

QUT MODERN SLAVERY STATEMENT 2020

the university
for the real world 

02 About QUT

03 QUT Structure Operations

04 Supply Chain

05 Risks of modern slavery practices

- Research05
- Tracking and student services.....06
- Management of human resources06
- Investments06
- Commercial operations.....06
- Engagement with industry partners07
- Controlled entities07
- Supply chain.....07

08 Actions taken to assess and address risks

- Consultation and collaboration as a sector and establishment of the Modern Slavery Working Group (MSWG)..... 09
- Templates and guidance..... 10
- Data gathering 11
- Communications (universities and stakeholders)..... 11
- Support from consultants 11
- Academic Advisory Board 11
- High risk identified industries..... 11

12 Measuring effectiveness Consultation

13 Other information and next steps Approval

INTRODUCTION

The Australian Government's *Modern Slavery Act 2018* (Cth) (the Act) came into effect on 1 January 2019. The Act established a national Modern Slavery Reporting Requirement that requires certain large entities to publish annual reports (modern slavery statements) on their actions to address modern slavery risks in their operations and supply chains. The Act aims to combat modern slavery by holding large businesses and other organisations publicly accountable for their actions to address modern slavery in their global supply chains.

The Queensland University of Technology (QUT) is committed to conducting business with ethically, environmentally, and socially responsible suppliers and recognises our responsibility to eliminate modern slavery practices within both our supply chains and operations.

This Modern Slavery Statement showcases QUT (ABN 83 791 742 622) commitment to tackling modern slavery in our organisation and supply chains and sets out the actions we are taking to address modern slavery risks during the 2020 financial year, from 1 January 2020 until 31 December 2020.



ABOUT QUT

With more than 50 000 students and offering more than 400 courses and research programs, QUT is a modern university for the real world. We began operating as QUT in January 1989, following approval of our status as a university. QUT has two inner-city campuses at Gardens Point and Kelvin Grove situated on the land of the Turrbal and Yugara people; lands that were never ceded.

We are well known as ‘the university for the real world’ because of our close links with industry and our relevant teaching and applied research. Industry representatives and professionals contribute to our course development, adding a practical perspective to theoretical education.

Our academic staff consult in industry and work on industry projects which often involve students. Staff and students have access to the latest teaching technology.

We are an ambitious institution, with a rapidly growing research effort and we seek to equip our students and graduates with the skills they will need in an increasingly disrupted world.

QUT recorded significant achievements in academic performance during 2020, named Australia’s best young university in the Times Higher Education (THE) Young University

Rankings and was ranked 14th internationally, and 186th in the world in the 2021 THE World University Rankings. QUT sits within the top 40 in employer-student connections in the global QS Graduate Employability Rankings 2020, and our education graduates have the highest graduate employability rates in the country.

Blueprint 6 is the university’s institutional strategic plan. It sets out a series of priorities that integrate and align our different plans and activities, focus, and express our aspirations, state, and reinforce our values, exploit our distinctiveness, and reflect our refreshed vision as the university for the real world.

More information on QUT’s business, history, operations, and Blueprint 6 strategy, can be found in our 2020 Annual Report and on our website – www.qut.edu.au.

QUT STRUCTURE

The university's governing body is QUT Council, which oversees and reviews proper and effective management and operation of the university and its controlled entities.

QUT Council is Chaired by the Chancellor, Dr Xiaoling Liu and has up to 22 members. Management of the university is the responsibility of the Vice-Chancellor and President, Professor Margaret Sheil AO.

