

# MODERN SLAVERY STATEMENT

2022

**QUT**

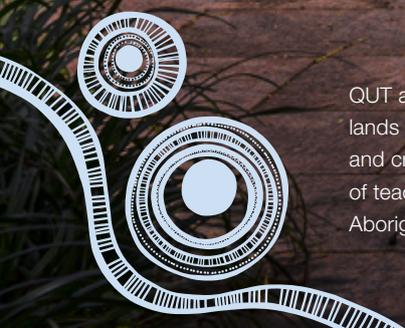


**DRAFT**

**the university for the real world<sup>®</sup>**



QUT acknowledges the Turrbal and Yugara, as the First Nations owners of the lands where QUT now stands. We pay respect to their Elders, lores, customs and creation spirits. We recognise that these lands have always been places of teaching, research and learning. QUT acknowledges the important role Aboriginal and Torres Strait Islander people play within the QUT community.





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# Introduction

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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.

Queensland University of Technology (QUT) (ABN 83 791 742 622) 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.

In 2022, QUT continued its journey to combat Modern Slavery, and this is the third QUT Statement. It sets out the actions taken during the 2022 financial year—from 1 January 2022 until 31 December 2022—along with future actions planned.

# About QUT

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Queensland University of Technology (QUT) is an ambitious institution, with strong research programs which connect with fundamental enquiry into societal outcomes. QUT ranks in the world's top 200 universities.

Our strategy *Connections – the QUT Strategy 2023 to 2027* establishes QUT as ‘the university for the real world’ and charts our provision of transformative education and research relevant to our communities.

We teach more than 50,000 students across two inner-city campuses in Brisbane. Our five thriving faculties, along with QUT College, the Carumba Institute and more than 10 university-wide research centres, support academic programs in fields spanning business, creative industries, education, engineering, health, law, science, and social justice.

We are transforming the learning experience, embedding work integrated learning, and focusing on developing entrepreneurial skills. We offer executive education and professional development through QUTex, flexible learning through QUT Online, and pathways into our undergraduate programs through QUT College.

QUT is well-known for our strong links to industry and government, and our inter-disciplinary teams create high-impact research in areas as diverse as climate change mitigation, digital media, materials science, and biomedical innovation.

The QUT community acknowledges that our two inner-city campuses at Gardens Point and Kelvin Grove stand on Aboriginal lands, the Country of the Turrbal and Yugara people: lands that were never ceded. We pay our respects to their Elders—past, present, and emerging—and thank them for their wisdom, forbearance and spirit of sharing. We respectfully recognise the role that Aboriginal and Torres Strait Islander people play within the university and in the wider community. We celebrate that the lands on which we live, study and work have always been places of learning, research and engagement.

QUT is committed to embedding Indigenous Australian cultures, knowledges, and perspective across everything we do, and through our Campus to Country strategy we are in the process of transforming our campuses to reflect the past and present culture of Indigenous Australians.

Despite the continuing challenges that COVID-19 presented throughout 2022, the university community has learned, adapted and evolved our procedures and practices. More information about QUT business, history, operations and *Connections – the QUT Strategy 2023 to 2027* can be found in our *2022 Annual Report* and on our website at [qut.edu.au](https://qut.edu.au)

# QUT Structure

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

QUT Council was Chaired by the Chancellor, Dr Xiaoling Liu until 30 June 2022, and Ms Ann Sherry AO from 22 August 2022. Management of the University is the responsibility of the Vice-Chancellor and President, Professor Margaret Sheil AO.

## The QUT structure is as follows:

- Academic Division
- Administrative Division
- Chancellery 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 at [qut.edu.au/about/our-university/organisational-structure](https://qut.edu.au/about/our-university/organisational-structure)

The university has seven (7) controlled entities to support our operations. During the reporting period, four (4) of these identified below were operating:

- Brisbane Business School Pty Ltd (ABN 38 085 931 611)
- QUT Student Managed Investment Fund (ABN 92 718 723 234) (operating)—please note this is defined as a fixed trust
- 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)
- qutbluebox Trust (ABN 97 041 405 905) (operating)
- QUT Advisory Pty Ltd (ABN 82 099 110 924) (operating)

# Operations

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QUT 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 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.

**As outlined in the 2022 Annual Report, in 2022 QUT had:**

- 50,216 students (34,106 full time and 16,110 part time), including 932 Aboriginal and Torres Strait Islander students
- a total of 4,488 full-time equivalent (FTE) staff members
- \$1.004 billion in revenue.



