



Modern Slavery Statement

2022

ACKNOWLEDGEMENT OF COUNTRY

Griffith University acknowledges the people who are the traditional custodians of the land and pays respect to the Elders, past and present, and extends that respect to all Aboriginal and Torres Straits Islander peoples.



CONTENTS

Message from the Vice Chancellor	5
Introduction and progress	6
Progress in 2022	7
The reporting entity (Criterion 1)	7
The University's structure, operations, and supply chains (Criterion 2)	8
Structure	8
Operations	10
Supply chain	11
The risks of modern slavery in our operations and supply chains (Criterion 3)	12
Our approach to risk	12
Risks in our operations and supply chains	14
Risks for students	15
Our actions to assess and address the risks identified (Criterion 4)	16
How we assess the effectiveness of our actions (Criterion 5)	19
Consultation (Criterion 6)	20
Other relevant information (Criterion 7)	20
2023 road map	20
Declaration	21





MESSAGE FROM THE VICE CHANCELLOR

Griffith University was established in 1975 in response to the people of Queensland's desire for a university that opened up the rich experience of higher education to a wider group of people—a university capable of creating new possibilities and opportunities for all. Since its inception, the University has focused its teaching and research on addressing the most pressing social and environmental issues of our time. That mission—to create a just and equitable future for all—sits at the heart of everything we do, from sourcing and operations to education and research programs.

Since the Australian Modern Slavery Act 2018 (Cth) came into force on 1 January 2019, Griffith University has welcomed and embraced the Act's fundamental ambition to eradicate the worst forms of human exploitation from Australian and international supply chains. In our commitment to advancing human rights and complying with the requirements and ethical standards within the Act, Griffith has taken steps to strengthen our sourcing activities and operating model.

Identifying and mitigating adverse human rights impacts in global supply chains is a complex task requiring a collective effort. Over the past year, Griffith has mobilised its resources and built strategic partnerships to establish and implement systems and controls to bring transparency to operations and supply chains to mitigate and address risks. Along with raising awareness and capabilities among staff, suppliers and students, Griffith has worked to ensure proper remediation of any harm the University may have caused or contributed to.

While progress has been made, considerable efforts are still required to build a future that benefits as many people as possible. To that end, Griffith will continue to align its approach to the highest ethical standards and collaborate with key stakeholders to embed modern slavery considerations into the University's operating model. Sharing lessons learnt and remaining responsive will enable the University to continue to improve its approach and adapt to risks in a rapidly changing world.

As stated in Griffith's 2020–2025 Strategic Plan, the University will steadfastly uphold its principles of excellence, engagement, and ethical behaviour to help create a world that is just, free of slavery, and equitable for all the communities it serves.

INTRODUCTION AND PROGRESS

Griffith's vision is to be a university of influence that makes significant, impactful contributions to society.

This is the University's third statement pursuant its obligations under Section 13 of the Modern Slavery Act (Cth) (the Act).

Modern slavery, as defined by the Act, describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom.

Examples of practices constituting modern slavery include:

- human trafficking
- slavery
- servitude
- forced labour
- debt bondage
- forced marriage, and
- the worst forms of child labour.

Griffith's zero tolerance for all forms of exploitation is aligned with the United Nations' Sustainable Development Goal No. 8. The University reports publicly against all 17 goals in its annual [SDG Impact Report](#).

8 DECENT WORK AND ECONOMIC GROWTH



PROGRESS IN 2022

In the 2021 statement, Griffith identified five focus areas consistent with the strategic road map of the Australian University Procurement Network (AUPN) and developed an action plan for 2022 with 15 commitments.

Through priority setting and stakeholder engagement, the University has met all commitments and commenced additional initiatives that have strengthened our approach to modern slavery. In 2022, we have:

- reframed our approach to modern slavery to align our actions more closely with the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the United Nations Sustainable Development Goals
- published [Griffith's Modern Slavery Policy](#) and established key internal procedures, frameworks, and contract templates to strengthen our approach to risk identification, management, and remediation
- reviewed our supply chains and operations and identified high-risk and high-priority focus areas
- adopted Informed 365 as a new cloud-based solution to engage with high-risk and high-priority suppliers throughout the sourcing, procurement and contract management processes
- launched Griffith's Supplier Code of Conduct, which references modern slavery
- included a page on the Griffith website titled "[Supplying to Griffith](#)" to guide prospective and current suppliers in their commercial and ethical engagement with the University
- played an active role within AUPN to pilot the [FRDM tool](#)
- established accessible modern slavery grievance and remediation mechanisms for contractors' workers on Griffith's campuses
- developed training and tools for Griffith's staff and suppliers to build modern slavery awareness and capability
- contracted a Modern Slavery Specialist and established an executive-led Modern Slavery Task Force to provide strategic direction to the implementation of Griffith's Modern Slavery Action Plan
- continued to play an active role within AUPN and entered strategic collaborations with the Mekong Club and Electronics Watch to gain greater insights into emerging issues and support to mature our approach over time
- created and published a [Recruitment Scam Awareness](#) page on the Griffith website to alert students about the dangers of online job scams, which can lead to severe exploitation.

Griffith's five focus areas consistent with the AUPN's strategic Road map:



THE REPORTING ENTITY (CRITERION 1)

This statement is made on behalf of Griffith University and its subsidiary International Water Centre Pty Ltd. Griffith University (ABN 78 106 094 461) is a statutory body established under the Griffith University Act 1998 (Qld). Its principal office is at Parkland Drive, Southport Qld 4222.

In the 2022 reporting period, Griffith University's consolidated revenue was \$935 million. It therefore qualifies as a reporting entity under the Act. Griffith University has no subsidiaries or joint ventures that meet the requirements to be a reporting entity in their own right.

THE UNIVERSITY'S STRUCTURE, OPERATIONS, AND SUPPLY CHAINS (CRITERION 2)

Structure

The University's governing body is the University Council, with two of its members elected as chancellor and deputy chancellor. Council must appoint a Vice Chancellor who is the chief executive officer of the University. Griffith's Council has delegated some of its powers to various committees and the Vice Chancellor.

