

# ECU Modern Slavery Statement 2021

ECU recognises the significance of Aboriginal and Torres Strait Islander peoples' communities, cultures, and histories. ECU acknowledges and respects its continuing association with the Whadjuk people and Wardandi people of the Noongar nation, who are the original custodians of the land upon which the University's campuses stand in Australia.

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This document is available online at the link below. It is available in alternate formats upon request.

<https://www.ecu.edu.au/about-ecu/reports-and-plans/modern-slavery>

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# Introduction

The [Modern Slavery Act 2018](#) (Cth) requires large organisations in Australia to publish annual modern slavery statements to address the risks of slavery in their businesses and supply chains.

Edith Cowan University (ECU) is an Australian public university. It was established under the [Edith Cowan University Act 1984](#) (WA).

The University has three controlled entities: Edith Cowan Accommodation Holdings, Australian Pathway Education Group, and ECU Holdings.

ECU's internal modern slavery working group develops strategies to address the requirements of the *Modern Slavery Act 2018*. The working group reports to the University's Senior Deputy Vice-Chancellor.

Within ECU's operations, the University has determined that the risk of modern slavery practices is very low.

ECU's suppliers provide goods and services that can be broadly divided into four categories: professional services; property and facilities; research and teaching; and technology. In 2021, over 88 per cent of ECU's expenditure with suppliers was within Australia. ECU is aware that any risk of modern slavery existing in its supply chains is likely to be with smaller vendors, and potentially Tier 2 and Tier 3 suppliers.

Potential risks in ECU's supply chain relate to information technology hardware, medical personal protective equipment (particularly during the COVID-19 pandemic), clothing and apparel, construction materials, and cleaning services.

The University is a member of the Australian Universities Procurement Network (AUPN), which has facilitated a sector-based, coordinated approach for universities to monitor modern slavery. ECU uses an online tool (FRDM) to assist with identifying risks of modern slavery in its supply chain.

In 2021, the AUPN advised its members of a potential human rights issue with a Malaysian manufacturer of gloves. In response, ECU notified key purchasing staff across the University, and requested information on the origin of gloves being purchased to assess and address any risks.

ECU has implemented a reporting process that enables staff, students, external organisations, and members of the public to notify the University of suspected modern slavery practices within its supply chain or operations.

The University has finalised an online integrity training module that includes information about modern slavery. Training will be mandatory for all ECU staff. In addition, all ECU procurement staff will be required to complete the Australian Border Force's public procurement online training course.

ECU's Modern Slavery Statement 2021 has been prepared in accordance with the provisions of the *Modern Slavery Act 2018*, and was approved by the University's Council on 23 June 2022.

## About modern slavery

Slavery is defined in Australian legislation as the condition of a person over whom the powers of ownership are exercised. Slavery-like offences include servitude, forced labour, deceptive recruiting for labour, forced marriage, and debt bonding. Slavery also includes trafficking in persons, and the worst forms of child labour (e.g., commercial sexual exploitation; work likely to harm health or safety).

The Walk Free Foundation's [Global Slavery Index 2018](#) (GSI) assessed Australia as a low prevalence country for modern slavery (ranked 163 out of 167 countries). However, the GSI estimated that over 40 million people were living in modern slavery in 2016, including 15,000 people in Australia.

# About ECU

[Edith Cowan University](#) (ECU) is one of Western Australia's oldest higher education institutions, and its youngest university. ECU has over 30,000 undergraduate and postgraduate students, and approximately 2,000 staff. The University has three campuses in Western Australia, at Joondalup, Mount Lawley, and Bunbury.

ECU's eight schools – Arts and Humanities; Business and Law; Education; Engineering; Medical and Health Sciences; Nursing and Midwifery; Science; and the Western Australian Academy of Performing Arts (WAAPA) – deliver a range of on-campus and online courses and undertake research across a range of disciplines.

ECU was established by the [Edith Cowan University Act 1984](#) (WA). The University is a Table A provider in the [Higher Education Support Act 2003](#) (Cth), and is a registered training organisation (RTO) as per the [National Vocational Education and Training Regulator Act 2011](#) (Cth).

