

# Modern Slavery Statement

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*Reporting period: 2021*

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# Preamble

Modern slavery is a global issue. The exploitation of an individual’s rights and freedoms through coercion, threats or deception must be challenged wherever it exists. At Griffith University (‘Griffith’, ‘the University’, ‘we’, ‘us’, ‘our’), we are committed to protecting and respecting human rights, and have a zero-tolerance approach to slavery, exploitation, and human trafficking in all its forms. Our vision is to be a university of influence that makes significant, impactful contributions to society.

Griffith’s core principles of excellence, ethics and engagement form the basis of our stance against modern slavery. We take modern slavery risks seriously, and the following document constitutes Griffith University’s Modern Slavery Statement for the reportable period 1 January to 31 December 2021.

## PART A

# Reporting entity








The *Griffith University Act 1998* establishes Griffith University as a statutory body of the Queensland Government. It is governed by the University Council, who oversee several core committees and sub-committees.

The University is organised into four academic groups:

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

Griffith also hosts central academic and student support services, campus and corporate services, and research services.

***Griffith University is a world-class university***

 <p><b>Ranked in the top 2% of universities globally</b></p>	 <p><b>6 campuses</b></p>	 <p><b>200+ degrees</b></p>
 <p><b>200,000 alumni across 130 nationalities</b></p>	 <p><b>Extensive network of research centres and institutes</b></p>	
 <p><b>50,000 students</b></p>	 <p><b>4,000 staff</b></p>	

In the 2021 reporting period, Griffith University’s annual turnover was \$1.044 million.

The University’s Strategic Plan 2020–2025 sets out six key commitments, underpinned by the University’s core principles of excellence, ethical behaviour and engagement, to transform lives and add to human knowledge and understanding in a way that creates a future that benefits all.

Griffith supports the United Nations Sustainable Development Goals (SDGs) reporting publicly against all 17 goals in our annual SDG Report. Our University Strategic Plan 2020–2025 sets a target of being ranked in the top 200 universities globally for SDG impact through the Times Higher Education Impact Rankings. In 2021, Griffith was ranked 38th overall and 5th globally against SDG 17.

To provision our research, learning and teaching capabilities, Griffith University procures a wide range of goods and services. University purchasing behaviour is guided by the Purchasing Policy, which is strongly aligned to the Queensland Government Procurement Policy, and therefore public procurement principles and practices are prominent.

Griffith often utilises pre-existing frameworks to take advantage of operational efficiencies and/or reduce pricing. These include Queensland Government Standing Offer Arrangements, Tertiary Access Group (TAG) agreements, arrangements with the Council of Australasian University Directors of Information Technology (CAUDIT), and Commonwealth Government supplier panels, where possible.

Griffith transacted with over 8,000 suppliers throughout the 2021 reporting period, with a procurement spend in excess of \$244 million.

# Structure, operations and supply chains

## STRUCTURE

This statement is for Griffith University (ABN 78 106 094 461) of 170 Kessels Rd, Nathan QLD 4111 (together with its subsidiaries International WaterCentre Pty Ltd and Griffith Innovation Centre Ltd). Griffith does not have any other entities as either subsidiary or within a joint venture structure that meet the criteria to become a reportable entity within its own right.

The University has a toolkit of processes, structures, and practices that support risk management. These have been developed in line with the globally recognised ISO 31000 Standard for risk management. Griffith's Enterprise Risk Management Framework (ERMF) is the main structure that supports and drives these activities. It is based on a continuous process of identifying and assessing risk in the context of a cycle of consultation and review. Griffith uses this framework when assessing ways to mitigate modern slavery risks within its operations and continuously strives to improve upon improvements realised to date.

Key components of Griffith's Corporate Governance include our ERMF, our Council and internal committees (including an Executive Group) and key staff throughout the University. To learn more about Griffith's Corporate Governance, please refer to our [Corporate website](#).

## OPERATIONS

As a university, Griffith's operations centre on delivering high-quality learning, research and social outcomes for students, and researchers. But we were also designed to be different—since our inception, we have prioritised practices that result in positive social, economic, and environmental impacts for our communities. This is evidenced by the services Griffith provides to members of our community and other third parties (e.g. provision of day care and health clinics services).

