

Australian Council for Educational Research

ACER

# MODERN SLAVERY STATEMENT



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This is the first Modern Slavery Statement submitted by The Australian Council for Educational Research Ltd pursuant to the *Modern Slavery Act 2018 (Cth)*.



# INTRODUCTION FROM THE CEO

As an organisation dedicated to giving everyone the chance to succeed by transforming learning, the Australian Council for Educational Research (ACER) is proud to be an active part of the movement to eradicate all forms of modern slavery.

A registered charity operating throughout Australia and in several countries in Asia, the UAE and UK, ACER has a zero-tolerance approach to modern slavery and human trafficking and is committed to maintaining and improving our systems and processes to avoid the risk of such practices occurring in our own operations, our supply chain, and our services.

Integrity is one of our core values and principles, and ACER pledges to act ethically and with integrity in all our business dealings and relationships, including engaging only with those businesses and organisations which comply fully with global anti-slavery and human trafficking laws.

While we identify a low risk of modern slavery in our operations because of strong employment policies and practices in all our operations, and compliance with all relevant, local laws, we understand that no country is immune from the risk of modern slavery in the supply chain, as the Global Slavery Index shows.

Consequently, ACER has established safe, confidential and accessible mechanisms and procedures to report modern slavery and/or human trafficking allegations and to ensure that stakeholders are aware of these.

ACER will investigate any allegations and, if they are confirmed, refer them to the appropriate law enforcement authorities for criminal prosecution, if appropriate.

On behalf of the ACER Board and staff, I am pleased to present our first Modern Slavery Statement. The statement sets out actions taken by The Australian Council for Educational Research Ltd (ABN: 19 004 398 145) (ACER) to address reporting obligations under the Modern Slavery Act (Commonwealth) for the reporting year (financial) year 2023-2024 (the Modern Slavery Act).

The Act requires entities based or operating in Australia, which have a consolidated revenue equal to or greater than \$AUD100 million during a financial year, to submit a Modern Slavery Statement for that year. This is the first statement reporting on modern slavery by ACER in its operations, supply chain and its related entities to assess and address risks related to modern slavery.

ACER acknowledges that it has a responsibility under the Act to report on the steps which it has taken with respect to addressing the risks of slavery and human trafficking. ACER is committed to doing as much as it can to identify, assess and respond to risks of slavery and human trafficking in all organisational activities and in our supply chain.

This statement covers the reporting period 1 July 2023 to 30 June 2024.

### **Approval and Signing**

This statement was approved by ACER's Board of Directors on 19 December 2024

This statement has been approved and is signed in accordance with Section 13 of the Act by the ACER Board of Directors which has authorised its Chief Executive Officer, Lisa Rodgers, to sign this Modern Slavery Statement on behalf of ACER:

A handwritten signature in black ink, appearing to read 'Lisa Rodgers', written over a dotted line.

Signature

Lisa Rodgers PSM

Chief Executive Officer, Australian Council for Educational Research



# ABOUT ACER

**ACER'S MISSION IS TO CREATE AND PROMOTE RESEARCH-BASED KNOWLEDGE, PRODUCTS AND SERVICES THAT CAN BE USED TO IMPROVE LEARNING ACROSS THE LIFE SPAN.**

ACER is a not-for-profit global research organisation that conducts a range of research and assessment services.

We're an independent non-government organisation, and generate our income through contracted research and development projects, and through developing and distributing products and services, with surplus directed back into research and development.

ACER was established in Melbourne, Australia, in 1930, incorporated in 1958 and now has 500 employees, with related companies in 5 countries outside Australia.



