

# Charles Darwin University

## Modern Slavery Statement 2024



# Acknowledgement of Country

**Charles Darwin University acknowledges and respects the many Australian First Nations traditional custodians of the lands upon which our campuses and centres are located.**

We acknowledge and pay our respect to the Larrakia who are the traditional custodians of the lands upon which our Education and Community Precinct, Casuarina, Waterfront, and Palmerston campuses and centres are located.

We acknowledge and pay our respect to the Arrernte who are the traditional custodians of the lands upon which our Alice Springs campus is located.

We acknowledge and pay our respect to the Jawoyn, Wardaman and Dagomon who are the traditional custodians of the lands upon which our Katherine campuses are located.

We acknowledge and pay our respect to the Gadigal who are the traditional custodians of the lands upon which our Sydney campus is located.

We acknowledge and pay our respect to the Turrbal and Yuggera who are the traditional custodians of the lands upon which our Brisbane centre is located.

We acknowledge and pay our respect to the Warumungu who are the traditional custodians of the lands upon which our Tennant Creek centre is located.

We acknowledge and pay our respect to the Yolŋu who are the traditional custodians of the lands upon which our Nhulunbuy centre is located.

We also acknowledge and pay our respect to the Mirrarr (Jabiru), the Kungarakan and Warrai (Batchelor and Adelaide River), the Anindilyakwa (Groote Eylandt) and the Tiwi (Tiwi Islands) people.

We acknowledge Australian First Nations peoples' long tradition of sustaining their communities and environments over thousands of years. They are the first educators and first innovators.

They are the holders of knowledge that makes an important contribution to the improvement of our local, national and global communities.

We extend our respect to Elders - past, present and emerging - and to all First Nations people.

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# 2024 Modern Slavery Statement

## Introduction

Charles Darwin University (CDU) provides this statement in accordance with the *Modern Slavery Act 2018 (Cth)*. This is our fifth statement under the Act covering the period 1 January 2024 to 31 December 2024.

CDU is committed to eliminating all forms of modern slavery where coercion, threats or deception are used to exploit victims and undermine their freedom. Modern slavery is a complex global matter and can occur in various forms, such as slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage and child labour. CDU acknowledges its responsibility as a higher and vocational education provider, researcher, employer, and a buyer/consumer of goods and services to safeguard human rights.

CDU is deeply committed to operating ethically and establishing processes to identify and mitigate the risks of modern slavery in our operations and supply chains.

The modern slavery risks inherent in the operations of CDU are identified in Part C. The role that the University as an educator can play in highlighting awareness of modern slavery within its sphere of influence is set out in Part D.



## Part A – Reporting entity (Criterion 1)

Charles Darwin University was founded in 2003 after merging the Northern Territory University (including the Centralian College of Alice Springs, Katherine Rural College, and the University College of NT) and the Menzies School of Health Research.

CDU is a sustainable, innovative, creative and inclusive university. We offer more than 300 degrees, diplomas, certificates and short courses across a wide range of fields such as health, nursing, education, environmental science, business, the arts, Indigenous knowledge systems, and more.

We are a dual-sector university committed to our core business of vocational skills and training, higher education teaching and learning, research and engagement. We are student-centered, industry-relevant, and deeply connected to our communities and our partners.

Located in Northern Territory, CDU is the largest tertiary education provider in the Territory and offers both academic degree and vocational education programs. We teach 21,716 students across Australia and the globe through flexible, online learning, at eleven campuses and training centres, and in over 100 regional and remote locations.

Our consolidated group consists of the following entities in 2024:

- Menzies School of Health Research (Menzies), which includes:
- Bridging the Gap Foundation (Dissolved in January 2024)

### **Menzies School of Health Research**

Menzies was established in 1985 as a body corporate of the Northern Territory Government under the *Menzies Act 1985*. This Act was amended in 2004 to formalise the relationship with Charles Darwin University (CDU). Menzies is now a major partner of CDU and constitutes a school within the University's Institute of Advanced Studies.

Menzies is one of Australia's leading medical research institutes dedicated to improving the health and well-being of Aboriginal and Torres Strait Islander peoples. They are also a leader in global and tropical health research into life-threatening diseases. Through effective partnerships with communities across northern Australia and the Asia-Pacific region, we aim to translate our research into real change.