QUT moved to a three-division structure on 1 July 2020 and currently has five faculties:

- Chancellery Division
- Academic Division
- Administrative Division
- Faculty of Business and Law
- Faculty of Creative Industries, Education and Social Justice
- Faculty of Engineering
- Faculty of Health
- Faculty of Science

The full university structure can be found on our website – www.qut.edu.au/about/our-university/organisational-structure

The university has seven controlled entities to support our operations. During the reporting period, four of these identified below were operating:

- Brisbane Business School Pty Ltd
ABN: 38 085 931 611
- Student Managed Investment Fund
ABN: 92 718 723 234 (operating)
- QUT Enterprise Holdings Pty Ltd
ABN: 97 097 319 778
- QUT Enterprise Holdings Trust
ABN: 28 928 640 473 (operating)
- qutbluebox Pty Ltd
ABN: 34 118 773 096
- QUT bluebox Trust
ABN: 97 041 405 905 (operating)
- Creative Industries Precinct Pty Ltd
ABN: 82 099 110 924 (operating)

OPERATIONS

QUT's core business is research, learning and teaching. The university's functions are to:

- provide education at university standard
- provide facilities for, and encourage, study and research
- encourage the advancement and development of knowledge, and its application to government, industry, commerce, and the community
- provide courses of study or instruction (at the level of achievement QUT Council considers appropriate) to meet the needs of the community
- confer higher education awards
- disseminate knowledge and promote scholarship
- provide facilities and resources for the wellbeing of the university's staff, students and other persons undertaking courses at the university
- to exploit commercially, for the university's benefit, a facility or resource of the university, including, for example, study, research or knowledge, or the practical application

of study, research, or knowledge, belonging to the university, whether alone or with someone else

- to perform other functions given to the university under the *QUT Act* or another Act.

Our activities are largely undertaken across our two campuses at Gardens Point and Kelvin Grove and across various distributed sites located in Queensland, Australia. QUT does not own or operate overseas campuses. Some staff and students may travel overseas from time to time to undertake work or study associated with the university. The university's controlled entities operate in Queensland, Australia.

In 2020, QUT had:

- 52 672 students (37 334 full-time and 15 338 part-time. This includes 864 Aboriginal and Torres Strait Islander students
- a total of 5049 Full-Time Equivalent (FTE) staff members, of these there were 1000.4 FTE casual staff members and 4048.50 FTE full-time and part-time staff members
- \$1.054 billion in revenue

SUPPLY CHAIN

In 2020, QUT worked with over 9000 suppliers to provide goods, services, and works to support the delivery of our core business of research, teaching, and learning. QUT spent approximately \$317million across four main areas:

Table 1 – QUT percentage of spend per Category

Category	Includes, but is not limited to:	% of total estimated procurement spend
Medical, Scientific, Research and Teaching	Equipment, Scientific and Medical Consumables, Chemicals, Gases, Laboratory supplies, sporting, and musical equipment.	14.2%
Facilities Management and Campus Services	Construction, Operations, Maintenance, Fleet, Security, Waste, Cleaning, Transportation Services and Minor Works.	30.8%
Technology	Computer Hardware and accessories, Software and Licensing, Audio Visual and ICT services.	13.4%
Business Services	Professional Services, Human Resources, Library Services, Contingent Labour, Marketing and Media, Legal, Audit, Logistics, Freight, Postage, Financial Services, Banking, Catering, Uniforms, Travel, and Insurance	34.9%
Non-Procurement Spend	Non-procurement/non-addressable spend	6.7%

QUT recognises that there are modern slavery risks across the goods, services and works that we purchase and are committed to identifying and addressing these. The below table shows our top 10 country spend by geographical location. Where possible, QUT is committed to procuring goods from Australian suppliers and approximately 86% of our spend is from suppliers within Australia. Only 2% of our spend is from countries that are of medium or high risk of modern slavery.

