

2022 Modern Slavery Statement



JAMES COOK
UNIVERSITY
AUSTRALIA





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**RESPECT.
NOW.
ALWAYS.**

James Cook University values and celebrates the diversity of our community, and is committed to ensuring our learning and working environment is safe and welcoming.

JCU is proud to be part of the Respect. Now. Always. campaign – a national initiative led by Universities Australia to highlight our determination to ensure our students and staff are safe from discrimination and sexual harassment. Further information about the campaign and free services available for students can be found at jcu.edu.au/sew



Our commitment to Australian Aboriginal and Torres Strait Islander peoples

James Cook University is committed to building strong and mutually beneficial partnerships that work towards closing the employment, health and education gap for Australian Aboriginal and Torres Strait Islander peoples.

Our students come from many backgrounds, promoting a rich cultural and experiential diversity on campus.

We acknowledge the Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the Australian lands and waters where our staff and students live, learn and work. We honour the unique cultural and spiritual relationship to the land, waters and seas of First Australian peoples and their continuing and rich contribution to James Cook University (JCU) and Australian society. We also pay respect to ancestors and Elders past, present and future. Aboriginal and Torres Strait Islander peoples are advised that this publication may contain names or images of people who have passed away.



Kassandra Savage (JCU Alumni), 'Coming Together and Respecting Difference', acrylic on canvas, 2014, 90cm x 90cm.

Prospective domestic students and all international applicants should contact the University to confirm admission requirements and the availability of courses. Information is correct at the time of printing. James Cook University reserves the right to alter any course or admission requirement without prior notice.

Our Approach and Progress

Modern slavery is a severe violation of human rights. It occurs when a person is coerced into work and exploited for personal or commercial gain. Under Australian and international law, it includes offences such as forced labour, servitude, child labour, deceptive recruiting and debt bondage.

This statement, pursuant to the Australian Modern Slavery Act 2018 (Cth), sets out the actions taken by James Cook University to address modern slavery and human trafficking risks in our business and supply chain for the financial year ending 31 December 2022.



Part A – Reporting Entity

James Cook University (JCU) is a body corporate established under an Act of the Queensland Government, the *James Cook University Act 1997*.

ABN: 46 253 211 955

Registered Address: 1 James Cook Drive,
James Cook University,
QLD 4811

Part B – The University’s Structure, Operations and Supply Chains

Structure and operations

The University is a mid-sized, research-intensive public university with the following objectives:

- a) To provide university-standard education
- b) To offer facilities for general study and research, as well as specialised subjects relevant to the tropics
- c) To promote general study and research in tropical subjects
- d) To provide courses of study and instruction to meet community needs
- e) To confer higher education awards
- f) To spread knowledge and advance scholarship
- g) To provide resources and facilities for the well-being of staff, students, and course participants
- h) To commercially exploit University resources for its benefit
- i) To carry out other functions assigned under the Act.

The University has two main campuses in Australia located in Townsville and Cairns, with study centres in Mount Isa, Mackay, and Thursday Island. JCU Singapore, established in 2003, is a wholly-owned international campus. JCU Brisbane, operated by Russo Higher Education, delivers JCU degrees under license.

The University Council is the governing body, responsible for overseeing University affairs, ensuring effective management, and establishing the University’s long-term objectives as specified in the Corporate Strategy.

The parent entity of the university has a workforce of approximately 4,500 employees and operates under a divisional structure that includes:

1. The Academy:

- College of Arts, Society and Education
- College of Business, Law and Governance
- College of Healthcare Sciences
- College of Medicine and Dentistry
- College of Public Health, Medical and Veterinary Sciences
- College of Science and Engineering.

2. Service Divisions:

- Chancellery
- Research
- Education
- Services and Resources.

