

# MODERN SLAVERY STATEMENT 2021

the university  
for the real world







# CONTENTS

- 4** Introduction
- 6** About QUT
- 8** QUT Structure
- 9** Operations
- 10** Supply Chain
- 12** Risks of modern slavery practices
  - 12 Research
  - 13 Teaching and student services
  - 13 Management of human resources
  - 13 Investments
  - 13 Commercial operations
  - 14 Engagement with industry partners
  - 14 Risk in controlled entities
  - 14 Supply chain
- 15** Actions taken to assess and address risks
- 17** 2021 Metrics
- 18** The AUPN's modern slavery sector approach
  - 18 Why a sector approach
  - 19 Timeline of events and key deliverables
  - 20 2021 AUPN MSWG key achievements
  - 21 Outcomes
  - 22 Other information/Next steps
  - 23 Approval

# INTRODUCTION

**...QUT is committed to conducting business with ethically, environmentally and social responsible suppliers...**

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.

This Modern Slavery Statement is QUT's second statement. It showcases QUT's continued commitment to addressing modern slavery in our organisation and supply chains. It sets out the actions taken during the 2021 financial year –from 1 January 2021 until 31 December 2021–along with future actions planned.





# ABOUT QUT

**QUT is a major Australian university with a global outlook and a real-world focus.** With more than 50,000 students and offering more than 400 courses and research programs, QUT is a modern university for the real world. We began operating as QUT in January 1989, following approval of our status as a university.

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.

The effects of COVID-19's persistence and evolution throughout 2021 on the university's community and operations have been significant, but the lessons learned and the successful adaptations made in 2020 stood QUT in good stead as the university persevered through another year of lock-downs, domestic and international border closures, social distancing, contact tracing and personal protection measures.

We are well known as 'the university for the real world' because of our focus on industry-engaged education and research with practical benefit. Industry representatives and professionals contribute to our course development, adding practical perspective to theoretical education. Our strategic fundamental research addresses modern challenges across a broad range of fields. This engaged and grounded approach to education and research is highly valued and trusted by employers, government and business.

## **...known as 'the university for the real world' because of our close links with industry and our relevant teaching and applied research...**

QUT is committed to providing real-world learning experiences and research solutions, and our courses are in high demand. In addition to our award-winning teaching and relevant research that benefits the community, our strengths include a commitment to entrepreneurship and creativity, high student satisfaction and excellent graduate employment outcomes.

QUT ranked 17th internationally in the Times Higher Education (THE) Young University Rankings and equal 43rd in the world in the THE Impact Ranking. We also once again placed inside the top 200 in the world in the 2020 THE World University Rankings. We continued to advance up the Quacquarelli Symonds World University Ranking to 213th, and 16th in the QS global 50 Under 50 ranking. QUT also moved up in the Academic Ranking of World Universities (ARWU) into the 201–300 band.

*Blueprint 6* is the university's institutional strategic plan and continued to provide a planning framework for the university in 2021. *Blueprint 6* formalises QUT's ambitions and informs our purpose: to provide transformative education and research relevant to our communities.

More information about QUT's business, history, operations and *Blueprint 6* strategy can be found in our 2021 Annual Report and on our website at [www.qut.edu.au](http://www.qut.edu.au)



# QUT STRUCTURE

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

In late 2021, QUT's enabling Act was amended to streamline the membership of Council to a 15-member model—improving the balance of external and internal members to facilitate the necessary skills mix on QUT Council in line with other universities in the state.

Prior to the governance reform, QUT Council had up to 22 members. At the close of 2021, there were no vacancies on QUT Council with all 15 positions filled.