The University is recognised as a self-accrediting authority by the [Tertiary Education Quality and Standards Agency](#), and as an RTO by the [Australian Skills Quality Authority](#).

## Purpose

ECU's purpose is to transform lives and enrich society.

## Vision

To lead the sector in educational experience, research with impact, and in positive contributions to industry and communities.

## Values

- **Integrity**  
We are ethical, honest, and fair and demonstrate trust and personal responsibility.
- **Respect**  
We treat everyone within our diverse community with dignity and respect.
- **Rational Inquiry**  
Our decision-making is driven by evidence, sound reasoning, and creative thinking.
- **Personal Excellence**  
We demonstrate the highest personal and professional standards.
- **Courage**  
We are bold and resolute in our thinking and actions in pursuit of our goals.



# Structure

## Governance

ECU is governed by a University Council that controls and manages the operation, affairs, concerns, and property of the University, in accordance with ECU's [Corporate Governance Statement](#) and the *ECU Act 1984*.

The University Council and the senior management team, led by the Vice-Chancellor, work together to ensure that the University achieves its strategic goals.

ECU's Council establishes committees to assist in meeting its responsibilities, which report to Council or Academic Board as appropriate.

## Controlled entities

### Australian Pathway Education Group Pty Ltd

ABN 25 607 580 969  
ACN 607 580 969  
RTO Provider 41472

Unit 3, 15 Barron Parade  
Joondalup WA 6027, Australia

Suite 15, Level 40, 669 XinZha Road  
Jing'An District, Shanghai  
People's Republic of China

Australian Pathway Education Group (APEG) is an Australian registered training organisation providing vocational education and training programs to high school students in China.

### ECU Holdings Pty Ltd

ACN 635 918 286  
270 Joondalup Drive  
Joondalup WA 6027, Australia

ECU Holdings is an entity established to focus on generating revenue via commercial activities for re-investment in ECU's academic activities.

### Edith Cowan Accommodation Holdings Pty Ltd

ABN 80 135 260 383  
ACN 135 260 383  
270 Joondalup Drive  
Joondalup WA 6027, Australia

Edith Cowan Accommodation Holdings provides residential and commercial accommodation and related ancillary activities to offer an affordable and supportive living environment for ECU students residing on campus in Australia.

## Staff

ECU and its controlled entities employed the following numbers of staff in 2021:

Organisation	Staff	
Edith Cowan University	1,954	<i>(Full-time equivalent)</i>
Australian Pathway Education Group	8	<i>(Headcount)</i>
ECU Holdings	0	<i>(Headcount)</i>
Edith Cowan Accommodation Holdings	32	<i>(Headcount)</i>



## Operations

Edith Cowan University provides higher education and vocational education and training across a broad range of disciplines, and conducts research and development under the themes of health; society and culture; natural and built environments; and securing digital futures.

ECU's services and products include:

- Teaching and educational services for students (e.g. library resources, academic support, counselling, medical services, sports and fitness services, IT facilities).
- Research and research support services, and collaborations with other organisations.
- Educational outreach in primary and secondary schools, and in communities.
- External products and services in areas such as training, consultancy, fitness, arts, entertainment, and health care.
- Facilities for hire and lease.
- Student accommodation.
- Academic scholarships and prizes through the charitable ECU Foundation.
- Professional services to support operations.

ECU's global partnerships include dual degree programs, articulation of students to ECU, delivering ECU's academic programs overseas, student exchange and study tour programs, joint PhDs, and research collaboration. In addition, ECU has a significant presence in Sri Lanka, and the Australian Pathway Education Group delivers education services in China.

Typically, ECU has long-term contractual relationships with major suppliers, underpinned by regular market testing and competitive tendering to ensure value. Due to the diversity of its operations, ECU also deals with a number of occasional or one-off transactional suppliers.