Table 2 – Top 10 Country Spend

Equates to 95% of QUT spend

Country of Spend – using supplier head office location	Country Risk level (based on the Global Slavery Index)	% of QUT spend 2018 to 2020
Australia	Low	86.86%
United States of America	Low	3.82%
India	High	0.86%
China	Medium	0.82%
United Kingdom	Low	0.77%
Germany	Low	0.70%
Netherlands	Low	0.63%
Singapore	Low	0.54%
Hong Kong	Medium	0.32%
Ireland	Low	0.10%

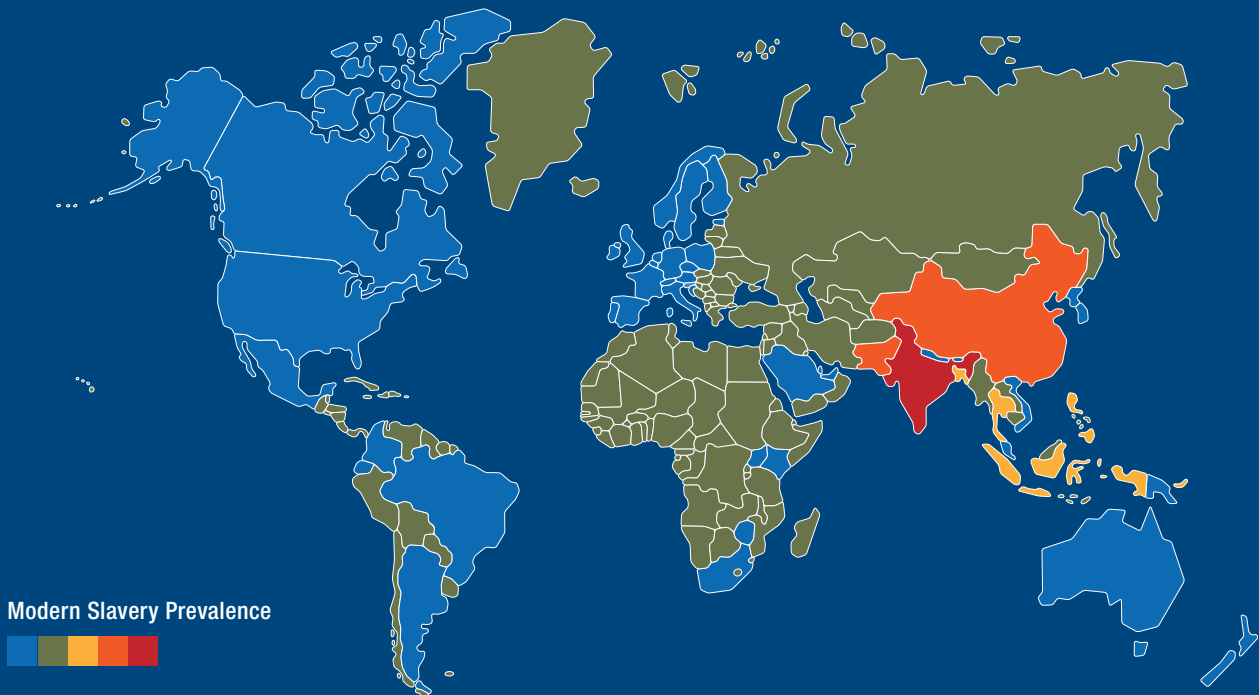


Image 1 – Modern slavery prevalence globally from AUPN Modern Slavery Dashboard

RISKS OF MODERN SLAVERY PRACTICES

QUT acknowledges that modern slavery can occur in every industry and sector and has severe consequences, and that is why we are committed to taking steps to identify, assess and address modern slavery risks.

The QUT Council has overall responsibility for risk management at QUT, which is exercised through the Risk and Audit Committee (RAC). RAC has approved the Enterprise Risk Management framework to proactively manage risks, optimise opportunities and achieve our objectives.

This framework has been used to assess how QUT will identify and manage the risk of modern slavery in our operations (including research, teaching, human resources, investments, and commercial operations), as well as our supply chains.

Through existing organisational controls, new initiatives underway, as well as future improvements identified, QUT's risk of modern slavery within our operations can be mitigated and managed effectively.