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

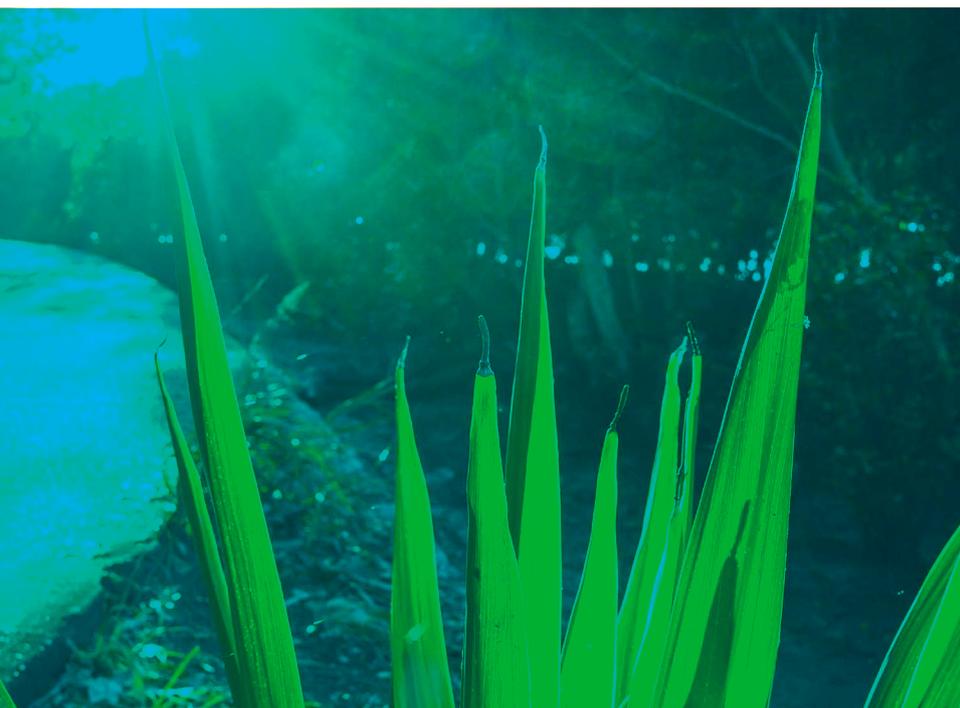
The QUT structure is as follows:

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

The full university structure can be found on our website at [www.qut.edu.au/about/our-university/organisational-structure](http://www.qut.edu.au/about/our-university/organisational-structure)

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

- Brisbane Business School Pty Ltd (ABN 38 085 931 611)
- 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)—please note QUT Advisory Pty Ltd was previously known as Creative Industries Precinct Pty Ltd, with the name change occurring in October 2021.



# OPERATIONS

## ...QUT's core business is research, learning and teaching...

### The university's functions are to:

- provide education at university standard
- provide facilities for, and encourage, study and research
- encourage the advancement and development of knowledge, and its application to government, industry, commerce, and the community
- provide courses of study or instruction (at the level of achievement QUT Council considers appropriate) to meet the needs of the community
- confer higher education awards
- disseminate knowledge and promote scholarship
- provide facilities and resources for the well-being 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 (noting that very limited, if any, travel occurred during the reporting period). The university's controlled entities operate in Queensland, Australia.

### As outlined in the 2021 Annual Report, in 2021 QUT had:

- 53,255 students (36,512 full time and 16,743 part time), including 1,022 Aboriginal and Torres Strait Islander students
- a total of 4,612 full-time equivalent (FTE) staff members, of whom 842 were casual staff FTE and 4,612 were full-time/fractional full-time staff FTE
- \$1.163 billion in revenue.

# SUPPLY CHAIN

| CATEGORY                                   | INCLUDES, BUT IS NOT LIMITED TO  | % OF TOTAL ESTIMATED PROCUREMENT SPEND |
|--|--|--|
| Medical, scientific, research and teaching | Equipment, scientific and medical consumables, chemicals, gases, laboratory supplies, and sporting and musical equipment   | 8.64%                                  |
| Facilities management and campus services  | Construction, operations, maintenance, fleet, security, waste, cleaning, transportation services and minor works   | 18.33%                                 |
| Technology                                 | Computer hardware and accessories, software and licensing (including as a service), and audio visual and ICT services  | 12.12%                                 |
| Business services                          | Professional services, human resources, library services, contingent labour, marketing and media, legal, audit, logistics, freight, postage, financial services, banking, catering, uniforms, travel and insurance | 28.48%                                 |
| Non-procurement spend                      | Non-procurement/non-addressable spend (including QUT's investments)  | 32.43%                                 |

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 15 spend by country geographical location, which makes up 99.53 per cent of QUT's spend. Where possible, QUT is committed to procuring goods from Australian suppliers and approximately 92.4 per cent of our spend is from suppliers within Australia. Only 1.1 per cent of our top spend is from countries that have been identified as having a medium or high risk of modern slavery.