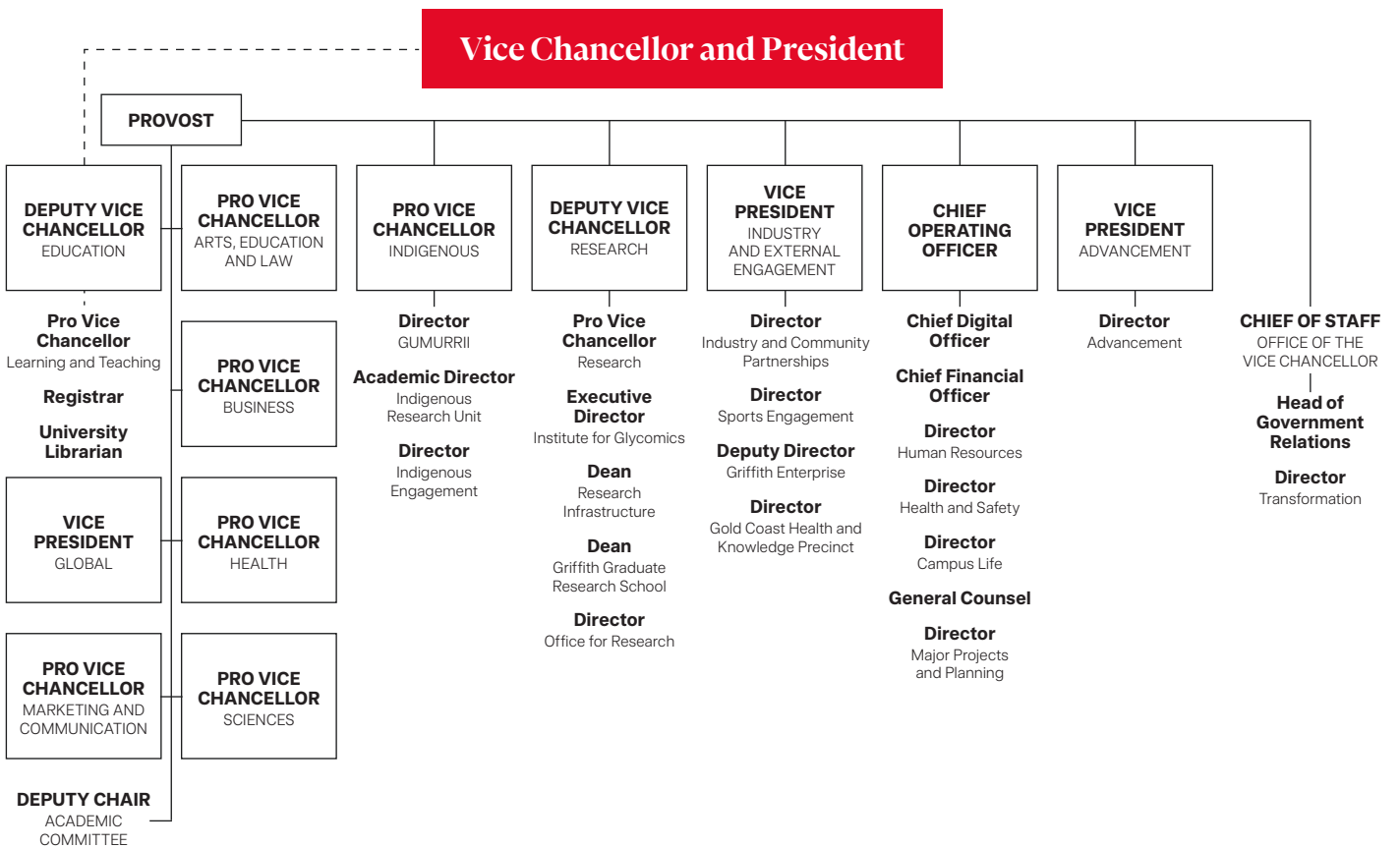
The University is organised into four academic groups (groups). Groups in turn are organised by schools or departments, research institutes and research centres. The four groups are:

- Arts, Education and Law
- Griffith Business School
- Griffith Health
- Griffith Sciences



We also have an array of administration services that support the University's staff and students, as well as our research, teaching and learning.

Griffith's organisational structure is shown below, followed by each academic group's organisational make-up.



	Arts, Education and Law	Griffith Business School	Griffith Health	Griffith Sciences
Senior officers	<ul style="list-style-type: none"> Office of the PVC (AEL) Dean (Academic) Dean (Research) Dean (Learning and Teaching) 	<ul style="list-style-type: none"> Office of the PVC (Business) Dean (Academic) Dean (Research) Dean (Learning & Teaching) Dean (Engagement) Director (International) Communication and Group Services Departments 	<ul style="list-style-type: none"> Office of the PVC (Griffith Health) Dean (Academic) Dean (Learning and Teaching) Dean (Research) 	<ul style="list-style-type: none"> Office of the PVC (Griffith Sciences) Dean (Academic) Dean (Learning and Teaching) Dean (Research)
Schools	<ul style="list-style-type: none"> Queensland College of Art Queensland Conservatorium Griffith Film School School of Criminology and Criminal Justice School of Humanities, Languages and Social Science School of Education and Professional Studies Griffith Law School 	<ul style="list-style-type: none"> Department of Accounting, Finance and Economics Department of Business Strategy and Innovation Department of Tourism, Sport and Hotel Management Department of Employment Relations and Human Department of Marketing School of Government and International Relations Research centres 	<ul style="list-style-type: none"> School of Medicine and Dentistry School of Pharmacy and Medical Sciences School of Nursing and Midwifery School of Applied Psychology School of Health Sciences and Social Work 	<ul style="list-style-type: none"> School of Engineering and Built Environment School of Information and Communication Technology School of Environment and Science
Research Centres	<ul style="list-style-type: none"> Creative Arts Research Institute Griffith Criminology Institute Griffith Centre for Social and Cultural Research Griffith Institute for Educational Research Law Futures Centre 	<ul style="list-style-type: none"> Griffith Asia Institute Centre for Governance and Public Policy Griffith Institute for Tourism Centre for Work, Organisation and Wellbeing 	<ul style="list-style-type: none"> Menzies Health Institute Queensland Centre for Mental Health Australian Institute for Suicide Research 	<ul style="list-style-type: none"> Institute for Integrated and Intelligent Systems Queensland Micro- and Nanotechnology Centre Griffith Institute for Drug Discovery Centre for Planetary Health and Food Security Centre for Catalysis and Clean Energy Australian Rivers Institute Centre for Quantum Dynamics Cities Research Institute Coastal and Marine Research Centre Australian Research Centre for Human Evolution
Other	<ul style="list-style-type: none"> Griffith University Art Museum 		<ul style="list-style-type: none"> Griffith Health Clinics Health Technical Services 	<ul style="list-style-type: none"> Griffith Sciences Partnerships Office Griffith Sciences Services Griffith Climate Change Response Program Griffith University Eco Centre

