



MODERN SLAVERY STATEMENT

2023

the university for the real world®



QUT Kelvin Grove



QUT acknowledges the Turrbal and Yugara, as the First Nations owners of the lands where QUT now stands. We pay respect to their Elders, lores, customs and creation spirits. We recognise that these lands have always been places of teaching, research and learning. QUT acknowledges the important role Aboriginal and Torres Strait Islander people play within the QUT community.

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Introduction

Since its inception on 1 January 2019, the Australian Government's Modern Slavery Act 2018 (Cth) (the Act) has been a catalyst for change.

The Act mandates large entities to publish annual reports (modern slavery statements) detailing their actions to combat modern slavery risks in their operations and supply chains. The Act aims to hold businesses accountable for addressing modern slavery in their global supply chains.

At Queensland University of Technology (QUT) (ABN 83 791 742 622), we are committed to conducting business ethically, environmentally, and with socially responsible suppliers. We recognise the importance of eliminating modern slavery practices within both our operations and those we buy from (directly and indirectly).

In 2023, QUT continued its approach to combat modern slavery, marking our fourth statement. This statement outlines the actions taken from 1 January 2023 to 31 December 2023, as well as our planned future actions. A key component of our approach in 2023 was re-branding our response from Modern Slavery to Anti-Slavery to be more reflective of the purpose of the program – to reduce the risk of slavery – and in line with preferred industry terminology.

This Statement will continue to be called a Modern Slavery Statement (in line with the legislation).

About QUT

Queensland University of Technology (QUT) is an ambitious institution, with a growing research output focused on technology and innovation. QUT ranks in the world's top 200 universities.

With more than 50,000 students, QUT offers academic programs in fields spanning business, creative industries, education, engineering, health, law, science, and social justice across five faculties.

The QUT community acknowledges that our two inner-city Brisbane campuses at Gardens Point and Kelvin Grove stand on Aboriginal lands, the Country of the Turrbal and Yugara people: lands that were never ceded. We pay our respects to their Elders—past, present, and emerging—and thank them for their wisdom, forbearance, and spirit of sharing. We respectfully recognise the role that Aboriginal and Torres Strait Islander people play within the university and in the wider community. We celebrate that the lands on which we live, study and work have always been places of learning, research, and engagement.

In 2023, QUT continued to work on its framework of interconnecting themes and values, namely *Connections: QUT Strategy 2023-2027* that establishes QUT as 'the university for the real world' and charts our provision of transformative education and research relevant to our communities.

The strategy is supplemented by tangible achievements through several targeted supporting strategies. The *QUT Indigenous Australian Employment Strategy* champions Indigenous Australian staff excellence. It aims to position QUT as an attractive and culturally affirming employer that supports and develops the personal and professional aspirations of Indigenous Australians. The *QUT Digital Strategy* will continue to progress the university into the future, aligning people, processes and systems required to deliver world-leading research, transformative education, and community engagement. These and new supporting strategies, including the *QUT Health and Wellbeing Strategy* and *QUT Spiritual Support and Inclusion Action Plan*, will help QUT realise our vision for an inclusive and interconnected future.

Financial challenges continue to confront the higher education sector in Australia post the global COVID-19 pandemic, and amid growing global instability and challenging economic conditions. These conditions include inflationary pressures, such as rising energy, building, and insurance costs, as well as competition for staff in a period of high employment.

The impact of cost-of-living pressures on students, combined with strong employment prospects, has also impacted university enrolments. While the 2023 QUT financial results reflect our budget expectations, the immediate future will require us to take measured and principled decisions to ensure we meet our performance aspirations. While these factors impacted our response to modern slavery we continued to adapt and evolve.

More information about QUT business, history, operations and *Connections – the QUT Strategy 2023 to 2027* can be found in our *2023 Annual Report* and on our website at www.qut.edu.au

QUT Structure

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

QUT Council is Chaired by the Chancellor, Ms Ann Sherry AO. Management of the university is the responsibility of the Vice-Chancellor and President, Professor Margaret Sheil AO.