# OUR PRINCIPLES

ACER is committed to creating an inclusive working and learning environment which values diversity and respect. Accordingly, we will display ACER values and leadership behaviours in our everyday work and interactions, and we will act in line with the following principles:

**Professional behaviours**

**Respect**

**Accountability**

**Integrity**

**Equity, diversity and inclusion**

**Success**



# OUR VALUES

## **Expertise**

producing high quality, innovative research and research-based services and materials to improve learning

## **Innovation**

taking a creative, flexible and bold approach to the development of knowledge, services and materials

## **Independence**

providing advice and commentary that is informed through research, is authoritative, and non-aligned

## **Integrity**

being ethical, honest and trustworthy in all our relationships and interactions

## **Responsiveness**

anticipating, understanding, meeting and exceeding client and customer expectations

## **Reflection & improvement**

being self-reflective and listening to and learning from others in order to improve the quality of our work, our efficiency and productivity


## **Positive relationships**

creating an organisational environment characterised by respect, fairness, openness and support of physical and emotional wellbeing

## **Individual fulfilment**

encouraging personal contribution and achievement, and the pursuit of excellence





# OUR CODE OF CONDUCT

Our Code of Conduct sets out expected standards of behaviour for ACER employees and contractors while undertaking their duties. It is intended to guide how we operate, interact with our clients and colleagues, and how we demonstrate the ACER's values and Leadership Framework in our day-to-day work activities.

While promoting and encouraging appropriate behaviour, the Code of Conduct does not stand alone, it complements our internal framework of policies and procedures, enterprise agreement (where applicable), and relevant employment legislations.

The ACER Code of Conduct applies to all ACER employees (full time, part time and casual), and its contractors. Contractor includes all independent or company-based contractors and consultants engaged by ACER to undertake work with ACER employees and clients. Contractors and consultants are not employees of ACER.



# OUR OPERATIONS AND SUPPLY CHAIN

ACER Ltd:

- is a public company limited by guarantee and is governed by the members of ACER Council who also are appointed as members of the Board of Directors;
- is a registered charity;
- is Australian-based, with offices in Victoria, Western Australia, South Australia, New South Wales and Queensland and wholly owned subsidiaries in the United Arab Emirates, United Kingdom, Indonesia, India, and Malaysia;
- and its related companies are providers of educational goods and services which includes the development, distribution, and implementation of assessments and surveys, research professional development and publication of literary works (**the Services**); and
- has a zero-tolerance approach to modern slavery and human trafficking within our organisation and supply chain.

This statement is made on behalf of ACER Ltd and:

- Australian Council for Educational Research (India) Private Limited (Co. No. U74120DL2007PTC166565);
  - PT. Australian Council for Educational Research Indonesia (Registration Number 4019070231100349);
  - Australian Cnl For Educational Research Sdn. Bhd. 202401003148 (1548998-W);
  - ACER International UK Ltd (Co. No. 05572704); and
  - ACER Educational Research Services, Licence No:891496..
- ACER's wholly owned subsidiaries form part of the corporate governance network of the ACER group of companies which will continue to work closely together with the aim of ensuring compliance with the Modern Slavery Act, and addressing modern slavery risks as appropriate.

In providing the Services, ACER uses a network of suppliers in the regions in which it operates for professional resources, technology, logistics corporate services and facilities management in support of its day-to-day business which are reflective of the Services.



## OUR CONSULTATION

ACER's wholly owned subsidiaries form part of the corporate governance network of the ACER group. ACER takes a group wide approach to managing modern slavery risk, which ensures that our policies, systems and processes are applied consistently throughout the group. Consultation has occurred through the Chief Executive Officer of our subsidiaries. Each ACER entity has reviewed this statement and been given an opportunity to provide input. In addition to being put to the ACER Ltd board for approval, this statement was reviewed by the Chief Executive Officer, General Counsel, Company Secretary and Chief Operations Officer.



## OUR POLICY

The ACER Modern Slavery and Human trafficking Policy applies to all persons employed by ACER and its related companies (as defined by the Corporations Act 2001 (Cth)).

ACER has a zero-tolerance approach to modern slavery and human trafficking.

In line with our values, ACER is committed to:

- acting ethically and with integrity throughout the course of all our business dealings and relationships;
- implementing effective systems and controls in order to limit the risk of modern slavery occurring within ACER, its supply chain or in any other business relationship;
- only engaging in business with those who fully comply with global Anti-Slavery and Human Trafficking laws; and
- maintaining compliance with global Modern Slavery and Human Trafficking laws.

A breach of ACER Policies by ACER employees and related personnel constitutes an act of misconduct and shall be considered grounds for termination of employment.