Figure 1—Griffith's organisational make-up

Griffith University aims to practise good corporate governance. We adhere to the Griffith University Act and governance requirements of other relevant legislation. We also comply with the University Chancellors Council Voluntary Code of Best Practice for the Governance of Australian Public Universities (amended May 2018). To learn more about Griffith's corporate governance, please refer to our [Corporate website](#).

Operations

Griffith's operations are geared toward offering high-quality learning, research and social outcomes for students and researchers, with a focus on practices that have a positive social, economic and environmental impact on our communities.

Griffith also provides members of our community and other third parties with other services such as day care and health clinics.

Griffith University is a world-class university:



Ranked in the top 2%

of universities globally



260,000+ alumni

across 150+ nationalities



46,000 students

encompassing 137 different citizenships



6 campuses



4,200 staff

across administrative and academic areas



200+ degrees



Extensive network of **research centres and institutes**

Griffith operates in Australia and has five campuses across Queensland and one digital campus. The University has no solely owned facilities or locations based internationally.

LOCATIONS

Griffith University operates its teaching and research primarily from five physical campuses located at:

- Nathan, Brisbane, Qld
- South Bank, Brisbane, Qld
- Mt Gravatt, Brisbane, Qld
- Meadowbrook, Logan, Qld
- Southport, Gold Coast, Qld

Additionally, with more than 20 years' experience teaching online, we have reinforced our commitment to giving our students the flexibility and support they need to succeed in their studies with a thriving Digital campus.

STUDY AREAS

Griffith offers its students tertiary degrees grouped into 10 study areas:

- Architecture, construction and planning
- Business and government
- Criminology and law
- Education
- Engineering, IT and aviation
- Humanities, languages and social science
- Medicine, dentistry and health
- Music and performing arts
- Science and environment
- Visual and creative arts

Figure 2—Griffith's operations

We also lease property to tenants on our campuses to provide food and retail services.

Supply chain

To provision our research, learning and teaching capabilities, Griffith University procures a wide range of goods and services, and our supply chains are broad, spanning from research equipment to building and construction to information and communications technology services. Adhering to the AUPN taxonomy, we have organised our spend in four main categories and each of them include four, more granular, subcategories.

Level 1	Business services	Research & teaching	Property & facilities	Technology
Level 2	Corporate professional services	Laboratories & research	Buildings & grounds	Audio visual
	Human resources	Lecturer & teaching expenses	Construction, refurbishment & works	IT hardware
	Logistics & storage	Library services	Plant & equipment	IT professional services
	Marketing & media	Student services	Property management	IT software
	Office related supplies & services		Utilities & renewables	Telecommunications
	Travel & entertainment			

Table 1—Griffith's spend categories as per AUPN' s taxonomy

Griffith's procurement spend exceeded \$280 million during the 2022 reporting period. We transacted with over 3,600 suppliers from 67 countries, with Australia-based suppliers accounting for 87.8% of our spending, followed by Europe (4.5%), and North America (2.3%).

Total expenditure has increased by about 11.5% over the previous year as teaching and research activities have started to resume after the COVID-19 pandemic.

Griffith engages with suppliers in a variety of ways, from single, low-cost transactions through to strategic longer-term contracted relationships where substantial amounts of money are paid to the supplier. Griffith has the general capacity to transact with its suppliers via purchase order, payment request (invoice-only payment), credit card, trade card and direct bank transfer. The University's purchasing practice is guided by the Procurement and Supply Policy, which is closely aligned to the Queensland Government Procurement Policy, and therefore public procurement principles and practices are prominent.

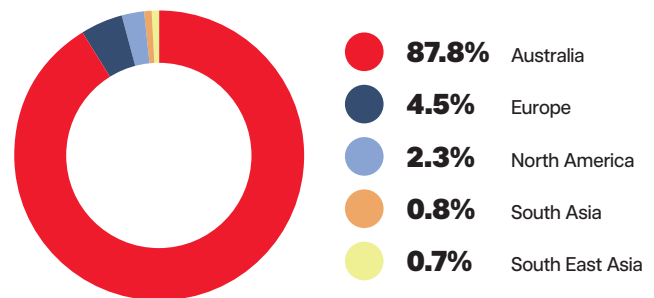


Figure 3—Griffith's Tier-1 supplier locations

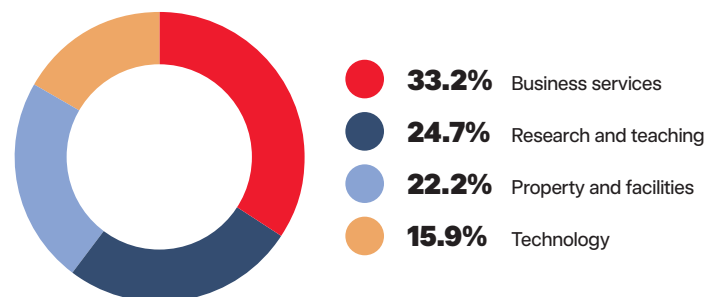


Figure 4—Griffith's spend per AUPN taxonomy: Level 1 category

THE RISKS OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS (CRITERION 3)

In 2022, we began engaging with our high-priority Tier 1 suppliers to gain better visibility into their business models and map where the goods supplied to Griffith were manufactured.

Our approach to risk

In 2022, Griffith developed a three-step process for identifying where modern slavery inherent and residual risk factors exist and intersect in our operations and supply chains. The framework was included in the University's Risk Registry and is integral to our Modern Slavery Supplier Due Diligence.

