

# 2024 Modern Slavery Statement



*Ready today for tomorrow*

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Kassandra Savage (JCU Alumni), 'Coming Together and Respecting Difference', acrylic on canvas, 2014, 90cm x 90cm.

## Our commitment to Australian Aboriginal and Torres Strait Islander peoples

We acknowledge the Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the Australian lands and waters where our staff and students live, learn and work. We honour the unique cultural and spiritual relationship to the land, waters and seas of First Australian peoples and their continuing and rich contribution to James Cook University (JCU) and Australian society. We also pay respect to ancestors and Elders past, present and future. Aboriginal and Torres Strait Islander peoples are advised that this publication may contain names or images of people who have passed away.



**RESPECT.  
NOW.  
ALWAYS.**

James Cook University values and celebrates the diversity of our community, and is committed to ensuring our learning and working environment is safe and welcoming.

JCU is proud to be part of the Respect. Now. Always. campaign – a national initiative led by Universities Australia to highlight our determination to ensure our students and staff are safe from discrimination and sexual harassment. Further information about the campaign and free services available for students can be found at [jcu.edu.au/sew](http://jcu.edu.au/sew)





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## Modern slavery means conduct which would constitute:

- (a) an offence under Division 270 or 271 of the Criminal Code; or
- (b) an offence under either of those Divisions if the conduct took place in Australia; or
- (c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done in New York on 15 November 2000 ([2005] ATS 27); or
- (d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).





# Criteria 1 - Reporting Entities

This Modern Slavery Statement is submitted in compliance with the Modern Slavery Act 2018 (Cth) for the reporting period of 1 January 2024 to 31 December 2024. It has been prepared on behalf of James Cook University (ABN 46 253 211 955) (JCU) and its controlled entities, collectively referred to as "we," "us," "our," or "the University."

JCU is a public university established under the James Cook University Act 1997 (Qld) and operates as a statutory body within Queensland, Australia. Our University Council is the principal governing body, overseeing the strategic direction and corporate governance of the institution. JCU is committed to upholding the highest ethical standards, including addressing modern slavery risks within our operations and supply chains.

The controlled entities covered by this statement include:

- JCU Univet Pty Ltd (ACN - 138 879 419)
- JCU Health Pty Ltd (ACN - 099 496 232)
- JCU Early Learning Centres Pty Ltd (ACN - 061 144 769)

- JCU CPB Pty Ltd as Trustee for the CPB Trust (ACN - 153 630 445)
- Tropical Queensland Centre of Oral Health Pty Ltd (trading as JCU Dental) (ACN - 153 926 080)
- North Queensland Commercialisation Company Pty Ltd (ACN - 130 517 207)
- JCU College Pty Ltd (ACN - 607 713 691)
- Discover Sport Ltd (non-trading) (ACN - 626 386 641)
- JCU Enterprises (non-trading) (ACN - 011 005 888)
- James Cook Holdings Pte Ltd
- James Cook University Pte Ltd
- Tropical Futures Institute Ltd
- James Cook Academy Ptd Ltd
- James Cook Institute Pte Ltd
- JCU Innovation Holdings Limited (non-trading).

This statement was approved by the JCU Council on 26 June 2025.



## Criteria 2 – Our Structure, Operations & Supply Chains

### Our Structure

James Cook University is a leading tertiary education and research institution with a global presence. We have two primary campuses in Townsville and Cairns, Australia, and a significant international presence through James Cook University Singapore. JCU also has study centres in Mackay, Mount Isa, Rockhampton, Emerald, and Thursday Island, further supporting our commitment to education and research across regional and remote locations.

The University operates under an academic division comprising six Colleges and various service divisions, including Research, Education, Services and Resources, and the Chancellery. These divisions facilitate research, teaching, operational support, and strategic planning, ensuring JCU's mission aligns with national and international higher education standards.