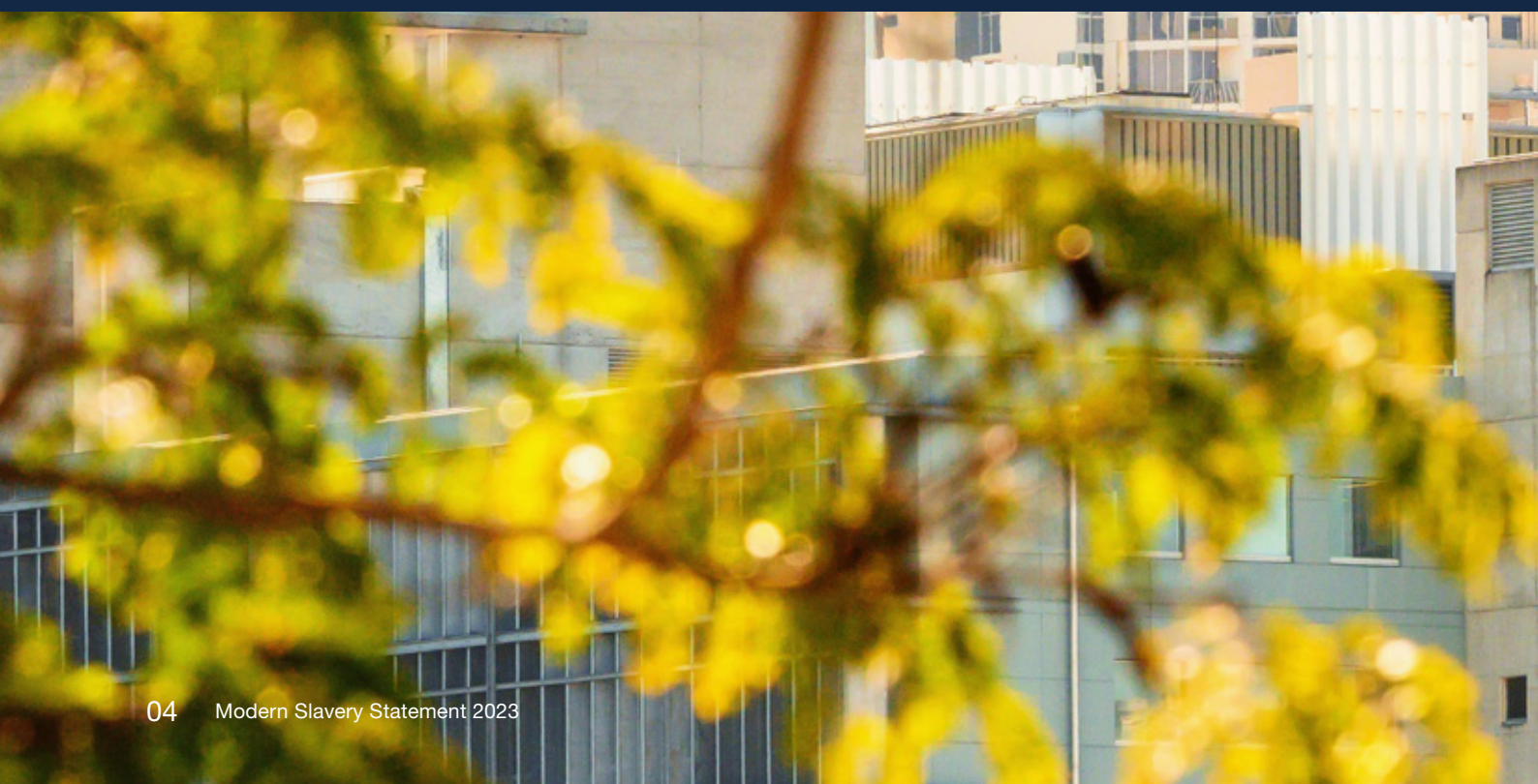
The QUT structure is as follows:

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

The full university structure can be found on our website at qut.edu.au/about/our-university/organisational-structure

The university has seven (7) controlled entities to support our operations. During the reporting period, four (4) of these were operating as identified below:

- Brisbane Business School Pty Ltd (ABN 38 085 931 611)
- QUT Student Managed Investment Fund (ABN 92 718 723 234) (operating) — please note this is defined as a fixed trust
- QUT Enterprise Holdings Pty Ltd (ABN 97 097 319 778)
- QUT Enterprise Holdings Trust (ABN 28 928 640 473) (operating)
- qutbluebox Pty Ltd (ABN 34 118 773 096)
- qutbluebox Trust (ABN 97 041 405 905) (operating)
- QUT Advisory Pty Ltd (ABN 82 099 110 924) (operating)



Operations

QUT core business is research, learning and teaching.

The university's functions are to:

- provide education at university standard
- provide facilities for, and encourage, study and research
- encourage the advancement and development of knowledge, and its application to government, industry, commerce, and the community
- provide courses of study or instruction (at the level of achievement QUT Council considers appropriate) to meet the needs of the community
- confer higher education awards
- disseminate knowledge and promote scholarship
- provide facilities and resources for the wellbeing of the university's staff, students and other persons undertaking courses at the university
- exploit commercially, for the university's benefit, a facility or resource of the university including, for example, study, research or knowledge, or the practical application of study, research, or knowledge, belonging to the university, whether alone or with someone else
- perform other functions given to the university under the QUT Act or another Act.

Our activities are largely undertaken across our two campuses at Gardens Point and Kelvin Grove and various distributed sites located in Queensland, Australia and one located in Canberra, Australia. QUT does not own or operate overseas campuses. Some staff and students may travel overseas from time to time to undertake work or study associated with the university. The university's-controlled entities operate in Queensland, Australia.

As outlined in the 2023 Annual Report, in 2023 QUT had:

- 52,073 students (36,732 full time and 15,341 part time), including 961 Aboriginal and Torres Strait Islander students
- a total of 4,509 full-time equivalent (FTE) staff members
- \$1.188 billion in revenue



Supply chain

QUT recognises that there are modern slavery risks across the goods, services and works that we purchase and is committed to identifying and addressing these.

In 2023, QUT transacted with 3,766 external suppliers (excluding corporate card purchases) to provide goods, services and works to support the delivery of our core business of research, teaching and learning. QUT spent \$416.02 million with external suppliers (excluding corporate card purchases and GST) in 2023 across the following areas:

Table 1: QUT spend per category

Category	Includes, but is not limited to
Research, equipment, and consumables	Equipment, scientific and medical consumables, chemicals, gases, and laboratory supplies
Property & Facilities	Construction, operations, maintenance, fleet, security, waste, cleaning, transportation services and minor works
Technology	Computer hardware and accessories, infrastructure, software, and licensing, as a service, subscriptions and memberships, ICT professional services, managed services, consultancy, cloud hosted services, telecommunications, market research and systems integration.
Business & teaching services	Professional services, human resources, library services, contingent labour, marketing, and media, legal, audit, logistics, freight, postage, financial services, banking, catering, uniforms, travel, and insurance
Non-procurement spend	Non-procurement/non-addressable spend (including QUT investments) and any spend that we are not able to currently categorise accurately

For QUT's 2021 and 2022 Statement, QUT utilised the sector-wide technology solution to enable QUT to assess risk of Modern Slavery across our supply chains in a proactive way. However, in 2023, issues were identified with the current system.

As a result, the AUPN is now working with another external partner to provide:

1. Modern Slavery data analytics
2. Risk assessment to identify high risk suppliers by country and category through assessment against multiple feeds of data and the external partners' Intellectual Property (IP).

This tool has been available to QUT since February 2024 (analysing our 2023 spend for this statement), with full utilisation and risk assessment incorporated in our 2024 Action Plan.

As a result, the data for this year's Statement is slightly different to previous years including the risk assessment as it utilises different base sources to analysis and identify risks. The university sector, through the AUPN, is confident that this new data source will be able to provide better categorisation of our data moving forward. However, additional work is needed to ensure the source data is accurate and up to date.