### Controlled entities

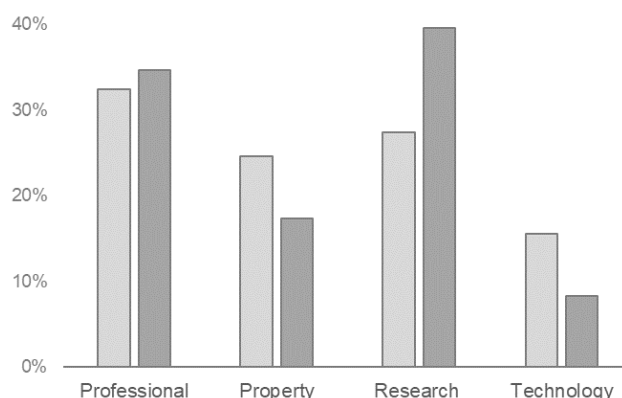
As detailed on the previous page, ECU's controlled entities provide student accommodation (**Edith Cowan Accommodation Holdings**), deliver vocational education and training services (**Australian Pathway Education Group**), and generate revenue to fund academic activities (**ECU Holdings**).

# Supply chains

ECU's suppliers provide goods and services that can be divided broadly into four categories:

- Professional services, such as insurance, staff training, and advertising.
- Property and facilities, including cleaning and facilities management services, and utilities.
- Research and teaching; for example, research supplies and equipment.
- Technology, such as hardware, software, and printing.

Percentage of total spend and number of suppliers by category



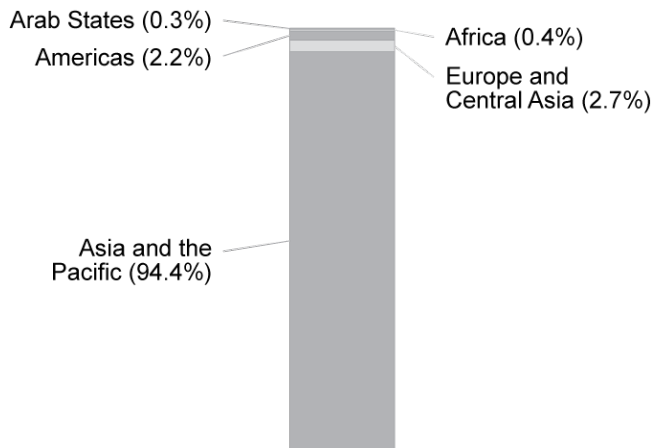
## Spend by country

In 2021, over 89 per cent of ECU's spend was with suppliers located in Australia. Per the Walk Free Foundation's 2018 assessment, the estimated prevalence of modern slavery (victims per 1,000 population), vulnerability score, and government response credit rating for each country is listed below.

Country	ECU spend (%)	ECU spend (\$m)	Modern slavery estimated prevalence (# per 1,000 ppl)	Modern slavery vulnerability score (lower=better)	Modern slavery government response score (higher=better)
Australia	89.2	160.6	0.6	4.3	63.8
United States	2.1	3.8	1.3	15.9	71.7
Singapore	2.0	3.7	3.4	13.4	32.8
India	1.0	1.8	6.1	55.5	45.7
Netherlands	1.0	1.7	1.8	6.1	75.2
United Kingdom	0.9	1.6	2.1	11.1	71.5
China	0.6	1.1	2.8	50.6	27.4
Sri Lanka	0.5	0.8	2.1	42.5	37.4
Germany	0.4	0.6	2.0	10.4	57.1
United Arab Emirates	0.3	0.6	1.7	26.8	47.8

Note: Figures in the 'Estimated prevalence', 'Vulnerability score', and 'Government response' columns are from the Walk Free Foundation's Global Slavery Index (GSI) 2018. The prevalence of modern slavery, as the number of victims per 1,000 population, includes estimates of forced labour and forced marriage drawn from national surveys, the International Organization for Migration's trafficking database, and secondary sources for assessing state-imposed labour (prisons, labour camps, and military facilities). The GSI's vulnerability model maps 23 risks across governance, access to basic needs, inequality, disenfranchised groups, and conflict, resulting in a total score out of 100. Government response assessed the support provided for victims, the criminal justice outcomes, coordination, complicity, and the use of state-imposed forced labour, to obtain a final score. Data from [walkfree.org](https://www.walkfree.org).