# Supply chain

In 2022, QUT transacted with 3951 external suppliers (excluding corporate card purchases) to provide goods, services and works to support the delivery of our core business of research, teaching and learning. QUT spent \$360,432,240 (excluding corporate card purchases and GST) in 2022 across the following areas:

**Table 1: QUT percentage of spend per category**

| Category                                   | Includes, but is not limited to  | % of total estimated procurement spend |
|--|--|--|
| <b>Research, equipment and consumables</b> | Equipment, scientific and medical consumables, chemicals, gases and laboratory supplies  | 12.65%                                 |
| <b>Property &amp; Facilities</b>           | Construction, operations, maintenance, fleet, security, waste, cleaning, transportation services and minor works   | 24.52%                                 |
| <b>Technology</b>                          | Computer hardware and accessories, software and licensing (including as a service), and audio visual and ICT services  | 12.85%                                 |
| <b>Business &amp; teaching services</b>    | Professional services, human resources, library services, contingent labour, marketing and media, legal, audit, logistics, freight, postage, financial services, banking, catering, uniforms, travel and insurance | 43.37%                                 |
| <b>Non-procurement spend</b>               | Non-procurement/non-addressable spend (including QUT investments) (3.11%) and any spend that we are not able to currently categorise accurately (3.5%)   | 6.61%                                  |

QUT recognises that there are modern slavery risks across the goods, services and works that we purchase and is committed to identifying and addressing these. The table below shows our top fifteen spend by country geographical location, which makes up 99.33 per cent of QUT spend. Where possible, QUT is committed to procuring goods from Australian suppliers and approximately 89.79 per cent of our spend is from suppliers within Australia. Only 2.09 per cent of our top spend is from countries that have been identified as having a medium or high risk of modern slavery.

**Table 2: QUT spend by country**

|    | Country of spend – (using supplier head office location) | Total spend             | % Of QUT total spend for 2022 (excluding corporate card) | Country risk level (based on prevalence from the global slavery index - 2018)* |
|----|--|-------------------------|--|--|
| 1  | Australia  | \$323,625,334.71        | 89.79%   | Low  |
| 2  | United States  | \$10,908,533.06         | 3.03%  | Low  |
| 3  | United Kingdom   | \$5,040,979.63          | 1.40%  | Low  |
| 4  | Singapore  | \$4,293,782.21          | 1.19%  | Low  |
| 5  | Germany  | \$3,274,721.95          | 0.91%  | Low  |
| 6  | India  | \$2,574,976.32          | 0.71%  | Medium   |
| 7  | China  | \$2,478,832.18          | 0.69%  | High   |
| 8  | Netherlands  | \$2,000,349.31          | 0.55%  | Low  |
| 9  | Switzerland  | \$949,290.70            | 0.26%  | Low  |
| 10 | Hong Kong  | \$848,054.21            | 0.24%  | Medium   |
| 11 | Vietnam  | \$615,969.83            | 0.17%  | Medium   |
| 12 | New Zealand  | \$457,148.89            | 0.13%  | Low  |
| 13 | Korea, Republic of                                       | \$336,148.74            | 0.09%  | High   |
| 14 | Malaysia   | \$335,904.01            | 0.09%  | Medium   |
| 15 | Taiwan   | \$285,622.87            | 0.08%  | Medium   |
|    | <b>Total</b>   | <b>\$358,025,648.62</b> | <b>99.33%</b>  |  |

\* Note the risk level is as at 2018 (and has not been updated by the Global Slavery Index since then). QUT is working with the FRDM tool to have an up-to-date mechanism to identify risks by country. QUT has updated the country risk for China in the above table to "high" (whereas, in the Global Slavery Index it is "medium") – this is given reports and information being published on some practices in specific areas of China.

# Risks of modern slavery practices

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

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 by the Modern Slavery Reference Group 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.

## 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.

The QUT 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.

As QUT starts to investigate and use more innovative supply chains, particularly across research activities, it is acknowledged that the university may be exposed to additional modern slavery risks.

The use of crowdsourcing platforms to outsource activities to a distributed virtual workforce is an example of this. These platforms are currently a new and evolving way of outsourcing tasks and are not widely used across QUT business, however they will continue to be monitored to identify risks associated with this approach.

## Teaching and student services

In 2022, QUT had 43,217 domestic students and 6,999 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 policies 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) 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 sign an agreement which include 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.

Additional modern slavery clauses and provisions for WIL agreements were considered by QUT, however, it was determined that these clauses were not required given the nature of the activity where students undertake learning activities with industry partners.

In 2022, QUT had 2,200 higher degree by research (HDR) students. In 2022, QUT established a minimum HDR scholarship rate for all students, with this scholarship rate being increased to \$30,000pa from 1 January 2023. For International students without scholarships, the student is required to provide QUT with evidence of being able to cover minimum costs of their stay (at least \$21,041 per year, as per student visa evidence of sufficient funds requirements). Limits are also placed on HDR students regarding working hours while enrolled, with scholarship recipients requiring the approval of both their supervisor and Head of School to undertake additional work.

## Management of human resources

All permanent, fixed-term and casual staff engaged by QUT are recruited using transparent processes in line with approved policies and the QUT Enterprise Bargaining Agreements. These documents govern all employment terms and conditions of academic and professional staff.

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 or QUT Purchasing Terms and Conditions which has 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, modern slavery clauses have been included in the contract with the suppliers.

