

Central Queensland University

Modern Slavery Statement

Period: 1 January to 31 December 2023



BE WHAT **YOU** WANT TO BE
cqu.edu.au



Table of Contents

Introduction.....	3
About Us	3
Our Structure	4
Our Operations	4
Our Supply Chains.....	6
Modern Slavery Risk Assessment and Response.....	7
Effectiveness of Actions and Looking Ahead.....	8
Consultation and Approval.....	9
Appendix 1: Definitions	10
Appendix 2: CQU Travel Centre Pty Ltd	11
Appendix 3: PT CQU Executive Business Training Centre.....	12
Appendix 4: Statement Annexure.....	14

Introduction

This statement meets the University's reporting obligations under the *Modern Slavery Act 2018* (Cwlth). The Modern Slavery Act requires entities based, or operating, in Australia, which have an annual consolidated revenue equal to or greater than \$100 million, to report annually on the risks of modern slavery in their operations and supply chains, and actions to manage, lessen and where possible remove those risks.

Central Queensland University, trading as CQUniversity Australia, is committed to the prevention of slavery and human trafficking in all University activities and to ensuring our supply chains are free from slavery and human trafficking.

About Us

Central Queensland University, ABN 39 181 103 288, trading as CQUniversity Australia, is established by the *Central Queensland University Act 1988* (Qld). The University is located at 554-700 Yaamba Road, Norman Gardens, Queensland.

Founded in Rockhampton in 1967 as the Queensland Institute of Technology Capricornia, CQUniversity Australia was granted full university status in 1992, became Queensland's first dual sector university in 2014, and now has more than 30 000 students studying online and on campus across Australia.

CQUniversity is proud to be recognised as Australia's most inclusive university with some of the highest ratios of students from disadvantaged, mature age, Aboriginal and Torres Strait Islander, and first-in-family backgrounds. This inclusive approach and commitment to access and participation means the University defines itself by who it embraces, rather than who it excludes.

This strong focus on participation and accessibility has seen CQUniversity firmly establish itself as one of the largest universities based in regional Australia, and one of the only Australian universities with a presence across the country. The University operates campuses in Adelaide, Brisbane, Bundaberg, Cairns, Emerald, Gladstone, Mackay, Melbourne, Rockhampton, Sydney and Townsville and works in direct partnership with regional university centres throughout Australia, helping to ensure that no matter where students are located, they have the opportunity to access world-class higher education. In 2020, CQUniversity also established an international presence with a delivery site in Jakarta, Indonesia that offers executive and postgraduate education and training.

Our Vision

To be Australia's most accessible, supportive and engaged university, recognised globally for innovative teaching and research excellence.

Our Purpose

To provide world-class, transformative education and research for our students, partners and communities across Australia and internationally.

Our Values

Engagement

We recognise that authentic engagement with our communities, industries, stakeholders, and students is an inseparable feature of our social purpose.

Can Do

We have the skills, vision, and courage to achieve anything. We support one another to seize opportunities and overcome challenges.

Openness

As individuals and as a university, we build trust by acting with integrity and embracing open and honest dialogue.

Leadership

We value leadership as a quality embedded within every role at CQUniversity, and recognise that initiative, collaboration, accountability, and daring to be different define our success as leaders.

Inclusiveness

We value accessible education and training as an undeniable human right afforded to any person who aspires to it, anchored by a shared sense of equity, kindness, and humanity.

Our Structure

The University is governed by the Council of Central Queensland University as required by the *Central Queensland University Act 1998* (Qld). The Vice-Chancellor and President is the chief executive officer of the University. The University is structured into five Divisions, each headed by a Vice-President: Tertiary Education, Research, Corporate Services, Student Success, and the Vice-Chancellor and President's Division.