## Spend by region



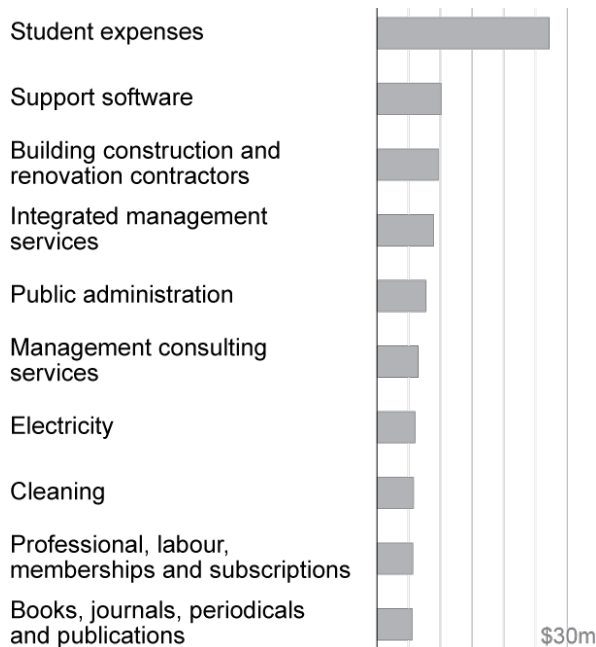
## Controlled entities

**Edith Cowan Accommodation Holdings** has only one supplier, Campus Living Villages, which provides all goods and services.

**Australian Pathway Education Group (APEG)** has a limited number of suppliers that provide services including training, printing, and delivery, and products like computer hardware and software, cloud-based systems, books, and office supplies.

**ECU Holdings** follows ECU's procurement policies and uses ECU's corporate services. Its suppliers are a subgroup of the University's.

## Spend by top 10 categories





# Risks of modern slavery

All organisations are subject to risks of modern slavery within their supply chains and operations. In addition, the COVID-19 pandemic continues to exacerbate the risks of modern slavery practices in some locations and industries. Supply chain pressures are a global issue.

## Risks of *causing* modern slavery practices

Organisations can directly cause modern slavery by using exploitative labour practices, such as forced labour (people working against their will under threat of punishment), debt bondage (people forced to work to pay off debt without control of employment conditions or debt), or human trafficking (using violence or coercion to transport people for forced labour).

Within ECU's operations, the University has determined that the risk of modern slavery practices is very low. The University's activities are governed by its risk management framework, key policies, and compliance with Australian legislation, including employment laws.

## Risks of *contributing* to modern slavery practices

An organisation may contribute to modern slavery practices if its actions facilitate or incentivise modern slavery, for example through unrealistic pricing or delivery expectations placed on suppliers.

ECU's procurement and human resources policies and processes, and internal governance structures, work together to mitigate these risks.

## Risks of being *linked* to modern slavery practices

Organisations can be linked to modern slavery practices through the activities of a partner organisation, including organisations where there is no direct contractual relationship, such as the partner of a partner organisation. The complexity of supply chains can make these issues difficult to identify.

In 2021, ECU assessed its procurement modern slavery risks by category and country of origin. ECU is aware that any risk of modern slavery existing in its supply chains is likely to be with smaller vendors, and potentially Tier 2 and Tier 3 suppliers. At this stage, ECU has audited Tier 1 suppliers. (Tier 1 refers to ECU's direct suppliers, Tier 2 to the suppliers of ECU's Tier 1 suppliers, and so on.) To ensure the University's information is accurate and comprehensive, ECU paused its assessment of further tiers until access could be granted to a specialised online platform for this risk assessment, as outlined in the next section.

There are inherent risks in the property and facilities sector, given the nature of subcontracting arrangements in building and cleaning. ECU's primary suppliers are large multinational corporations that are required to comply with Australian legislation like the *Modern Slavery Act 2018* (Cth), *Fair Work Act 2009* (Cth), and *Fair Work Regulations 2009* (Cth). There are also risks in the technology sector, particularly regarding the origins of materials and production of devices.