Research

QUT participates in wide-ranging research activities including, industry collaborations and partnerships undertaken both locally and Internationally.

QUT acknowledges the potential for modern slavery risks in research. Particularly where the research involves:

- human participants in other countries; and/or
- procurement of goods or services for research purposes, including obtaining human biospecimens from international biobanks, or purchase of equipment.

All QUT staff and students involved in research or research related activities are required to adopt responsible research practices consistent with the Australian Code for the Responsible Conduct of Research, national and international ethics guidelines and related legislation.

All QUT research involving humans is reviewed by the University Human Research Ethics Committee (UHREC) or a delegated university review body, in accordance with the ethical principles of the *National Statement on Ethical*

Conduct in Human Research (2007) (National Statement). The National Statement must be used to inform the design, ethical review, and conduct of human research that is funded by the NHMRC or ARC and is the national standard for use by any individual, institution or organisation conducting human research.

QUT's Office of Research Ethics and Integrity (OREI) assists the operations of the UHREC and supports researchers by providing education, guidance, process, and advice to embed a high-quality research culture at QUT.

Teaching and student services

In 2020, QUT had 44 230 domestic students and 8442 international students. University teaching and other student services are primarily provided in Australia by QUT staff who are recruited and managed according to QUT employment policy and procedures.

QUT acknowledges that students, particularly international students, may be at risk of modern slavery when working in Australia, volunteering in Australia, or when undertaking work integrated learning (WIL) experiences or international learning experiences. QUT provides education and awareness to students on matters relating to their rights and provides student support services that are accessible to all students. As part of any WIL, industry partners are required to sign an agreement which includes clauses that require the industry partner to comply with legislation, as well as provide a variety of tasks for the student so that learning outcomes can be achieved.

In 2020, QUT had 2465 HDR students. International HDR students are accepted to QUT with evidence of being able to cover minimum costs of their stay—\$21 041 per year (as per visa requirements). Limits are also placed on HDR students regarding working hours while enrolled (no more than 10 hours/week for scholarship recipients).

Management of human resources

All permanent, fixed-term and casual staff engaged by QUT are recruited using transparent processes in line with approved policy and QUT's Enterprise Bargaining Agreements. These documents govern all employment terms and conditions of academic and professional staff. In addition, QUT has a range of human resources policies, procedures, and guidance in place to manage risks of modern slavery in our operations.

QUT supplements its workforce from time to time with temporary workers to complete specific pieces of work, and/or fill temporary vacancies. These workers are engaged using the Queensland State Government Standing Offer Arrangement which has mandatory provisions for all companies on the Arrangement to have a labour hire license. These licenses are covered by legislation with the dual purpose of protecting workers from exploitation by providers of labour hire services and to promote the integrity of the labour hire industry. In addition, the Arrangement also has contract clauses that ensure compliance with relevant legislation.

Investments

As part of our operations, QUT makes financial investments. QUT's Council has appointed the Queensland Investment Corporation (QIC) to oversee and manage our investment portfolio. The QIC has its own published modern slavery statement and is committed to responsible investment through embedding environmental, social and governance (ESG) factors to make better informed decisions, while delivering on long-term investment obligations. QUT has a Finance and Planning Committee that considers the selection of fund managers and advises and monitors the performance, associated risks, and management of long-term investments and endowments.

Commercial operations

QUT has approximately 28 retailers on campus and 27 other commercial licences/agreements. All retailers have documented leases or licences in place with clauses covering compliance obligations with all relevant legislation.

Engagement with industry partners

QUT engages industry partners across its operations for a wide variety of reasons in line with our Blueprint 6 strategy. Industry partners may be Australian or International entities, located in wide-ranging countries. Any engagement of industry partners includes a due diligence process to ensure the partner is a legitimate business operation. Concerns identified through this process are flagged with the accountable senior staff member for consideration and further action, if required. This process also includes potential major gift donors.

