not previously included.

Modern Slavery Awareness Training

Participating in Modern Slavery Awareness Training (initially rolled out in 2022) is now an established practice. For 2023, the three dedicated procurement areas (Technology Services, Facilities and Services and Finance and Business Services) refreshed our Annual Modern Slavery Awareness Training in a group setting to foster better collaboration and idea sharing. New hires in these three areas are required to complete their training within the first 3 months of their employment.

Modern Slavery is also now an annual topic at the UPCO Procurement Community of Interest meetings where an overview of the training is provided, and attendees are actively encouraged to participate and share the information with their teams.

Australian Universities Procurement Network (AUPN) Modern Slavery Program

The ANU is a member of the Australian Universities Procurement Network (AUPN) which represents the Australian and New Zealand higher education sector. ANU had an academic staff member on the AUPN Advisory Board during its formation.

The AUPN is leading a sector collaboration to support member universities to meet the challenge of human rights transparency and risk management in their supply chains and contribute to the fulfillment of reporting requirements under the Act. By working together, we hope to minimise the duplication of activities and associated costs across individual universities, including risk assessment, implementation of systems and remediation. We also hope that leveraging our aggregated buying power will improve our capacity to identify and action any modern slavery risks and drive more effective changes through our supply chains.

The ANU participates in the AUPN Modern Slavery Program through a series of meetings:

- Monthly Modern Slavery Forum
- Monthly Modern Slavery Working Group.

Supply chain technology

One of the two main focuses for the AUPN Modern Slavery Working Group in 2023 involved reviewing our risk software provider FRDM and determining that they were not the best fit for our needs. Because of this, the AUPN has engaged ArcBlue to provide our 2023 modern slavery risk dashboards.

Third Party Engagement

The AUPN also actively engaged with a large number of expert guest speakers to train and help build awareness around different aspects of Modern Slavery. Speakers included:

- The Faculty Presentation
- London University Purchasing Consortium
- Australian Red Cross
- Electronics Watch
- The Mekong Club
- Be Slavery Free
- Australian Catholic Anti-Slavery Network
- TelcoTogether
- SA Modern Slavery Network

Modern Slavery Supplier Questionnaire/Audit

In late 2023, UPCO also drafted a Modern Slavery Questionnaire which was sent to our key Scientific Consumable Suppliers.

We sent this survey to:

- identify and assess possible modern slavery risks in our supply chain and operations,
- identify mitigation efforts to combat the risk of modern slavery in our supply chain and operations, and
- foster collaboration between the ANU and our suppliers to address these risks.

Responses will be available in late Q1 2024.

Section 5: Assessing the effectiveness of actions taken (Criterion E)

The ANU continued to explore the vectors for Modern Slavery risks and implement enabling processes and activities to play our part in eradicating Modern Slavery in the community during 2023. As part of this approach, the University added this as a focus of its Sustainability Division who leveraged and learnt from our internal expert group as well as from our relationship with the AUPN and its member network. We will continue to monitor and oversee the effectiveness of these actions through our internal governance and oversight mechanisms.

To assess the effectiveness of our training, once all new hires in dedicated procurement teams have completed their training course, a one-on-one session is scheduled to discuss the course with our Performance and Governance Manager. This meeting is used to ensure each participant has attained an understanding of the content, to clarify any questions, and to discuss the implications of modern slavery on the ANU community particularly in relation to the procurements or contracts they manage.

Section 6: Consultation with Subsidiary Entities (Criterion F).

During the reporting period, ANU did not undertake any explicit engagement with subsidiary entities about their approach to assessing and addressing modern slavery risks. The preparation of this report has highlighted this gap and ensured that there is a focus on this engagement in future years.

In preparing this report, ANU Enterprise (ANUE) has confirmed that in preparation of any bids and tenders on behalf of the ANU, application of the relevant ANU advice on modern slavery is considered and is a checklist item before submission for approval.

Section 7: Other relevant information (Criterion G)

Planning around awareness-raising

A key activity across this current reporting period has been planning and consultation, by our Working Group, towards awareness-raising activities for our staff and students in 2024 and beyond. In addition to work on the procurement side, we see this focus on awareness-raising as consistent with our identity as an educational institution as well as relevant to risk mitigation itself.