### **Bridging the Gap Foundation Limited**

Bridging the Gap Foundation Limited (the Foundation) was established through the Menzies School of Health Research to fund research in health and education in order to address one of Australia's most urgent issues; the gap between Indigenous and non-Indigenous Australians' health and education opportunities and outcomes.

During 2023, it was determined that current economic factors, including the cost of living, interest rates, global conflicts, and a shift in the causes supported by some corporations and philanthropists, have created significant financial pressures and challenges for not-for-profit organisations, including the Foundation. This led to the unfortunate decision of the Foundation's directors to wind up the affairs of the Foundation effective 2 January 2024.

## Part B – The University’s Structure, Operations, and Supply Chains (Criterion 2)

### Structure

CDU is a body corporate enacted on 5 November 2003 by the *Charles Darwin University Act 2003 (CDU Act)*. We are the parent entity domiciled in Australia with approximately 1315 full-time equivalent employees. Staff are employed under the CDU Enterprise Agreement 2022 and governed by the staff Code of Conduct.

For the purpose of the *Modern Slavery Act 2018*, the governing authority of CDU is the Charles Darwin University Council (the Council).

The Council, comprising of 15 members, is the principal governing body of the University. It was established under the *Charles Darwin University Act 2003*, led by the Chancellor and a Deputy Chancellor (elected by the Council members). Many of the members are appointed by the Administrator of the Northern Territory. The Council is responsible for the governance of the University, acts in its best interest, drives performance through strategy and stewardship, provides overall strategic guidance, and oversees senior management in carrying out that strategic direction.

The Council is supported by four sub-committees:

- Executive Committee of Council, which supports the Vice-Chancellor and the University’s senior executive team to identify challenges and opportunities for the University as they arise.
- Finance and Infrastructure Development Committee, which reviews financial planning and reporting, people and culture, infrastructure reporting, risk management, and compliance.
- Audit, Risk, and Compliance Committee, which reviews financial reporting, external/internal audit, risk management, fraud, internal controls and compliance.
- Nominations, Honorary Awards, and Legislation Committee, which acts as a selection panel for various nominations and honorary awards.

### Operations

CDU is a dual-sector university committed to our core activities of vocational skills and training, higher education teaching and learning, research, and engagement.

We have 21,716 students across eleven campuses and centres in Australia. The main campuses of CDU are located in Darwin, NT. 33% of our students are international students from over 71 countries, 83% of which are from Asia. The top 3 international source countries being Nepal, India and Bangladesh.

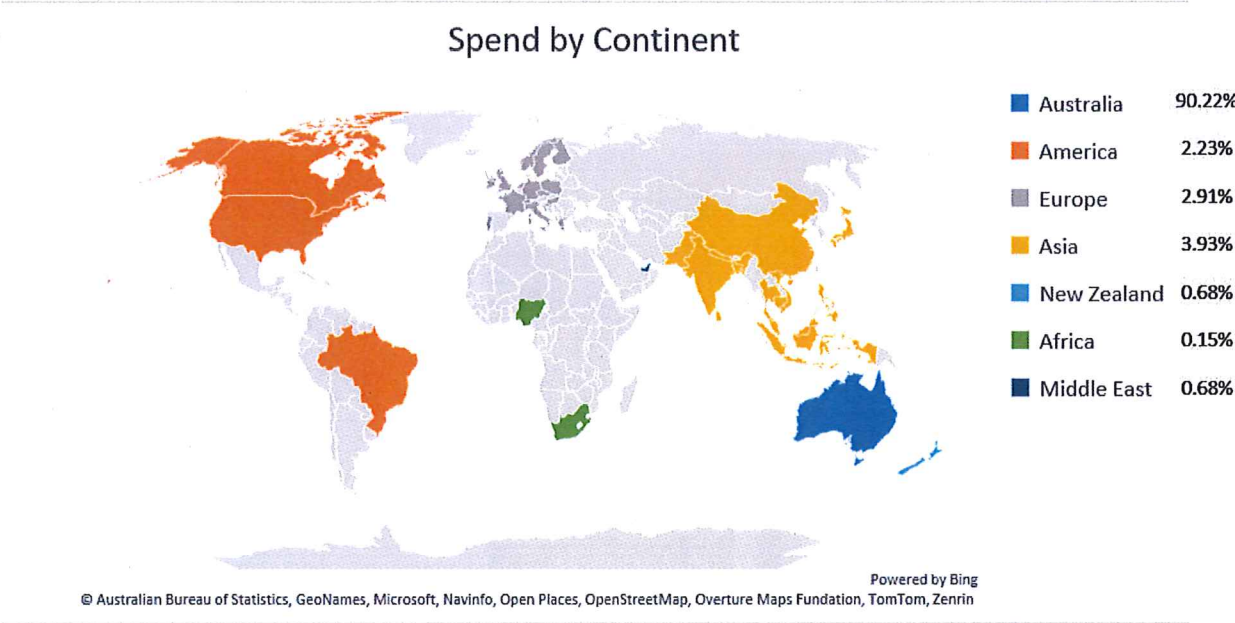
CDU is a deeply connected university, working in partnership and collaboration with First Nations peoples, our communities and industries, government, and alumni to address the needs of the Northern Territory and regional, rural, and remote people nationally and globally.