**...Where possible, QUT is committed to procuring goods from Australian suppliers...**

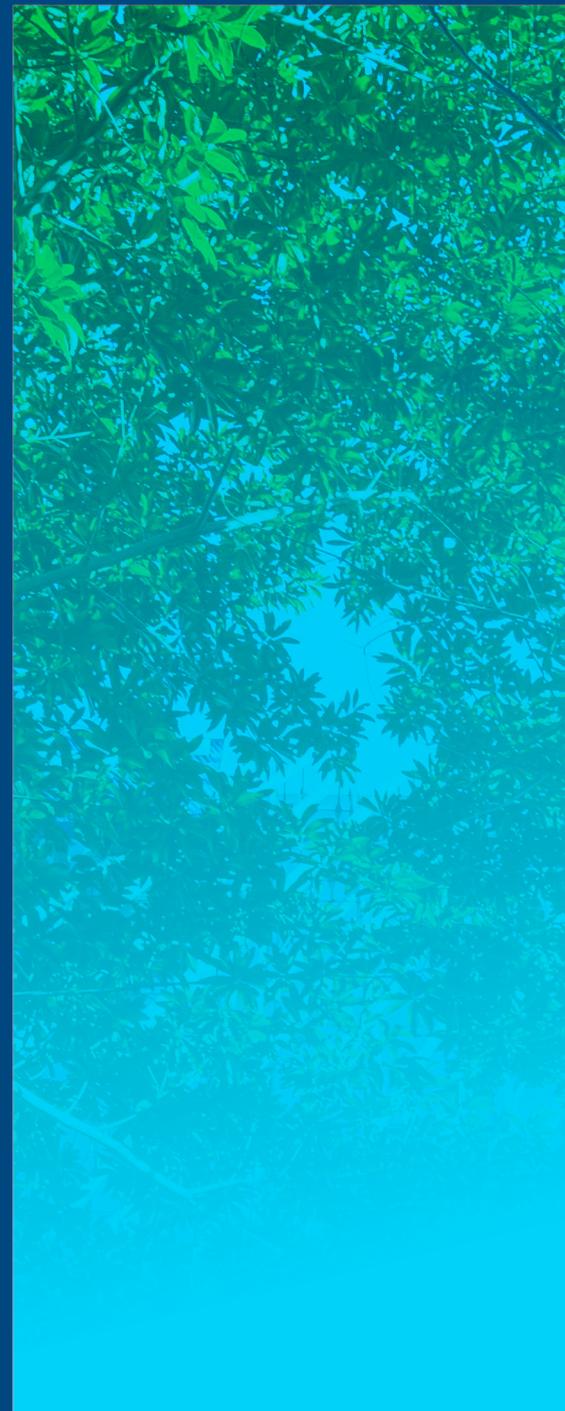
\* Please note: the differences in data between 2020 and 2021 can be attributed to the following factors in 2021:

- \$111m of QUT's spend was with Qld Investment Corporation for investments (this spend is captured and covered in this statement to ensure investments are responsible)
- QUT's operations were significantly impacted in 2021 due to COVID-19, embedding a new organisational structure (undertaken through an approved re-positioning), along with several initiatives to reduce or minimise spend (such as no travel and a recruitment freeze)
- In 2020, QUT supplier numbers included all suppliers to the university during the period – including student and employee reimbursements through accounts payable. In 2021, this figure has been updated to reflect only external suppliers to QUT – which is the focus of QUT's modern slavery approach.



| COUNTRY OF SPEND<br>– (using supplier head<br>office location) | TOTAL SPEND             | % OF QUT'S<br>TOTAL SPEND<br>FOR 2021<br>(excluding<br>corporate card) | COUNTRY RISK<br>LEVEL (based<br>on prevalence<br>from the Global<br>Slavery Index) |
|--|-------------------------|--|--|
| 1   Australia  | \$356,158,246.03        | 92.369%  | Low  |
| 2   United States  | \$10,118,740.82         | 2.624%   | Low  |
| 3   United Kingdom   | \$4,789,355.90          | 1.242%   | Low  |
| 4   Singapore  | \$3,272,050.69          | 0.849%   | Low  |
| 5   China  | \$1,932,583.68          | 0.501%   | Medium   |
| 6   Germany  | \$1,890,639.48          | 0.490%   | Low  |
| 7   Netherlands  | \$1,235,326.90          | 0.320%   | Low  |
| 8   Hong Kong  | \$1,099,449.86          | 0.285%   | Medium   |
| 9   Switzerland  | \$912,124.37            | 0.237%   | Low  |
| 10   India   | \$523,295.01            | 0.136%   | Medium   |
| 11   Ireland   | \$468,257.79            | 0.121%   | Low  |
| 12   Vietnam   | \$405,012.20            | 0.105%   | Medium   |
| 13   New Zealand   | \$369,232.46            | 0.096%   | Low  |
| 14   Korea, Republic of  | \$298,728.57            | 0.077%   | High   |
| 15   Taiwan  | \$298,603.49            | 0.077%   | Low  |
| <b>TOTAL</b>   | <b>\$383,771,647.25</b> | <b>99.530%</b>   |  |