### 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

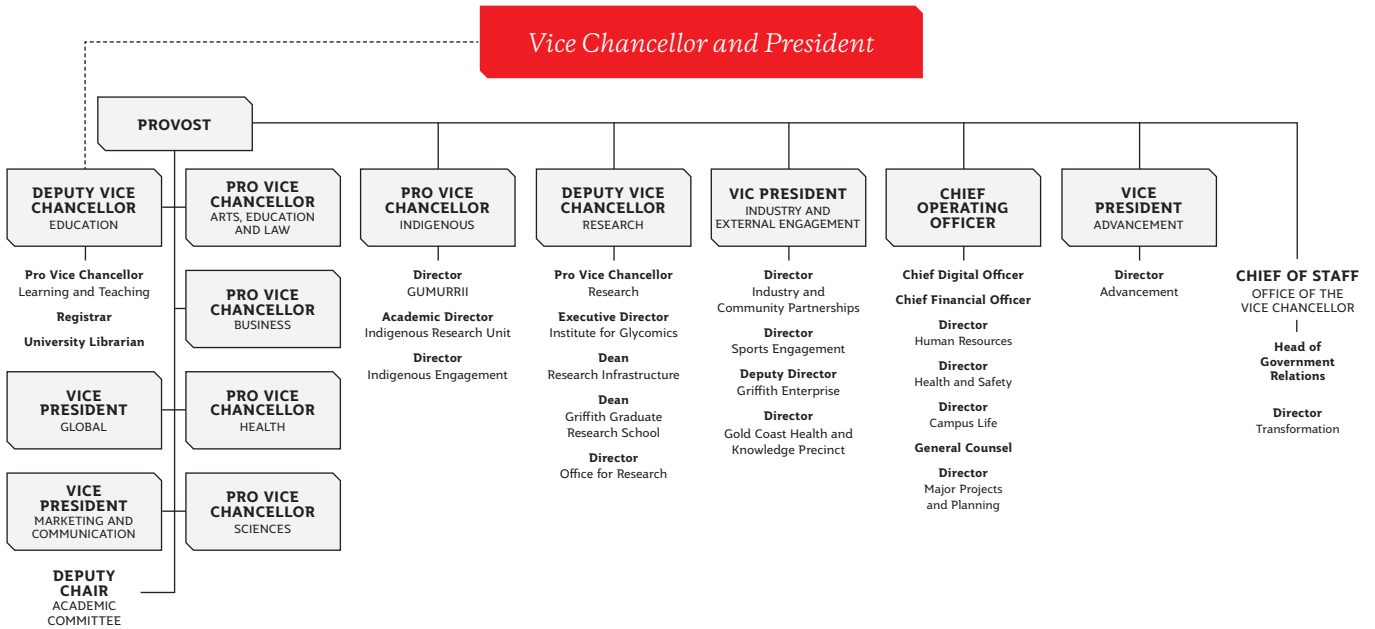
Griffith offers its students tertiary degrees grouped into 10 study areas:

- **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**

## Organisational structure

Griffith has a core foundation of four academic groups: Arts, Education and Law, Griffith Business School, Griffith Health and Griffith Sciences. Schools, departments and centres fall under our academic groups, plus a range of research centres and institutes that develop new knowledge to feed into these areas. An array of administration services support the University and our staff and students, as well as our research, teaching and learning and engagement. Griffith is led by the Vice Chancellor and the University Executive Group.

Griffith’s organisational structure is shown below, followed by each academic group’s organisational makeup.



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

## Movements—domestic and international

Throughout 2021, travel restrictions remained in place for both domestic and international travel due to the coronavirus (COVID-19). Griffith continued to follow the latest health advice from both the Australian Government’s Department of Health and Queensland Health. This demonstrated Griffith’s priority of ensuring the health and wellbeing of its staff and students.

Griffith has no solely owned facilities or locations based internationally.

## Code of conduct

When working for Griffith or acting on its behalf, all staff are bound by the University's Code of Conduct, which sets out our values and expected behaviour standards.

Griffith's Code of Conduct promotes integrity through ethical decision-making and behaviour. It provides employees with guidance on a range of topics including providing a safe working environment for all, being fair and respectful, acting ethically, complying with all applicable laws, and how to manage conflicts of interest and how to safely create a public interest disclosure (whistleblowing).

Due to the complexity of the University environment, the Code provides guidance to staff and access to a range of policies which provide more detailed information on specific topics related to the Code.

## Prevention of sexual exploitation, abuse and harassment

Griffith has a responsibility to create respectful and safe campus communities, where disrespectful behaviours, discrimination, harassment, and bullying (including sexual exploitation or harassment and assault) are not tolerated. This responsibility extends to the conduct of staff, students, and University partners when they are working and interacting with individuals and communities away from the University.

The University has zero tolerance for sexual assault and sexual harassment and expects that our staff and students are able to participate fully in work and university activities and will feel welcome, safe and supported. All staff and students are expected to conduct themselves in a manner which is consistent with the Code of Conduct, and will at all times behave professionally and with respect for others.

Griffith's Staff and Student Sexual Assault and Sexual Harassment policies are supported by procedures for the reporting and resolution of sexual assault and harassment.