The university also operates several controlled entities, including:

- JCU Univet Pty Ltd
- JCU Health Pty Ltd
- JCU Early Learning Centres Pty Ltd
- JCU CPB Pty Ltd as Trustee for the CPB Trust
- CPB Trust

- Tropical Queensland Centre of Oral Health Pty Ltd (trading as JCU Dental)
- North Queensland Commercialisation Company Pty Ltd as Trustee for the JCU Asset Trust
- JCU Asset Trust
- JCU College Pty Ltd
- Discover Sport Ltd (non-trading)
- JCU Enterprises (non-trading)
- James Cook Holdings Pte Ltd
- James Cook University Pte Ltd
- Tropical Futures Institute Ltd
- James Cook Academy Pte Ltd
- Eagle Infotech Consultants Pte Ltd.

Each of these controlled entities is subject to governance, monitoring, and reporting requirements, which are directed and reviewed by various committees of the University Council.

Supply chains

Supporting the teaching and research activities and operations of the University requires a diverse range of goods and services provided by a large and complex supply chain. The University purchases goods and services required to deliver:

- core teaching and research services
- construction and facilities management services
- office equipment and supplies including furniture, stationery, computers and phones
- catering services and meals
- student accommodation
- travel and accommodation for travelling staff and students
- branded merchandise, printing, and distribution services
- laboratory supplies including consumables, pharmaceuticals, and cutting-edge scientific equipment and
- many other goods and services.

In 2022 the University spent over \$205 million on goods and services from over 8,000 suppliers across four main goods and service categories – Business Services, Property and Facilities, Research and Teaching and Technology. The approximate spend summary by location was:

- \$48 million - North & Far North Queensland
- \$105 million - Rest of Queensland
- \$41 million - Rest of Australia
- \$11 million - International.

The University recognises that there are risks of modern slavery in the supply chains of all the goods and services we purchase and are committed to understanding these risks.

Part C – Risks of Modern Slavery Practices in the Operations and Supply Chains of the University and Subsidiaries

Risk identification

The ultimate responsibility for approving and committing to the risk management policy and framework, and defining the University's risk tolerance, lies with the University Council. The Audit, Risk, and Compliance Committee of the Council oversees the overall risk management process of the University and reviews the University's Risk Management Framework and Plan, while other committees, such as the Workplace Health and Safety Committee and Finance Committee, manage risk in their respective areas of responsibility.

The Vice Chancellor and University Executive are responsible for promoting a culture of enterprise risk management throughout the University, and the Chief of Staff (Risk Management Coordinator) ensures effective implementation of the Risk Management Framework and Policy. All managers and staff, including those who may be designated as risk owners, are accountable for understanding and implementing risk management principles and practices in their respective areas.

Information about modern slavery practices in the University's operations and supply chains was gathered from various departments and controlled entities. The University is a member of the Australian Universities Procurement Network (AUPN), the leading body for procurement in higher education in Australia and New Zealand, which provides advice on supply chain risk identification. Additional information on this process can be found in the section titled "Risk in Supply Chains."

Risk in operations generally

The University believes that the risk of modern slavery in its operations and supply chain is low and has established effective internal controls to manage and mitigate this risk. The nature of higher education employment does not involve a significant amount of low-skilled labour, and work is primarily performed within Australia. The University does not rely on migrant workers or complex labour arrangements, and the types of work considered to pose a high risk for modern slavery are not present in the University's activities or workforce. The University has established robust policies, procedures, and employment agreements to protect employee rights and entitlements, ensure compliance with laws and regulations, and ensure a system of internal review and audit.

Risk in management of human resources

Continuing, fixed-term, and casual employees at the University are covered by the James Cook University Enterprise Agreement 2016, which has been approved by the Fair Work Commission. This agreement encompasses all aspects of employment, such as working conditions, compensation, leave, and other benefits.

The University does not rely on foreign labour brokers to recruit staff and no staff member is required to pay recruitment fees or provide personal or property security deposits. Most employees are hired directly by the University, and where labour-hire companies are used, they are primarily based in Australia. In rare cases, overseas labour-hire companies may be used for short-term overseas assignments for a small number of employees.

The University takes great care in verifying that all new hires have the legal right to work in Australia. The majority of employees are located in Australia, and where work is performed abroad, employees are still covered by the Enterprise Agreement. In rare instances, some individuals may not fall under the purview of the University's Enterprise Agreement, although the University will still apply the provisions of the agreement where applicable.