**...QUT is committed to procuring goods from Australian suppliers and approximately 92.4 per cent of our spend is from suppliers within Australia...**



# RISKS OF MODERN SLAVERY PRACTICES

**...we are committed to taking steps to identify, assess and address modern slavery risks...**

QUT acknowledges that modern slavery can occur in every industry and sector and that it has severe consequences. That is why we are 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 pro-actively manage risks, optimise opportunities and achieve our objectives.

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

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

## RESEARCH

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

QUT acknowledges the potential for modern slavery risks in research, particularly where the research involves:

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

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

All QUT research involving humans is reviewed by the University Human Research Ethics Committee (UHREC) or a delegated university review body, in accordance with the ethical principles of the National Statement on Ethical Conduct in Human Research (2007) (National Statement). The National Statement must be used to inform the design, ethical review and conduct of human research that is funded by the NHMRC or ARC and is the national standard for use by any individual, institution or organisation conducting human research.

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

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 crowd-sourcing 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's business, however they will continue to be monitored to identify risks associated with this approach.



## TEACHING AND STUDENT SERVICES

In 2021, QUT had 46,112 domestic students and 7,143 international students. University teaching and other student services are primarily provided in Australia by QUT staff who are recruited and managed according to QUT employment policy and procedures.

QUT acknowledges that students, particularly international students, may be at risk of modern slavery when working in Australia, volunteering in Australia, or when undertaking work integrated learning (WIL) 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 includes clauses that require the industry partner to comply with legislation, as well as provide a variety of tasks for the student so that learning outcomes can be achieved.

In 2021, QUT had 2,468 higher degree research (HDR) students. International HDR students are accepted to QUT with evidence of being able to cover minimum costs of their stay—\$21,041 per year (as per visa requirements). Limits are also placed on HDR students regarding working hours while enrolled (no more than 10 hours/week for scholarship recipients).

## MANAGEMENT OF HUMAN RESOURCES

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

QUT supplements its workforce from time to time with temporary workers to complete specific pieces of work and/or fill temporary vacancies. These workers are engaged using the Queensland State Government Standing Offer Arrangement which has mandatory provisions for all companies on the arrangement to have a labour hire license. These licenses are covered by legislation with the dual purpose of protecting workers from exploitation by providers of labour hire services and to promote the integrity of the labour hire industry. In addition, 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 approximately 31 retailers on campus and 26 other commercial licences/agreements. All retailers have documented leases or licences in place with clauses covering compliance obligations with all relevant legislation.

## ENGAGEMENT WITH INDUSTRY PARTNERS

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

## RISK IN CONTROLLED ENTITIES

In the 2021 reporting period, QUT had four operating controlled entities. These entities had limited operations and the one interim employee within the controlled entities transitioned to QUT during the reporting period, leaving the entities with no employees. The controlled entities had extremely limited (if any) supply chain activity undertaken. The risk of modern slavery within QUT's controlled entities has been assessed again as part of the development of this second statement and continues to be deemed as extremely low, given the minimal activity.

Student Managed Investment Fund (ABN 92 718 723 234) is used as an experimental learning tool for students. All investments made through this fund are consistent with QUT's investment policy.

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

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

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

## SUPPLY CHAIN

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

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

QUT's 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

## ...commitment to assess and address modern slavery across our operations and supply chain.

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. On 30 June 2021, QUT published its first Modern Slavery Statement based on the 2020 calendar and financial year.