ANU initiated in this reporting period discussions around raising awareness of modern slavery risks within its staff and student population, including international students. The special emphasis on international students is not just about them being higher-risk persons in the onshore Australian labour market. It is also because ANU recognises that our international students are the future business or policy or political leaders in the region. Consistent with our educational approach, in 2023, and continuing into 2024, ANU has begun plans to draw on student talent (in Law, Visual Media, Media Studies and other fields) in appropriate and empowering ways in terms of the design, planning and implementation of compelling and appealing awareness-raising activities for students and others.

Student and academic research and learning

Modern slavery was integrated into the curriculum in the College of Business and Economics during the reporting period. In the Research School of Accounting, the new modern slavery reporting requirements are covered in the context of new accountability demands on corporations. In the Research School of Management, courses discuss the ethical implications and challenges of managing global supply chains in terms of labour standards.

During the reporting period ANU law students continued to be actively engaged in the fight against modern slavery through a partnership (since 2018) with Walk Free, a global non-profit organisation dedicated to ending modern slavery, and Wikirate, a Berlin non-profit that evaluates corporate responsibility. Under academic supervision by ANU Professor Jolyon Ford, ANU Law students collaborated with the WalkFree and Wikirate 'Beyond Compliance' partnership on evaluation of modern slavery reporting, as well as some students doing for-credit internships on research projects, contributing to these NGOs' groundbreaking reports that influence policy and raise public awareness. The students tend work on sector-specific tasks for the internship host organisations. Internship programs allow students to obtain law course credit while working directly with WalkFree and Wikirate, gaining hands-on experience in evaluation, research, advocacy and campaign strategies. These initiatives are complemented by seminars and workshops led by Ford and other experts in the field, equipping students with the knowledge and skills to become effective researchers and changemakers in the global effort to understand and eradicate modern slavery. In this reporting period, ANU Law student interns also helped research on university approaches worldwide to modern slavery reporting and action.

ANU academics continued to run a range of conventional and less traditional credit-bearing degree courses for students relevant to modern slavery awareness-raising, from law courses in 'Business and Human Rights' to other faculties' offerings, such as a 2023 study tour course on gender, labour and migration in South-East Asia in the context of human trafficking. The working group continues to attempt to audit existing teaching and research activity and explore ways to enhance this.

During the applicable period, ANU academics have also discussed modern slavery through the publication of academic papers and participating in conferences including:

- Christ , K, Burritt, R & Islam, M 2023, 'Modern slavery and the accounting profession', British Accounting Review, vol. 55.
- Burritt, R & Christ, K 2023, 'Modern slavery and the Global Reporting Initiative – A bridge too far? Business Strategy and Development, vol. 6, issue 3.
- Molland S 2023, 'How to effectively use technology to raise awareness of modern slavery: a cross-sector approach' Modern Slavery Conference, Taking Action Together (breakout session 2).

Conclusion

This statement summarises our commitment, actions taken, and plans for improvement to eliminate modern slavery from our operations and supply chains. We recognise that modern slavery is a complex and evolving issue that requires ongoing and collaborative efforts from all stakeholders and sectors. We are committed to playing our role as a leading research university and a responsible business entity to contribute to the global fight against modern slavery and the promotion of human rights. We acknowledge that while there was increased focus on Modern Slavery, through exploratory activities undertaken by the newly formed Division of Sustainability, in 2023 there is still room for improvement. The University is committed to progress towards this goal through our actions in 2024.

The following table summarises the University's compliance with the mandatory criteria of the Act:

Criterion	Description	Section
A	Identify the reporting entity	Section 1
B	Describe the reporting entity's structure, operations and supply chains	Section 2
C	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls	Section 3
D	Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Section 4
E	Describe how the reporting entity assesses the effectiveness of such actions	Section 6
F	Describe the process of consultation with any entities that the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Section 7
G	Include any other information that the reporting entity, or the entity giving the statement, considers relevant	Section 8

APPROVAL

This report was reviewed and endorsed by the Chief Operating Officer, and the Vice Chancellor before being approved on 14 June 2024 by the University Council, ahead of the 30 June 2024 submission deadline.



The Hon Julie Bishop
Chancellor
14 June 2023