## Operations focused on improving the world

Griffith invests resources into making the world a better place. Much of our research is targeted around the SDGs, and our Beacons and Spotlights research initiatives ensure that research is problem-focussed and addresses society's most pressing challenges. Some of the relevant leading research and contribution being made by our academics is showcased in a bio of Dr Kathryn (Kate) E. van Doore below.

Dr Kathryn (Kate) E. van Doore is an international child rights lawyer and is the Deputy Head of School (Learning and Teaching) at Griffith Law School, Australia. Kate is a high impact researcher, regarded as a 'global authority on orphanage trafficking', a form of modern slavery where children are recruited into orphanages for profit. She has worked tirelessly and effectively to ensure the international and national impact of her groundbreaking research by engaging with law-makers, not-for-profit organisations and industry. Her research aims at policy and legislative impact to change the lives of 5.5 million children living in orphanages globally. Many of these children are falsely characterised as orphans, to respond to the demand for orphanage tourism and funding from developed countries. Her monograph, *Orphanage Trafficking in International Law*, was published by Cambridge University Press in 2022.



*Dr Kate van Doore*

Kate's research has attracted substantial investment from, and has been directly applied and adopted by, NGOs, businesses, governments and multilateral organisations nationally and internationally in changing policy and legislation on orphanage tourism and orphanage trafficking. Kate and her colleagues have worked extensively with the Australian government on the issue of orphanage trafficking, with the Australian government being the first government to declare [orphanage trafficking as a form of modern slavery](#). Kate was appointed to the inaugural Australian Government Modern Slavery Expert Group in 2020 and the National Action Plan to Combat Modern Slavery and Human Trafficking Monitoring and Evaluation Framework Advisory Group. Kate is also a member of the Australian Universities Procurement Network Modern Slavery Academic Advisory Board and sits on QNEST (the Queensland Network to End Slavery and Trafficking).

Internationally, her engagement has been extremely influential. She has advised the Dutch parliament, and government departments in the United Kingdom and United States on issues relating to orphanage trafficking. She worked with the US State Department on the Trafficking in Persons Report and was an expert for the Asia-Pacific Regional Workshop for Members of Parliament for the Commonwealth Parliamentary Association. In 2019, Kate advised on recommendations on trafficking and residential care for the International NGO's Coalition on Key Recommendations for the United Nations General Assembly Rights of the Child Resolution, which were adopted in the final Resolution. In 2020, she was invited to sit on the Trafficking in Human Beings International Expert Advisory Group for Romania and has recently been invited to sit on the Ukrainian Crisis Working Group on Enhancing Prevention of Trafficking in Human Beings. Kate has engaged in extensive media coverage, with her research featured in The Australian and The Guardian amongst many others. In 2020, her work was featured in an episode of [Foreign Correspondent](#).

### Arrangements with suppliers

Griffith engages with suppliers in a variety of ways, from single, low-cost transactions through to strategic longer-term contracted relationships where significant amounts of money are spent with 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. Griffith's Purchasing Policy requires that competitive quotations be received for most expenditure, with formal tenders for significant expenditures.

Griffith's Guide to the Responsible Conduct of Commercialisation Activities outlines how staff can meet the requirements of Griffith's Code of Conduct when conducting Commercialisation Activities. It also reinforces the ethical principles to be adopted when undertaking Commercial Activities on behalf of Griffith.

In 2022, Griffith will build on its capacity to conduct supplier assessments (as part of the onboarding and post qualification processes) to enable a more detailed view of modern slavery risks within our operations and supply chains to be identified, assessed, monitored and addressed where necessary.

## SUPPLY CHAIN

### Spend categories

Like many Australian-based universities, Griffith University's supply chains are varied, covering several spend categories such as:

Spend Category	
• Corporate professional services	• IT hardware
• Construction, refurbishment and works	• Travel and entertainment
• Buildings and grounds	• IT professional services
• Laboratories and research	• Office related supplies and services
• Student services	• Telecommunications
• IT software	• Audio visual
• Marketing and media	• Plant and equipment
• Human resources	• Logistics and storage
• Library services	• Lecturer and teaching expenses
• Utilities and renewables	• Property management

# Risks of modern slavery practices in the operations and supply chains of the University and any subsidiaries

There has been no material change in Griffith’s modern slavery risk profile during 2021, with Griffith’s modern slavery risks remaining similar to those faced by other universities in Australia.

## Spend profile

Throughout 2021, Griffith continued its partnership with AUPN, which ensured the continued visibility over Griffith’s spend data within the AUPN Modern Slavery Risk Dashboard to help identify modern slavery risks.

During the 2021 reporting period, Griffith University transacted with over 8,000 suppliers, with a procurement spend in excess of \$244 million.