### Academic Division and Colleges

- **Arts, Society and Education:** Offers coursework in humanities, social sciences, social work, and education.
- **Business, Law and Governance:** Provides coursework in law, business, conflict management, international business, political science, economics, governance, and management.
- **Healthcare Sciences:** Includes programs in nursing, midwifery, occupational therapy, physiotherapy, psychology, speech pathology, and sports and exercise science.
- **Medicine and Dentistry:** Focuses on medicine, dentistry, and pharmacy with practical experience in rural and regional communities.
- **Public Health, Medical and Veterinary Sciences:** Covers biomedicine, human physiology, genomics, health systems and policies, immunology, medical entomology, microbiology, public health, and veterinary science.
- **Science and Engineering:** Provides education in marine biology and aquaculture, zoology and ecology, earth and environmental sciences, planning, IT, physical sciences, and engineering.

### Service Divisions

- **Research:** Manages research policy, builds research capability, and collaborates with government, industry, and other universities.
- **Education:** Oversees learning and teaching services, library and information services, and student support services.
- **Services and Resources:** Responsible for planning and performance, international student engagement, marketing, human resources, IT services, infrastructure planning, health and safety, campus maintenance, and student accommodation.
- **Chancellery:** Includes legal and assurance, media and communications, secretariat and records, finance, strategic procurement, and advancement, as well as offices of the Chancellor, Vice-Chancellor, and President, and Chief of Staff.



Map of JCU campus locations in Queensland

## Our Operations

JCU is an international University as reflected in our people, our places, and our research. Our mission is to create a brighter future for life in the Tropics and beyond, through education and research that makes a difference locally and globally.

The University takes pride in being recognised as a leading tertiary institution that consistently delivers outstanding student outcomes and highly employable graduates. The University provides a practical, experiential, and research-rich learning environment for students, fostering their professional expertise and intellectual curiosity.

JCU is uniquely woven into the intellectual, economic, and social fabric of the communities it serves and is set amid irreplaceable ecosystems and cultures.

For more than 60 years, JCU has served the regional and remote communities of northern Queensland and remains dedicated to providing study and research experiences that are transformative and impactful. Students who study in northern Queensland, stay in northern Queensland. Most importantly, JCU remains committed to the success and well-being of its students, staff, communities, and local economies.

Over 22,000 students are part of the JCU community, including approximately 8,600 international students.

JCU has two main campuses in Australia located in Townsville and Cairns. The JCU Townsville, Douglas campus has been named Bebegu Yumba, which means "Place of Learning" in the Birri-Gubba language.

Set in a 386-hectare natural bush and parkland setting, 13 kilometres (8 miles) from the Townsville CBD, the campus houses around 1,400 students in colleges and halls of residence.

JCU Cairns, Smithfield campus has been named Nguma-bada (pronounced nom-ah-bud-ah), which means belonging to tomorrow: "Place for tomorrow's learning, knowledge, and wisdom" from the Yirrgay (Yirrganydji) coastal dialect of Djabugay. Conveniently located 15 kilometres (9 miles) north of the city centre, the campus is surrounded on three sides by rainforest-covered mountains and is close to the northern beaches. Students enjoy a tranquil learning environment due to the abundance of lush greenery and spacious areas.

JCU also has study centres located in Emerald, Mackay, Mount Isa, Rockhampton, and Thursday Island. JCU Singapore, established in 2003, is a wholly owned international campus. JCU Brisbane is operated by Russo Higher Education and delivers JCU degrees under license.

## Our Supply Chains

James Cook University's (JCU) supply chain is diverse and complex, reflecting the wide scope of activities undertaken across teaching, research, and operational services. Our procurement spans a broad array of goods and services, including construction, laboratory and teaching consumables, IT hardware and services, facilities management, and corporate support.

In 2024, JCU engaged 2,584 unique suppliers worldwide to support the delivery of academic, research, and community objectives. Total addressable spend for 2024 was \$183 million. The majority of this procurement spend was directed to Australian-based suppliers, contributing significantly to local and national economies. However, as a global university with international research and operational linkages, our procurement activity also extends beyond Australia.