# RISK OF MODERN SLAVERY IN OUR OPERATIONS AND SUPPLY CHAIN

## OPERATIONS

We identify a low risk of modern slavery in our internal operations due to:

- the direct employment relationship between ACER and staff;
- the employment practices covered by ACER's Enterprise Agreement with staff;
- compliance with laws applicable to ACER;
- ACER having strong employment policies, practices and compliance requirements based on existing laws, agreements and regulations within the Education and Not-for-Profit Sector;
- ACER's subsidiaries being covered under our global policies and having procedures in place to ensure compliance with local laws and legislative requirements.

## SUPPLY CHAIN

At ACER we prioritise integrity as one of our guiding principles and uphold ethical standards in all aspects of our operations. Our commitment to responsible procurement practices and processes extends to our expectations of our contractors and supply partners.

In assessing the risk of modern slavery in our supply chain, the following factors are considered:

- Total contract value
- Product or service
- Corporate social responsibility
- Ethics and probity

A significant majority of ACER's supply chain is within Australia for goods and services provided to its headquarters in Victoria and its Australian offices specified above. Consequently, direct exposure to risk of slavery is low in its supply chain. Via its governance and operating procedures ACER monitors and manages its supply chain but in future reporting periods will further strengthen and document its risk management by:

- regularly assessing its supply chain for modern slavery risks, especially in high-risk industries or regions.
- implement codes that set clear expectations for ethical labor practices;
- further monitoring suppliers and business partners; and
- Providing staff with training on identifying and managing modern slavery risks.



# WHAT'S NEXT

ACER recognises that there are opportunities for us to address and/or mitigate any potential modern slavery risk and related issues within our organisation and supply chain.

These include:

## INTERNAL AUDIT FUNCTION

Implementation of an internal audit function potentially including a modern slavery audit schedule.

## DESK TOP AUDITS

Incorporating desk top audits as part of a contract management plan to include:

- Evidence of employment contracts
- Pay slips for random employees
- Procurement Policy reviews
- Policies reviews
- Training and awareness on policies that address modern slavery, human rights, and work right issues.

These audits will ensure we are actively addressing issues and keeping contractors accountable.

## IDENTIFICATION AND RISK ASSESSMENT

ACER recognises reviews of existing procurement practices and employment practices, identification of gaps and areas for improvement are paramount for our success.

Identification of high-risk areas in our supply chain against global modern slavery indexes and as a subset of that goods and services procurement origins.

Ongoing engagement with our contractors and key suppliers relating to ACER policies and procedures and expectations in relation to a zero tolerance to Modern Slavery and Human trafficking.



## ACTIONS TO ADDRESS RISK

ACER will take steps to ensure that modern slavery and human trafficking are not taking place in its own business, partnerships nor within any of its supply chain. This will be achieved by ensuring that:

- all recruitment is carried out in a fair and transparent manner and complies with relevant local legislation and standards,
- the requirements and expectations made of the supply chain, in relation to the relevant legislation, are clearly communicated and included within any contractual terms issued to partners or members of the supply chain;
- suppliers commit to complying with the relevant Modern Slavery and Human Trafficking laws, and that they comply and act in accordance with this Policy;
- ACER takes a partnership approach with regards to working with its suppliers to combat the threat of modern slavery and human trafficking across its sectors and all the international jurisdictions in which it operates; and
- training is provided to staff, as appropriate, to enhance their understanding of the risks and issues surrounding modern slavery and human trafficking, how to identify it and appropriate measures to prevent it.

ACER has safe, confidential and accessible mechanisms and procedures for personnel, beneficiaries and communities, including children, to report modern slavery and/or human trafficking allegations and ensures that beneficiaries are aware of these.

ACER will investigate any allegations through its Dispute Settlement Policy and shall properly, and without delay, conduct an investigation of any breach of this Policy by its employees, contractors or volunteers, or refer to the proper investigative body if the alleged perpetrator is affiliated with another entity.

If, after proper investigation, there is evidence to support allegations of modern slavery and/or human trafficking, these cases may be referred to the appropriate law enforcement authorities for criminal prosecution.

ACER will promptly refer modern slavery and/or human trafficking survivors to relevant services and/or government authorities, based on their needs and consent.