To further mitigate the risks of modern slavery in its operations, the University has in place a variety of policies, procedures, and supporting documents, in addition to the Enterprise Agreement, these include:

- Recruitment, Selection and Appointment Policy;
- Code of Conduct for the University Council; and
- Staff Code of Conduct.

The University has established measures to prevent, detect, and address any suspected fraudulent or corrupt practices, child abuse, and regulatory non-compliance. These measures are outlined in the Staff Code of Conduct, the Code of Conduct for the University Council and its Committees, the Crime and Corruption Act 2001 (Qld), and the Public Sector Ethics Act 1994 (Qld).

University employees and council members are considered public officers and must report any suspected corruption to the Crime and Corruption Commission Queensland (CCC). Furthermore, members of the public, including students, have the right to make complaints about suspected corruption or misconduct to the CCC. The Public Interest Disclosure Act 2010 (Qld) provides special protection for those who report such issues in the public interest, including concerns about unlawful, negligent, or improper conduct, as well as threats to public health and safety or the environment.

Risk in teaching operations

The University is committed to providing high-quality educational activities to its students, which are delivered by its dedicated and skilled employees. These employees are bound by the University's policies and procedures, which ensure that all aspects of educational activities are conducted in a professional, ethical, and equitable manner.

While the majority of these activities take place in Australia, some may be located overseas. The University takes great care to ensure that all educational activities are delivered to the same high standards, regardless of their location.

However, the University recognises that temporary visa holders in Australia, including international students, may face particular challenges and vulnerabilities when it comes to employment. The University is committed to providing support and resources to these students to help them navigate these challenges and protect their rights.

In particular, the University is aware of the risk of exploitative working conditions, such as underpayment of wages, that some international students may face when employed outside of the University. To address this risk, the University provides information and guidance to students on their employment rights and responsibilities, and works closely with

relevant government agencies and community organisations to ensure that international students are protected from exploitation¹.

Overall, the University is dedicated to providing a safe and supportive learning environment for all of its students, and to upholding the highest standards of ethical and professional conduct in all of its educational activities.

Risk in research operations

The University's research operations primarily involve providing research services. It is not involved in the production or selling of retail or commercial products. Although the University may develop prototypes and field-demonstrable products as part of its research services, these are handed over to clients prior to production.

The University takes great care in conducting research services in compliance with its policies and procedures, which provide clear guidelines for the ethical and responsible conduct of research. The majority of research services are carried out by the University's highly qualified and experienced employees, who are fully committed to upholding these standards.

In some cases, subcontractors may be engaged to support research activities. The University carefully selects and oversees subcontractors to ensure that they meet the same rigorous standards as its own employees. These subcontractors may be located in Australia or overseas, and their contracts are reviewed and approved by the University's Legal and Assurance office.

When the research is funded by government sources, the University's contract with the funding agency sets out the terms and conditions for subcontractors, which are consistent with the University's own policies and procedures. This ensures that all parties involved in the research are held to the same high standards of integrity and accountability.

Overall, the University is committed to conducting research services with the utmost professionalism and integrity, and to ensuring that all stakeholders are fully aware of their roles and responsibilities

in upholding these standards. The University has a Code for the Responsible Conduct of Research that outlines expectations for the conduct of everyone involved in research conducted under the University's auspices. This code was adapted from the Australian Code for the Responsible Conduct of Research, which was jointly developed by the National Health and Medical Research Council, the Australian Research Council, and Universities Australia.

Risk in controlled entities

Controlled entities incorporated in Australia

Discover Sport Limited

A company limited by Guarantee whose objectives are to promote awareness and benefits of healthy exercise. Discover Sport Limited is not currently trading and does not employ any staff or have any assets.

JCU College Pty Ltd

A proprietary limited company. The University is the sole shareholder and the company is registered with the Australian Charities and Not-for-Profit Commission (ACNC). JCU College is not currently trading and does not employ any staff or have any assets.