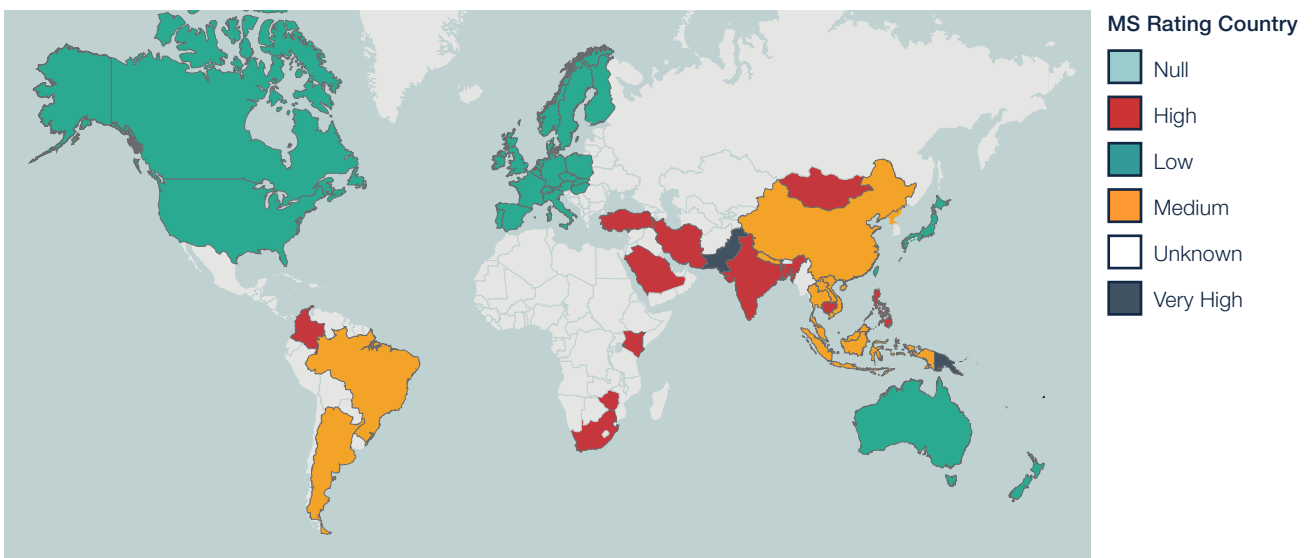
In 2023, the country risk by supplier:

- 92.43% (3481 suppliers) - low risk
- 4.97% (187 suppliers) - medium risk
- 2.26% (85 suppliers) - high risk
- 0.21% (8 suppliers) - very high risk

The very high-risk engagements were with eight suppliers in Papua New Guinea and Pakistan for student recruitment and consulting services, with a total value of \$36,364. Eighty-five percent (85%) of this spend was for student recruitment services. QUT’s contracts for student recruitment have modern slavery clauses included within the terms and conditions and supply partners are screened throughout the engagement process to ensure international student are being appropriately recruited. International students are also offered support when they arrive and study at QUT.

The high-risk engagements were with 85 suppliers across 13 high risk countries (as outlined in the map below), equating to \$13.83m. Approximately 85% of this spend was also on student recruitment services. The additional 15% spend was for consultancy, conferences, venue hire, scientific equipment, and chemicals.

Country Risk



Source - AUPN Anti-Slavery Dashboards

Spend by supplier and supplier risk requires further analysis – which will be done by QUT and the AUPN in 2024.

In 2024, QUT will be maturing our approach to all procurement data and analytics through the implementation of the University Procurement Analytics Service (UPAS) provided through an external partner. This will provide more accurate source data on what we are buying and with which suppliers. This tool, along with the updated technology solution provided through the AUPN, will give QUT improved visibility of the actual risks across QUT’s procurement spend, allowing us to implement a more detailed risk analysis and actual mitigations. QUT will be spending more time in 2024 addressing the countries and suppliers that were identified as high and very-high risk and this is outlined in our 2024 Action Plan.