In 2021, 4.1 per cent of ECU's spend was in countries that are considered by the Global Slavery Index to present a moderate to high risk of modern slavery. This spend predominantly relates to student recruitment agents and activities, which are considered relatively low risk.

## A sector-based approach

ECU is a member of the [Australian Universities Procurement Network](#) (AUPN). The AUPN is supported by HES Pty Ltd, a not-for-profit organisation owned by Universities Australia. The AUPN established a Modern Slavery Working Group that provides resources for universities, including a modern slavery risk dashboard.

The AUPN Modern Slavery Working Group identified a list of suppliers used by multiple universities that presented a high risk of modern slavery within their operations. AUPN invited these suppliers to engage further in a session to:

- Provide an overview of the AUPN and the modern slavery program.
- Discuss and confirm the suppliers' willingness to engage with the AUPN's sector collaboration on modern slavery.
- Request completion of the AUPN's supplier self-assessment.
- Request feedback on the AUPN's approach and contract clauses.

Feedback from the suppliers was positive overall, which showed the benefits of engaging through a sector-based approach, rather than as multiple individual organisations.

ECU also implemented the [FRDM](#) platform through a contract arranged by the AUPN. FRDM analyses supply chains to identify potential risks, which are then displayed via a dashboard and complemented by mitigation and progress tracking tools.

All participating universities contribute data into a spend cube, which increases visibility of modern slavery risks and allows coordinated actions within supply chains.

The University will commence its review of Tier 2 suppliers during 2022 using the FRDM tool.

## Controlled entities

Campus Living Funds Management Pty Ltd (Campus Living Villages), the sole supplier for **Edith Cowan Accommodation Holdings**, assesses and mitigates its modern slavery risks as outlined in the next section of this report.

**Australian Pathway Education Group** (APEG) has assessed the modern slavery risk for its Australian operations to be low.

APEG's operations in China have additional risks of modern slavery due to local work practices and cultural factors. To mitigate this increased risk, APEG uses active account management and provide significant in-country support to ensure its team has visibility over any applicable supply chains. Overall, the risk is relatively low due to the nature and limited number of suppliers.

**ECU Holdings** is in a start-up phase and does not have any employees. Currently, its risks are a subset of those managed by the University. This may change in the future, depending upon the investment activities undertaken.



## Potential human rights issue with a gloves manufacturer

In 2021, the Australian Universities Procurement Network (AUPN) advised member institutions of a potential human rights issue with a Malaysian manufacturer of gloves.

ECU made its key purchasing staff across the University aware of the issue, and requested information on the origin of gloves being purchased to ensure that any modern slavery risks were identified and addressed.

In January 2021, the AUPN identified and contacted 10 key suppliers that provide gloves to multiple universities. Suppliers were requested to complete a modern slavery questionnaire and attend AUPN-led awareness sessions on modern slavery. Eight suppliers responded to the questionnaire, and these demonstrated that:

- Four out of eight suppliers were not required to submit a modern slavery statement under the *Modern Slavery Act*.
- All suppliers indicated that they have not identified modern slavery in their supply chains, but two acknowledged that gloves manufacturing in Malaysia experienced a high risk for modern slavery practices.
- Four of the suppliers did not include personnel recruitment sources in their auditing program.
- Five were able to describe the countries where their products were manufactured.

Overall, the responses indicated that Australian distributors of gloves have limited-to-moderate visibility of their supply chains and are at varying stages of development in terms of modern slavery policies and assessment and mitigation processes. The AUPN will continue to develop its supplier engagement approach and remediation processes to improve supply chain visibility, and leverage the sector's buying power to influence better purchasing practices.

## Addressing the risks

ECU's internal modern slavery working group develops strategies to address the requirements of the *Modern Slavery Act 2018*. The working group includes representatives from procurement, human resources, compliance, planning, and risk management services. Representatives from ECU's controlled entities are also invited to attend and participate in meetings of the working group. The working group reports to the University's Senior Deputy Vice-Chancellor.