## Investments

As part of our operations, QUT makes financial investments. QUT Council has appointed the Queensland Investment Corporation (QIC) to oversee and manage our investment portfolio. 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 that advises and monitors the performance, associated risks and management of long-term investments and endowments.

## Commercial operations

### QUT has:

- 25 commercial licences, agreements or leases at Gardens Point campus
- 28 commercial licences, agreements or leases at Kelvin Grove campus
- 2 sub-leases at external sites in Banyo and Mackay.

These agreements cover all retailers on campus. These legal agreements have 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 *Connections* 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.

Contracts and agreements within the Office of Industry Engagement (OIE) were reviewed internally and it was determined that Modern Slavery clauses were not required for agreements and deed templates specifically used by the OIE.



## Risk in controlled entities

In the 2022 reporting period, QUT had four operating controlled entities (as listed above). These entities had limited operations and no employees. The controlled entities had extremely limited (if any) supply chain activity undertaken. The risk of modern slavery within QUT controlled entities has been assessed again as part of the development of this statement and continues to be deemed as extremely low, given the minimal activity.

## 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's 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 all relevant legislation, which includes modern slavery legislation.

The QUT Procurement Policy was reviewed in 2021 and continues to be principles based, with the key principle of the policy outlining:

***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.

# 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.

**Table 3: 2022 actions implemented**

| Area  | Action taken during 2022 reporting period  |
|---|--|
| <b>QUT Modern Slavery Remediation Plan</b>              | Developed, consulted and published QUT Modern Slavery Remediation Plan including how to report instances of Modern Slavery.  |
| <b>Modern Slavery Statement 2021</b>                    | Drafted, consulted, approved and published the second QUT <i>Modern Slavery Statement 2021</i> by the 30 June 2022 requirement.  |
| <b>Modern Slavery cross-functional reference group</b>  | <p>The cross-functional Modern Slavery Reference Group met four times during 2022 (and will continue to meet quarterly in 2023).</p> <p>This group was used to identify and review modern slavery risks specific to QUT's operations and supply chain including existing controls and mitigations.</p> <p>A formal Terms of Reference (TOR) was developed and approved for this reference group to govern its operations.</p>  |
| <b>Internal Audit on QUT approach to Modern Slavery</b> | <p>An internal audit was completed on QUT's approach to Modern Slavery. This identified areas for improvement, the majority of which have been implemented during 2022, including:</p> <ul style="list-style-type: none"> <li>• Ensuring Modern Slavery information is included in training / education for WILs and pre-departure for QUT students on international student exchange.</li> <li>• Review of modern slavery clauses in contracts for advancement, industry engagement and Office of Research Services.</li> <li>• Formalising the Terms of Reference for the Modern Slavery Reference Group.</li> <li>• Increased Awareness of Modern Slavery requirements.</li> <li>• Mandating Modern Slavery training for the Modern Slavery Reference Group.</li> <li>• Enhancements to QUT's Modern Slavery Remediation Plan.</li> </ul> |
| <b>Training</b>   | <p>Continued to implement modern slavery training for:</p> <ul style="list-style-type: none"> <li>• all new staff in procurement (with 100 per cent uptake)</li> <li>• the modern slavery reference group (including mandating this requirement to be on the reference group).</li> </ul> <p>Modern Slavery information was also added to:</p> <ul style="list-style-type: none"> <li>• QUT standard, general procurement training and bespoke procurement training for specific areas (for example our Digital Business Solutions team)</li> <li>• Work Integrated Learning training prior to placements</li> <li>• Outbound mobility pre-departure workshops for students with international exchanges.</li> </ul>   |
| <b>Awareness</b>  | <p>Continued to raise awareness of QUT response to modern slavery through:</p> <ul style="list-style-type: none"> <li>• face-to-face briefings at Risk and Audit Committee (RAC)</li> <li>• information on QUT intranet including the QUT Remediation Plan and Statement</li> <li>• articles in five of the 12 Strategic Procurement newsletters</li> <li>• article in QUT's all staff newsletter.</li> </ul> <p>Presentations were also held throughout 2022 with specific groups of staff and students to raise awareness.</p>   |