### Supply Chain

CDU is a significant purchaser of a wide variety of goods, services, and capital works essential to supporting the University's operational and strategic goals. Our procurement practices are governed by CDU's Procurement Policy and Procurement Procedure, which ensure ethical, transparent, and value-driven outcomes.

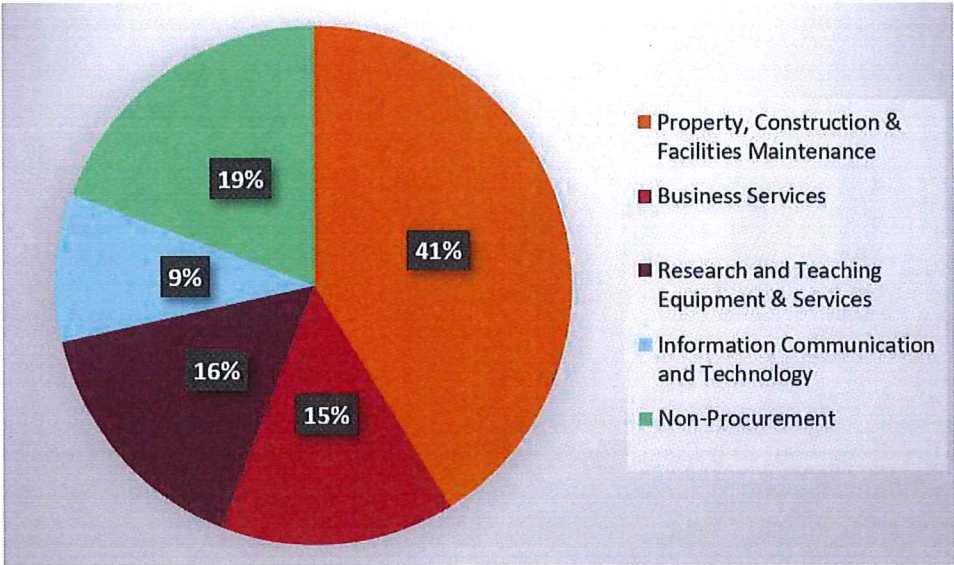
The Australasian University Procurement Network (AUPN), has once again partnered with ArcBlue, an advanced technology platform to assess and identify modern slavery risks within supply chains. As more suppliers complete the modern slavery questionnaire, our visibility of potential risks improves, enabling CDU to enhance its approach to addressing modern slavery across our procurement activities.

CDU currently engages with 2,677 suppliers, both domestic and international, with the majority based in Australia. In 2024, the University's procurement spend totalled \$228 million, distributed across suppliers in 41 countries. 90% of this spend was within Australia, with the remaining allocated as follows: 4% in Asia, 3% in Europe, 2% in America, and less than 1% in New Zealand, Middle East and Africa.