Risks of modern slavery practices

QUT's risk level for Modern Slavery has been assessed by the Anti-Slavery Reference Group as remaining consistent / not changed over the past 12 months; with the university remaining committed to taking steps to identify, assess and address modern slavery risks.

As part of the quarterly Reference Group, each area reviews the identified risks to ensure they are relevant and up to date. Each Reference Group member monitors the risks assigned to their area and provides an update on their assessment and actions to mitigate and address the risk identified.

QUT Council has overall responsibility for risk management at QUT, which is exercised through the Risk and Audit Committee (RAC). RAC has approved the Enterprise Risk Management framework to proactively manage risks, optimise opportunities and achieve our objectives.

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

Research

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

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

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

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

All QUT research involving humans is reviewed by the University Human Research Ethics Committee (UHREC) or a delegated university review body, in accordance with the ethical principles of the *National Statement on Ethical Conduct in Human Research 2023* (National Statement). The National Statement must be used to inform the design, ethical review and conduct of human research that is funded by the NHMRC or ARC and is the national standard for use by any individual, institution or organisation conducting human research.

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

QUT is investigating and starting to use more innovative supply chains, particularly across research activities, for example, the use of crowdsourcing platforms to outsource activities to a distributed virtual workforce. The use of these platforms will continue to be monitored to identify risks associated with this approach.

Teaching and student services

In 2023, QUT had 42,253 domestic students and 9,820 international students. University teaching and other student services are primarily provided in Australia by QUT staff who are recruited and managed according to the university's employment policies and procedures.

QUT acknowledges that students, particularly international students, may be at risk of modern slavery when working or volunteering in Australia, or when undertaking work integrated learning (WIL) or international learning experiences. QUT provides education and awareness to students on matters

relating to their rights and provides student support services that are accessible to all students. As part of any WIL, industry partners sign an agreement which include clauses that require the industry partner to comply with legislation, as well as provide a variety of tasks for the student so that learning outcomes can be achieved.

As outlined in our previous statements, additional modern slavery clauses and provisions for WIL agreements were considered by QUT, however, it was determined that these clauses were not required given the nature of the activity where students undertake learning activities with industry partners.

In 2023, QUT had 2,339 higher degree by research (HDR) students. QUT now has a minimum HDR scholarship rate for all students of \$30,000 pa. For International students without scholarships, the student is required to provide QUT with evidence of being able to cover minimum costs of their stay (at least \$21,041 per year, as per student visa evidence of sufficient funds requirements). Limits are also placed on HDR students regarding working hours while enrolled, with scholarship recipients requiring the approval of both their supervisor and Head of School to undertake additional work.

Management of human resources

All permanent, fixed-term and casual staff engaged by QUT are recruited using transparent processes in line with approved policies and the QUT Enterprise Bargaining Agreements.

These documents govern all employment terms and conditions of academic and professional staff.

QUT supplements its workforce from time to time with temporary workers to complete specific pieces of work and/or fill temporary vacancies. These workers are engaged using the Queensland State Government Standing Offer Arrangement, QUT Contract Terms or Purchasing Terms and Conditions. These terms include provisions for companies on the arrangement to have a labour hire license. These licenses are covered by legislation with the dual purpose of protecting workers from exploitation by providers of labour hire services and to promote the integrity of the labour hire industry. In addition, modern slavery clauses have been included in contracts with such suppliers.

Investments

As part of our operations, QUT makes financial investments. QUT Council has appointed the Queensland Investment Corporation (QIC) to oversee and manage our investment portfolio. QIC has its own published modern slavery statement and is committed to responsible investment through embedding environmental, social and governance (ESG) factors to make better informed decisions, while delivering on long-term investment obligations. QUT has a Finance and Planning Committee that considers the selection of fund managers and that advises and monitors the performance, associated risks and management of long-term investments and endowments.

Commercial operations

QUT has:

- 31 commercial licences, agreements, or leases at Gardens Point campus
- 33 commercial licences, agreements, or leases at Kelvin Grove campus
- 3 sub-leases at external sites in DaVinci Precinct (Airport), Redlands and Samford. These Licences for space are used to undertake collaborative research agreements.