Our Entities

The University has the following controlled entities:

- CQU Travel Centre Pty Ltd, ABN 84 067 862 391
- Australian International Campuses Pty Ltd, ACN 088 382 012 (company deregistered 17 December 2023)
- C Management Services Pty Ltd, ACN 088 415 829
 - PT CQU Executive Business Training Centre (established in Indonesia, NIB 9120002743602)
- CQU Indonesia Holdings Pty Ltd, ACN 662 203 965
- Mask-Ed International Pty Ltd (dormant), ACN 151 764 046
- DataMuster Pty Ltd (dormant), ACN 625 765 942.

Further details about CQU Travel Centre Pty Ltd are provided in Appendix 2. Further details about PT CQU Executive Business Training Centre are provided in Appendix 3.

C Management Services Pty Ltd and CQU Indonesia Holdings Pty Ltd do not have employees or conduct business. Mask-Ed International Pty Ltd and DataMuster Pty Ltd are dormant. Australian International Campuses Pty Ltd did not have employees or conduct business, and was de-registered in 2023.

Our Operations

CQUniversity is Queensland's only dual sector university and delivers more than 250 education and training offerings, from short courses and certificates, through to undergraduate, postgraduate and research degrees. Study areas include apprenticeships, trades and training, business, accounting and law, creative, performing and visual arts, education and humanities, aviation, engineering and built environment, allied health, nursing and midwifery, regional medical pathways, information technology and digital media, psychology, social work and community services, science and environment, and work and study preparation.

As a pioneer in the delivery of distance education, CQUniversity continues to be a leader in online study with around one third of the current student cohort made up of students studying off-campus, many of whom are based in rural and remote areas. CQUniversity's flexible approach to learning and teaching, and continued innovation in this space, has provided opportunities for thousands of students to complete qualifications, regardless of their geographical location or personal circumstances.

After more than half a century working with stakeholders in regional Australia, CQUniversity is a renowned research institution in several key disciplines and the benchmark leader for how universities should engage and collaborate with communities and industry. The University's applied research focus is oriented towards impact and real-world outcomes, with the purpose of providing solutions to challenges, and identifying new opportunities for advancement in our regions and beyond.

This focus has seen CQUniversity achieve recognition for research excellence in areas such as agriculture, education, engineering, environmental systems, exercise and sports science, health, psychology and wellbeing, regional economies, renewable energy, and workforce development. The University's impact is demonstrated in improved industry processes, regional and economic development, business improvement, productivity and innovation, social advancement and equity, and healthier communities.

CQUniversity has a strong alumni community with more than 130 000 alumni across the globe. CQUniversity graduates also have some of the best employment outcomes in Australia, with official data consistently indicating above average national undergraduate and postgraduate employment outcomes. Data released by the Quality Indicators for Learning and Teaching (QILT) also shows that CQUniversity outperforms most other Australian universities when it comes to the overall student experience.

CQUniversity places a strong emphasis on sustainability, social innovation and global outreach and fosters several key partnerships with communities, industry and government, both in Australia and overseas. This commitment to engagement and social advancement has led to CQUniversity being recognised as Australia's first and only Changemaker Campus by Ashoka U, and Australia's only certified social enterprise university by Social Traders.

CQUniversity's unique vision for diversity, outreach, engagement, research, learning and teaching, and inclusiveness, combined with its growth aspirations and continued expansion of student success, research excellence, social innovation, and community engagement, has led to it being recognised within several world university rankings including Times Higher Education and QS World University Rankings.

2023 At a Glance

Total students: 33 494 [^]	VET students: 11 733	New students in 2023: 13 618 [^]	On-campus students: 20 635 ^{^*}	Online students: 13 365 ^{^*}
Students enrolled in a pathway or enabling course: 1555	Indigenous students: 1986 [^]	International students: 5213 [^]	Students from regional/remote backgrounds: 21 143 [^]	Research Higher Degree students: 340
Alumni: 132 413	International Alumni: 49 591	Course completions: 6890	Students awarded scholarships or financial support: 2056	Value of financial support and scholarships offered: \$4.2m
VET and higher education courses offered: 250+	Total employees: 1937 [*]	Research income: \$20.8m	Invested in facilities and infrastructure: \$13m	Invested in technology and digital infrastructure: \$13.88m

[^] Combined higher education and vocational student numbers

^{*} Excludes casual appointments.