## JCU 2024 Spend Breakdown



**\$183 million**

*Total 2024 addressable spend*



**2,584**

*Unique Suppliers*



**From 62**

*Countries*



**Across 64**

*Categories*

# Criteria 3 – Identifying and Addressing Our Modern Slavery Risk

## Risks of Modern Slavery

JCU is a member of the Australasian Universities Procurement Network (AUPN), and actively participates in the AUPN's Modern Slavery Program. We regularly attend collaborative workshops and training sessions in relation to identifying and managing modern slavery risks with our supply chains.

The anti-slavery risk assessment tool developed by ArcBlue was used by JCU to map 2024 spend data, replacing the previously used AUPN tool, FRDM (Freedom).

ArcBlue's risk assessment is based on three key factors: geography, sector and commodity, and is determined using data from:

- Global Slavery Index (GSI) 2024 developed by the Walk Free Foundation
- Responsible and Ethical Private Sector Coalition against Trafficking (RESPECT)
- Australia Catholic Anti-Slavery Network (ACAN).

The map below, outlines JCU's suppliers in 2024 by country in relation to the prevalence of modern slavery risks as per the ArcBlue tool.

## Risks in Controlled Entities

The University's operating controlled entities and the risks of modern slavery in their operations and supply chains are detailed below:

### Controlled Entities Incorporated In Australia

- JCU CPB Pty Ltd: Acts as trustee of the CPB Trust, managing commercial spaces on the Bebegu Yumba (Douglas) campus.
- JCU Early Learning Centres Pty Ltd (JCU ELC): Provides non-profit childcare for children of students, staff, and graduates. Operates two childcare centres on the Bebegu Yumba (Douglas) Campus.
- JCU Enterprises Pty Ltd: Owns shares in James Cook Holdings Pte Ltd, does not trade in its own right.
- JCU Health Pty Ltd: Provides non-profit medical services, education, and clinical training for University staff and students.
- JCU Univet Pty Ltd (JCU Vet): Trades from Townsville's only animal hospital, providing facilities for study, research, and clinical education in Veterinary Science.
- North Queensland Commercialisation Company Pty Ltd (NQCC): Provides research commercialisation services to JCU, acts as trustee of The JCU Asset Trust.

## 2024 Category Risks by Suppliers

Top 10 L4 Categories	% of total Suppliers	No. Suppliers	Risk
Scientific Equipment Service & Maintenance	17.41%	450	Medium
Couriers, Freight & Postage	17.34%	448	High
Strategy & Analysis	14.74%	381	Low
Building Repair and Construction	10.26%	265	High
Training & Development	9.75%	252	Medium
Furniture	8.75%	226	High
Travel Passes	7.59%	196	High
Professional Subscriptions	5.77%	149	Low
Ground Maintenance	5.15%	133	High
Software Licences (not SAAS)	5.11%	132	High

