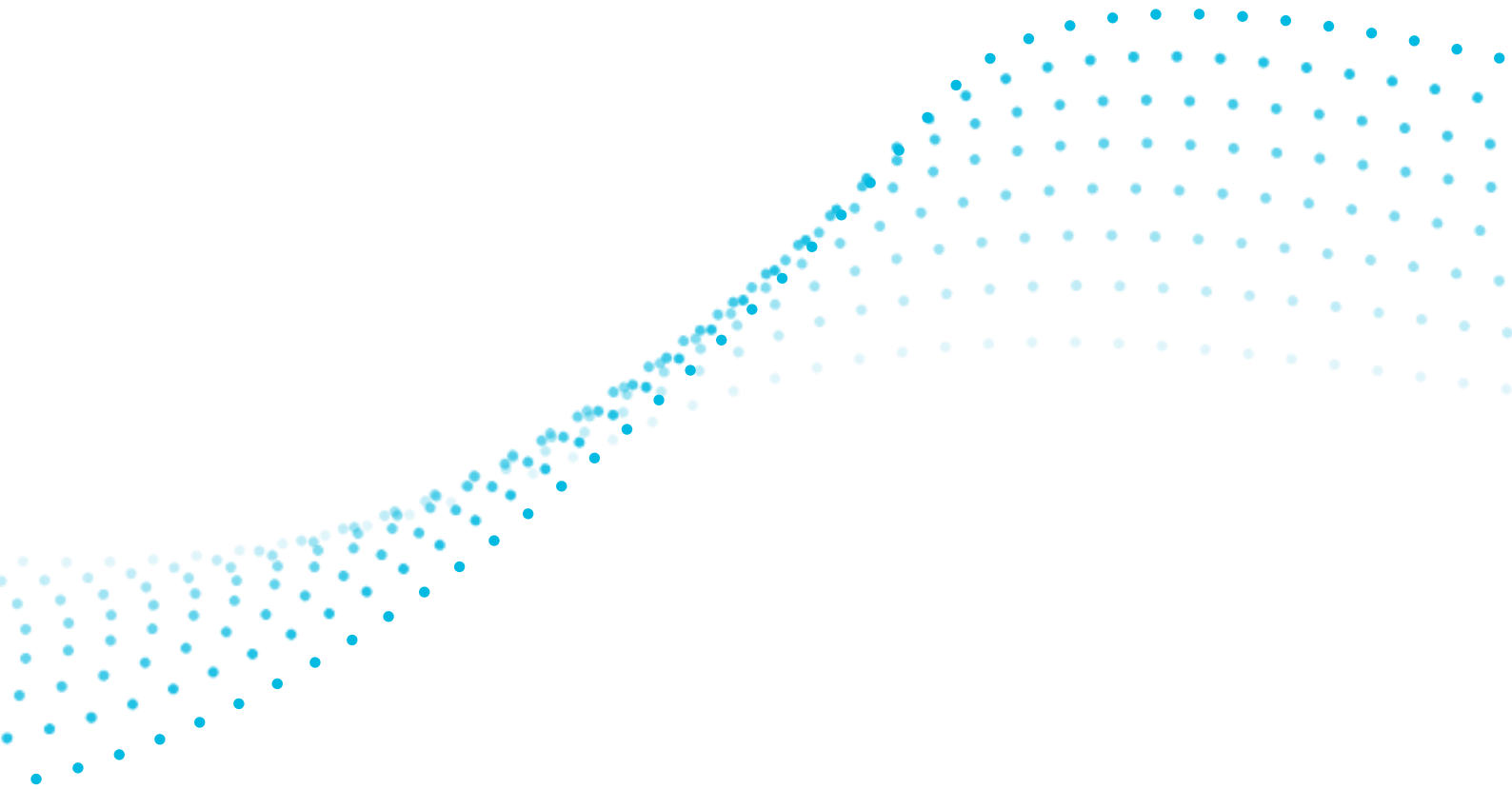




Modern Slavery Statement 2024-25

Australian Council *for* Educational Research



Executive Summary

This Modern Slavery Statement outlines the actions taken by the Australian Council for Educational Research Ltd (ACER) during the financial year 1 July 2024 to 30 June 2025 to identify, assess, and address risks of modern slavery in its operations and supply chains. Prepared in accordance with Section 13 of the *Modern Slavery Act 2018* (Cth), this statement responds to the mandatory criteria under Section 16 of the Act.

ACER is a not-for-profit educational research and assessment services organisation headquartered in Camberwell, Victoria, with offices across Australia and subsidiaries in the United Kingdom, United Arab Emirates, India, and Malaysia. ACER is committed to upholding human rights and ensuring that its operations and supply chains are free from modern slavery practices, including slavery, servitude, human trafficking, forced labour, child labour, debt bondage, and other exploitative practices.