Year	All sources		Accounts payable		Purchasing card		Amex	
	Amount (\$m)	# Suppliers (Unique)	Amount (\$m)	# Suppliers (Unique)	Amount (\$m)	# Suppliers (Unique)	Amount (\$m)	# Suppliers (Unique)
2021	244.8	8,911	240.7	3,232	3.7	5,809	0.4	19

\* Data sources - AUPN Modern Slavery Dashboard and Griffith University spend cube

Following is a summary of risks applicable to Griffith University.

## Geographic risks

Griffith University’s supply chains are diverse with goods and services being purchased from both domestic and international suppliers. Some countries are known to be at higher risk of having modern slavery in the operations of organisations that operate from those countries.

Griffith’s high-risk supply chains, based on the country from which Griffith sources directly, are in Asia. Examples of goods and services sourced from high-risk countries include lab consumables, subscriptions to professional organisations and commissions paid to student recruitment agencies.

It should be noted that the view of geographic modern slavery risk in Griffith supply chains that are not directly sourced from a foreign country but have some of their supply chain linked to foreign countries, is not well known to Griffith at this time.

The best view we currently have of opaque geographic risk contribution to overall modern slavery risk is based on category risks. These category views are based on generally known or accepted research from modern slavery experts, in which some categories that typically have opaque supply chains, have been shown to often lead back to high-risk geographies. Spend categories deemed high-risk include laboratories and research, IT hardware and cleaning services. Further analysis will be undertaken in 2022 to overlay high-risk categories with high-risk countries to enable focal points to be identified and assessments carried out on suppliers within those focal areas.

The implementation of the new technology solution in 2022 (FRDM tool, which will replace the AUPN Modern Slavery Risk Dashboard) will supplement the above planned activities in 2022 and will assist Griffith in identifying and analysing modern slavery risks further down our supply chains.



## Category risks

Griffith University buys a broad range of products and services, and some of these are recognised to be in high-risk categories.

Categories may be considered high-risk because of sector or industry risks, product and service risks, or supply chain model risks.

These categories may be high-risk because some of their supply chain is linked to high-risk geographies or because the nature of the category has high-risk inputs, irrespective of geography.

By way of example, cleaning services, a sub-category of the Buildings and grounds category is recognised as a high-risk category for Griffith due in large part to the labour input that includes risk related to working conditions. Student services is another example of a high-risk category as food and beverage products are considered high-risk due to modern slavery in cocoa agriculture and the fishing industry.

Top 5 spend categories	% of total spend
Corporate professional services	16%
Construction, refurbishment and works	12%
Buildings and grounds	11%
Laboratories and research	10%
Student services	7%

## Supplier risks

Through overlaying geographic and category risk, Griffith now has a list of suppliers of interest due to the risk of modern slavery. Griffith sampled 12 suppliers categorised as high-risk (and with annual spend of \$1 million+ with Griffith in 2021) and found that the majority of the sampled suppliers had recently published their own Modern Slavery Statements. Their Modern Slavery Statements detailed actions taken to date and future planned actions, demonstrating their commitment to recognising and addressing Modern Slavery risks in their own operations and supply chains.

It should be noted that just because a supplier is of interest to Griffith University, it does not mean that they do or will have modern slavery in their supply chain. However, it does mean that the supplier should be actively managed related to modern slavery risk. Increased focus on supplier compliance (both as part of the supplier onboarding process and post qualification checks) will form part of Griffith's planned future actions. Griffith will expand its Strategic Procurement and Supply Team in 2022 to enable more concentrated reviews and supplier management practices to be developed and implemented.

## Procurement and supply process risks

Whilst we have made some progress during the 2021 reporting period, Griffith University recognises that further actions are required to improve our processes and operations in order to mitigate our modern slavery risks. Griffith will continue to improve processes and develop improved capability related to eliminating modern slavery in the world as part of the following key processes:

- Sourcing and related due diligence processes
- Contract management and supplier relationship management processes
- Collaboration with other universities to address modern slavery risks
- Risk identification through ongoing monitoring of global supply chain events that relate to modern slavery
- Automation of the collection and feed of data into a tool to enable access to timely modern slavery data to support risk assessment and action coordination

## Staff underpayments risk

Staff underpayments, when present with other factors, may be an indicator of modern slavery which could prompt further investigation. Griffith takes the matter of pay compliance seriously and engaged external advisors to undertake a review of our payroll system and practices. The review identified process issues that could lead to some casual and sessional staff not being paid correctly.

In response, Griffith has established an in-depth program to review all payroll payments to casual and sessional staff. This will focus on identifying any cases where casual and sessional staff were not paid correctly, ensuring staff are reimbursed for any underpayments and implementing process redesign to prevent this from happening again.