These agreements cover all retailers on campus and includes leases/licences with telecommunication companies, Childcare providers, and collaborative research agreements. These legal agreements have clauses covering compliance obligations with all relevant legislation.

Engagement with industry partners

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



Contracts and agreements within the Office of Industry Engagement (OIE) were reviewed internally and it was determined that Modern Slavery clauses were not required for agreements and deed templates specifically used by the OIE.

Risk in controlled entities

In the 2023 reporting period, QUT had four operating controlled entities (as listed above). These entities had limited operations and no employees. The controlled entities had extremely limited (if any) supply chain activity undertaken. The risk of modern slavery within QUT controlled entities has been assessed again as part of the development of this statement and continues to be deemed as low, given the minimal activity.

Engagement with Donors

While we strive to engage with donors who align with our values and ethical standards, there is a risk that some donors may have operations or supply chains that involve modern slavery practices. To mitigate this risk, we conduct due diligence procedures for

major donors and have appropriate clauses for donation contracts, where needed. This is an area we will continue to work through.

Volunteers to QUT – incoming and outgoing

In 2023, QUT reviewed the risk of modern slavery within our volunteer community – both incoming and outgoing. It was determined no further action was required.

Volunteering, by its nature is based on the individual's choice to offer their time and skills without monetary compensation. It's crucial to differentiate volunteering from slavery, which involves forced labour, coercion, and lack of freedom.

Volunteering is a form of service where individuals willingly contribute to a cause they support, without any element of coercion or exploitation. It's an opportunity to make a positive impact, gain experience and contribute to a society in various ways without being compelled to do so.

While there might be instances where volunteer work can be exploited or misused, categorising volunteering as modern slavery would be inaccurate

and diminish the severity and horrors of actual slavery. It's crucial to ensure that volunteering remains a free and voluntary activity, respected for the positive contributions it makes to communities and causes worldwide.

Supply chain

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

The majority of suppliers are engaged using QUT's Terms and Conditions, from purchase orders through to comprehensive contract conditions, and are based on the value and risk of what we are buying. These Terms and Conditions include existing clauses that cover compliance with all relevant legislation, which includes modern slavery legislation.

Actions taken to assess and address risks

QUT tracks our risks (as outlined above) through a shared risk register. This is reviewed at each Anti-Slavery Reference Group meeting and actions taken tracked against each risk. Below is a summary of each action taken, against each risk as outlined in our risk matrix.

While QUT does not have dedicated staff working full time on the program, we are committed to taking actions to address the risks to as an organisation and what we purchase. In addition to the risk matrix, in 2023, QUT:

1. Developed an action plan to document and track all

commitments we have made as the university to combat Modern Slavery. This action plan is outlined below and will continue to mature and evolve in 2024.

2. Agreed a framework to measure our effectiveness. This was approved by the Anti-Slavery Reference Group in December

2023 and QUT has commenced measuring our effectiveness in 2024, that will be reported in next year's statement.

3. Implemented the remaining internal audit actions identified through the 2022 Modern Slavery Audit.

Table 2: QUT's completed actions in 2023 to address Modern Slavery

Area	Completed Actions in 2023
QUT's Supply Chain Risks	
<p>Consistent tool to proactively, identify supply chain risks across QUT's spend with external suppliers (directly and indirectly) and implement mitigations.</p>	<ul style="list-style-type: none"> • QUT participates in the AUPN technology solution including contributing financially. This technology solution was to enable QUT to assess risk of Modern Slavery across our supply chains in a proactive way. In 2023, issues were identified with the current system. As a result, the AUPN is now working with another technology provider to provide: <ol style="list-style-type: none"> 1. Data analytics 2. Risk assessment to identify high risk suppliers by country and category through assessment against multiple feeds of MS data and Arc Blue IP. <p>This tool has been available to QUT from February 2024 and will be incorporated in our 2024 Action Plan.</p>
<p>Awareness, understanding, education and training</p>	<ul style="list-style-type: none"> • A cross-functional QUT Anti-Slavery reference group established to provide oversight, governance and raise awareness (met 4 times). • Online training program available via the Digital Workplace, along with Statement and remediation plan. • Newsletter articles have been published in the Finance newsletter and on Digital Workplace (the university's intranet site). • All Strategic Procurement & Finance Support team members have completed Modern Slavery training (and it has been added to the induction program for QUT). • All members of the Anti-Slavery reference group have completed Modern Slavery training. • Representatives from Strategic Procurement & Finance Support teams participate in monthly AUPN Anti-Slavery reference group meetings and Queensland Government Community of Practice Sessions. • Sessions with other key stakeholders including students – embedded as standard to increase awareness.