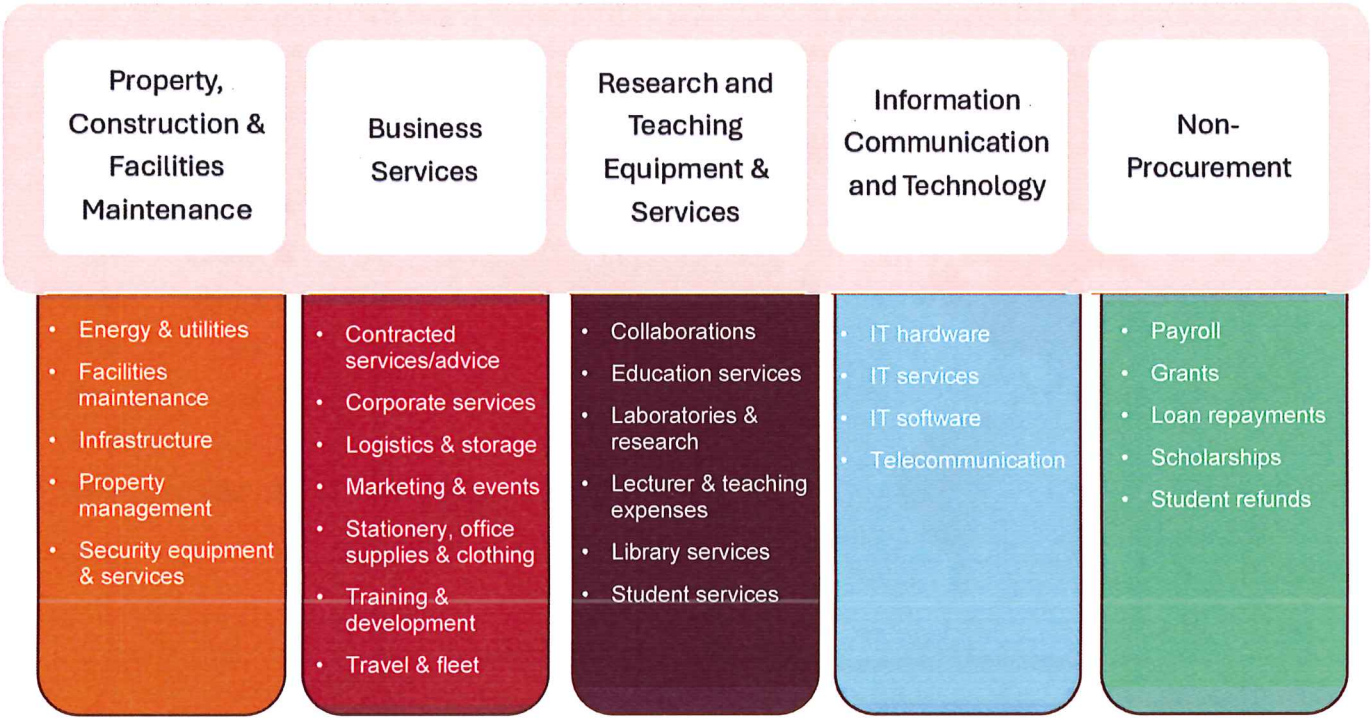


While less than 2% of our suppliers are located in countries assessed as high-risk for modern slavery, CDU recognises that risk may still exist within broader supply chains, regardless of the immediate supplier's location. We are committed to identifying, understanding, and mitigating the risks of modern slavery throughout our procurement processes.

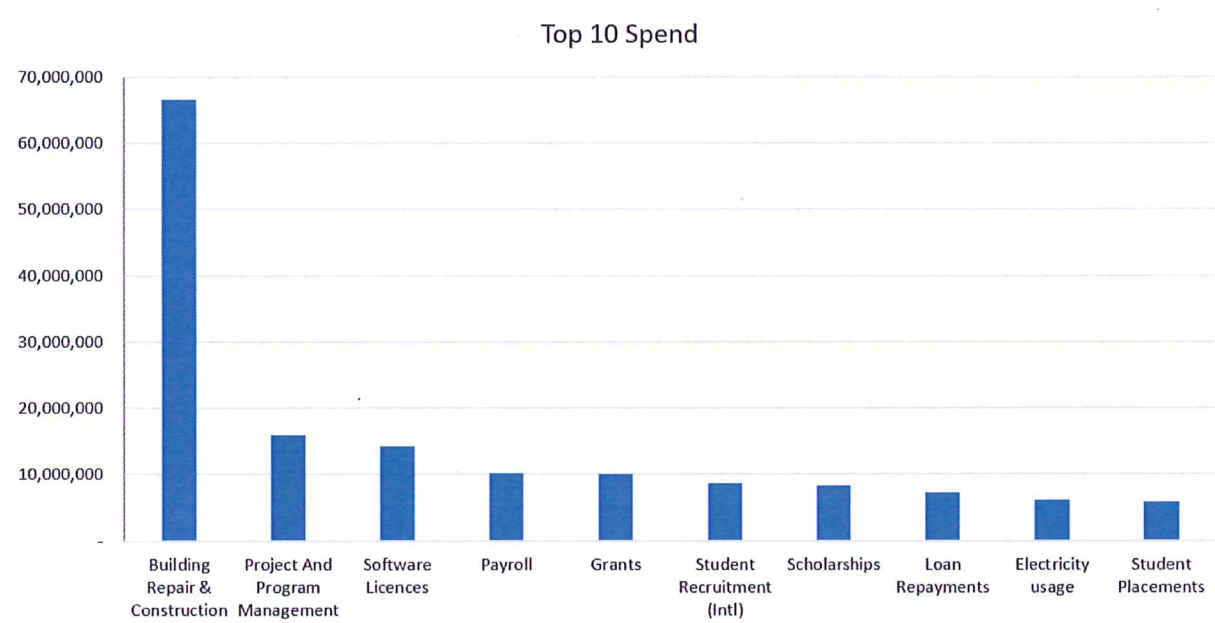
We source a broad and diverse portfolio of goods and services to support our operations and project delivery. In alignment with the AUPN taxonomy codes, our expenditure can be broadly classified into the following high-level categories:



The corresponding subcategories under these primary classifications are as outlined below:



The top 10 expenditure categories within CDU’s supply chain were as follows:



- **Building Repair & Construction:** This category reflects the University’s investment in constructing the new Danala campus in Darwin City, NT, Australia, which was officially completed in October 2024. In addition, ongoing repair and construction works across other CDU campuses continue to contribute significantly to this top spending category.

- **Project and Program Management (Consulting Services):** CDU is undergoing a major systems transformation aimed at improving the experience for both students and staff. As a result, spending on project and program management - delivered by external consultants - remains one of the highest areas of expenditure.
- **Software Licences:** Now ranked third, spending in this category has increased due to changes in expense classification as well as the initiation of several new projects and programs. These developments have driven higher demand for software solutions, leading to greater investment in software licensing.

## **Part C – Risks of modern slavery practices in the operations and supply chains (Criterion 3)**

### ***Risks in operations***

The risk of modern slavery practices being caused by, or directly linked to, CDU and its controlled entities through current operations has been assessed as low, based on the following considerations:

#### ***Employees***

In respect to the direct employment of our people, one of our goals in the Strategic Plan 2021-2026 is to be an employer of choice where people feel supported and happy. The risk of employment practices leading to modern slavery is low as most staff employed by the University are protected under the conditions in the CDU and Menzies Enterprise Agreements 2022 (EA). The EA provides support for our staff and requires the University to meet the employment conditions as a minimum. Most CDU & Menzies employees are employed directly on a permanent, fixed term or casual basis through standard contracts of employment administered centrally by CDU's People and Culture team and the Menzies HR team. CDU acknowledges the vital role of both mental and physical wellbeing and is dedicated to promoting a holistic, integrated approach to employee health. This dedication is demonstrated through a variety of initiatives, such as wellbeing events, online learning resources, and confidential support via the Employee Assistance Program. CDU provides a supportive and flexible workplace for those balancing families, has cultural and religious commitments, and promotes career growth. We are committed to maintaining a safe, family-friendly, environmentally conscious, and culturally respectful workplace with equal opportunities for everyone.

In addition, the University has policies directly related to the safety and well-being of people including:

- Academic Freedom and Freedom of Speech Policy
- Anti-Racism Policy
- Bullying, Harassment and Discrimination Policy
- Child Abuse Allegation and Reporting Procedure
- Child Safety Policy
- Code of Conduct – Staff
- Code of Conduct – Students
- Diversity, Equity and Inclusion Policy
- Enterprise Risk Management Policy and Procedure
- International Students – Welfare of International Students U18 Procedure
- Sexual Exploitation Abuse and Harassment Prevention Policy
- Sustainability Policy
- Whistleblower Reporting (Improper Conduct) Procedure
- Work Health and Safety Policy

Further to the above, CDU continues to be a values-led organisation. Our Strategic Plan 2021-2026 sets out the values in which we will engage with our people and stakeholders. Three of the values below are at the forefront in how we interact with people in our business operations:



- **Courage** – we make courageous decisions to act in the best interests of our students, our people and our communities.
- **Kindness** – in all things we act with respect, decency, and integrity and strive to understand each other's differences and points of view.
- **Openness** – we communicate and listen openly and frankly in a way that is honest and respectful. We share information with candour and empower our people with knowledge.