Employees and representation

Our employees are employed directly, on a permanent, fixed term or casual basis. Employees were located across Queensland, New South Wales, Victoria, South Australia and Western Australia, reflecting the University's broad footprint.

The Central Queensland University Enterprise Agreement 2023 came into effect on 15 November 2023, replacing the Central Queensland University Enterprise Agreement 2017. Employee rights are protected through the Enterprise Agreements and the University's comprehensive policy framework.

Our University Code of Conduct: *The Standards We Live By* sets the behavioural standards for everyone who works for, or on behalf of, the University. Our Code of Conduct (Code) provides guiding principles and standards requiring CQUniversity employees to work with integrity, diligence, honesty and respect to deliver

the University's aim to be a great university. The Code reflects the commitment of our University to ensure fair and ethical behaviour in an institution dedicated to the pursuit of enquiry and academic excellence, engagement with people and ideas, and equity and diversity amongst our students and employees.

In delivering this commitment within a truly great university, we operate in accordance with our organisational values as well as abiding by the Federal and State ethics acts, the *Human Rights Act 2019* (Qld) and other relevant legislation, the Freedom of Speech and Academic Freedom Policy, and the Academic Board Position Statement – Academic Freedom. We do this not only because we are legally obligated to do so, but because it is right and just.

The Code applies to all employees and individuals affiliated with the University, including casual employees, honorary and adjunct appointments, consultants and contractors, volunteers, and members of the University Council and all University boards and committees.

In addition, the following policy documents are the most relevant to preventing modern slavery in our operations:

- Code of Conduct for Research
- Complaints Policy and Procedure
- Conflict of Interest Policy and Procedure
- Employee Visa Policy
- Fraud and Corruption Control Framework
- Freedom of Speech and Academic Freedom Policy
- Procurement Policy and Procedure
- Public Interest Disclosure Policy and Procedure
- Recruitment and Selection Procedure
- Sexual Harassment Policy and Procedure
- Workplace Harassment, Bullying and Unlawful Discrimination Policy and Procedure.

All employees participate in a Corporate Induction upon joining CQUniversity which covers their obligations under the Code of Conduct and the above policies. A biennial corporate induction refresher is required of all employees.

Our Supply Chains

Due to the breadth of services that CQUniversity provides to its students and the community, our supply chain consists of a large range of suppliers across multiple procurement categories and in many countries. Overall, 90% of CQUniversity's expenditure in 2023 was within Australia. The largest categories of spending within Australia were leases, professional contractor services, student health fees, building and construction, and information technology licensing. This spending supported our core business of educating students across a national footprint in regional and metropolitan centres. The primary suppliers in these categories have been assessed as low risk.

External to Australia, the largest categories of spending were agent commission, professional services, marketing and promotions, and books. The majority of this expenditure is supporting the recruitment of international students. It has been anticipated that overseas student recruitment is the primary area with potential for modern slavery to occur. These supply chains are reviewed and monitored accordingly, and it should be noted that many of these recruiters are sole agents. Our second greatest category carrying risk for modern slavery is professional services. In 2023, CQUniversity began requesting suppliers complete the Queensland Government Modern Slavery self-assessment document. These are reviewed and recorded as they are received.