Step 1—Identification of inherent modern slavery risks

The process took the following inherent risk factors into account to identify potential risk areas and guide understanding and prioritisation:

1. Vulnerable populations
2. Business models
3. Sectors
4. Geographies

The approach took into consideration that the greater likelihood of actual harm occurs when multiple high-risk factors coexist. It was informed by desktop review and interviews with key stakeholders.

Our desktop review included the following resources:

- [Annual Trafficking in Persons Reports](#)—US State Department's Annual Trafficking in Persons Report
- [Corruption Perceptions Index](#)—Transparency International
- [Global Estimates of Modern Slavery: Forced Labour and Forced Marriage](#)—ILO and Walk Free Initiative
- [Global Slavery Index](#)—Walk Free Foundation
- [Human Freedom Index](#)—CATO Institute
- [List of Goods Produced by Child and Forced Labor](#)—US Department of Labor

We also engaged with strategic stakeholders, such as the Mekong Club, Electronics Watch and AUPN, and reviewed the resources they make available only to members:

- Mekong Club Knowledge Hub
- FRDM Media Alerts
- Electronics Watch Library

Because human rights risks are dynamic, we will review publicly available resources and engage with key stakeholders each year.

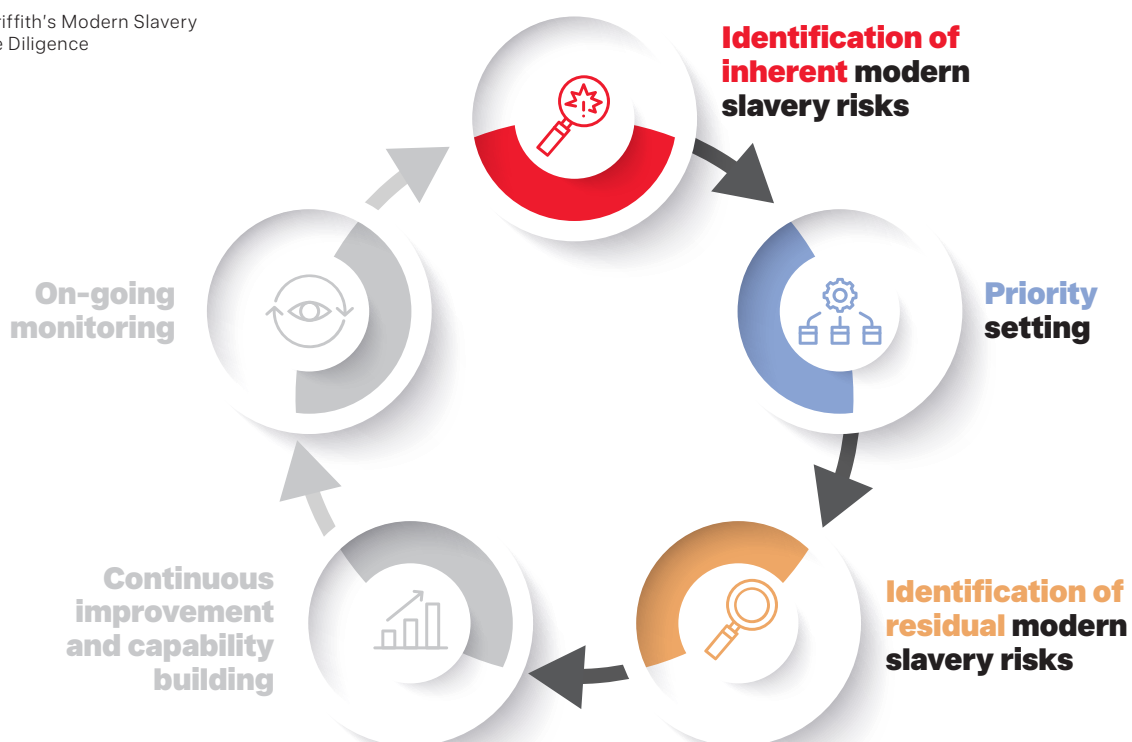
Step 2—Priority setting

We created a spend/risk matrix to assess the complexity of Griffith's spend categories and identify high-risk and high-priority supply chains.

Step 3—Identification of residual modern slavery risk

To identify residual risk, we started to engage with our high-risk and high-priority suppliers through a Modern Slavery Supplier Assessment Questionnaire (SAQ) distributed via Informed 365.

Figure 5—Griffith's Modern Slavery Supplier Due Diligence



Risks in our operations and supply chains

Using Griffith's Modern Slavery Risk Framework, in 2022, we identified seven high-risk and high-priority business areas in which Griffith could potentially cause, contribute or be directly linked to harm to people:

On-campus operations

Property and facilities:

- Construction
- Maintenance
- Cleaning
- Security and parking
- Real estate—retailers on campus

We also assessed specific business services provided to Griffith, such as transportation, promotional materials, and events. These services do not fall into high-spend categories, but they are important to the University's operation and are potentially vulnerable to modern slavery.

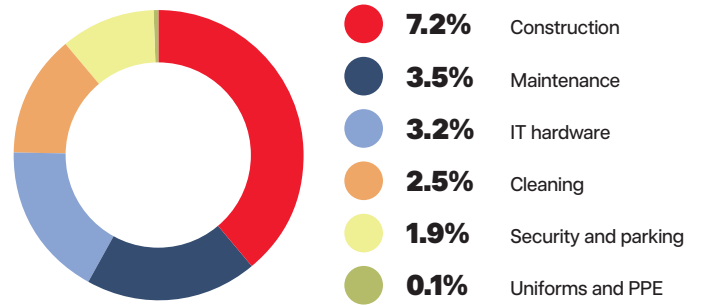


Figure 6—High-risk categories—percentage of total spend

Supply chains

- Uniforms and personal protective equipment (PPE)
- Information technology (IT)

To gauge the existing and potential residual risk in our high-priority supply chains, we distributed a SAQ to 81 existing and potential suppliers. The SAQ was geared towards gaining transparency of the systems and controls that the respondents have in place to identify and manage the risk of modern slavery in their respective operations and supply chains:

- 22 existing providers of services such as maintenance, cleaning and security, as well as goods such as personal protective equipment (PPE), completed an extensive questionnaire and provided granular information about their business model as well as the systems and controls in place to identify and address the risk of modern slavery in their operations and supply chains.
- 59 potential suppliers participating in a construction tender completed a concise pre-qualification questionnaire, included in the tender documents, which provided Griffith with an initial understanding of the responding companies' approach to modern slavery.