### ***Students***

Students may be vulnerable during the recruitment process, especially if they are persuaded to pay agents for application assistance or visa services that exceed the fees set by the Australian Government. Additionally, students face risks in their relationships with sponsors who provide fees and stipends, particularly if they are coerced into agreements that offer minimal financial support in exchange for admission sponsorship. To minimise the risk to students during the recruitment process, CDU only engages with reputable agents and also has some in-country representatives based in India and China to assist students with their application process. The in-country representatives also provide training for the local agents that help students with their submissions.

Many students, both domestic and international, support their university studies through employment.

Some degree pathways require industry-related employment, while in other cases CDU arranges work-related learning opportunities as part of the degree program or for general work experience. In all these situations, students may be at risk of very low wages and exploitative working conditions. CDU employs Placement Coordinator teams, who are responsible for making sure the well-being of students is prioritised whilst on placements. CDU carries out appropriate due diligence for student placement agreements and only partners with reputable placement providers to ensure the risk of students being unfairly treated. CDU's Work Integrating Learning Policy highlights the roles and responsibilities of placement providers to ensure a safe learning environment for students whilst on placement.



### ***Risks in supply chain***

CDU recognises that its supply chain may reveal instances of modern slavery, especially concerning materials produced in countries with a high prevalence of low-skilled labor, where modern slavery has been identified or is likely to occur.

CDU is also aware that modern slavery may occur within its domestically based supply chains with the highest risk sectors being information technology, cleaning and maintenance, and building construction.

Procurement of goods and services at CDU is governed by the Procurement Policy and Procedure. The policy enables departments to undertake their own purchasing requirements with relevant endorsement by senior staff/executives and specialists against four benchmark principles of procurement. One of the principles details the assessment of modern slavery risks.

## Part D – Actions taken to assess and address risks (Criterion 4)

Our approach is founded on a culture of continuous improvement, ensuring that CDU comprehends our modern slavery risks. Key staff in the procurement team continue to receive monthly training and awareness to effectively identify and address these risks, and we integrate essential modern slavery principles into our contracts and procurement guidelines and equip student-facing staff with relevant information, enabling them to raise awareness of the realities of modern slavery that students may encounter. Staff are encouraged to promote student participation in the Student Advocate Program, which offers online training and group discussions to build knowledge, skills, and confidence in recognising and discussing modern slavery.

Our continuous focus is to enhance our core capabilities for the identification of and response to modern slavery risks.

### Collaboration with the Australian University Procurement Network (AUPN)

CDU, along with 38 other institutions, voluntarily joined the AUPN's Modern Slavery Users Forum (MSUF). In July 2020, the MSUF formed the Modern Slavery Academic Advisory Board, currently consisting of 10 members from 7 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 on a monthly basis to review and refine AUPN-developed materials and initiatives.

AUPN's Objectives and Drivers are to support members to improve supply chain human rights transparency, reduce individual university costs and resources, collaborate on risks and issues for greater impact, and contribute to reporting requirements. Key Benefits are:

|                      |                                                                                                                                                                                                                               |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Compliance</b>    | Including The Modern Slavery Act 2018 (Cth) & (NSW) and New Zealand modern slavery legislative reporting requirements. Universities wish to demonstrate leadership on this important issue.                                   |
| <b>Efficiency</b>    | Working together minimises the duplication of activities and associated costs across individual universities, including risk assessment, implementation of systems and remediation.                                           |
| <b>Effectiveness</b> | Leveraging our aggregated buying power should improve our capacity to identify and action any modern slavery risks and drive more effective changes through our supply chains.                                                |
| <b>Capability</b>    | By accessing our academics across Australian and international universities and engaging with civil society organisations to build capacity and stay abreast of the latest trends and emerging issues to be industry leaders. |
| <b>Cooperation</b>   | AUPN members are an engaged group of procurement professionals within publicly spirited organisations, operating in a uniquely collaborative sector.                                                                          |

© Australasian University Procurement Network

CDU continues to participate as a member of the AUPN and its modern slavery working group. The AUPN currently has 38 Australian and 3 New Zealand member institutions working together to improve excellence in procurement practice and in the skills of procurement professionals in the education sector. Through our membership with the AUPN, CDU is able to leverage the aggregated buying power of \$16b+

in procurement spend across 91k+ suppliers within the 41-member group. As a sector we hope this collaboration will enhance the capacity to identify modern slavery risks and mitigate these risks by driving effective change from our suppliers and the supply chains.