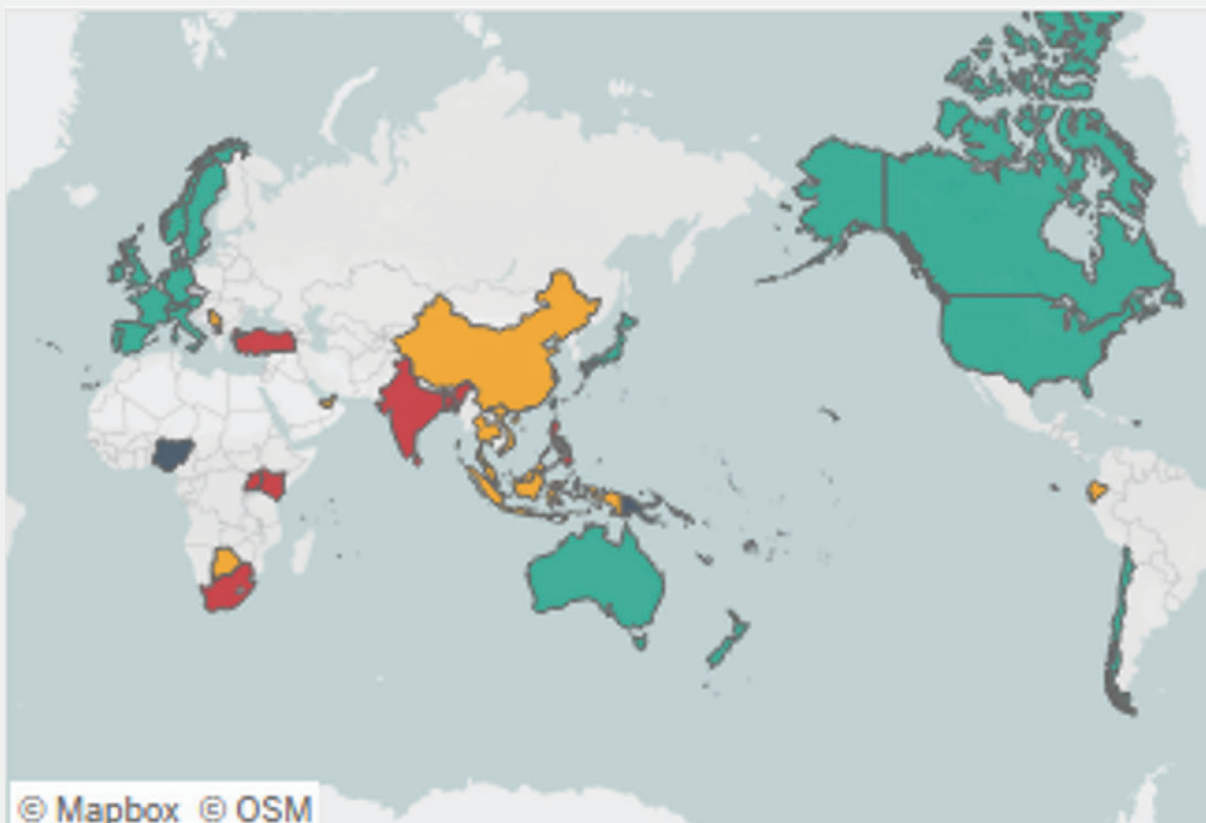


- Tropical Queensland Centre for Oral Health Pty Ltd t/as JCU Dental: Provides clinical placements for dental students and improves oral health services in Northern Queensland.
- JCU Students Plus Pty Ltd was established at the request of the JCU Student Association (JCUSA), to support the delivery of non-academic support and services and facilities previously delivered by the JCUSA. The JCUSA transferred the business operations of the association to Students Plus Pty Ltd on 1 October 2024 and a tripartite agreement between JCUSA, Students Plus Pty Ltd and JCU ensures the effective delivery of these services and facilities.

#### Controlled Entities Incorporated Outside Australia

- James Cook Holdings Pte Ltd: Registered in Singapore as a holding company, does not trade.
- James Cook University Pte Ltd: Operates JCU's Singapore campus, the first private education institution to attain an EduTrust Star quality mark.
- James Cook Institute Pte Ltd: Provides short courses in technology and soft skills for working professionals in Singapore.
- Tropical Futures Institute Ltd: Established in Singapore to provide region-specific research to Singapore and the wider ASEAN region.

### Our Modern Slavery Risks by Country



● High    ● Medium    ● Low

# Criteria 4 – Actions to Assess and Address Modern Slavery Risks

The University recognises the presence of modern slavery risks in its supply chains and has taken steps to address them. During the past reporting year, the University focused on conducting due diligence with suppliers and participating in the Australian Universities Procurement Network (AUPN) Modern Slavery Users Forum (MSUF). These activities aimed to identify, assess, and mitigate the risk of modern slavery practices in the University's operations and supply chains.

## Contracts

The University includes modern slavery clauses in its contractual terms, including the expectation that suppliers comply with the University's Supplier Code of Conduct. They also include the University's right to audit and take action if we discover any breach of modern slavery laws or the Code.