Our procurement model follows a hybrid system, with our purchasing and contractual agreements administrated at the individual departmental level and the procurement advice team completing an advisory, assistance and compliance review role. Significant and strategic purchases are procured via formal tender processes and under formal contracts. These processes are led by the department purchasing the goods or

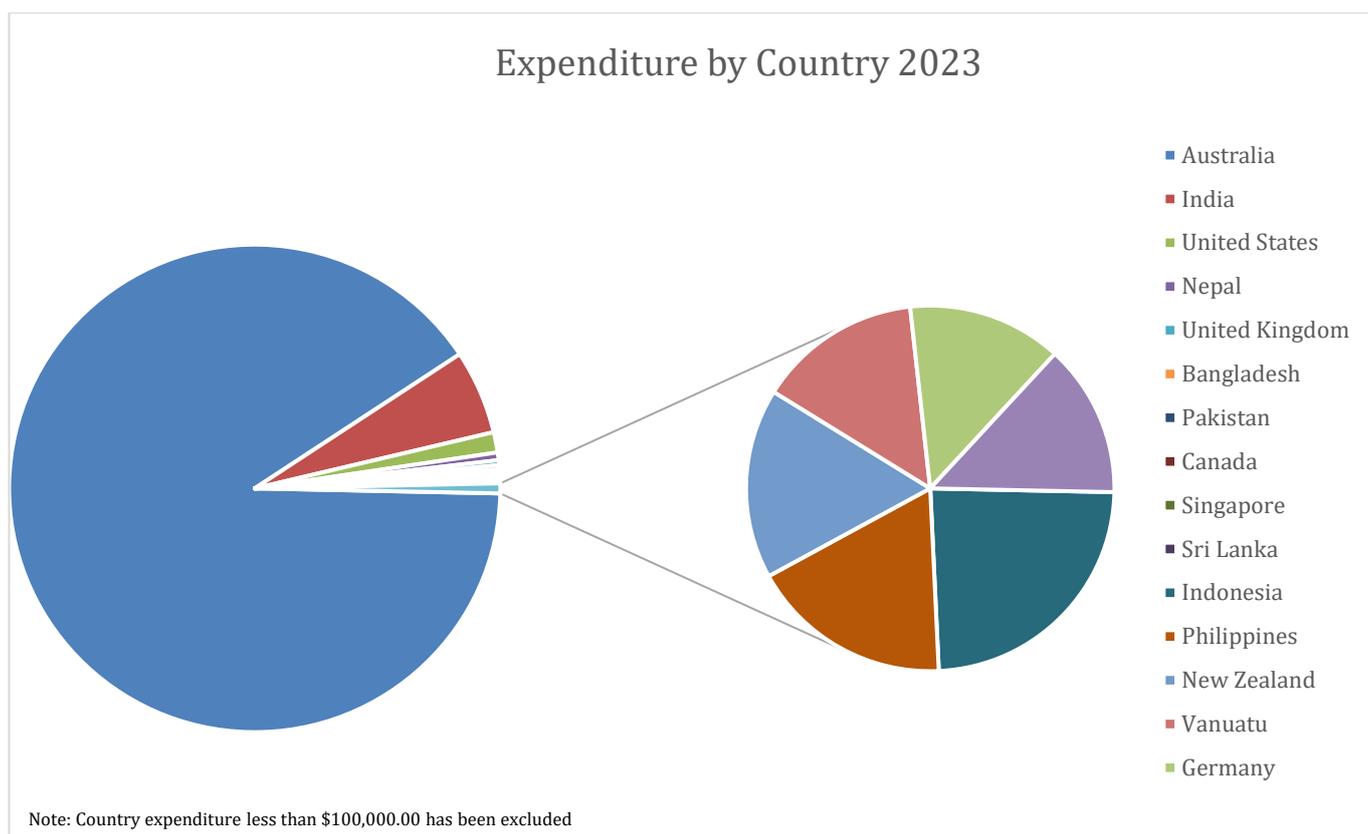
services with guidance and approval by the procurement team. CQUniversity utilises a mixture of Queensland Government Standing Offer Arrangements and contracts resulting from our own tenders. Routine purchases are managed via a quotation process, with governing terms managed via Purchase Order terms or short form contracts. All CQUniversity contracts include requirements to manage and report modern slavery in the suppliers' supply chains.