In 2021, QUT continued its commitment to assess and address modern slavery across our operations and supply chain. As they were in 2020, QUT's operations and supply chains were significantly impacted by COVID-19 and this has impacted on QUT's response and progress. However, even with these impacts, multiple initiatives were commenced and/or implemented across QUT to support compliance with the Act and to ensure that QUT is actively combating modern slavery.

| AREA  | ACTION TAKEN DURING 2021 REPORTING PERIOD   |
|---|---|
| Modern Slavery cross-functional reference group | The establishment of a cross-functional Modern Slavery Reference Group which met four times during 2021 (and will continue to meet quarterly in 2022). This group was used to identify and review modern slavery risks specific to QUT's operations and supply chain including existing controls and mitigations.   |
| Human rights                                    | QUT is committed to the protection of human rights and has responded to the Human Rights Act 2019 (the HRA) by integrating human rights considerations into policy and procedure including the QUT Staff Code of Conduct, QUT Student Code of Conduct, management of student misconduct policy, and policy relating to the protection of academic freedom and freedom of speech. The university trains key staff about the requirements of the HRA and has developed internal guidelines to assist process owners and decision makers in the proper consideration of human rights. QUT has designated discrimination advisers forming part of the Equity department and has commenced transitioning to a central complaint-handling process for human rights complaints. There were no human rights complaints received by QUT in 2021. |
| Modern Slavery Statement 2020                   | Drafted, consulted, approved and published QUT's first Modern Slavery Statement 2020 by 30 June 2021.   |
| Training  | Implemented modern slavery training for all staff in procurement (with 100 per cent uptake) and the modern slavery reference group.   |
| Awareness                                       | Continued to raise awareness of QUT's response to modern slavery through face-to-face briefings at Risk and Audit Committee (RAC) and QUT Council, as well as information on QUT's intranet and communication through the Strategic Procurement newsletter.   |

| AREA   | ACTION TAKEN DURING 2021 REPORTING PERIOD  |
|--|--|
| Procurement templates  | Updated QUT's procurement templates to include modern slavery supplier questions in quotation and tender documents, and modern slavery considerations when extending existing contracts.   |
| QUT's supplier maintenance form  | QUT's supplier maintenance form (for all new suppliers, along with updating existing suppliers' details) has been updated to include a link to the updated purchasing terms and conditions which are published on QUT's website. The updated purchasing terms and conditions include a specific modern slavery clause.   |
| University sector-wide response  | In 2021, 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  | Commenced the roll out of specific modern slavery clauses for relevant QUT standardised contract terms and conditions, including state government contracts that QUT 'purchases through' and the state government QITC contract framework.   |
| Contracts with key suppliers   | Commenced varying existing supplier contracts, including state government contracts that QUT 'purchases through'.  |
| Contractual arrangements with QUT's network of international representatives (agents)  | QUT's standard Recruitment Services Agreement (RSA) template has been updated with a new clause addressing modern slavery. In 2021, approximately one third of the agreements have been renewed, with the remaining targeted for updating as part of their renewal cycle.  |
| Supporting students to avoid exploitation, protect their rights and stay safe in the workplace via: <ul style="list-style-type: none"> <li>• information</li> <li>• online sessions</li> <li>• individual support</li> </ul> | <p>In 2021, QUT Welfare Officers provided a series of 16 messages to inform international students of their work rights and responsibilities in Australia. Information was also provided about where to seek help. These messages contained links to original sources for further information and were sent to all enrolled international students via the weekly International Student Newsletter.</p> <p>Two online information sessions were provided. These sessions, titled, 'Let's talk about jobs', were an opportunity to share vital information on working in Australia, as well as worker rights and warning signs awareness. They also allowed students to share their experiences of working in Australia and to seek help in situations where they may be at risk of exploitation or unsafe work practices.</p> <p>Welfare and Counselling staff in Student Services regularly 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> |
| Work integrated learning (WIL) contracts   | A review of QUT's WIL 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   | <p>Leveraging the work undertaken by the AUPN, QUT commenced engagement with the Cleaning Accountability Framework (CAF) with the objective of ending exploitation in property services and improving work standards through education and advocacy (<a href="https://www.cleaningaccountability.org.au/">https://www.cleaningaccountability.org.au/</a>).</p> <p>QUT commenced work with CAF to develop a compliance framework to cover contract cleaning and security at our campuses—covering nearly \$10 million spend per annum.</p>  |

# 2021 METRICS



**Cross-functional Reference group**  
established and met four times in 2021.



**Over 15 tenders released**  
by QUT included modern slavery questions and contract clauses.



**16 newsletter articles**  
were sent to QUT's 7,143 international students about safe work practices.



**Over 20 students registered**  
to attend 'Let's talk about jobs' sessions to share experiences about working in Australia.