| Area  | Action taken during 2022 reporting period   |
|---|---|
| University sector-wide response   | In 2022, QUT continued to actively participate in the sector-wide response to modern slavery through the Australian University Procurement Network (AUPN). See below for further details.   |
| QUT Contract Terms and Conditions templates   | Finalised modern slavery clauses within the relevant QUT standardised Contract Terms and Conditions templates for all new contracts.  |
| Contracts with key suppliers  | Continued to vary existing supplier contracts to include Modern Slavery Clauses including (but not limited to) Medibank, Assure and Technology One.<br>Ensured new supplier contracts executed in 2022 included a relevant Modern Slavery clause.   |
| Contractual arrangements with QUT network of international representatives (agents)             | In 2021, QUT's standard Recruitment Services Agreement (RSA) template has been updated with a new clause addressing Modern Slavery.<br>As at the end of 2022, approximately 63% of the agreements have been renewed (with the new clause), with the remaining targeted for updating as part of their renewal cycle in 2023.   |
| Supporting students to avoid exploitation, protect their rights and stay safe in the workplace. | <p><b>Newsletter Articles</b></p> <p>In 2022, QUT Welfare Staff provided content to HiQ Comms for the International Student Newsletter which is sent to all enrolled international students each month. These messages provided information on workplace rights, safety, responsibilities, and sources of support. The included links to original sources of information including Fact Sheets on Workplace Discrimination and Bullying, Sexual Harassment, and Telephone Information Service by The Fair Work Ombudsman and JobWatch.</p> <p><b>Workshops and Presentations</b></p> <p>Four (4) Working in Australia Information Sessions for International Students were presented by Welfare staff (two (2) at the start of each semester)</p> <p>Three (3) online sessions for students delivered for QUT by JobWatch. Two of these were titled Your Work Rights in Australia: Information Session for International Students and the third session was titled Staying Safe at Work. These sessions deliver expert information, advice and insights for students and provide an opportunity for students to ask questions and get advice on individual concerns.</p> <p><b>Individual Support and Counselling</b></p> <p>Welfare and Counselling staff in Student Services continue provide individual support, information and referrals to students on work-related matters. This includes students in unsafe work environments, those who have been underpaid, injured at work, experienced abuse, intimidation or harassment in the workplace, and those seeking support to discuss their rights with their employer.</p> |
| Contracts within the Office of Industry Engagement  | Contracts and agreements within the Office of Industry Engagement (OIE) were reviewed internally and it was determined that Modern Slavery clauses were not required for agreements and deed templates specifically used by the OIE.<br>A review of the QUT agreement was undertaken by Legal and Governance. Additional clauses related to modern slavery were considered. It was determined that these clauses were not required given the nature of the activity where students undertake learning activities with industry partners. The current agreement templates meet the requirements, and no further updates were deemed to be required.  |
| Partnership with industry bodies  | QUT continued to work with the Cleaning Accountability Framework (CAF) during 2022. The objective of CAF is to audit for and remediate labour exploitation and improve work standards through education and advocacy in the Higher Education Sector. For full details see: <a href="https://cleaningaccountability.org.au">cleaningaccountability.org.au</a><br>QUT is working in collaboration with CAF to pilot a compliance framework to cover contract cleaning and security at our campuses (covering over \$11 million spend per annum). This work will continue in 2023 and beyond.  |

# 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 39 member institutions. QUT plays an active role in the AUPN, with a representative on the AUPN's Executive Committee.

In 2022, QUT continued to participate in the sector-wide collaboration led by the AUPN. This collaboration supports all member universities to meet the challenge of human rights transparency and risk management in their supply chains and contributes to the fulfillment of members reporting requirements to the *Modern Slavery Act 2018* (Cth).

## Why a sector approach?

|                       |  |
|-----------------------|--|
| <b>New obligation</b> | The <i>Modern Slavery Act 2018</i> (Cth) is applicable to most AUPN member universities, and we wish to demonstrate leadership on this important issue.                            |
| <b>Efficiency</b>     | Working together minimises the duplication of activities and associated costs across individual universities including risk assessment, implementation of systems and remediation. |
| <b>Effectiveness</b>  | Leveraging our aggregated buying power improves our capacity to identify and action any modern slavery risks and drives more effective changes through our supply chains.          |
| <b>Cooperation</b>    | AUPN members are an engaged group of procurement professionals within publicly spirited organisations operating in a uniquely collaborative sector.                                |

In 2022, the AUPN program focused on delivering:

- the FRDM technology tool solution to deploy sector wide technology to tackle modern slavery within our supply chains
- ongoing sector engagement
- continuous improvement.

|   |                                   |   |  |   |  |  |
|---|-----------------------------------|---|--|---|--|--|
| 1 | 2019<br>Discovery                 | PROGRAM OF WORKS (PROJECT PLAN)   |  |   |  |  |
|   |                                   | DISCOVERY<br>Interviews, scope, objectives, outcomes and tactics  | DATA ANALYSIS<br>Aggregated data, overlay publicly available MSA risk (category and country) and produce dashboards        |   | COMMUNICATIONS<br>Stakeholder mapping and communications matrix  |  |
| 2 | 2020/21<br>Implementation         | TECHNOLOGY ENABLEMENT WORKSTREAM<br>• Delivering technology platform for reporting dashboards and information bank available on the AUPN portal | FRAMEWORK DOCUMENTATION WORKSTREAM<br>• Delivering a flexible framework, templates and processes to support MSA statements | DATA ANALYSIS WORKSTREAM<br>• Delivering a sector wide MSA risk matrix and risk metric against common suppliers<br>• Data cleansing, analysis and application of risk framework | ENGAGEMENT AND COMMUNICATIONS WORKSTREAM<br>• Delivering communication and training to university's to support the awareness and knowledge of program outcomes | GOVERNANCE WORKSTREAM<br>• Providing due diligence and reporting for the program |
|   |                                   | CAPABILITY UPLIFT   |  | ASSESS & ADDRESS  | LEADERSHIP & IMPROVEMENT   |  |
| 3 | 2021/22<br>Continuous Improvement | MEASURING EFFECTIVENESS   |  |   |  |  |