# Actions taken to assess and address risks

Griffith University took the following actions to assess and address modern slavery risks in our operations and in our supply chains in 2021. Image 1 provides an overview of the Griffith University Modern Slavery Program timeline and key activities from commencement in 2020 through to our proposed next steps in 2022.

## Griffith University Modern Slavery Program

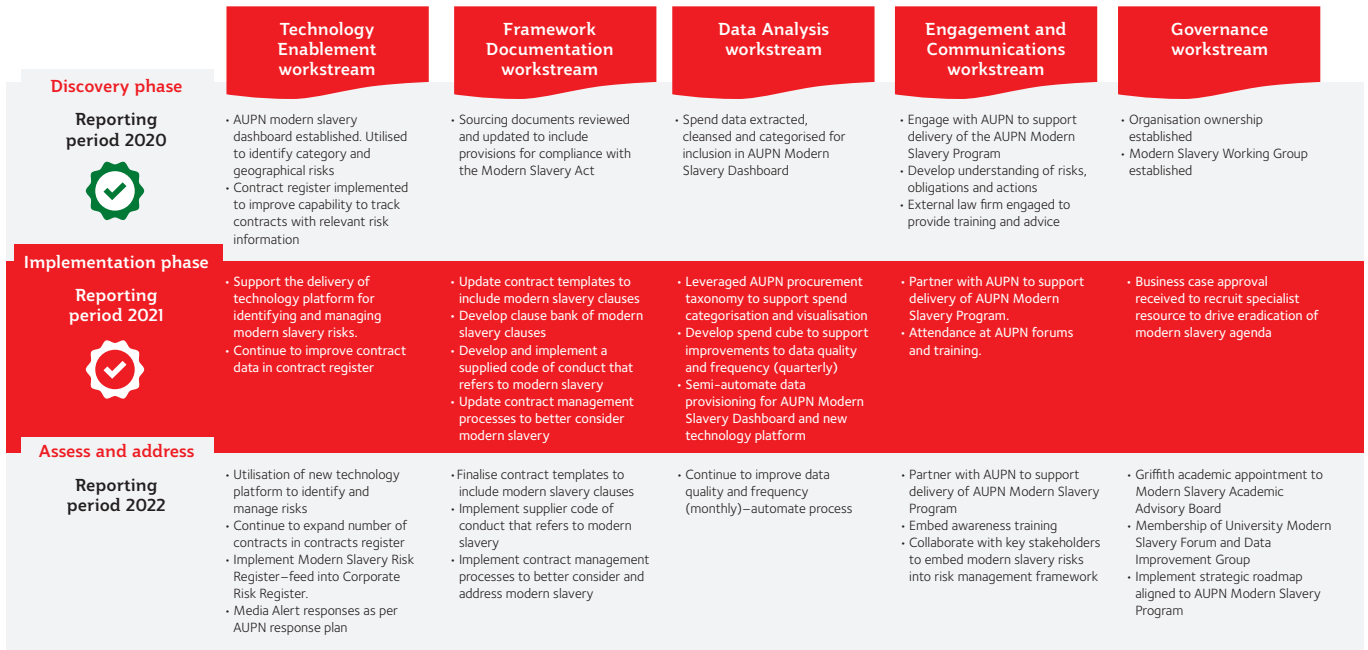


Image 1 – Griffith University Modern Slavery Program

### Continued to collaborate with the AUPN on modern slavery

During the 2021 reporting period, Griffith partnered with the AUPN to support the selection of a tool to assist with risk identification and action coordination for participating universities. The FRDM tool was selected, with implementation planned for a go live in the first quarter of 2022. The FRDM tool will strengthen our capability to identify risk, improve reporting, improve supply chain transparency, inform actions, track effectiveness, support sector collaboration and contribute to continuous improvement. At the time of writing, the FRDM tool has gone live and we are in the process of validating the information being reported in the tool for Griffith.

Expanding upon the activities that commenced in 2020, Griffith University continued to leverage the procurement taxonomy provided by the AUPN for the purposes of categorising and visualising our spend and risk classification using the AUPN Modern Slavery Risk Dashboard.

Part G in this report contains details of the scope of the AUPN Modern Slavery Program and the key achievements of the Modern Slavery Working Group during the 2021 implementation phase. It is anticipated that Griffith will participate in the continuous improvement phase in 2022.

## **Organisation ownership and change management**

Under the Act, Griffith's Council has accountability for the deliverables of the Act, with Strategic Procurement and Supply responsible for ensuring compliance with the Act.

Strategic Procurement and Supply continues to leverage the expertise of a core team of internal stakeholders to support the implementation of the Act across the University. This included engaging a Griffith academic that specialises in research and advocacy in modern slavery, who provided insights into the comprehensiveness of our approach towards addressing modern slavery risks.