Modern Slavery Risk Assessment and Response

Supply Chains

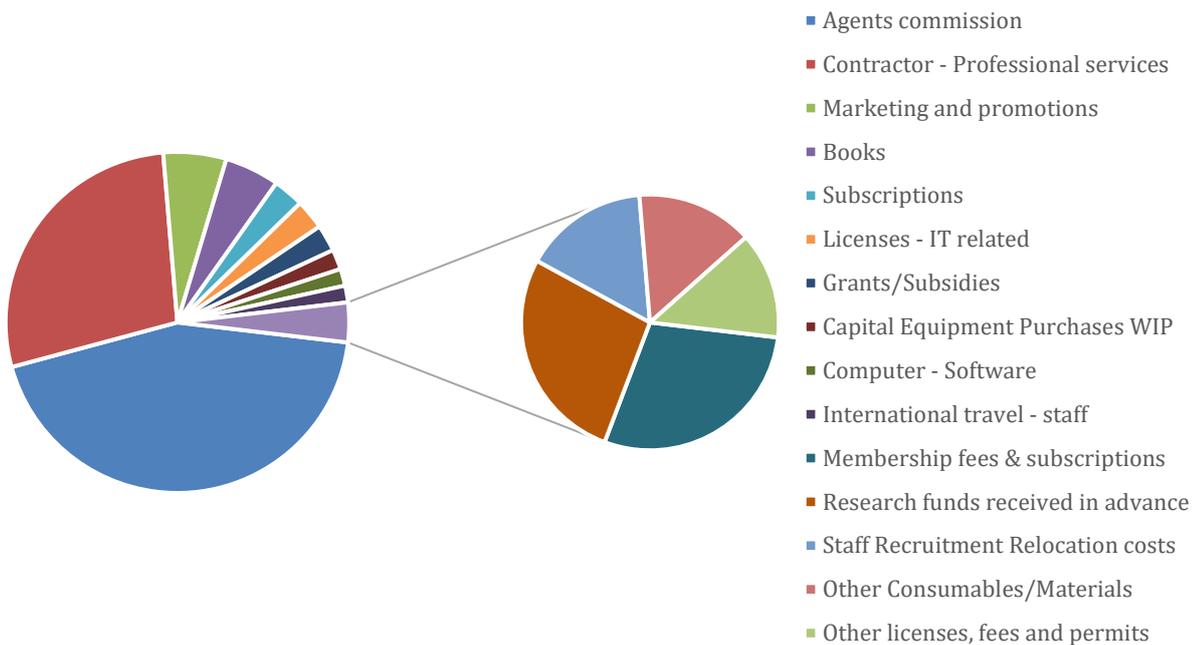
CQUniversity has several measures to detect potential modern slavery occurrences in our supply chains. During the tendering process, all respondent suppliers are required to complete and sign a statement identifying any previous breach of modern slavery laws in their business and supply chains. These statements are reviewed during the tender assessment and recommendation process to ensure compliance; non-compliant suppliers are managed in line with legislative requirements. All CQUniversity contracts include modern slavery provisions requiring our suppliers to represent and warrant that they conduct their business in a manner that is consistent with the Modern Slavery Laws and to notify us of any change to their compliance status or instances of modern slavery identified in their supply chain.

CQUniversity has analysed its supply chain locations and noted much of its expenditure occurs within Australia. Of those countries outside Australia where expenditure occurs, review of the supply categories has been undertaken to identify any potential Modern Slavery risks.



Of the expenditure occurring outside Australia, CQUniversity has identified the top categories and assessed them for the potential risk of Modern Slavery. The top five categories are considered lower risk, and no instances of Modern Slavery were noted therein.

Expenditure outside Australia, by Category 2023



CQUniversity will continue to monitor supply chains both nationally and internationally as well as the categories therein for any trend shifts or risk increases.