The following graphs show some of the results of this initial pilot.

Property and facilities

The SAQ-enabled assessment found that the respondents providing the University with construction and property and facility services—such as cleaning, security, parking, and maintenance—are registered in and have workers based in Australia. These respondents rely on subcontractors and seasonal workers to deliver their services and do not always have robust systems and controls in place to ensure decent working conditions for all workers.

Commercial activities on campus are primarily focused on hospitality and retail, with outlets selling a wide variety of product categories (from IT products to clothing, footwear, stationery and food). The retailers assessed included small businesses with relatively simple business models, and larger companies with more complex supply chains. Most retailers did not have a system in place to enable visibility of the risks of modern slavery in their supply chains.

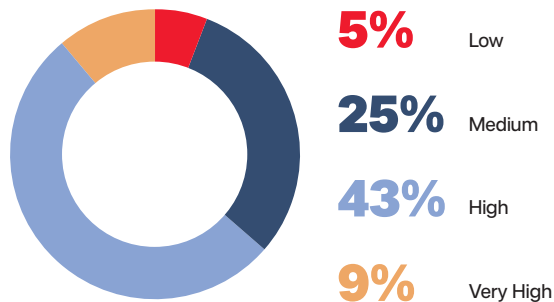


Figure 7—Risk Profile of 58 Potential Suppliers in the Construction Sector

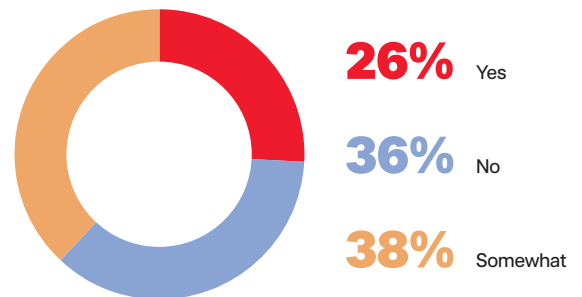


Figure 8—Construction suppliers with a comprehensive modern slavery risk assessment in place

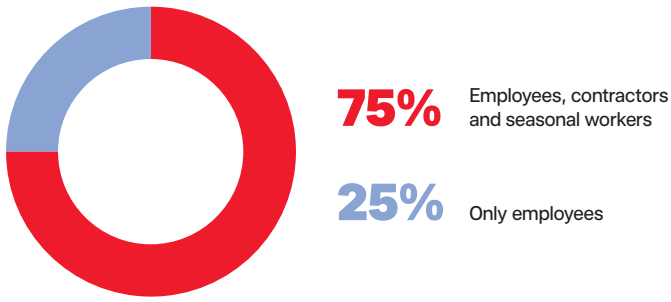


Figure 9—Workforce composition of property and facilities suppliers

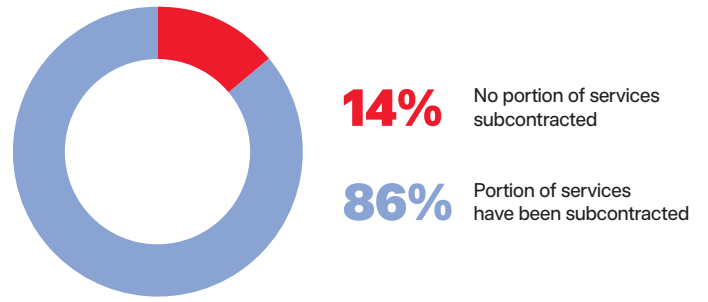


Figure 10—Construction companies who have subcontracted portion of services during the past 12 months

Uniforms, PPE and IT

All responding suppliers of PPE have commercial dealings in Australia, but their goods are manufactured in high-risk locations—primarily China and South East Asia—where they have little visibility and control over working conditions.

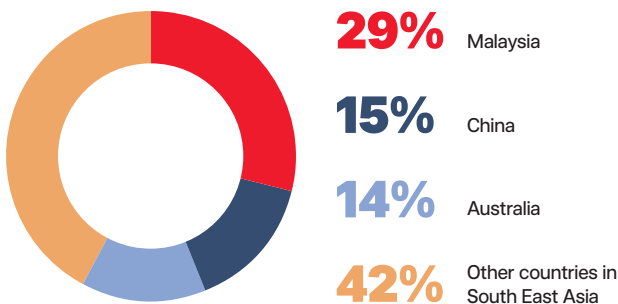


Figure 11—PPE and uniforms—manufacturing countries

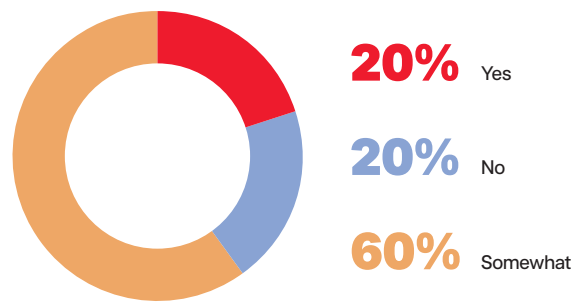


Figure 12—PPE and uniform companies with a comprehensive modern slavery risk assessment in place

While IT hardware vendors were not included in the 2022 pilot, we conducted extensive desktop research to inform and prioritise future actions, and our recent affiliation with the Electronics Watch will assist us in defining our approach and engagement in the sector in 2023.

Residual risk

The above evaluation provided us with a better understanding of the residual risk of our current suppliers and will inform our future engagement process.

The graph below shows the overall assessment of the 21 suppliers currently in a business relationship with Griffith. In 2023, we intend to share an improvement plan with these 21 suppliers in the hope it will provide an opportunity to advance human rights in our supply chains. We will take a collaborative approach and offer opportunities for capability building to support them on their improvement path.