As a sector via the AUPN Program, the following were achieved in 2024:

#### ***Data & Technology***

- 2024 data upload to the ArcBlue modern slavery risk dashboard analysis tool
- 72 ArcBlue Sector Self-Assessment Questionnaires (SAQ) invitations issued
- ArcBlue SAQ Dashboard launched

In 2023, AUPN introduced the ArcBlue tool for member use - a modern slavery risk analysis solution aimed at supporting universities in conducting baseline risk assessments. ArcBlue is a leading procurement & supply chain consulting firm that helps clients leverage the power of procurement & supply to drive positive change in their organizations. ArcBlue provides expert support to organisations to understand their obligations, identify risks, monitor compliance and arm them with the knowledge to handle any potential Modern Slavery concerns.

#### ***Training and Capacity***

- Monthly University Modern Slavery Forum with expert guest speakers
- AUPN Portal updated with internal and external Modern Slavery training resources
- Risk Category Sector Approach – Supplier remediation plan training
- Monthly Anti-Slavery Update Newsletter
- ArcBlue software training sessions/recordings/user guides

#### ***Framework***

- University Media Alert Process approved & implemented
- Expert legislative guidance guest speakers at forum presentations

#### ***Engagement & Communications***

- AUPN LinkedIn activity
- Engagement with community and industry

#### ***Governance***

- Monthly Anti-slavery Working Group meetings
- Regular sector risk Working Group meetings
- International Student Risk Steering Groups
- Monthly reporting on program results to AUPN Executive

#### ***Supplier Engagement***

- Australian Red Cross International Student Worker Exploitation Hub project
- Migrant Justice Institute 24 universities promoted survey
- ACRATH, “Education for Change” learning modules (available for universities April 2025)
- Electronics Watch sector pilot (scoped & approved for 2025 start)

In addition to the above, CDU undertook the following actions to assess and address risks in 2024:

#### ***Improved data collection***

Continue to improve our newly implemented finance system, specifically designing and configuring it to generate data for reporting on procurement activities. This enhanced data enabled us to conduct a detailed analysis of our modern slavery suppliers' risk.

#### ***Training and Awareness***

CDU's procurement function is centralised and overseen by the Procurement Steering Group. To raise awareness and ensure key staff understand the CDU's responsibilities regarding modern slavery, we conducted training sessions in 2024 for relevant parties across the University. The training includes the use of AUPN Modern Slavery tools and ArcBlue dashboards.

The student-facing team has engaged with the Salvation Army (NT) and the NT Anti-Trafficking Working Group to deliver targeted awareness resources for students and staff who support them. The "Speak Now" Student Advocacy Program is actively being shared with students to raise awareness about modern slavery.

#### ***Employee health and wellbeing***

The People & Culture department at the University has conducted several information sessions for staff on employment provisions in the EA and has an employee assistance program.

#### ***Procurement and contracts***

The University incorporates modern slavery provisions into its standard contract documents provided to all suppliers. These provisions require organisations supplying goods and services to CDU to:

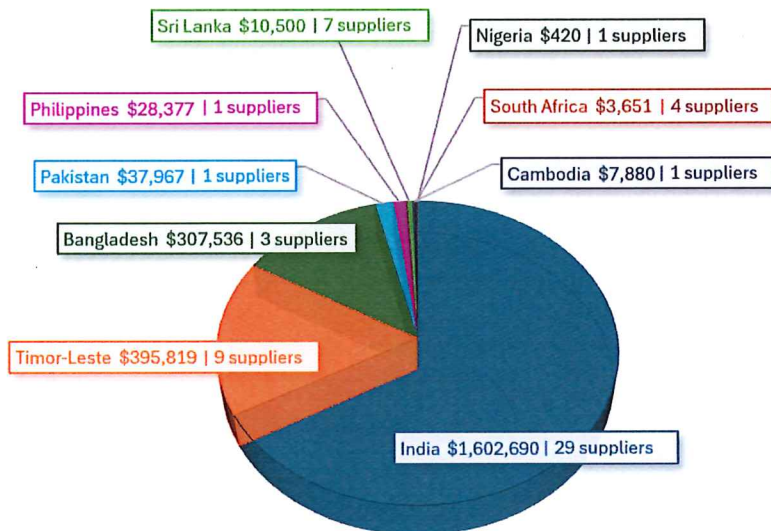
- It must take reasonable steps to identify, assess and address the risks of Modern Slavery practices in the operations and supply chains used in the provision of the supplies.
- Conform with the goals and requirements of the *Modern Slavery Act*.
- Assure that neither they nor their subcontractors have been convicted of offenses involving modern slavery and, to the best of their knowledge, are not currently under investigation, review, or legal proceedings by any authority regarding such offenses.