**Over 10 contracts were updated**  
to include modern slavery provisions as part of the extension/variation of the contract—capturing nearly \$14 million annual QUT spend.



**100% of procurement staff**  
completed modern slavery training.



Most State Government contracts that QUT purchases through (piggy backs off) updated with modern slavery clauses including temporary workers, legal services and professional services—covering over  
**\$5 million of QUT spend per annum.**

# THE AUPN'S MODERN SLAVERY SECTOR APPROACH

**...The AUPN is leading a sector collaboration to support all member universities to meet the challenge of human rights transparency...**

QUT is a member of the AUPN—the peak body for strategic procurement in the higher education sector in Australia and New Zealand. Membership of the AUPN comprises 38 member institutions. QUT plays an active role in the AUPN, with a representative on the AUPN's Executive Committee. The AUPN's vision is to transform universities' capability into a world-class standard of professional procurement.

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

## Why a sector approach?

### NEW OBLIGATION

*The Modern Slavery Act 2018 (Cth)* is applicable to most AUPN member universities, and we wish to demonstrate leadership on this important issue.

### EFFICIENCY

Working together minimises the duplication of activities and associated costs across individual universities including risk assessment, implementation of systems and remediation.

### EFFECTIVENESS

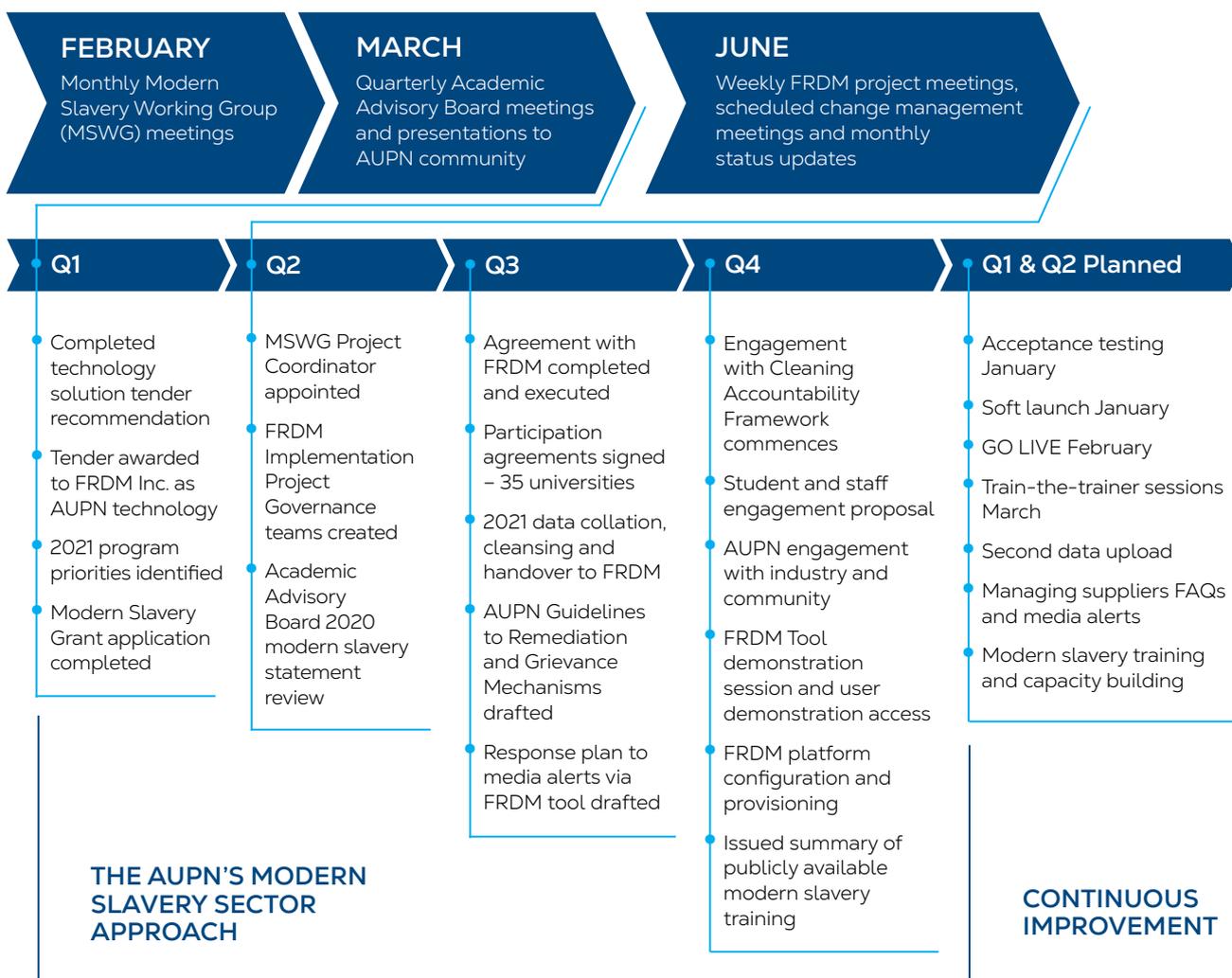
Leveraging our aggregated buying power improves our capacity to identify and action any modern slavery risks and drive more effective changes through our supply chains.