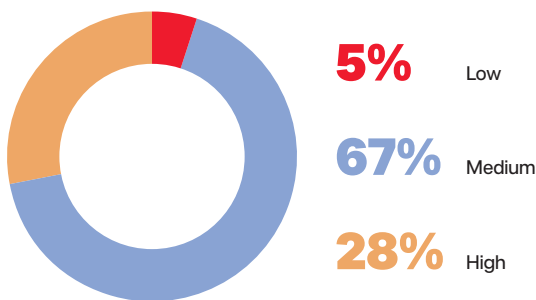


Figure 13—Residual Risk of the 21 suppliers assessed

Risks for students

Griffith helps prepare students for life and for the future. As a result, we recognise a duty of care to respect the human rights of our students and provide them with awareness of modern slavery risks.

In 2022, students from over 137 countries studied at Griffith University. According to reports and media exposés, international students typically work in the hospitality, retail and service industries (e.g., cleaning) and gig economy to support themselves, unaware of recruitment scams that can lead to serious forms of exploitation. Recruitment scams or fraud can occur at all levels and in any industry. It can happen anywhere, including large criminal networks and commercial enterprises. Scammers' increasing use of technology, such as social media and messaging services, can frequently deceive prospective employees. Students who are vulnerable due to their lack of proficiency in the local language and familiarity with local practices are more likely to be victims of a recruitment scam or exploitation.

OUR ACTIONS TO ASSESS AND ADDRESS THE RISKS IDENTIFIED (CRITERION 4)

In 2022 Griffith focused its efforts on establishing robust systems and controls, awareness and capability-building initiatives and strategic collaborations to identify, assess, address and account for adverse human impact in its operations and supply chains.

Policy commitment

In 2022, the following policy, internal processes, and contract templates were developed and approved:

- Griffith's Modern Slavery Policy, which states the University's commitment to respecting human rights and addressing modern slavery. The policy is consistent with the intent of the United Nations Sustainable Development Goals, as well as relevant laws, principles and standards, such as the United Nations (UN) Declaration on Human Rights, International Labour Organization Conventions and the Modern Slavery Act 2018 (Cth), to eradicate modern slavery. The policy was approved by the Vice Chancellor after extensive consultation with internal and external stakeholders. It is available on Griffith's website and through the Griffith Policy Library.
- Griffith's Supplier Code of Conduct (the Code), which sets out the standards of behaviour that we expect of our suppliers when doing business with us, including our expectations for addressing modern slavery risks throughout their supply chain. The Code is aligned with the core conventions of the International Labour Organization, the UN Global Compact's 10 principles and the Queensland Government Ethical Supplier Threshold and Mandate. We expect our suppliers to take reasonable actions to address any non-compliances with the Code, including non-compliances by their employees, related entities, suppliers and subcontractors. The Code is available on Griffith's website.
- Griffith started to include modern slavery clauses in its contractual terms, including the expectation that suppliers comply with Griffith's Supplier Code of Conduct and Griffith's Supplier Risk Assessment and Management Procedure. They also include Griffith's right to audit and take action if we discover any breach of modern slavery laws or the Code.
- Griffith University is committed to continuously improving our systems and controls to assess, address and mitigate modern slavery risks. To translate this commitment into action, the University has developed the Modern Slavery Supplier Risk Assessment and Management Procedure, which outlines the steps to assess and address any identified risk. The procedure is an expression of the Griffith Supplier Code of Conduct, and it is consistent with the core conventions of the International Labour Organization and the United Nations Guiding Principles on Business and Human Rights. The procedure resulted from extensive consultation with internal and external stakeholders and was approved by Griffith's executive-led Modern Slavery Task Force.
- Griffith's Modern Slavery Grievance and Remediation Procedure outlines the steps the University takes to investigate and, if appropriate and possible, take remediation actions. This includes for potential instances of modern slavery that Griffith University might have caused or contributed to in its supply chain. The procedure is grounded in the UN's Guiding Principles for Business and Human Rights, Walk Free's Modern Slavery Response & Remedy Framework, and the Mekong Club's Remediation Toolkit. The procedure resulted from extensive consultation with internal and external stakeholders and was approved by Griffith's executive-led Modern Slavery Task Force.

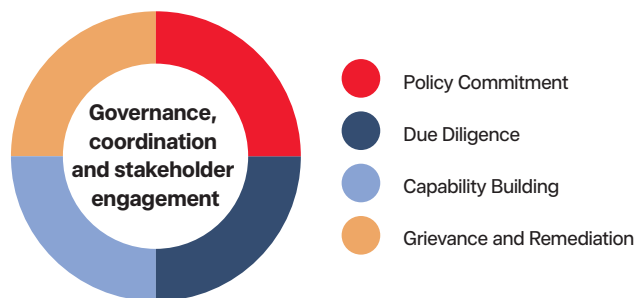


Figure 14—Griffith's approach to assess and address modern slavery risks in its operations and supply chains.