Through ECU's membership of the Australian Universities Procurement Network (AUPN), the University accesses a platform that assists with sourcing goods and services, and a tool that identifies and rates modern slavery supplier risks.

The AUPN developed the following templates and guidance for its members:

- Supplier assessment questionnaire or response schedule.
- Standard contract clauses.
- Supplier code of conduct guidelines.
- Supplier engagement terms of reference and communication approach.
- Modern slavery risk dashboard.

ECU used these tools to resolve the issue related to procurement of gloves, outlined as a case study on the previous page, and in the development of this modern slavery report.

## Incident reporting and investigation

To further facilitate the reporting of suspected modern slavery practices, the University added a "Report modern slavery concerns" section to its webpage for [lodging a complaint, grievance, misconduct, or safety incident](#). The newly developed form can be used to notify the University of suspected modern slavery practices within the University's supply chain or operations. Reports can be made by any staff member, student, worker in ECU's supply chain, or member of the public, and they can be lodged anonymously if desired.

Any complaint about modern slavery practices in ECU's operations or supply chains would be handled as part of ECU's formal complaints process, as per the *Public Complaints* policy. The complaint would be registered and acknowledged, and its investigation overseen, by ECU's Manager, Legal and Integrity.

Where necessary, the complaint would be referred to other ECU business units (e.g. procurement, human resources, IT, campus services) or externally to a government agency. As with all complaints, the Manager, Legal and Integrity, would respond to the person who reported the issue after the investigation is concluded, outlining the decisions and actions.

Internal recommendations for improvements are registered in the ECU Recommendations Tracking System to ensure the associated actions are implemented.



## Staff training

The University has finalised an online integrity training module that includes information about modern slavery. The training will be mandatory for all ECU staff. In addition, all ECU procurement staff will be required to complete the Australian Border Force's online training course, [Modern Slavery in Public Procurement](#). The University will continue to assess further education options for staff and students on modern slavery practices.

## Policies and processes

The following policies relate to managing the risks of modern slavery practices, in accordance with ECU's values of integrity, respect, rational inquiry, personal excellence, and courage.

- [Staff Code of Conduct](#), which provides a framework for appropriate behaviour for staff.
- [Complaints](#), which defines the principles for handling complaints made by students and the public.
- [Public Complaints](#), which outlines the handling of complaints from the public.
- [Fraud and Misconduct Prevention and Management](#) that sets out the principles, strategies, and controls for preventing, detecting, and managing misconduct, fraud, and corruption.

The processes below are designed to complement the University's policies and operations.

- [Public Interest and Whistleblower Protection Disclosure Guidelines](#) to assist staff who report corrupt or improper conduct.
- [Social and Sustainable Procurement Guidelines](#) to incorporate sustainability and social responsibility into purchasing decisions, including risks of modern slavery.
- [Fraud and Misconduct Prevention and Management Guidelines](#), which support early detection and appropriate responses to acts of fraud, corruption, and misconduct.

The University's supplier contracts contain clauses related to modern slavery practices. The clauses are included in all legal templates.

ECU acts on the principles of natural justice, confidentiality, protection of complainants from retaliation or discrimination, consistent and fair decision-making, and the right of response for persons of interest.

ECU's new *Strategic Plan 2022-2026* supports the University's commitment to social change and sustainability through the Strategic Priority below:

- 22. Social change imperatives.** ECU will effect social change by engaging with communities for its education and research activities, and environmental sustainability will be considered in all University activities and operations.

## Legislation and guidelines

Edith Cowan University is subject to legislative obligations, including the following:

- [Modern Slavery Act 2018](#) (Cth)
- [Fair Work Act 2009](#) (Cth)
- [Corruption, Crime and Misconduct Act 2003](#) (WA)
- [Corporations Act 2001](#) (Cth)
- [Public Interest Disclosure Act 2003](#) (WA)

In addition, ECU supports the following international conventions and guidelines:

- [United Nations \(UN\) Universal Declaration of Human Rights](#)
- [UN Guiding Principles on Business and Human Rights](#)
- [International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#)
- [Ten Principles of the UN Global Compact](#)

ECU endorses the UN [Sustainable Development Goals](#), including targets [8.7](#) and [16.2](#).