At Griffith, we see the Sustainable Development Goals (SDGs) as a reflection of our core values and are committed to investing in First Peoples, environmental sustainability, diversity and inclusion, and social justice for a better world – now and in the future. SDG 5 and SDG 16 are both relevant to modern slavery and trafficking, and Griffith was ranked 12th for SDG 16 in the Times Higher Education Impact Rankings for the implementation of the Sustainable Development Goals.

To further drive the eradication of modern slavery at the University, Griffith's Executive Group approved a business case in the latter part of 2021 to recruit a Modern Slavery specialist resource. Griffith has successfully appointed a person to this role, with their commencement date scheduled for Quarter 2, 2022.

## **Data analysis capability to identify risks**

Griffith University manually extracted spend data from our systems to support geographical and category risk assessment in 2020. In 2021, Griffith University built the capability to extract spend data on a quarterly basis for inclusion in a spend cube developed during the same reporting period. This spend cube has been developed to support a semi-automated push of data to the AUPN modern slavery risk dashboard for the continued purpose of identifying our geographic and category modern slavery risks associated with our spend.

## **Procurement process updates**

Griffith continued to refine procurement processes and operations to improve our ability to identify and manage modern slavery risks in 2021. Some are noted below.

## **Contract management**

Griffith implemented a contract register in 2020 in a phased approach, with the initial phase focussing on registering new contracts only. During 2021, Griffith University made improvements to the meta data being captured, including contract owner and contract classification; and towards the end of 2021 we commenced a program of work to migrate contract information from other systems into the contract register. Plans were made to improve capability further with the roll out of a comprehensive training program in 2022.

## **Contract templates review and implementation**

Griffith has made significant progress in updating contractual provisions that address modern slavery risk. Contract templates have been updated and a suite of clauses (clause bank) have been developed that can be included in contracts where our templates are not used. Implementation across the University is planned for 2022.

## Supplier code of conduct development

Griffith is committed to working with suppliers who share our vision, mission and values, and our commitment to ethical, social and environmental practices. Our supplier code of conduct sets out the minimum standards of behaviour that we expect of our suppliers when doing business with us. This includes our expectations for addressing modern slavery risks throughout the supply chain.

Griffith's supplier code of conduct has been drafted and will be finalised and implemented in 2022 following consultation with key stakeholders across Griffith. The additional resource in 2022 will enable supplier questionnaires to be sent to both existing and new suppliers, and will provide Griffith with a mechanism to assess compliance of our existing suppliers, whilst ensuring that new suppliers are aware of their obligations. Supplier questionnaires will also be a prominent focal point for participants within the AUPN Modern Slavery Program in 2022.

## Plan for the way forward

Our key areas of focus for 2022 and beyond will include:

- Development and implementation of a modern slavery strategic roadmap for Griffith University that is aligned to the AUPN Modern Slavery Program.
- Implementation and utilisation of the FRDM tool to identify and manage risks.
- Implementation of the Supplier Code of Conduct that refers to modern slavery across the University and its supply chain.
- Implement improved contract management practices across the University to better consider and address modern slavery risks.
- Continue to expand contracts included in the contract register, with each contract allocated a contract owner and contract risk classification.
- Refine our strategy for assessing and managing suppliers with a high-risk rating for potential modern slavery risk.
- Collaborate with key stakeholders to ensure modern slavery risks are embedded into our risk management framework and communicated across the University.
- Networking and collaboration with the AUPN to seek opportunities to strengthen our modern slavery response.
- Build supplier and staff capability to identify and address modern slavery risks through the sharing of awareness learning materials.
- Develop and implement a Modern Slavery Risk Register, which will also inform our Corporate Risk Register for Modern Slavery related risks.
- Increase supplier compliance checks.
- Develop and implement a Modern Slavery Prevention Policy and a Modern Slavery Incident Response Policy to provide a framework for a whole of university approach to addressing modern slavery.
- Understand the vulnerability of international students to exploitation in employment situations.

## PART E

# Assessment of the effectiveness of actions

All actions taken by Griffith University noted above have been effective. Some observations on effectiveness of the actions are noted in the table below:

Action	Effectiveness
1. Engage with AUPN	The activities undertaken to support the implementation of the FRDM tool will enable increased capacity to identify and manage modern slavery risks. It is expected that the FRDM tool will deliver these benefits from the 2022 reporting period.
2. Organisation ownership and change management	Insights provided by an academic with expertise in modern slavery has helped shape the thinking in terms of future strategy and the actions required to continue making progress in addressing modern slavery risks. Further, the approval of a resource to progress with these actions will enable benefits to be delivered from 2022 onwards.
3. Data analysis to identify risks	We are now able to extract spend data on a monthly basis and visualise the data in a spend cube. Further, this spend cube supports the input of spend data into the AUPN Modern Slavery Dashboard. This data will be included in the FRDM tool effective from the 2022 reporting period and will increase our capability to identify and manage modern slavery risks.
4. Procurement process updates	<p>In 2020, Griffith updated sourcing documentation to improve our ability to combat modern slavery and implemented a contract register to improve our ability to track contracts with relevant risk information.</p> <p>In 2021, our ability to mitigate modern slavery risks progressively improved as our ability to track contracts using the contract register increased. The use of contract templates that include clauses addressing modern slavery risks will further mitigate those risks from 2022 onwards.</p>
5. Plan for the way forward	Over the reporting period we progressed a number of actions to deliver upon our commitment to addressing modern slavery risks. Our plan for the 2022 reporting period and beyond will enable us to strengthen organisation awareness of modern slavery risks and improve our risk identification and control measures.

Griffith has taken effective action and continues to make progress in identifying and addressing the modern slavery risks in our operations and supply chains. Griffith will expand its activities aimed at reducing modern slavery risks, evidenced by investment in specialist in-house resource commencing in 2022.

## PART F

# Consultation

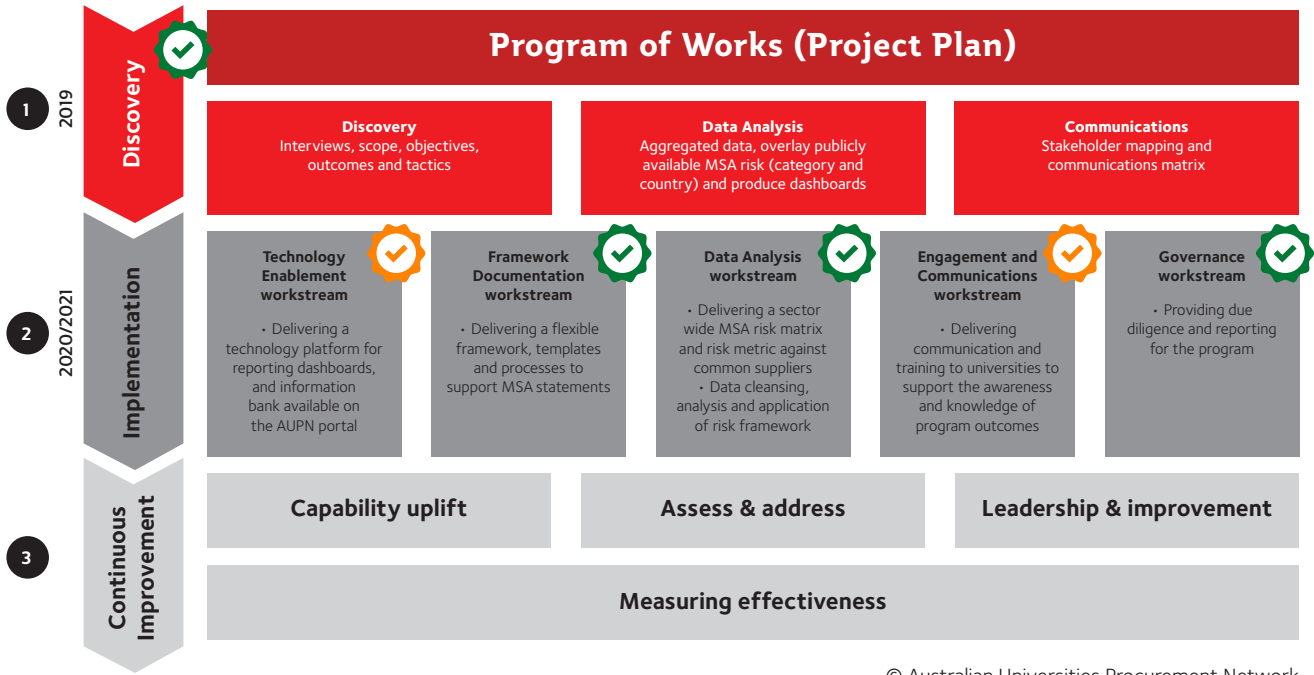
Consultation on addressing modern slavery was primarily within Griffith University and across the university sector through the AUPN.

An external organisation was consulted and engaged to support the development of the spend cube. Their expertise supported improvements for partially systemised data extraction, dashboarding, reporting and analysis, as well as supporting the delivery of data in a format required for the AUPN Modern Slavery Dashboard and future new technology solutions to be implemented across the university sector in 2022.

Given that Griffith University is the reporting entity and (except for the two subsidiary entities in 2021) is not reporting on behalf of any other entities, no further consultation was required. In relation to the two subsidiary entities, Griffith staff were board members of the two subsidiary entities, which enabled ongoing dialogue on modern slavery expectations and oversight of any procurement activities involving those entities.