Due diligence

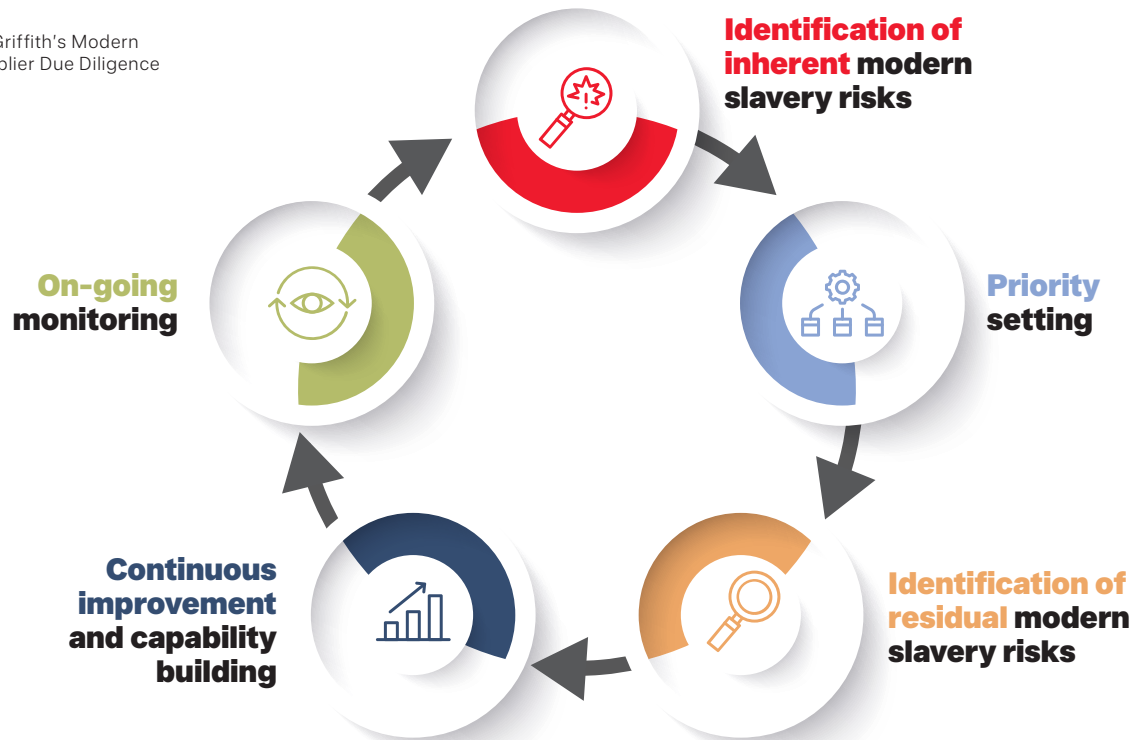
In 2022 Griffith set the foundations of its approach to modern slavery due diligence, which includes five steps:

Steps 1–3: Identify inherent and residual risks of modern slavery in our operations and supply and identify priority areas as described on page 10

Step 4: Develop action plans and work collaboratively with suppliers to mitigate and address any residual risk identified, and drive continuous improvement

Step 5: Ongoing monitoring

Figure 15—Griffith's Modern Slavery Supplier Due Diligence



We implemented this approach, and achieved the following outcomes:

- Developed Griffith's Modern Slavery Supplier Risk Assessment Procedure and selected the Informed 365 dashboard as a tool to assess and engage with suppliers throughout the sourcing and contract management process.
- Identified seven high-risk, high-priority areas.
- Commenced using the Informed 365 toolset with 22 current suppliers operating in high-risk, high-priority categories and 59 potential suppliers that expressed interest in being part of one of Griffith's Construction Panels.
- Developed Griffith's Modern Slavery Grievance and Remediation Procedure and engaged Your Call as independent modern slavery grievance reporting service for contractors' workers on campus.

Awareness and capability building

To strengthen Griffith's ability to respond to the risk of modern slavery in our operations and supply chains, we initiated the following activities to build modern slavery awareness and capability among our employees, suppliers, and students:

- We developed an e-learning module for Griffith staff that introduces the issue of modern slavery, the University's commitment to combating modern slavery in its operations and supply chains, and the role that Griffith staff are expected to play in delivering this commitment. From 2023, the training will be mandatory for staff in critical roles, such as members of the University Council, the University Executive Group, stakeholders involved in strategic sourcing events, contract owners, frequent travellers, and new hires in critical roles.
- We held a live training session for the finance team and two awareness-building sessions with the Mekong Club and one with Electronics Watch.
- We issued fortnightly modern slavery newsletters to the Strategic Procurement and Supply team, and we referenced the risk of modern slavery in the hospitality and tourism sectors in Griffith's travel guidance.
- We developed an e-learning module for suppliers, which from 2023 will be a requirement in the supplier onboarding process.
- We created and published a [Recruitment Scam Awareness](#) page on the Griffith website to warn students about the dangers of online job scams.

Grievance and remediation

Griffith's Modern Slavery Grievance and Remediation Procedure outlines the steps the University takes to investigate and, if appropriate and possible, take remediation actions. This includes for potential instances of modern slavery that Griffith University might have caused or contributed to in its supply chain. Where possible, the process is carried out in complete confidentiality to prevent any retaliation or victimisation against the reporter or the rights-holder who suffered the abuse.

Anyone can raise concerns directly and anonymously to Griffith's Integrity Team or through [Your Call](#), Australia's largest independent whistleblowing provider, available 24 hours a day, 365 days a year. Your Call is engaged by the University's Integrity team and is accessible through [Griffith's Complaints and Grievance web page](#).

The procedure is grounded in the UN's Guiding Principles for Business and Human Rights, Walk Free's Modern Slavery Response & Remedy Framework, and the Mekong Club's Remediation Toolkit. The procedure resulted from extensive consultation with internal and external stakeholders and was approved by Griffith's executive-led Modern Slavery Task Force.



Figure 16—Griffith's approach to grievance and remediation

While not a modern slavery risk—but nonetheless important and consistent with the University's principles of ethics, engagement and excellence—in 2021, Griffith established an in-depth program to review all payroll payments to casual and sessional staff and identify any cases where casual and sessional staff are not paid correctly, ensuring staff are reimbursed for any underpayments and implementing process redesign to prevent this from happening again. The review and remediation process continued throughout 2022.

Case study: How Griffith addresses alleged modern slavery instances in its supply chain

In 2022, a media report alerted Griffith to an allegation of modern slavery against one of its suppliers. After consulting with AUPN and the Queensland Government, the University contacted the relevant supplier to understand their approach to upholding labour rights throughout their operations and supply chains, as well as their response to the recent allegation. While the allegation has yet to be confirmed, the supplier responded promptly and provided an overview of their ethical standards and the actions they were taking to address and resolve the allegation. As part of their response, they completed the Informed 365 SAQ and they have been placed on Griffith's watch list for close monitoring. The positive response from the supplier confirmed that engagement and collaboration are key to eradicating all forms of exploitation across the world.

In 2022, this was the only instance of alleged modern slavery identified in Griffith's supply chain. The incident prompted the University to review its modern slavery contract clauses to ensure they allow the University to take appropriate action should similar allegations arise in the future.