Controlled entities

In the 2020 reporting period, QUT had four operating controlled entities. These entities had limited operations (one interim employee across all four entities) and very limited (if any) supply chain activity undertaken. The risk of modern slavery within QUT's controlled entities has been reviewed and assessed as part of the development of this statement.

Student Managed Investment Fund

ABN: 92 718 723 234 is used as an experimental 'real' world learning tool for students. All investments made through this Fund are governed by QUT's investment policy.

QUT Enterprise Holdings Trust

ABN: 28 928 640 473 has been established to undertake or to initiate, promote, facilitate, and oversee research and development projects, and education and training programs in relation to any university discipline.

The Creative Industries Precinct Pty Ltd

ABN: 82 099 110 924 manages creative business development services, incubator and co-working facilities based at the Creative Industries Precinct at Kelvin Grove. The Fund invests in early-stage creative businesses with a view to generating future long-term revenues. Any investments through this entity includes a due diligence process. Concerns identified through this process are flagged with the Board for consideration and further action, if required.

QUT bluebox Trust (bluebox)

ABN: 97 041 405 905 is used as a vehicle to manage financial transactions relating to start-up companies based on QUT's intellectual property and managed through the Office of Industry Engagement. The Trust is also limited to financial transactions to manage legacy projects and investments and is jointly managed by QUT Finance and the Office of Industry Engagement in line with QUT's financial policies and procedures and audited by Qld Audit Office (QAO). Annual valuations of any investment companies are undertaken by bluebox including the provision of financial data, information about the strategic direction of the company, current revenue/income and products/services generated. Concerns identified through this process are flagged to the Board to consider possible divestment.

Supply chain

QUT recognises that there are risks of modern slavery in the supply chains of the goods and services we purchase. QUT supply chains include industries, goods and services identified as high risk, such as cleaning, security, catering, building maintenance services, clothing/uniforms and computer hardware and accessories (such as electronics).

All suppliers engaged by QUT agree to QUT terms and conditions from purchase orders through to comprehensive contract conditions based on the value and risk of what we are buying. These terms and conditions include existing clauses that cover compliance with relevant legislation, which includes modern slavery legislation.

QUT's Procurement Policy was updated in 2019, to a principles-based approach. The second principle within the policy is:

Advancing local, socially responsible, Indigenous, environmental, and sustainable outcomes.

This principle demonstrates the importance to QUT in dealing with ethical and socially responsible suppliers and enables QUT to clearly pursue these objectives in its procurement decision making, both holistically and in individual procurement activities.

As QUT starts to investigate and use more innovative supply chains, for example, the use of crowdsourcing platforms to outsource activities to a distributed virtual workforce, it is acknowledged that QUT may be exposed to additional modern slavery risks. However, this is a new and evolving way of outsourcing tasks, and not widely used across QUT's business.

ACTIONS TAKEN TO ASSESS and ADDRESS RISKS

QUT recognises the importance of taking action to assess and address the risk of modern slavery in our operations and supply chain, over and above the existing controls in place at the university (listed above). There are multiple initiatives underway across QUT divisions to support compliance with the Act and to ensure that QUT is actively combatting modern slavery.

QUT is committed to the protection of human rights and in 2020, responded to the *Human Rights Act 2019* (the HRA) by integrating human rights considerations into policy and procedure including the QUT Staff Code of Conduct, QUT Student Code of Conduct, Management of student misconduct policy, and various policies relating to the hiring and accessing of university spaces. The university has commenced training key staff about the requirements of the HRA and developed internal guidelines to assist process owners and decision makers in the proper consideration of human rights. QUT has designated discrimination advisors who form part of the Equity department and has commenced transitioning to a central complaint handling process for human rights complaints. There were no human rights complaints received by QUT in 2020.