## Controlled entities

The University continues to monitor its controlled entities' progress towards assessing and mitigating modern slavery risks. Controlled entities are required to complete ECU's modern slavery self-assessment questionnaire annually, which assists them to identify and manage their modern slavery risks. The process also provides ECU with the opportunity to review the outcomes and work with the entities to address risks.

**Edith Cowan Accommodation Holdings'** sole supplier, Campus Living Villages (CLV), does not meet the threshold for required reporting under the *Modern Slavery Act 2018*. For 2021, CLV has chosen to produce a voluntary modern slavery statement in line with its company values.

In 2020 and 2021, CLV participated in the [Global Real Estate Sustainability Benchmark \(GRESB\) Real Estate Assessment](#). GRESB provides a platform and rating system to interrogate and measure CLV's frameworks against peers, and highlights material issues. Evaluation of the organisation's approach to modern slavery, and its related policies and processes, is included in the governance section of the GRESB assessment.

## Assessment of actions taken

The University's 'three lines of defence' model of risk assurance involves the following:

*First line of defence:* Systems and processes, culture, and controls present at the operations level. With the specific risks of modern slavery practices in ECU's supply chains and operations, this primarily involves the procurement function.

*Second line of defence:* ECU's risk management and compliance functions, which include assessing the effectiveness of controls through regular risk reviews, self-assessment reviews, and a formal compliance review program.

The assessment results include scores, ratings, ranking against peers, and a roadmap to future improvement. For the 2021 reporting period, CLV saw significant improvements, attributable to its commitment to environment, social, and governance matters.

CLV uses an online questionnaire system to screen suppliers for modern slavery risks, ensures its supplier contracts include modern slavery clauses, and has a number of policies, including its *Group Human Rights Policy*. All CLV staff have undertaken modern slavery training.

**Australian Pathway Education Group (APEG)** has not yet developed formal modern slavery policies and procedures. It has assessed its level of risk of modern slavery practices among suppliers to be 'low'. The University will continue to liaise with APEG regarding development of relevant policies and procedures.

**ECU Holdings** follows the University's established risk management strategies.

*Third line of defence:* Internal audit, which provides further oversight of controls, including independent assurance that the framework is functioning correctly.

ECU's 2022 audit schedule includes internal audits related to procurement and the University's compliance obligations, which will involve the University's actions related to modern slavery.

The online integrity training module will enable the University to monitor staff participation in the training, and processes will be implemented to ensure the training is undertaken by all staff.



## Consultation and approvals

We hereby submit the Modern Slavery Statement of Edith Cowan University for the year ending 31 December 2021, for publication on the Australian Government's [Online Register for Modern Slavery Statements](#).

The Statement was completed in consultation with relevant representatives from ECU's three controlled entities: Edith Cowan Accommodation Holdings, ECU Holdings, and Australian Pathway Education Group.

In addition, the University also consulted with the sole supplier for Edith Cowan Accommodation Holdings, Campus Living Villages.

The entities were represented by senior staff members, including the Regional General Manager for Campus Living Villages, and the Quality and Compliance Manager for Australian Pathway Education Group.

The representatives for controlled entities were invited to participate in ECU's modern slavery working group meetings, and were requested (along with Campus Living Villages) to complete a self-assessment questionnaire to:

- Identify modern slavery risks.
- Foster collaboration between ECU and its controlled entities to address these risks.
- Improve transparency.
- Identify areas for further due diligence.

The information gathered from the consultation process was used to inform ECU's Modern Slavery Statement 2021, and will further be used to assist controlled entities to develop relevant modern slavery policies and procedures, as necessary.

ECU's Modern Slavery Statement 2021 is made in accordance with the *Modern Slavery Act 2018*. It is provided pursuant to a resolution of the University's Council on 23 June 2022, following endorsement by University Executive and the Quality, Audit and Risk Committee.

Denise Goldsworthy AO  
Chancellor  
23 June 2022

Professor Steve Chapman CBE  
Vice-Chancellor  
23 June 2022