## Market Approach

The University has incorporated a returnable schedule into its standard tender and market approach documentation to gain a deeper understanding of its supply chains. Prospective suppliers responding to market approaches are requested to answer questions regarding their reporting status under the Modern Slavery Act, their policies and training practices related to modern slavery, and the measures they have taken to identify and address the risks of modern slavery in their supply chains and operations.

## Supplier Questionnaires

The University has an extensive and complex supply chain that covers more than 150 different categories of goods and services. As part of every tender process, suppliers are required to complete a questionnaire that gathers crucial information about their business practices, including:

- Their reporting status under the Modern Slavery Act
- Their policies, procedures, contracts, and other relevant documents
- The supply chains of the goods they sell
- The measures they have taken to identify and address the risks of modern slavery in their supply chains and operations.
- Completion of the questionnaire is mandatory and is taken into account as a criterion during the evaluation of offers.

## Guiding Documents

The University's Procurement Procedures incorporate the University's obligations under the Modern Slavery Act as a key principle that must be followed during any procurement activities.

## Collaboration as a Sector

The University, along with 38 other institutions, voluntarily joined the AUPN's MSUF. In July 2020, the MSUF formed the Modern Slavery Academic Advisory Board, consisting of 12 members from 9 universities who have expertise and experience in modern slavery risk and supply chains. The board's goal is to enhance the sector approach. Meetings are held every month to review and refine AUPN-developed materials and initiatives. The sector-wide Modern Slavery Program aims to achieve the following:

- Collection and aggregation of sector procurement data
- A solution for members to identify risk, allocate resources, and inform action, supported by a third-party technology solution
- A sector-wide approach/action plan for addressing, mitigating, and/or remediating identified risks
- Flexible templates and guidance
- Continuous improvement

AUPN members and their suppliers have benefited from the improved operational efficiency that has resulted from the collaboration, resulting in a better ability to mitigate risk and enhance social performance within supply chains.





## Criteria 5 – Evaluating Effectiveness

James Cook University is committed to continuously enhancing our modern slavery program to identify, assess, and manage modern slavery risks, and to advance the rights and wellbeing of workers connected to our operations and global supply chains.

As an institution with a diverse and complex supply chain, we recognise the inherent challenges in measuring the direct impact of our actions on modern slavery practices. Acknowledging these complexities, JCU is taking active steps to evolve our supplier engagement program, aiming to deepen collaboration with suppliers and external partners to improve protections for vulnerable workers, particularly in the lower tiers of our supply chain.

When assessing the immediate effectiveness of our modern slavery program, we prioritise:

- Regularly reviewing the operation of our existing systems and processes;
- Identifying any gaps or opportunities for enhancement; and
- Designing and implementing targeted improvements to address identified issues.

## Criteria 6 – Consultation and Collaboration

To prepare this joint statement, we engaged with the reporting entities covered by this statement and consulted the entities we own or control.

## Criteria 7 – Additional Information and Next Steps

James Cook University is committed to continuously improving our efforts to assess and address modern slavery risks. We recognise that this requires an ongoing commitment. Through our AUPN Slavery Working Group, we will continue to identify and manage modern slavery risks and report progress transparently.

### Key priorities for FY25:

- Improve and report on modern slavery risks for all suppliers awarded a contract.
- Continue to identify and develop pre-qualified panels to ensure suppliers are evaluated before use.
- Continue to utilise the ArcBlue Modern Slavery Solution tool to monitor risk and identify any instances of modern slavery in our supply chain, and conduct detailed assessments of high-risk suppliers.

By implementing these actions, JCU is committed to creating a safer, more ethical future for all those connected to our University and beyond.

## Conclusion

While the University considers the risk of modern slavery in its activities to be low, it is proactively working to fulfill its obligations under the Modern Slavery Act, especially regarding its supply chains, by actively managing and reducing the risks. This statement is approved by the James Cook University Council.



**Ngiare Brown**

Chancellor

June 2025

JCU: Ready today  
for tomorrow



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