In 2020, QUT's operations were significantly impacted by COVID-19, as a result, the focus to assess and address risks around modern slavery was limited to:

- assessing the existing controls (as outlined above) across QUT operations and supply chains to ensure existing controls support the identification and mitigation of risks identified
- providing QUT spend data for 2018, 2019 and 2020 to the Australian University Procurement Network (AUPN) to help develop its sector-wide response
- actively participating in the sector-wide Australian University Procurement Network (AUPN) response to Modern Slavery. This included collaborating with other Universities to ensure a co-ordinated and consistent sector-wide response – as outlined in detail below, ensuring duplication was minimised
- providing internal briefings to key stakeholders and circulating communications within QUT's Strategic Procurement newsletter to raise awareness.

The AUPN's Modern Slavery sector approach

QUT is a member of the AUPN, the peak body for strategic procurement in the higher education sector in Australia and New Zealand. Membership of the AUPN comprises 38 member institutions and QUT plays an active role in the AUPN, with a representative on the AUPN's Executive Committee.

The AUPN is leading a sector collaboration to support all member universities to meet the challenge of human rights transparency and risk management in their supply chains and contribute to the fulfillment of members reporting requirement to the *Modern Slavery Act 2018* (Cth).

Consultation and collaboration as a sector and establishment of the Modern Slavery Working Group (MSWG)

In 2019, the AUPN established a Modern Slavery Working Group (MSWG) with nine universities actively contributing time and effort on a voluntary basis. The MSWG underwent a Discovery Phase and developed the following sector wide Modern Slavery (MS) Program. Refer to Program of Works diagram on page 9.



1
Discovery

PROGRAM OF WORKS (Project Plan)		
DISCOVERY Interviews, scope, objectives, outcomes and tactics	DATA ANALYSIS Aggregated data, overlay publicly available MSA risk (category and country) and produce dashboards	COMMUNICATIONS Stakeholder mapping and communications matrix

2
Implementation

Technology Enablement Workstream <ul style="list-style-type: none"> Delivering technology platform for reporting dashboards and information bank available on the AUPN portal 	Framework documentation workstream <ul style="list-style-type: none"> Delivering a flexible framework, templates and processes to support MSA statements 	Data analysis workstream <ul style="list-style-type: none"> Delivering a sector wide MSA risk matrix and risk metric against common suppliers Data cleansing, analysis and application of risk framework 	Engagement and communications workstream <ul style="list-style-type: none"> Delivering communication and training to university's to support the awareness and knowledge of program outcomes 	Governance workstream <ul style="list-style-type: none"> Providing due diligence and reporting for the program
System Review – technology platform/s to support MSA statement requirements				

3
Continuous Improvement

YEARLY REFRESHED DATA ANALYSIS	CONTINUOUS IMPROVEMENT	AUDITS AND COMPLIANCE
MSA STATEMENT FRAMEWORK SUPPORTING RESPONSE		

Image 2 – AUPN MS Program – Developed by MSWG with support from ArcBlue Consulting

This Program aims to deliver the following:

- a collection and aggregation of sector procurement data
- a solution that allows members to identify risk, focus resources and inform action – supported by a third-party technology enablement solution
- a sector approach/action plan for addressing, mitigating and / or remediating identified risks
- flexible templates and guidance
- continuous improvement.

The MSWG completed the sector-wide discovery phase of the MS Program in December 2019 and is currently in the implementation phase.

Templates and guidance

The MSWG developed templates and guidance to help universities implement mitigations in a consistent manner. These have been reviewed by Procurement and Governance, Legal and Performance (GLP) and will be embedded into documentation and procurement processes by the end of 2021, based on the value and risk of the procurement activity.