In 2022, the AUPN key deliverables for the Modern Slavery Program were:

### ONGOING

Weekly FRDM project meetings, change management meetings & monthly status updates; monthly Modern Slavery Working Group meetings & monthly University Forum meetings; quarterly Academic Advisory Board meetings & presentations to the AUPN community

| 2022   |  | 2023  |  |  |
|--|--|---|--|--|
| <b>Q1</b> <ul style="list-style-type: none"> <li>FRDM testing January</li> <li>Soft-Launch January</li> <li>GO-LIVE February</li> <li>Train-the trainer sessions March</li> <li>2nd data upload</li> <li>Nominations for 2022 Academic Advisory Board (AAB)</li> <li>Formation of University Modern Slavery Forum &amp; Data Improvement Group</li> <li>1st University Modern Slavery Forum meeting</li> </ul> | <b>Q2</b> <ul style="list-style-type: none"> <li>2022 Academic Advisory Board members appointed</li> <li>New Program Project Coordinator appointed</li> <li>Data improvement workshop with uni's, FRDM &amp; Arc Blue</li> <li>Presentation to Belgium Universities on Ethical Procurement</li> <li>1st Data Improvement Group meeting held</li> <li>Strategy for a pilot of FRDM supplier SAQs</li> <li>Sustainability project of the Year Award</li> </ul> | <b>Q3</b> <ul style="list-style-type: none"> <li>Pilot of supplier SAQs from FRDM Tool commences</li> <li>Universities complete a selfassessment via FRDM Tool</li> <li>Risk workshop with FRDM held</li> <li>Academic Advisory Board meeting – University Modern Slavery statement review</li> <li>AUPN spend data hub tender commences</li> <li>Weekly meetings with FRDM to resolve issues commence</li> <li>Supplier feedback session on the FRDM SAQ process undertaken</li> </ul> | <b>Q4</b> <ul style="list-style-type: none"> <li>Individual meetings with suppliers to discuss FRDM SAQ results</li> <li>Recruitment of new AUPN Modern Slavery Program Manager</li> <li>AUPN Australian Modern Slavery Act review feedback session with Professor John McMillan AO</li> <li>University CAF program pilot commences</li> </ul> | <b>2023 Planned</b> <ul style="list-style-type: none"> <li>Commencement of AUPN Modern Slavery Program Manager</li> <li>Operationalisation of FRDM, including more training and processes defined</li> <li>Integration with new AUPN spend data hub service provider</li> <li>Supplier engagement</li> <li>2023 priorities survey</li> </ul> |