#### ***Detailed data analysis***

Carried out a detailed analysis on all 2,677 suppliers to assess the risk of our supply base, a risk rating was applied based on the supplier's country of origin and the industry / sector they operate in:

- 0.07% of suppliers had a very high-risk rating,
- 2.65% of suppliers had a high-risk rating,
- 1.31% of suppliers had a medium risk rating, and
- 95.97% of suppliers had a low-risk rating.

### High-risk country spend



The chart illustrates the distribution of high-risk-rated spend and supplier count by country. The most significant spend categories in these high-risk areas are Student Recruitment, Project & Program Management, and Clinical Trials.

## Part E – Assessment of the effectiveness of actions (Criterion 5)

Throughout 2024, CDU implemented and integrated various enabling processes and activities to contribute to the elimination of modern slavery within the community. This approach involved leveraging insights from our partnership with the AUPN and its member network. We will continue to monitor and assess the effectiveness of these actions through our internal governance and oversight mechanisms.

- The continuing enhancement of data from our finance system has improved our precision in capturing expenditure categories and supplier origins. This advancement has allowed us to assign a risk rating to each supplier, thereby enhancing our ability to monitor and mitigate modern slavery risks effectively.
- CDU continues to strengthen its collaboration with AUPN. In 2025, we plan to include additional representatives from the University in the AUPN group, thereby broadening our reach and further embedding modern slavery awareness and prevention within the University.
- Established a dedicated focus group to examine risks and implement measures related to modern slavery across the supply chain, governance structures, student engagement, and employee practices.
- Conducted trials of ACRATH's "Education for Change" program and submitted recommendations to management for implementation of the training modules at CDU, scheduled to go live in April 2025.

## Part F – Consultation with controlled entities (Criterion 6)

CDU's controlled entities were consulted during the development of this report. During this reporting year under the Act, the consultation process focused on gaining a deeper understanding of the operations and supply chains of these entities and identifying suppliers of high-risk goods and services utilised by the entities.

MSHR is the only controlled entity where modern slavery risks may occur in supply chains. CDU continued to engage directly with MSHR throughout 2024 with the awareness campaign.

MSHR continued reviewing their suppliers for any online alerts on modern slavery with minimal risks identified. CDU will continue to work with MSHR in 2025 to embed the same reporting functionality from the new finance system, this will help us to assign a risk rating to each supplier of MSHR.

## Part G – Other relevant information (Criterion 7)

We are dedicated to continuously adapting, improving, and reviewing our processes to meet our modern slavery obligations effectively. This commitment includes enhancing our collaborative efforts to ensure that our mechanisms for mitigating modern slavery risk are both sustainable and effective. In 2025, CDU will implement the following focused measures:

- Embed the same reporting functionality from the finance system for our controlled entities.
- Continue engagement with controlled entities, stakeholders including students.
- Improve staff awareness of modern slavery risks and improve capability via training and leveraging subject matter experts.
- Promote student-specific programs so that students can develop their knowledge, skills and confidence to have conversations about modern slavery and important human rights issues.
- Continue reviewing contract renewals and update those that require modern slavery provisions.
- Benchmark University modern slavery statements to support continuous improvement.
- Commence drafting best practice guidelines and templates.
- Implement ACRATH's "Education for Change" into the existing training modules at CDU.

## Part H – Conclusion

While Charles Darwin 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 identifying, managing, and reducing the risks.

We recognise that eliminating modern slavery requires a sustained and long-term commitment. While we have made particular progress in enhancing the maturity of our practices, continued strategic and focused efforts are essential to further advance our approach in the coming years. We remain dedicated to this cause and will persist in our efforts to ensure the highest standards of ethical practice throughout our operations and supply chains.

### Approval

On the 12<sup>th</sup> June 2025 the CDU Council approved this Modern Slavery Statement for the year ending 31 December 2024 on behalf of CDU and its controlled entities pursuant to the *Modern Slavery Act 2018 (Cth)*.



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Chancellor



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