### COOPERATION

AUPN members are an engaged group of procurement professionals within publicly spirited organisations operating in a uniquely collaborative sector.

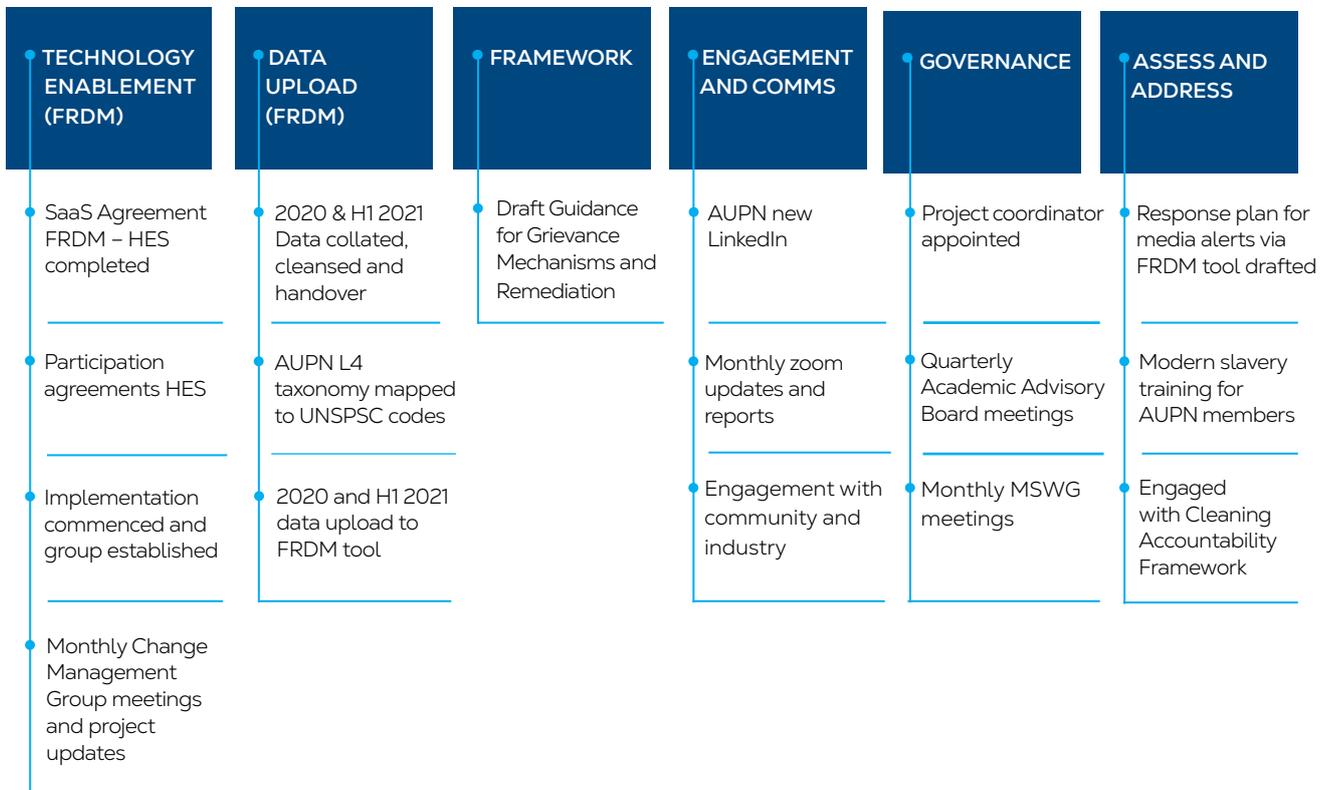
## Timeline of events and key deliverables