- Supplier Assessment Questionnaire or Response Schedule.
- Standard contract clauses
- Supplier Code of Conduct Guidelines
- Supplier Engagement Terms of Reference and Communication approach

Data gathering

As part of the Discovery phase, a Modern Slavery Risk Dashboard was developed and made available to all AUPN members in January 2020. QUT was one of 27 universities to submit spend data from 2018 to 2020 into the dashboard and MS Program. The dashboard is the first step in the AUPN's MS Program journey, providing an indication of a university's risk across two different lenses:

1. Potential risks of modern slavery applied against spend categories using the AUPN taxonomy, and
2. Potential risks of modern slavery applied against country locations using supplier head office location.

These risks have been determined through publicly available modern slavery risk (e.g., Global Slavery Index) and prevalence information together with some reasonable assumptions. The dashboard provides only an indicative view of where risks may exist and the AUPN aim to continue to evolve risk ratings over time as the analytics matures.

The aggregated data reflects the broad supply chains of the sector. Analysis of the spend data provided covers over \$14.6 billion annualised spend across more than 183 800 individual suppliers. Suppliers with the highest spend are in the construction, Information and Communications Technology (ICT) and research markets.

The findings of this piece of work, clearly shows that most goods and services procured by QUT are from Australia and other low-risk countries, however, approximately 2% of spend is from countries that are deemed medium or high risk (as outlined above). QUT will continue to analyse this data to identify high spend and high-risk suppliers and activities.

Technology solution

The MSWG is also currently undergoing a two-stage tender process seeking a third-party technology solution that will further support its members to gather and interrogate expenditure supplier data, identify risk, focus resources, and inform action. The initial stage (Request for Information) was released in July 2020 with the aim of awarding a collaborative solution for all AUPN members by mid-2021. QUT has committed to implementing the technology solution in 2021.

Communications (Universities and Stakeholders)

The MSWG provides progress updates on the MS program monthly via email correspondence and regular project status uploads into the AUPN portal – of which QUT has actively received. Monthly virtual sessions have also been used to update the AUPN community on progress of the MS program and provide feedback, discussion, and education to the wider AUPN community. QUT has been engaged directly to provide awareness on the MS Programs' progress and ensure alignment with university strategies.

Support from consultants

In 2019, ArcBlue Consulting were engaged to facilitate the discovery phase and supported development of the AUPN MS Program and the Modern Slavery Risk Dashboard. ArcBlue continues to support the AUPN with managing the online AUPN portal, including maintaining the Risk Dashboard and shared modern slavery documentation.

Modern slavery specialist Pillar Two were engaged in May 2020 following a tender process to provide modern slavery subject matter expertise (SME) and support of the AUPN MS Program. To date, Pillar Two has provided:

- a complete review of the AUPN MS Program including 25 recommendations to enhance the sector's approach
- modern slavery SME support throughout the entire technology solution tender process
- review of the Modern Slavery Risk Dashboard and risk ratings.

Given the resources available, the MSWG aims to action Pillar Two recommendations by early 2021 including providing indicative timeframes to deliver remaining initiatives.

Academic Advisory Board

An Academic Advisory Board was established in July 2020 consisting of 12 academics from 9 universities with experience and expertise in modern slavery. The board aims to enrich the sector approach. Meetings were held monthly for 2020 and structured to review and refine the AUPN artefacts and initiatives.

High risk identified industries

Using the Risk Dashboard and aggregated sector data, a list of nearly 20 suppliers with potentially a high-risk of modern slavery presence in their supply chain and high spend with multiple universities was considered for further engagement by the AUPN MSWG.

A questionnaire was developed by the AUPN MSWG to collect information from these suppliers relating to:

- their reporting status under the act
- their policies, procedures, contracts, and guiding documentation
- the supply chains of the goods they sell
- the actions they have undertaken to identify and address the risks in their operations and supply chains.

QUT actively engages 65% of the suppliers approached, all of which submitted positive responses to the questionnaire, showcasing the actions they are each taking towards eradicating modern slavery in their global supply chains and Australian operations.