Governance, coordination and stakeholder engagement

The University took the following meaningful actions in 2022 to continue to embed modern slavery considerations in our way of working, stay abreast of human rights emerging issues, and act promptly to address any concerns identified:

- A Modern Slavery Specialist joined the Strategic Procurement and Supply Team to lead and coordinate the University's commitment to advancing human rights in its operations and supply chains.
- An executive-led, cross-functional Modern Slavery Task Force was established to provide strategic direction to the University's approach to combatting modern slavery. The task force meets every two months and includes two Griffith executives, two directors, one department head, one human rights academic expert, one modern slavery specialist and one external modern slavery expert. In 2022, the task force was consulted on foundational documents and initiatives, such as the University's Modern Slavery Policy and the modern slavery training module, developed in line with the UN Guiding Principles and Human Rights, the Sustainable Development Goals and global leading practice.
- Modern slavery risk was included in the Corporate Risk Register and in 2023 will be included in the University's broader risk appetite statement. We also improved Griffith's spend data quality and feed frequencies, allowing access to more accurate and timely data each month.
- We embedded the Modern Slavery Supplier Risk Assessment Procedure in the Contract Management Procedure and continued to add contracts in the central Contract Register.
- We worked closely with stakeholders across the University, including Risk and Resilience, Integrity, Legal, Finance, Campus Life, human rights academic experts, Marketing and Communications, and Sustainability teams to develop and embed policies, procedures, awareness and capability-building initiatives in the University's operations.
- We worked closely with the AUPN Modern Slavery Working Group and took a leading role in the pilot of the FRDM tool, which resulted in the risk assessment of 10 suppliers providing goods and services to AUPN's members. This increased our ability to collaborate to drive positive change related to modern slavery as a sector.
- Kate Van Doore, Griffith's Deputy Head of School (Learning & Teaching, Griffith Law School), was appointed to the AUPN Modern Slavery Academic Advisory Board, which has been established to provide advice on the AUPN Modern Slavery Project. Advice includes the appropriateness and robustness of AUPN's proposed Modern Slavery Project's scope, methodologies, goals, and desired outcomes. Kate's active role supports the sector in collaborating to create positive leverage in our supply chains.
- We became an active member of and regularly engage with the Mekong Club, to inform and improve our approach to modern slavery over time and stay abreast of any emerging issues.
- We became an affiliate of Electronics Watch to gain first-hand insights into the working conditions in the factories manufacturing IT hardware, and work collaboratively to address the issues identified.
- We started to engage with our suppliers through the Informed 365 dashboard to increase our understanding of the modern slavery risks in our supply chains. This also supported the suppliers taking ownership and actions to address any modern slavery risk in their supply chains.

We also launched the [Supplying to Griffith](#) webpage to guide prospective and existing suppliers in their commercial and ethical engagement with the University.

HOW WE ASSESS THE EFFECTIVENESS OF OUR ACTIONS (CRITERION 5)

At Griffith, we believe that monitoring and reviewing the progress of our initiatives to eradicate modern slavery from our operations and supply chains is critical to improving our approach over time and addressing emerging issues.

To that end, throughout 2022, we tracked and evaluated our approach in several ways:

- Regularly reviewed our Modern Slavery Action Plan to monitor our progress towards expected outcomes.
- Actively engaged with the AUPN Modern Slavery Working Group to share good practice and create synergy for change.
- Regularly consulted with the Mekong Club to test and refine our approach.
- Monitored our contract register and spend data to track improvements in embedding modern slavery considerations in our way of working.

CONSULTATION (CRITERION 6)

The reporting entity is Griffith University, which reports on behalf of its sole subsidiary, International Water Centre Pty Ltd. Staff from Griffith served on the International Water Centre Pty Ltd board, allowing for ongoing dialogue on modern slavery expectations and oversight of any procurement activities involving the entity.

OTHER RELEVANT INFORMATION (CRITERION 7)

2023 road map

In 2023, we intend to develop a three-year Modern Slavery Action Plan with specific key performance indicators (KPIs) to track progress towards our goals. Those KPIs will provide us with targets and milestones to gauge progress and insights to guide our decision-making. By monitoring our KPIs, we will identify areas of strength and weakness, take steps to optimise performance and consolidate successful strategies.

Particular focus will be placed on the following:

University operations

- Continue to monitor our operations to identify emerging risks and prioritise and address those risks.
- Continue to use the Modern Slavery Task Force as a strategic advisory group to implement the University's Modern Slavery Action Plan.
- Review relevant University policies to reference modern slavery where relevant and appropriate.
- Roll out and monitor the completion rate of the e-learning modern slavery training for staff and launch new learning initiatives to continue to embed modern slavery considerations into our business decisions.
- Collaborate with key stakeholders to launch new initiatives to raise students' awareness and understanding of modern slavery.
- Ensure effective accessibility of Griffith's modern slavery grievance mechanisms and promptly address any concerns identified.
- Continue to engage in multi-stakeholder initiatives such as AUPN, Electronics Watch and the Mekong Club to identify and address risks of modern slavery proactively and explore new collaboration opportunities. Implement tools and methods to monitor the effectiveness of our actions and promptly take steps to remediate identified concerns where appropriate.

University supply chain

- Continue to engage with high-risk and high-priority suppliers through the Informed 365 dashboard for risk assessment and management, ethical onboarding, and awareness and capability building.
- Continue to play an active role within AUPN to leverage resources, expertise and innovation to advance the university sector's approach to modern slavery.
- Roll out and monitor the completion rate of the e-learning modern slavery training for suppliers, starting with high-risk, high-priority supply chains, and develop new tools and initiatives to support suppliers in advancing their approach to modern slavery and meeting Griffith's expectations.
- Engage with key external and internal stakeholders to conduct a deep-dive risk assessment in selected, high-priority supply chains.
- Carry out targeted on-site assessments in high-risk and high-priority supply chains.
- Continue to engage with suppliers through the Supplying to Griffith web page and act immediately to address any concerns identified.

DECLARATION

This statement is made pursuant to Section 13 of the Modern Slavery Act 2018 (Cth) and constitutes the Modern Slavery Statement of Griffith University for the year ending 31 December 2022. The statement has been approved by the Griffith University Council.



Professor Carolyn Evans

Vice Chancellor and President





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