Students

The University recognises that students, especially international students studying in Australia, may experience exploitation, substandard working conditions, and underpayment. Students are less likely to report such experiences due to their visa status, fear of reporting and consequences, and a general lack of awareness of expected working standards in Australia. While substandard working conditions and underpayment are not classified as modern slavery, the University acknowledges the guidance provided that these practices may escalate into modern slavery if not addressed.

To ensure international students are aware of expected working standards in Australia and their rights, the University provides dedicated staff to support international students, information sessions during orientation and workshops each term regarding life in Australia, scams, work rights, and how to report issues, online articles, and a range of support campaigns. These efforts are supported by a third-party service provider who provides 24/7 crisis assistance, legal referrals, and real-time safety alerts.

Effectiveness of Actions and Looking Ahead

Effective systems and a strong policy framework are key to supporting the elimination of modern slavery generally, and in our operations and supply chains specifically.

Due to the nature of the goods and services we procure, the risk of modern slavery in our supply chain has been assessed as low. As a statutory body of the Queensland Government our procurement processes were already driven by government best practice with a preference to support local and national industry. International engagement has primarily been for unique services that are not able to be provided nationally, with our risk appetite lending itself to extra compliance requirements for overseas suppliers.

Acknowledging the above risk profile, our primary areas of focus where Modern Slavery may occur are overseas recruitment agents and entry level facilities management services. Review of these areas of focus

has been conducted with the finding that our agents are primarily sole traders, and our facilities management services are conducted by organisations with social outcome goals.

Our Procurement Policy and Procedure includes requirements, explanations and provisions of modern slavery compliance and is regularly reviewed. Our contractual agreements include modern slavery provisions. Whilst we did not identify any instances of modern slavery in this reporting period, we will continue to work and collaborate with our supply chain to understand areas of underreporting. Continuing the trend of 2022, no instances of modern slavery have been identified in 2023, and the affirmative statements of compliance continue to paint a picture of the market scape for us.

The University has grievance systems to receive and address reports of wrongdoing, including those that relate to modern slavery. During the reporting period, no complaints nor public interest disclosures were received by the University concerning modern slavery practices in the University's supply chains and operations.

Students

The effectiveness of student supports is measured through a range of feedback mechanisms and exit interviews. Results are analysed and opportunities for continuous improvement identified and implemented for the following term or year.

Consultation and Approval

Senior management and relevant employees of each active controlled entity assisted with the compilation of this Statement. The CQU Travel Centre Pty Ltd Board of Directors, in their capacity as principal governing body of the company, approved the company's information provided in Appendix 2 on 13 February 2024. The PT CQU Executive Business Training Centre Board of Commissioners approved the company's information provided in Appendix 3 on 13 February 2024, in their capacity as principal governing body of the company.

As set out in the *Central Queensland University Act 1998* (Qld), the Council of Central Queensland University is the governing body of the University, with the power to manage and control the University's affairs and property. Its primary role is to provide effective governance and oversight of the University's operations.

On 15 May 2024 the Council, in its role as principal governing body, approved this Statement for the year ending 31 December 2023 on behalf of the University and its controlled entities that are reporting entities pursuant to the *Modern Slavery Act 2018* (Cwlth).

The statement is signed by Professor Nick Klomp, Vice-Chancellor and President; a responsible member as defined by the *Modern Slavery Act 2018* (Cwlth).



Nick Klomp
Vice-Chancellor and President

Appendix 1: Definitions

Modern slavery: describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery includes eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

Trafficking in persons: the recruitment, harbouring and movement of a person for exploitation through modern slavery.

Slavery: situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.

Servitude: situations where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work.

Forced labour: situations where the victim is either not free to stop working or not free to leave their place of work.

Forced marriage: situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.

Debt bondage: situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.

The worst forms of child labour: situations where children are:

- exploited through slavery or similar practices, including for sexual exploitation, or
- engaged in hazardous work which may harm their health, safety or morals, or
- used to produce or traffic drugs.