MEASURING EFFECTIVENESS

QUT has currently not identified or is aware of any causes or contributions to modern slavery in our operations and supply chains. If identified, QUT is committed to immediate remediation. The remediation will be reviewed on a case-by-case basis depending on the severity, impact, and risk to those involved and will include a documented plan with key actions to remedy.

QUT aims to monitor the effectiveness of its approach to modern slavery through the QUT Modern Slavery Reference Group and where possible, embedding actions to address modern slavery risks into 'business as usual' planning practices. This will include the development of Key Performance Measures (KPIs) to measure the effectiveness of our actions taken. QUT has had no complaints to date in relation to modern slavery risks in our operations or supply chains.

CONSULTATION

In addition to consultation with the AUPN as outlined above, a QUT Modern Slavery Reference Group was established in early 2021 with key internal stakeholders' from across QUT operational areas. The reference group representatives were engaged and consulted on QUT's Modern Slavery Statement.

The QUT Modern Slavery Reference Group provides a platform to enable consultation across various university departments and disciplines, including:

- University Registrar's Office
- Campus Services and Procurement
- Facilities Management
- QUT International
- Digital Business Solutions
- Business Development
- Research
- Work Integrated Learning
- Governance, Legal and Performance
- Assurance Risk and Integrity Services
- Faculty Operations.

The university's controlled entities which are currently operating were consulted as part of the development of this report.

OTHER INFORMATION and NEXT STEPS

While QUT's focus for 2020, was on the AUPN sector-wide response to modern slavery, to ensure a considered approach and duplication was minimised, our focus for 2021 and beyond is on embedding specific actions across our operations and supply chains, taking a proactive approach to identifying, assessing, and mitigating risks.

Table 4 – QUT actions planned for the future

Actions Planned
<ul style="list-style-type: none"> • Implementation of the AUPN technology solution (including financial contribution) that will: <ul style="list-style-type: none"> – Identify modern slavery risks – Support our future reporting – Improve supply chain transparency – Inform actions and track effectiveness – Identify mitigations – Supports sector collaboration – Contributes to continuous improvement. • Maturity of the cross-functional QUT reference group to raise awareness, provide oversight, develop a remediation approach, and develop KPIs to measure the effectiveness of our actions. • Education and training to raise awareness across QUT of this issue and the importance of addressing within our operations and supply chain. • Review standard contractual templates and assess need for specific modern slavery clauses for new contracts and/or variations to contracts (including, but not limited to, expenditure, revenue, commercial leasing, venue hire, work integrated learning international engagements, recruitment services agreements/overseas agents). • Update QUT's Market/Offer/Tender documentation templates to incentivise/encourage suppliers who are proactively working to combat modern slavery – directly and through their supply chains. • Update QUT's Procurement Procedures to include QUT's modern slavery obligations. • Work with key QUT's suppliers, especially those who provide high-risk goods and services (as identified through the AUPN technology solution – such as uniforms, computer hardware and accessories) to collect information relating to their reporting status; their policies, procedures, and actions taken within their own organisations to identify and address the risk of modern slavery. • Review and refine due diligence processes for the engagement of external parties including, but not limited to suppliers, industry partners and donors. • Run 'Work Safe' sessions for students focused on identifying and mitigating risks that they may encounter personally. • Review the investment strategy of QUT's controlled entities to incorporate Modern Slavery as a risk consideration for existing and new investments.

APPROVAL

This Modern Slavery Statement is made pursuant to Section 13 of the *Modern Slavery Act 2018* (Cth) and has been approved by the Council of Queensland University of Technology.



Professor Margaret Sheil
Vice-Chancellor and President
Queensland University of Technology

Sources of Data:

- QUT Annual Report
- QUT Website
- QUT Modern Slavery Reference Group – Risk Identification TABLE
- AUPN Portal
 - Modern Slavery Data Dashboard (QUT information and all University data)
 - Responses to AUPN MSWG supplier questionnaire
- Power BI Dashboard – Procurement Spend Analysis – Power BI
- QUT HR Data