During the reporting period, ACER undertook several actions to address modern slavery risks, including:

- embedding modern slavery clauses in all new and renewed supplier contracts;
- strengthening internal governance through cross-functional consultation with subsidiaries and executive leadership; and
- reviewing and updating its Modern Slavery and Human Trafficking Policy to align with evolving legal and ethical standards.

ACER also engaged in regular internal governance and external assurance processes to monitor and evaluate the effectiveness of its efforts. Based on the results of these processes, ACER adapted and strengthened its actions to continually improve its response to modern slavery.

Looking ahead, ACER plans to deepen its commitment by mapping Tier Two and Tier Three suppliers in high-risk categories, expanding supplier due diligence processes, and engaging with external partners and stakeholders to ensure continuous improvement.

Modern Slavery Statement 2024–25

The Australian Council for Educational Research Ltd (ABN: 19 004 398 145)

Prepared in accordance with Section 13 of the *Modern Slavery Act 2018* (Cth).

1. Introduction

This Statement outlines the actions taken by ACER during the financial year 1 July 2024 to 30 June 2025 to identify, assess, and address risks of modern slavery in its operations and supply chains. It responds to the mandatory criteria under Section 16 of the *Modern Slavery Act 2018* (Cth).

2. Reporting Entity

ACER is a not-for-profit educational research and assessment services organisation headquartered in Camberwell, Victoria, with offices across Australia in Victoria, Western Australia, South Australia, New South Wales and Queensland.

ACER was established in Melbourne, Australia, in 1930, incorporated in 1958 and now has approximately 500 employees. For more information concerning ACER please visit <https://www.acer.org/au>.

It also has the following subsidiaries:

- United Kingdom – ACER International UK Ltd (Co. No. 05572704);
- United Arab Emirates – ACER Educational Research Services (Licence No: 891496);
- India – Australian Council for Educational Research (India) Private Limited (Co. No. U74120DL2007PTC166565); and
- Malaysia – Australian Cnl For Educational Research Sdn. Bhd. 202401003148 (1548998-W)

Together, these entities are referred to as *ACER Group*.

3. Structure, Operations and Supply Chains

Structure

ACER is governed by the members of ACER Council who also are appointed as members of the Board of Directors. This Board is the highest governing body, responsible for overseeing the overall direction and strategy of ACER. The board includes directors with diverse expertise and experience.

The governance structure includes cross-functional consultation with the ACER Group and executive leadership to strengthen internal governance. This includes: a global senior executive group; and executives of ACER sitting on subsidiary boards. This ensures that all subsidiaries align with group-wide ethical sourcing and human rights expectations.

The Chief Executive Officer (CEO) of ACER works closely with the ACER Board, executives of subsidiaries (including being the chair of each subsidiary board) and various governance committees

to ensure effective governance and oversight, oversee day-to-day operations, setting the strategic directions, ensuring that ACER's goals and objectives align with its mission and vision, ensuring the financial sustainability of ACER, representing ACER in interactions with key stakeholders and playing a key role in fostering a positive organisational culture and promoting continuous improvement.

The CEO is supported in her role by the Senior Executive Group, Senior Management Group and the Finance and Investment, Information Technology and People and Culture Governance Committees.

ACER currently operates through a divisional structure focused on:

1. **Measurement, Analytics and Technologies:** This division focuses methodology and measurement; and data science and automation.
2. **Student Learning & Progress:** This division conducts online assessment, selective and scholarship testing, system and school service and international assessments.
3. **Marketing, Communications and Media:** This division is responsible for ACER's marketing, communications, and media activities and includes Teacher Magazine, and essential library services.
4. **Education Research, Policy & Development:** This division conducts educational research, policy analysis, and development initiatives.
5. **Assessment Development, Implementation and Reporting:** This division conducts assessment development, implementation and reporting.
6. **Tertiary and Industry Tools:** This division focuses on higher education, emergency services, professional and vocational, and medical programs assessments.
7. **Finance and New Business:** This division manages ACER's financial operations and new business opportunities.
8. **Information Technology:** This division delivers technology strategy, systems development, and IT support across ACER.
9. **People Culture and Business Services:** This division includes people and culture and facilities.
10. **Marketing, Communications and Media:** This division conducts business development, publishes teacher magazine and other publications, and is proactive and response to media and external affairs, communications and content planning, information and creative services.
11. **Legal Services:** This division includes the Company Secretary and Commercial Lawyer, providing legal and compliance support across the organisation.

These divisions are structured to ensure that ACER can effectively manage its diverse range of projects and initiatives, while also aligning with ACER's strategic priorities and goals.