# Other information

This section contains an overview of the actions and achievements delivered under the AUPN Modern Slavery Program (2021) by the Modern Slavery Working Group (MSWG) to address modern slavery risks. Image 1 provides an overview of the AUPN Modern Slavery Program timeline and key activities commencing with the discovery phase in 2019, followed by the implementation phase during 2020/2021.



© Australian Universities Procurement Network

Image 2. AUPN MS Program provided courtesy of the AUPN (program developed by MSWG with support from ArcBlue Consulting).

Table 1 below details by workstream the key achievements made by the AUPN MSWG with support from university members including Griffith University.

2021 AUPN MSWG Key Achievements				
Technology Enablement workstream	Framework Documentation workstream	Data Analysis workstream	Engagement and Communications workstream	Governance workstream
<ul style="list-style-type: none"> <li>SaaS Agreement <sup>2</sup>FRDM–HES completed</li> <li>Participation Agreements HES–35 Universities</li> <li>Implementation commenced and group established</li> <li>Monthly change management group meetings and project updates</li> </ul>	<ul style="list-style-type: none"> <li>Draft guidance for Grievance Mechanisms and Remediation</li> </ul>	<ul style="list-style-type: none"> <li>2020 and H1 2021 data collated, cleansed and handover to FRDM</li> <li>AUPN L4 taxonomy mapped to UNSPSC codes</li> <li>2020 and H1 2021 data upload to FRDM tool</li> </ul>	<ul style="list-style-type: none"> <li>AUPN new LinkedIn</li> <li>Monthly zoom updates and reports</li> <li>Engagement with <sup>1</sup>community and industry</li> </ul>	<ul style="list-style-type: none"> <li>Project coordinator appointed</li> <li>Quarterly Academic Advisory Board meetings</li> <li>Monthly MSWG meetings</li> </ul>
<b>Assess and address</b> <ul style="list-style-type: none"> <li>Response Plan for media alerts via FRDM tool</li> <li>MS training for AUPN members</li> <li>Proposed SAQ group for future mass SAQ send out via FRDM</li> <li>Engaged with Cleaning Accountability Framework</li> </ul>				
<sup>1</sup> Community and industry engagements: <ul style="list-style-type: none"> <li>Properties Council of Australia</li> <li>UNSDG Network Tasmania</li> <li>UTAS Accounting</li> <li>ACAN–UN International Day for the Abolition of Slavery</li> <li>CPA South Australia</li> <li>London Procurement University Consortium</li> <li>Red Cross Anti-Trafficking Network Tasmania</li> <li>Cleaning Accountability Framework (CAF)</li> <li>Fairtrade ANZ</li> <li>Anti-Slavery Australia</li> <li>Be Slavery Free</li> <li>UWA Modern Slavery Research Cluster</li> </ul>				
<sup>2</sup> FRDM is part owned by Made in a Fee Word and donates 5% of gross revenues to charity. Founded in 2016, based in California, USA with Managing Director ANZ based in Sydney, Australia – <a href="https://www.frdm.co/">https://www.frdm.co/</a>				

Table 1 – 2021 AUPN MSWG Key Achievements

Table 2 below details the planned Q1 and Q2 activities to be delivered by the AUPN MSWG in 2022. It is anticipated that Griffith University will be supporting these deliverables by completing its actions under the plan. By way of example this will include the provision of timely and accurate data for inclusion in the FRDM tool.

### 2022 AUPN MSWG planned Q1 and Q2

<ul style="list-style-type: none"> <li>• UAT testing - January 2022</li> <li>• Soft-launch - January 2022</li> <li>• Go-live - February 2022</li> <li>• Train-the-trainer sessions - March 2022</li> </ul>	<ul style="list-style-type: none"> <li>• Second data upload</li> <li>• Managing supplier SAQs and media alerts</li> <li>• MS training and capability building</li> <li>• Second MS Statement due 30 June 2022</li> </ul>
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Table 2 – 2022 AUPN MSWG planned activities for Q1 and Q2

### Academic Advisory Board

An Academic Advisory Board was established in July 2020, consisting of 12 academics from nine universities with experience and expertise in modern slavery. The board aims to enrich the AUPN sector approach through leveraging academic experience and learnings and embedding best practice recommendations and insights into program activities. Meetings were held quarterly in 2021. Board members were provided updates on the AUPN’s program and discussions were focused on specific themes/topics (e.g., AUPN Technology solution, modern slavery program priorities, University Modern Slavery Statement feedback, AUPN approach to grievance mechanisms and remediation)

## 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 2021. The statement has been approved by the Griffith University Council.

**Professor Carolyn Evans**

*Vice Chancellor and President*



*griffith.edu.au*