Deceptive recruiting for labour or services: situations where the victim is deceived about whether they will be exploited through a type of modern slavery.

Acknowledgement: These definitions, which expand upon those set out in the *Modern Slavery Act 2018* (Cwlth), are set out in the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities.

Appendix 2: CQU Travel Centre Pty Ltd

Structure

CQU Travel Centre Pty Ltd, ABN 84 067 862 391, is an Australian proprietary company limited by shares and a wholly-owned subsidiary of Central Queensland University. The Board comprises University Executives and employees. CQU Travel Centre Pty Ltd is a small business enterprise located on the University's North Rockhampton campus, Level 1, Commercial Centre, 554-700 Yaamba Road, Norman Gardens, Queensland.

Operations

CQU Travel Centre Pty Ltd, trading as The Travel Crew, provides corporate travel services to the University and other corporate customers, and leisure travel services to University employees and students and to the general public.

Employees

The Company's six employees (4.64 full time equivalent) are employed directly, on a permanent basis, in accordance with the General Retail Award 2020, and offered above award wages. All employees are required to adhere to the agency's employee agreement which sets the standards required of employees. This agreement provides guidance on the ethical and behavioural standards required.

Supply Chain

Our supply chain involves a wide range of operators and suppliers of travel services, such as accommodation, cruises, tours, flights, hire cars and rail, using mostly Australian-based travel service providers. The remaining company purchases were for office and operational supplies and marketing, which were purchased locally from reputable local and national businesses.

Risk Assessment and Response

The company recognises the potential for modern slavery to occur within the tourism industry, particularly with overseas third-and-fourth-party operators. A key mitigation strategy is the use of only Australian-based providers where possible. The company does not have contracts with the travel service providers it uses, which limits the company's ability to impose anti-modern slavery requirements on those providers.

CQU Travel Centre Pty Ltd understands that there are a range of human right violations that constitute modern slavery risk and acknowledges that our operations and supply chain could be directly or indirectly linked to modern slavery practices. Assessment work will continue to review the Modern Slavery Statements, where published, of travel service providers used to enable informed decisions. With international borders re-opened in 2022, and as international travel continues to grow back to pre-pandemic levels, it is important that all business dealings with employees, clients, suppliers and the general public are conducted professionally, legally, ethically, and integrity at all times.

Effectiveness of Actions and Looking Ahead

CQU Travel Centre Pty Ltd will continue to develop and improve policies, procedures, practices, and requirements for monitoring, assessing and implementing frameworks that address issues of Modern Slavery. We will ensure to the best of our ability that facilitated travel bookings and day-to-day interactions are not supporting modern slavery.

Appendix 3: PT CQU Executive Business Training Centre

Structure

PT CQU Executive Business Training Centre (PTCQUEBTC) was established on 9 July 2019 under Indonesia law as a limited liability company. The company's governance structure consists of a Board of Commissioners, Board of Directors and the General Meeting of Shareholders. Through two interposed entities, C Management Services Pty Ltd and CQU Indonesia Holdings Pty Ltd, CQUUniversity is the sole shareholder of PT CQU Executive Business Training Centre.

The training centre is located at Sopo Del Office Tower A, 18th Floor Jl. Mega Kuningan Barat III Lot 10.1-6, Kawasan Mega KUNINGAN, KUNINGAN Timur Jakarta Selatan 12950, Indonesia.

Operations

-PT CQU Executive Business Training Centre delivers non-formal, workforce training in Indonesia, recruits students from South-East Asia to study in Australia, and is the delivery mechanism under a Service Level Agreement for the dual MM-MBA degree partnership between CQUUniversity and Universitas Bakrie.

Employees

The company consist of one Director, 15 employees with definite employment contract, and six sessional lecturers with definite employment contract basis in accordance with the applicable Indonesian employment and labour laws and regulations. Employee rights are also protected by Manpower Laws in Indonesia which secure work rights for all employees.