Operations

ACER is dedicated to advancing educational research, assessment services, and professional learning both in Australia and internationally. ACER's core activities include:

1. **Educational Research:** ACER conducts extensive research to inform educational policy and practice. This includes large-scale assessment programs, policy analysis, and development initiatives aimed at improving educational outcomes;
2. **Assessment Services:** ACER develops and delivers a range of assessment tools and services, including standardised tests, psychometric assessments, and customised evaluation solutions.

These services support educational institutions, government agencies, and private organisations in measuring and enhancing student performance;

3. Professional Learning and Development: ACER offers professional learning programs and resources for educators, administrators, and policymakers. These programs are designed to build capacity, enhance teaching practices, and support continuous improvement in education;
4. Publishing and resources: ACER publishes a wide range of educational resources, including research reports, books, and digital content. These publications provide valuable insights and practical tools for educators and researchers; and
5. International Engagement: ACER operates through subsidiaries and branches in the UK, UAE, India, and Malaysia. These international offices support local and regional research, assessment, and consultancy projects, ensuring that ACER's expertise and services are accessible globally.

ACER's strategy is focused on fostering innovation, promoting evidence-based practices, and building strong partnerships with educational stakeholders. By leveraging its research capabilities and expanding its global reach, ACER aims to improve learning for all.

Supply Chains

ACER engages in a diverse range of supply chains to support its educational research, assessment services, and publishing activities. These supply chains include professional services, IT infrastructure, remote proctoring services, supervision services, printing, logistics, venue hire and facilities management. ACER works with suppliers both domestically and internationally to ensure seamless delivery of its services and products.

4. Risks of Modern Slavery

Most of ACER's supply chain is within Australia for goods and services provided to its headquarters in Victoria and other Australian offices. Consequently, direct exposure to risk of slavery in its Australian supply chain is considered low. Nonetheless, ACER acknowledges that while a majority of Tier 1 suppliers are based in Australia, some of these suppliers may source inputs from higher-risk geographies. It is also recognised that Australia is not immune to modern slavery risks, and we remain committed to monitoring our onshore suppliers.

In addition to its Australian operations, ACER maintains offices in the United Kingdom, the United Arab Emirates, India, and Malaysia. We acknowledge that these jurisdictions present varying levels of modern slavery risk, particularly in sectors such as facilities management, cleaning, logistics, construction, and certain professional services. We are mindful that supply chains and labour practices in these countries may involve a higher prevalence of modern slavery and exploitative labour practices.

Due to the limited visibility of some extended supply chains, ACER recognises the importance of understanding its relationship to potential modern slavery risks, in line with the United Nations Guiding Principles on Business and Human Rights. As such, in identifying our risks, we endeavour to

consider whether there is potential that we could cause, contribute to, or be directly linked to modern slavery practices.

Areas of potential risk include:

- logistics and freight services across all offices;
- IT hardware sourced from high-risk jurisdictions;
- third-party contractors providing facilities, security, and cleaning services; and
- labour practices in countries with a higher prevalence of modern slavery, including in sectors relevant to our operations in India, the UAE, and Malaysia.

5. Actions Taken

The actions taken by ACER in addressing the risk of modern slavery are supported by ACER's policies:

Modern slavery and human trafficking (policy 2.08)	Commits to compliance with relevant Australian and international laws, and applies to all employees, contractors, suppliers, and partners.
Protection from sexual exploitation and abuse (PSEA) (policy 2.07)	Reinforces ACER's commitment to human rights and ethical conduct by establishing a zero-tolerance approach to sexual exploitation and abuse (SEA) across all operations. SEA is recognised as a form of abuse of power and vulnerability, which aligns directly with the coercive and exploitative conditions defined under modern slavery.
Code of conduct	Establishes a foundational commitment to a fair, respectful, and ethical workplace for all employees, contractors, and community members. By promoting dignity, integrity, and accountability, the Code directly supports ACER's broader stance against modern slavery.
Anti bribery and corruption (policy 3.29)	Reinforces ACER's commitment to ethical conduct and legal compliance across all global operations. By establishing strict controls and promoting transparency, ACER reduces the risk of complicity in supply chain abuses,

	coerced labour, and trafficking. It complements ACER's Modern Slavery Policy by ensuring that business dealings are lawful, ethical, and free from coercion or undue influence.
Equity, diversity and inclusion (Policy 2.10)	By actively addressing systemic disadvantage and barriers to participation, the policy supports the prevention of exploitation and abuse, core concerns of modern slavery. It assists by ensuring that vulnerable individuals, whether employees, contractors, or service recipients are protected from exploitation through inclusive and ethical organisational practices.
Whistleblower (Policy 3.28)	Provides a safe, confidential, and legally protected mechanism for reporting unethical or unlawful conduct. This includes concerns related to forced labour, human trafficking, and exploitation within ACER's operations or supply chains.
Procurement (Policy 3.31)	Embeds ethical sourcing principles and compliance obligations into ACER supplier relationships and ensures that procurement processes uphold labour rights, data security, and environmental sustainability