JCU CPB Pty Ltd as trustee for the CPB Trust

A corporate trustee of the CPB Trust with the primary objective of assisting the University in carrying out its development, construction and ongoing management of the Clinical Practice Building (CPB), Townsville. The University is the sole beneficiary of the Trust, which ensures that the University benefits from the leasing of commercial spaces, within the building. The CPB Trust holds a ground lease of the CPB site from the University and owns and operates the CPB constructed on the site. Tenants in the CPB include both retail and medical and allied health operations. JCU CPB Pty Ltd purchase through the University's preferred suppliers for consumables (office and administrative items).



¹Walk Free Foundation, The Global Slavery Index 2018, www.globallslaveryindex.org

JCU Early Learning Centres Pty Ltd (JCU ELC)

A proprietary limited company. The University is the sole shareholder and the company is registered with the ACNC. JCU ELC provides non-profit childcare for children of students, staff, graduates of the University and community. It is also charged with providing and promoting the development, wellbeing and education of children, and encouraging parent and community involvement in its operations. JCU ELC employees are employed in accordance with the relevant award (Children’s Service Award 2010). Where possible, JCU ELC purchases through the University’s preferred suppliers for consumables.

JCU Enterprises Pty Ltd

A proprietary limited company and the University is the sole shareholder. JCU Enterprises Pty Ltd does not trade in its own right, nor does it employ staff or use consumables.

JCU Health Pty Ltd

A proprietary limited company. The University is the sole shareholder and the company is registered with the ACNC. JCU Health Pty Ltd operates a general practice doctor’s surgery for students, staff and the surrounding suburbs. Where possible, JCU Health Pty Ltd purchase through the University’s preferred suppliers for consumables and exercises due diligence and monitors supply chains for the balance of suppliers.

JCU Univet Pty Ltd

A proprietary limited company. The University is the sole shareholder and the company is registered with the ACNC. JCU Univet Pty Ltd provides student placements to support the Veterinary Science degree through the operation of an animal general practice and referral hospital. JCU Univet Pty Ltd employees are employed under the Animal Care and Veterinary Services Award. Where possible, JCU Univet Pty Ltd purchase through the University’s preferred suppliers for consumables and exercises due diligence and monitors supply chains for the balance of suppliers.

North Queensland Commercialisation Company Pty Ltd as trustee for the JCU Asset Trust

The company acts as the trustee of The JCU Asset Trust (the Trust), and any income of the Trust is to be distributed to the University. The Trust was formed to generally assist the University in research commercialisation, and to hold intellectual property rights and sponsor start-up initiatives in commercialisation companies. NQCC does not trade in its own right, nor does it employ staff or use consumables.

Tropical Queensland Centre for Oral Health Pty Ltd t/as JCU Dental

JCU Dental is a proprietary limited company. The University is the sole shareholder and the company is registered with the ACNC. JCU Dental operates multiple dental practices to provide student placements to support the corresponding degree at the University and provide services on behalf of Queensland Health to the public. JCU Dental employees are employed under the Health Professional and Support Services Award. Where possible, JCU Dental purchase through the University’s preferred suppliers for consumables and exercises due diligence and monitors supply chains for the balance of suppliers.

Controlled entities incorporated in Singapore

James Cook Holdings Pte Ltd

A private company registered in Singapore, incorporated in 2011 as a holding company fully owned and controlled by JCU Enterprises Pty Ltd. James Cook Holdings does not trade in its own right, nor does it employ staff or use consumables. The company is operated under the relevant local Singapore legislations.

James Cook University Pte Ltd

Incorporated in Singapore in 2001. On 13 April 2015, James Cook University’s Singapore campus earned the distinction of being the first private education institution to attain an EduTrust Star quality mark from the Singapore Government. The company is operated under the relevant local Singapore legislations. All employees are engaged in line with relevant local authorities and the company exercises due diligence when engaging suppliers, monitoring and reviewing their performance.

James Cook Academy Pte Ltd

A private company registered in Singapore, incorporated in 2021 as a holding company fully owned and controlled by James Cook University Pte Ltd (JCUS). James Cook Academy Pte Ltd does not trade in its own right, nor does it employ staff or use consumables. The company is operated under the relevant local Singapore legislations.