• 2021 ————— • 2022





## 2021 AUPN MSWG key achievements



**...enabling each university or the sector to collectively make informed decisions and take action to address modern slavery risk.**

A key deliverable that will help increase QUT's maturity is the partnership with FRDM to deploy a sector-wide technology to tackle modern slavery within our supply chains. FRDM is a supply chain technology company that will algorithmically identify modern slavery risks throughout universities' supply chains, enabling each university or the sector to collectively make informed decisions and take action to address modern slavery risk.

In 2021, 35 participating universities (including QUT) engaged in the various components of the implementation phase of the FRDM tool, including the establishment of a Change Management Group and collation/categorisation of \$16.2 billion of procurement spend (January 2020 – June 2021). QUT is working with the AUPN for full go live and implementation in 2022.



**QUT aims to monitor the effectiveness of its approach to modern slavery...**

## Outcomes

‘What will QUT have access to...’

**Modern Slavery Act reporting**

- Assist in developing annual university statements.

**Supplier on-boarding**

- Qualify suppliers for modern slavery risks and other ESG standards during tender processes.

**Supplier assessments and scoring**

- Manage, score and nest all questionnaires into supplier profiles.

**Sub-supplier visibility**

- View potential risks of lower-tier suppliers where modern slavery is more at risk.

**Supplier data cleansing/coding**

- Cleanse and code data to universal standards.

**Adverse media reporting**

- Notification about articles and media on risk types tied to AUPN suppliers/industries.

### MEASURING EFFECTIVENESS

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

QUT aims to monitor the effectiveness of its approach to modern slavery through the QUT Modern Slavery Reference Group and, where possible,

embedding actions to address modern slavery risks into ‘business as usual’ planning practices. This will include the development of key performance indicators (KPIs) to measure the effectiveness of our actions taken.

QUT has had no complaints to date in relation to modern slavery risks in our operations or supply chains.

### CONSULTATION

In addition to consultation with the AUPN as outlined above, the representatives of the QUT Modern Slavery Reference Group were engaged and consulted on QUT’s Modern Slavery Statement and will continue to meet quarterly in 2022.

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

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



**...raise awareness  
across QUT of  
this issue and the  
importance of  
addressing modern  
slavery within our  
operations and  
supply chain...**

**OTHER INFORMATION/NEXT STEPS**

QUT’s focus for 2022 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 4: QUT ACTIONS PLANNED**

**Actions planned**

- Embed the FRDM technology solution (including continued financial contribution) that will:
  - identify modern slavery risks
  - support our future reporting
  - improve supply chain transparency
  - inform actions and track effectiveness
  - identify mitigations
  - support sector collaboration
  - contribute to continuous improvement.
- Continue the cross-functional QUT reference group to raise awareness, and provide oversight, governance and management of modern slavery across QUT’s supply chain and operations.
- Develop a remediation approach.
- Develop Key Performance Indicators (KPIs) to measure the effectiveness of our actions.
- 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.
- Continue to review standard contractual templates and assess the need for specific modern slavery clauses for new contracts and/or variations to contracts.
- Work with QUT’s key suppliers, especially those who provide high-risk goods and services (as identified through the AUPN 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.
- Review and refine due diligence processes for the engagement of external parties including, but not limited to, suppliers, industry partners and donors.
- Continue to run ‘work safe’ sessions for students focused on identifying and mitigating risks that they may encounter personally.



## APPROVAL

QUT's focus for 2022 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.

This second 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

## Sources of data:

- QUT annual report
- QUT website
- QUT Modern Slavery Reference Group – Risk Identification matrix
- QUT spend data provided 27 January 2022 for Australian University Procurement Networking Benchmarking Data
- QUT's Power BI Dashboard with Procurement Spend (2021)
- Global Slavery Index