The ACER Group:

- Operates under a unified governance structure that enforces a zero-tolerance approach to modern slavery and human trafficking as exemplified in the Modern slavery and human trafficking (policy 2.08) specified in the above table which applies to all subsidiaries and their personnel, contractors, and business partners across relevant jurisdictions.
- Is committed to monitoring and evaluating the effectiveness of its efforts to address modern slavery risks across its operations and supply chains in line with the UN Guiding Principles.
- Will continually assess the effectiveness of our actions in identifying and managing modern slavery risks by: tracking our actions and outcomes, partnering with suppliers and other external partners, and undertaking regular internal governance and external assurance

processes. Based on the results of these processes we will adapt and strengthen our actions to continually improve our response to modern slavery.

- Complies with that policy which requires each member of the ACER Group to comply with Modern Slavery laws in each jurisdiction (and each respective CEO must ensure compliance):

Australia	Modern Slavery Act 2018 (Cth)
India	The Bonded Labour System (Abolition) Act, 1976 The Child Labour (Prohibition and Regulation) Act, 1986 The Immoral Traffic (Prevention) Act, 1956
Malaysia	Anti-Trafficking in Persons and Anti-Smuggling of Migrants Act 2007 Employment Act 1955
United Arab Emirates	Federal Decree by Law No. 24 of 2023 on Combating Human Trafficking
United Kingdom	Modern Slavery Act 2015

During the 2024–25 period, each member of the ACER Group has:

- Embedded modern slavery clauses in its contracts for all new and renewed supplier contracts and delivered training to staff in management skills and human rights.
- Strengthened internal governance through cross-functional consultation between the ACER parent company and subsidiaries and executive leadership.
- Has assisted with reviewing and updating the above Modern Slavery and Human Trafficking Policy to align with evolving legal and ethical standards.

Based on the results of these processes, the ACER Group will adapt and strengthen our actions to continually improve our response to modern slavery. ACER recognises the importance of ethical sourcing and is committed to upholding human rights across its supply chains.

Looking ahead, ACER plans to deepen its commitment by mapping tier two and tier three suppliers in high-risk categories, expanding supplier due diligence and audit processes, and engaging with external partners and stakeholders to ensure continuous improvement.

6. Assessing Effectiveness

ACER is committed to monitoring and evaluating the effectiveness of its efforts to address modern slavery risks across its operations and supply chains. This includes:

- Internal reporting mechanisms: ACER has established confidential channels for employees and stakeholders to report suspected breaches of its modern slavery policies, enabling timely investigation and remediation.

- Policy and process reviews: ACER regularly updates its policies, training programs, and supplier engagement strategies to reflect emerging risks and best practices.
- Continuous improvement: ACER adapts its actions based on feedback, audit outcomes, and stakeholder consultation. This includes refining due diligence processes and expanding supply chain visibility.
- Future Plans: For the 2025–26 reporting period, ACER intends to implement tracking mechanisms to better measure the impact of its anti-slavery initiatives. This will include adding to the standard operating procedure for IT procurement a check for supplier modern slavery statements; and deploying structured surveys that assess supplier compliance with modern slavery standards and ethical labour practices.

7. Consultation

The consultation process with ACER’s subsidiaries involves several key steps to ensure alignment and effective governance across the ACER Group. This process includes:

1. Cross-functional consultation: ACER strengthens internal governance through cross-functional consultation with its subsidiaries and executive leadership. This includes engaging with a global senior executive group and having executives of ACER sit on subsidiary boards. This ensures that all subsidiaries align with group-wide ethical sourcing and human rights expectations.
2. CEO Involvement: The CEO works closely with the ACER Board, executives of subsidiaries (including being the Chair of all of ACER subsidiary boards), and various governance committees. The CEO ensures effective governance and oversight, oversees day-to-day operations, sets strategic directions, ensures financial sustainability, represents ACER in interactions with key stakeholders, and promotes continuous improvement.
3. Consultation with subsidiaries: ACER consults with its controlled entities in the UK, UAE, India, and Malaysia during the development of its Modern Slavery Statement. Subsidiary leadership teams contribute to risk assessment and provide input on local operational risks, regulatory environments, and supplier relationships. This consultation ensures that all subsidiaries align with group-wide ethical sourcing and human rights expectations.
4. Feedback incorporation: Feedback is sought from the Global Senior Executive Group (SEG) and incorporated into the final draft of the Modern Slavery Statement. This collaborative approach ensures that the statement reflects the actions and risks across all ACER entities.

8. Approval

This Statement was approved by the ACER Board of Directors on 25 September 2025 and signed by the Chief Executive Officer:



Lisa Rodgers

Chief Executive Officer

The Australian Council for Educational Research Ltd