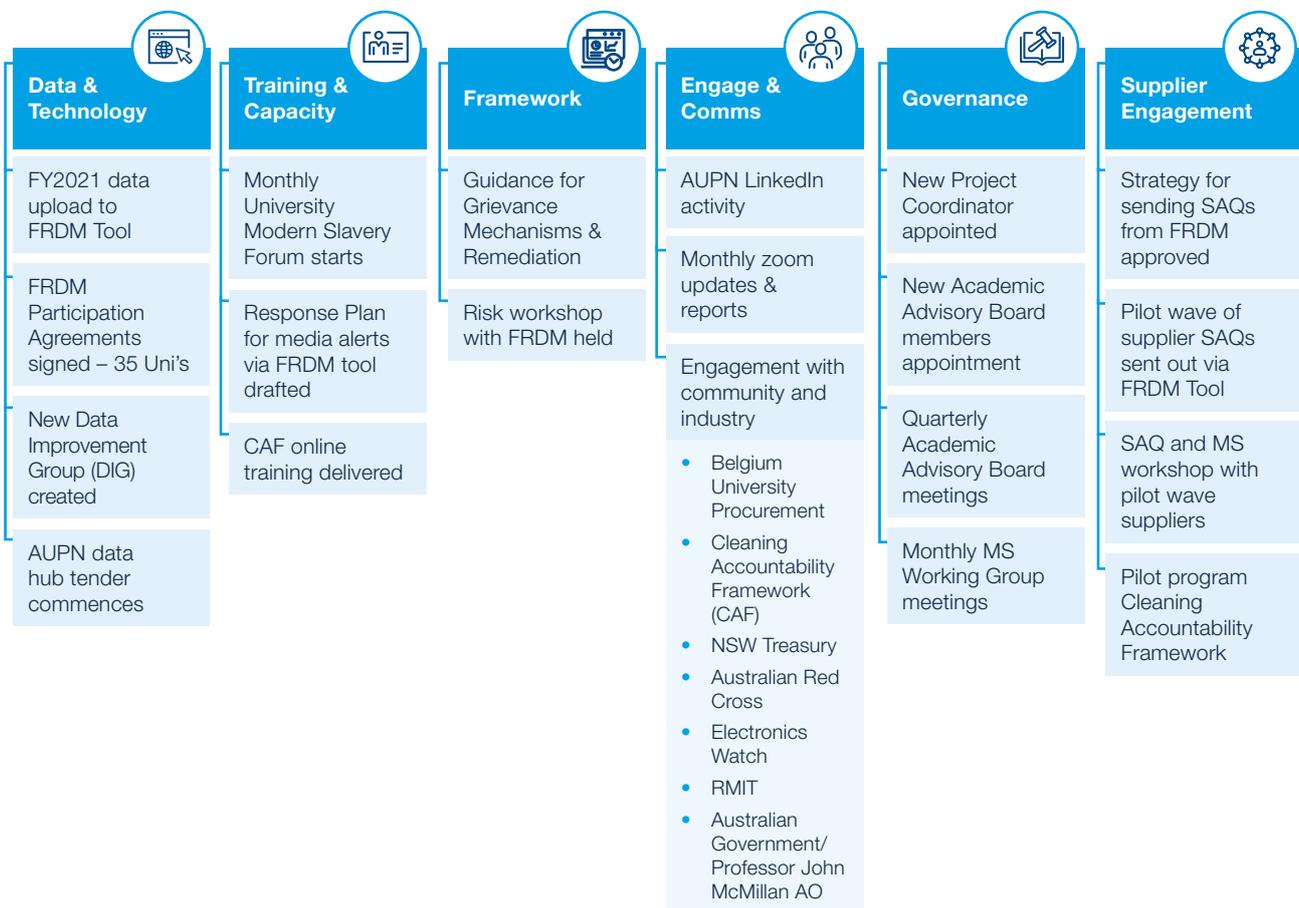
## CONTINUOUS IMPROVEMENT

Third Statement due 30 June 2023





The key achievements by the AUPN MSWG were:



# Key Involvement by QUT in the AUPN Program

## 1 | Supplier Self-Assessment Questionnaires (SAQs)

In 2022, QUT actively participated in the sector-wide pilot of the FRDM Supplier Self-Assessment Questionnaires (SAQs) to eight key suppliers across the university sector, including:

1. Thermo Fisher
2. Dell Australia
3. Telstra
4. Sigma Aldrich
5. Bio Strategy
6. Winc
7. AlSCO
8. Spotless.

This approach asked suppliers once as a sector, meaningful questions about their approach to modern slavery once, rather than multiple times from different universities.

A small working group was established with members from across the sector to lead each SAQ. QUT led the SAQ for Winc.

The working group provided a training session in how to use and answer the questionnaire and set clear timelines for completion with each supplier.

Once completed, the working group assessed the responses and provided each supplier with personalised feedback of their responses, as well as allowing each supplier to provide feedback on the SAQ process.

This feedback from the trial process has been provided to FRDM to assist with future development and enhancements for the process to roll out to other suppliers. The working group continues to meet regularly, investigating how the AUPN can use the survey responses to ensure a meaningful process that contributes to combatting modern slavery.

## 2 | Pilot Program – Cleaning Accountability Framework (CAF)

The Cleaning Accountability Framework (CAF) is an organisation whose mission is to improve labour practices in the cleaning industry. CAF works with cleaners, tenants, contractors, property owners, facility managers, and investors across the supply chain to ensure ethical labour practices.

Full details of CAF are available here via their website [cleaningaccountability.org.au](https://cleaningaccountability.org.au)

In 2021, CAF sought submissions from Australian Higher Education Providers (HEP) to participate in a pilot expansion of their existing building certification framework to cover contract cleaning and security at HEP campuses in accordance with a grant from the Fair Work Ombudsman. QUT made a submission to participate that was subsequently accepted by CAF. This pilot project is scheduled to occur over a four-year period (2021-2024) and involves three Australian Universities, one of which is QUT.

The aim of the pilot is to develop a certification framework that will be taken up more broadly by HEPs. The pilot relies on full cooperation by involved stakeholders, (including staff, suppliers, university representatives and the relevant union body) and is currently ongoing at QUT.