Eagle Infotech Consultants Pte Ltd

A private company registered in Singapore, acquired by James Cook Academy Pte Ltd in 2021 to develop the market segment for corporate training and Singapore Government funded short courses to complement James Cook University Pte Ltd’s degree level programs. The company is a reputable training provider with a suite of short courses in technology and soft skills for working professionals with 28 years of experience in Singapore. The company is accredited by the Singapore Workforce Development Agency (WDA) in 2005.

Tropical Futures Institute Ltd

A company limited by guarantee registered in Singapore. Tropical Futures Institute does not trade nor does it employ staff or use consumables. The company is operated under the relevant local Singapore legislations.

Risk in supply chains

The University is aware of the potential risks of modern slavery in its supply chains for all goods and services it purchases, and the risks vary depending on factors such as the type of product or service and the location of production or operation. In the past reporting year, the University carried out a comprehensive analysis and mapping of these risks through the AUPN, in order to have a clearer understanding of the potential for modern slavery in its supply chains.

The University conducted an analysis to identify high-risk goods and services and geographic locations susceptible to modern slavery in their supply chains. The analysis focused on goods and services that pose a significant risk and incur high expenses for the University. The following categories were identified as high-risk:

- Desktop hardware and IT accessories
- Commercial cleaning
- Building construction and maintenance services
- Scientific equipment and laboratory consumables
- Branded merchandise, printing, and distribution services
- Catering and meal services.

Overall, the analysis aimed to help the University take proactive measures to mitigate the risk of modern slavery in its supply chains.

Part D – Actions Taken to Assess and Address Risks

The University recognises the presence of modern slavery risks in its supply chains and has taken steps to address them. During the past reporting year, the University focused on conducting due diligence with suppliers and participating in the AUPN Modern Slavery Users Forum (MSUF). These activities aimed to identify, assess and mitigate the risk of modern slavery practices in the University's operations and supply chains.

Procurement and Contracts

The University includes provisions related to modern slavery in its standard contract documents. These provisions require organisations that provide the University with goods and services to:

- Comply with the goals and requirements of the Modern Slavery Act.
- Take reasonable steps to ensure that there is no modern slavery in the supply chains or any part of the business of the Contractor or any of its subcontractors.
- Conduct their business in a manner that aligns with the principles of the Modern Slavery Act.
- Warrant that neither the Contractor nor its subcontractors have been convicted of an offense involving modern slavery and, to the best of their knowledge, have not been or are not currently the subject of any investigation, inquiry, or enforcement proceedings by any authority in relation to any offense or alleged offense of or in connection with modern slavery.

Market approach

The University has incorporated a returnable schedule into its standard tender and market approach documentation in order to gain a deeper understanding of its supply chains. Prospective suppliers responding to market approaches are requested to answer questions regarding their reporting status under the Modern Slavery Act, their policies and training practices related to modern slavery, and the measures they have taken to identify and address the risks of modern slavery in their supply chains and operations.

Guiding documents

The University's Procurement Procedures incorporate the University's obligations under the Modern Slavery Act as a key principle that must be followed during any procurement activities. To help suppliers comprehend the University's expectations, a Supplier Code of Conduct has been established.

Supplier questionnaires

The University has an extensive and complex supply chain that covers more than 150 different categories of goods and services. As part of every tender process, suppliers are required to complete a questionnaire that gathers crucial information about their business practices, including:

- Their reporting status under the Modern Slavery Act
- Their policies, procedures, contracts, and other relevant documents
- The supply chains of the goods they sell
- The measures they have taken to identify and address the risks of modern slavery in their supply chains and operations.

Completion of the questionnaire is mandatory and are taken into account as a criterion during the evaluation of offers.

Training and awareness

The procurement function at the University is centralised and managed by the Strategic Procurement Group within the Financial and Business Services Directorate. To raise awareness of the issue and ensure that key staff are aware of the University's responsibilities, training was conducted in 2022 and made available to relevant parties across the University. Additional training was provided in 2022, with more to be offered in 2023. This training will include the utilisation of the AUPN Modern Slavery tool, FRDM.