All employees are required to adhere to the company's Code of Conduct which sets the standards required of employees. The Code provides guidance on the ethical and behavioural standards required when working for the Company, and largely mirrors CQUUniversity Australia's Code of Conduct.

The company has adopted employment policies that comply with the requirements of the Indonesian Constitution and laws and regulations related to Industrial Relations and Employment. The company's employment contracts reflect these requirements.

Supply Chain

The company purchases from highly reputable and recommended suppliers similar to or used by the Indonesian Government and partner academic institutions, where possible.

The largest categories of spending for the company are facilities rental and management, and student recruitment. This spending supports the core business of educating students in Jakarta and recruiting students to attend the University's Australian campuses.

Our procurement model follows a centralised design with our purchasing and contractual agreements administrated by our Finance Officer with procurement advice provided by the President Director. Significant and strategic purchases are procured under formal contracts. Routine purchases are managed via a quotation process, with governing terms managed via Purchase Order terms, or short form contracts.

Risk Assessment and Response

The company recognises the potential for modern slavery to occur within the education sector and the services it may purchase to deliver day-to-day operations. A key mitigation strategy is to access and purchase from highly reputable and recommended suppliers similar to or used by the Indonesian Government and partner academic institutions, where possible.

Risk assessments have been undertaken and the company acknowledges its responsibility to reduce the risk of modern slavery in its supply chain and to take steps to address those risks through its activities and business relationships.

Within the company's supply chains, domestic and overseas student recruitment is the primary risk area with potential for modern slavery to occur. CQUniversity's Statement sets out the management of potential modern slavery risks relating to international students studying in Australia.

Effectiveness of Actions and Looking Ahead

The company continues to review and improve its processes to ensure, to the best of its ability, it works with suppliers who are not involved in modern slavery practice.

The company will continue to monitor Indonesian practice regarding the use of suppliers and will continue to take advice from Government support agencies such as Queensland Investment Corporation (Indonesia Office), and Austrade to manage against the risk of securing suppliers who do not align with company values.

Indonesian Legislation

The company must also comply with the following Indonesian legislation.

Modern Slavery

Indonesia is ranked 16 on modern slavery. While Indonesia has not ratified the Slavery Convention 1926, it has ratified ILO Convention No.105 which has its values rooted in the Slavery Convention 1926, as a bridge to the formation of positive law for the crime of slavery in Indonesia.

Trafficking in Persons

Law No.21 of 2007 Concerning Eradication of Criminal Act of Trafficking People regulates trafficking in persons.

Forced Labour

Indonesia has ratified the ILO Convention No 105 Concerning The Abolition of Forced Labour.

Forced Marriage

Law No.12 of 2022 Sexual Violence Crime regulates forced marriage.

Child Labour

Indonesia has ratified the ILO Convention No. 182 Concerning The Prohibition and Immediate Action for The Elimination of The Worst Forms of Child Labour.

Law No. 23 of 2002 Child Protection (and its amendment in 2003) sets out a range of child protections and supports.

Law No 13 of 2003 concerning Manpower prohibits children under 18 years old to work.

Law No 39 of 1999 regarding Human Rights sets out that every child has the right to protection from economic exploitation and any work that endangers them, or which interferes with their education, physical health, morals, social life, or spiritual mentality.

Appendix 4: Statement Annexure

The following table sets out the required approvals and mandatory criteria for this Statement, and the page numbers on which the required information is located.

Requirement	Location
Approval	
Principal governing body approval	Page 9
Signature	
Signature of responsible member	Page 9
Mandatory Criteria	
Identify the reporting entity	Page 3
Describe the reporting entity's structure, operations and supply chains	Pages 4-7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Pages 7, 11-13
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	Pages 7-8, 11-13
Describe how the reporting entity assesses the effectiveness of these actions	Pages 8-9, 11, 13
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement)	Page 9