# Measuring effectiveness

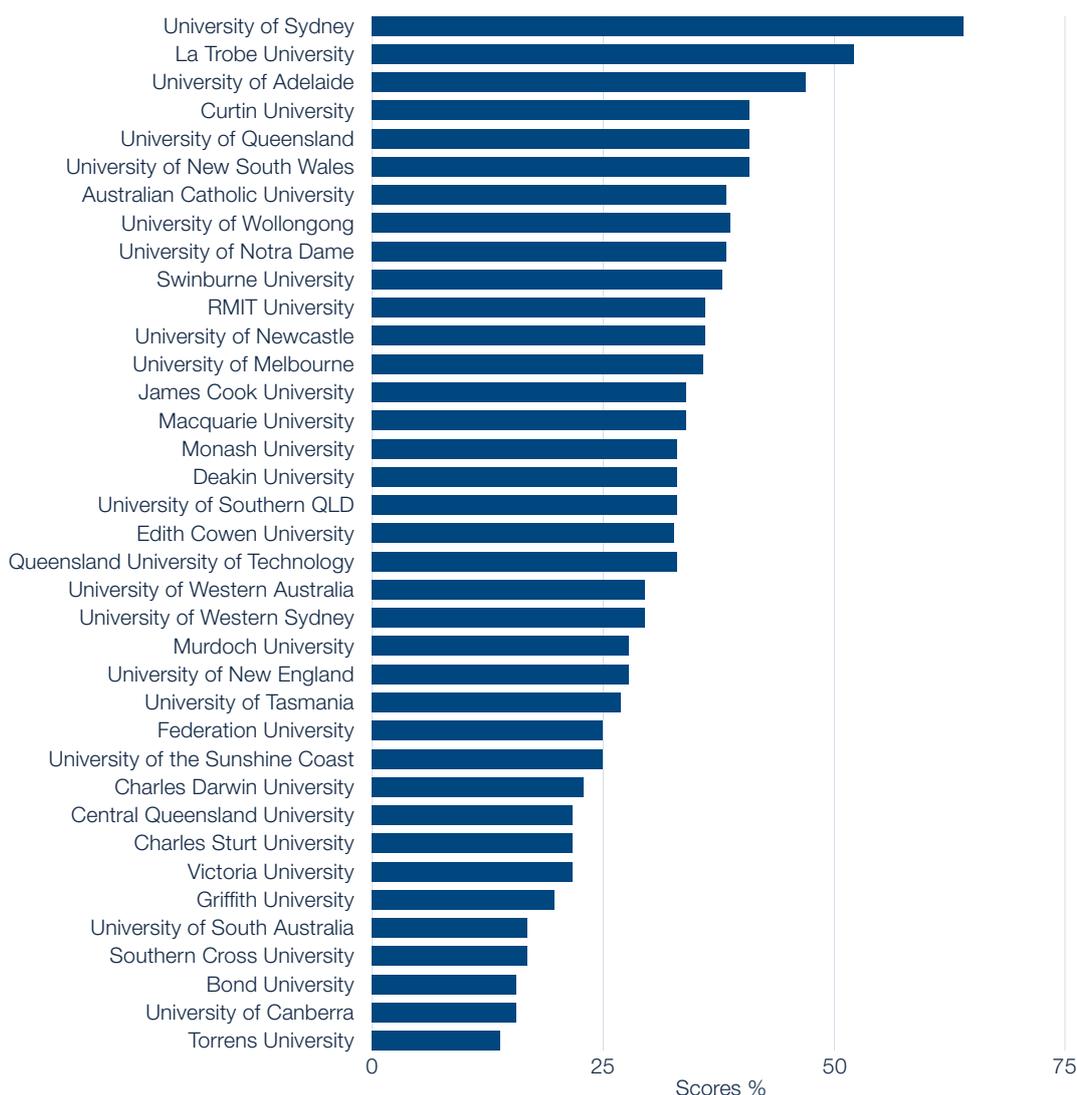
In 2022, QUT developed and published a principles-based remediation plan:

- Principle One:** Education is Key
- Principle Two:** Prevention is Better than the Cure
- Principle Three:** Targeted Proactive Remediation Where Possible
- Principle Four:** Crisis Remediation as a Last Resort
- Principle Five:** Ongoing Support and Monitoring Must Continue

QUT had two formal instances of Modern Slavery reported to Strategic Procurement during 2022. The remediation for these two instances was in line with our published Remediation Plan and included thirteen suppliers providing their preventative action plan regarding selling products that had suspected modern slavery in their supply chain.

In July 2022, the RMIT Business and Human Rights Centre published a review on *Evaluating the Quality of Modern Slavery Reporting in the Australian University Sector*. QUT was placed the 20<sup>th</sup> University out of the 37 Universities

**Table 4: Australian University scores for their Modern Slavery Statements from highest to lowest<sup>1</sup>**



<sup>1</sup> Evaluation-modern-slavery-report.pdf (rmit.edu.au)

The research included eleven recommendations for all Universities, which QUT are reviewing, assessing and addressing to ensure our response to Modern Slavery is effective.

**Table 5: QUT's assessment against the recommendations to improve the quality of modern slavery reporting in the Australian University Sector (from RMIT research).**