Collaboration as a sector

The University, along with 38 other institutions, voluntarily joined the AUPN's MSUF. In July 2020, the MSUF formed the Modern Slavery Academic Advisory Board, consisting of 12 members from 9 universities who have expertise and experience in modern slavery risk and supply chains. The board's goal is to enhance the sector approach. Meetings are held on a monthly basis to review and refine AUPN-developed materials and initiatives.

The sector-wide Modern Slavery Program aims to achieve the following:

- Collection and aggregation of sector procurement data
- A solution for members to identify risk, allocate resources, and inform action, supported by a third-party technology solution
- A sector-wide approach/action plan for addressing, mitigating, and/or remediating identified risks
- Flexible templates and guidance
- Continuous improvement.

AUPN members and their suppliers have benefited from the improved operational efficiency that has resulted from the collaboration, resulting in a better ability to mitigate risk and enhance social performance within supply chains.

Modern slavery technology solution

The AUPN has engaged FRDM to implement a technology platform that utilises AI to algorithmically identify modern slavery risks in the supply chain. This tool supports the University and other participating institutions in collecting and analysing expenditure and supplier data, identifying risk, directing resources, and informing action for modern slavery risk management. The collaborative solution has been available for use by all participating universities since February 2022.

Part E – Assessment of the Effectiveness of Actions

The table below outlines the steps taken by the University to review the effectiveness of its actions to assess and address modern slavery risks, including how it will monitor the effectiveness of its actions in future reporting years.

Area	Action	Outcomes
Training and awareness	Awareness training provided to procurement staff	Targeted training was conducted for Procurement staff managing categories identified as high risk. Procurement staff report that their understanding and ability to identify high-risk suppliers has improved.
Procurement and contract management processes	RFX documentation requires respondents to answer a modern slavery questionnaire. Engage with suppliers on modern slavery risks where issues are identified through the AUPN tool or as a result of a tender process. Respond to modern slavery risks in the University's procurement activities.	All procurement contracts contained modern slavery clauses. Modern slavery questionnaire responses were assessed against the AUPN modern slavery risk assessment tool which aids the evaluation team in determining the supplier risk and criteria score. In 2023, information provided by suppliers regarding their policies and practices relating to modern slavery will continue to be reviewed and checked against the FRDM risk ratings.
Collaboration as a sector	Member of AUPN's Modern Slavery User Forum (MSUF)	The University conducted targeted risk assessments of its suppliers to enhance its understanding and awareness of the areas within its supply chains and operations that are vulnerable to modern slavery risks.

Part F – Consultation

The University's controlled entities were consulted during the development of this report. During this reporting year under the Act, the consultation process focused on gaining a deeper understanding of the operations and supply chains of these entities and identifying suppliers of high-risk goods and services utilised by the entities.

Part G – Other Information

Next steps

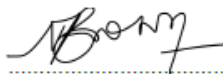
In 2023, the fourth reporting year under the Modern Slavery Act, the University plans to:

- Maintain the inclusion of clauses specific to modern slavery in contracts with suppliers and continue collecting data on modern slavery from suppliers participating in market activities.
- Implement contracts and supplier due diligence for high-risk goods and services categories that are not currently under contract, including catering services.
- Enhance awareness of the Modern Slavery Act and associated responsibilities within the central Procurement Services team and across the entire organisation.
- Further assess and identify the risk of modern slavery in the University's operations and supply chain, including controlled entities.
- Additionally, the University will benefit from the following activities planned for 2023 by the AUPN:
 - Sharing best practices for addressing modern slavery risks and human rights in the higher education sector.
 - Seeking advice and input from academics at Australian universities who specialise in modern slavery and human rights.

Part H – Conclusion

While the University considers the risk of modern slavery in its activities to be low, it is proactively working to fulfill its obligations under the Modern Slavery Act, especially regarding its supply chains, by actively managing and reducing the risks.

This statement is approved by the James Cook University Council.



Ngiare Brown
Chancellor

27 June 2023

Date



JCU: Ready today
for tomorrow



jcu.edu.au