| No. | Recommendation   | Assessment of Achievement   |
|-----|--|---|
| 1   | Ensure all owned and controlled entities, including all overseas operations, are included within the scope of reporting and consultation.  | Completed   |
| 2   | In addition to supply chain risks, examine and address risks within the university's own operations, including a core focus on international students and research participants.   | Partial   |
| 3   | Ensure responsibility for compliance is shared, not outsourced, to suppliers. Universities should take joint responsibility for any harms they have caused or contributed to.  | Partial   |
| 4   | Embed responsible purchasing practices into the university's own procurement policies and processes, in such a way as to: place limits on subcontracting, alleviate downward pressure on tender pricing, ensure prompt payment, guarantee workers are paid a living wage, prohibit financial penalties, and avoid short-term contracts and sudden changes in workload. | Additional work needed.   |
| 5   | Beyond basic approval of the University's Modern Slavery statement, substantively involve executive leadership in the formulation and implementation of modern slavery strategy.   | Additional work needed.   |
| 6   | Support freedom of association and adopt a worker-centric approach in which workers, trade unions and civil society organisations are genuinely engaged every step of the way.   | Additional work needed.   |
| 7   | Establish effective grievance mechanisms that are co-designed with users and accessible to all workers, including supply chain workers.  | Partial – additional consultation with supply chain workers required.   |
| 8   | Develop clear remedial policies and corrective action plans that ensure supply chain workers are appropriately compensated and receive full, fair and timely remedies.   | Partial – additional review to ensure compensation and timely remedies. |
| 9   | Disclose results from monitoring, use of grievance mechanisms, and outcomes of remedial measures, being transparent about harms that were found and what was done to address them.   | Partial – further transparency required.                                |
| 10  | Ensure that each University responds to its own set of modern slavery risks specific to that University and its controlled entities. Collective sectoral responses should not replace or substitute the efforts of an individual University.   | Partial – review of QUT individual measures to be reviewed.             |
| 11  | Situate efforts to address modern slavery within a broader human rights and labour rights framework by aligning the University's Modern Slavery response with core International Labour Organisation standards and the UN Guiding Principles on Business and Human Rights.   | Additional work needed.   |

Given the above recommendations and QUT current assessment of our effectiveness, the focus moving forward will be to mature our approach to modern slavery. Key performance indicators (KPIs) to measure the effectiveness of our Modern Slavery actions taken are under development and will be consulted and published during 2023.

# Consultation

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In addition to consultation with the AUPN as outlined above, the representatives of the QUT Modern Slavery Reference Group were engaged and consulted on the QUT Modern Slavery Statement and will continue to meet quarterly in 2023.

The QUT Modern Slavery Reference Group provides a platform to enable consultation across various university departments and disciplines. The group expanded its membership in 2022, to include a Head of School, researcher working in modern slavery and a representative from the QUT Graduate Research Centre.

- University Registrar's Office
- Finance Services
- Facilities Management
- QUT International
- Digital Business Solutions
- Business Development
- Research
- Work Integrated Learning
- Student Services and Equity
- Assurance and Audit
- Faculty Operations
- Teaching (through a Head of School)
- Researcher in Modern Slavery
- Graduate Research Centre

# Other information/next steps

QUT focus for 2023 and beyond is to increase the maturity of our response to modern slavery, including embedding key actions across our operations and supply chains, and taking a more proactive approach.

**Table 6: QUT actions planned**

| Actions planned   |  |
|---|--|
| <ul style="list-style-type: none"><li>• Become a formal member of the Cleaning Accountability Framework demonstrating QUT's commitment to responsible business practices and mitigating the risks of Modern Slavery in your cleaning supply chain. QUT's CAF University Membership benefits include:<ul style="list-style-type: none"><li>- Include CAF Membership in Modern Slavery reporting</li><li>- Member-only Quarterly Insight Report – this report is based on data CAF collects as part of worker engagement and identifies key compliance issues and remediation actions.</li><li>- Invitation to CAF briefings and educational events</li><li>- Free access to all courses on the CAF Learning Hub for up to *5 users (or more)</li><li>- 10% discount on CAF Procurement Advice</li><li>- Brand alignment and marketing opportunities</li></ul></li><li>• Undertake a detailed assessment against the 11 recommendations to improve the quality of modern slavery reporting in the Australian University Sector (from RMIT research)</li><li>• Further embed the FRDM technology solution (including continued financial contribution) as standard across QUT supply chain and operations. This tool will help:<ul style="list-style-type: none"><li>- identify modern slavery risks</li><li>- support our future reporting</li><li>- improve supply chain transparency</li><li>- inform actions and track effectiveness</li><li>- identify mitigations</li><li>- support sector collaboration</li><li>- contribute to continuous improvement.</li></ul></li></ul> | <ul style="list-style-type: none"><li>• Continue to participate in the AUPN sector-wide Modern Slavery program including maturing our approach and response – moving to a more proactive approach.</li><li>• Continue the cross-functional QUT reference group to raise awareness, and provide oversight, governance and management of modern slavery across QUT supply chain and operations.</li><li>• Develop Key Performance Indicators (KPIs) to measure the effectiveness of our actions.</li><li>• Continue to educate internal and external stakeholders and raise awareness across QUT of this issue and the importance of addressing modern slavery within our operations and supply chain.</li><li>• Continue to work with QUT key suppliers, especially those who provide high-risk goods and services (as identified through the FRDM technology solution) 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.</li><li>• Implement the remaining internal audit actions identified through the 2022 Modern Slavery Audit and ensure documented evidence saved on file.</li></ul> |



# Approval

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This third Modern Slavery Statement provided by QUT is 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 AO**  
*Vice-Chancellor and President*  
QUT