Area	Completed Actions in 2023
Contractual commitments for suppliers to ensure they have contractual obligations and mitigations in place to remediate (if required).	<p>QUT's purchase orders and standard contractual templates all include anti-modern slavery clauses – directly and through our suppliers' supply chains.</p> <p>This includes clauses for:</p> <ul style="list-style-type: none"> • new contracts • deed of Variation for existing contracts that are varied and / or extended.
Engaging new suppliers through a formal quotation or tender process.	<p>QUT's Offer documents (including RFO/RFQ templates) include questions around how suppliers are proactively working to combat modern slavery – directly and through their suppliers' supply chains.</p>
Engagement of all suppliers (with or without a contract)	<p>In 2023, QUT introduced a new supplier onboarding process for verification and validation of new suppliers and changes to suppliers – through EFTSure.</p> <p>The new process asks all suppliers to agree to QUT's purchasing terms and conditions (included on QUT's external website) - which includes a Modern Slavery clause:</p> <p><i>The Supplier must take all reasonable steps to identify, assess and promptly address risks of Modern Slavery practice in the operations and supply chains used in the provision of the goods, services, deliverables or works. If Modern Slavery is identified by the Supplier over the course of the Purchase Contract, it must be notified immediately to QUT in writing.</i></p> <p>The onboarding and maintenance process for domestic suppliers continued to include a check of the State Government Procurement Compliance Portal to ensure that businesses supplying to the Queensland Government (including QUT) are ethical in their business practices. QUT's formal procedures were updated in 2023 to reflect these changes.</p>
Engagement of strategic, high value suppliers to QUT	<p>In 2023, QUT continued to refine our approach to high value / high risk suppliers, but acknowledge we need to refine our focus and apply additional time to this activity.</p> <p>12 strategic suppliers in high-risk categories (facilities management, technology, and laboratory consumables) have been engaged to understand the actions they are taking to address modern slavery risks. Responses included information on how they are managing modern slavery risks in their operations and supply chains which will be reviewed as part of ongoing supplier management meetings.</p> <p>For security and commercial cleaning services, QUT participated in an AUPN pilot of Cleaning Accountability Framework (CAF) to assess, address, and mitigate risk of labour exploitation for cleaning and security services. In December 2023 the QUT Kelvin Grove Security Services achieved CAF certification - the CAF's 3 Star rating.</p>
QUT's operational risks	
Employees and temporary / fixed term workers engagement.	<p>No change or actions undertaken – process already in place addresses this risk as outlined in QUT's 2022 Statement.</p>
Research conducted overseas involving QUT research staff and students that may involve lack of voluntariness and exploitation of research participants.	<p>Research conducted overseas by QUT investigators must comply with the National Statement on Ethical Conduct in Human Research 2023 NHMRC</p>

Area	Completed Actions in 2023
<p>International suppliers of human cells lines and biospecimens procured for the purposes of research that may have been obtained in a manner inconsistent with the principles of the National Statement on Ethical Conduct in Human Research 2023 NHMRC (the National Statement). Supply chains include commercial entities based overseas and biospecimens shared between researchers.</p>	<p>The OREI has guidance on the Use of Stored biospecimens for research. The following information should be obtained by researchers when selected suppliers of human biospecimens and cell lines for research:</p> <ul style="list-style-type: none"> • Information on the provenance of the biospecimen – how they have been obtained and managed consistent with the principles of the National Statement. Evidence of sample provenance include: • Template Participant Information Sheet • Material Transfer Agreements • Other documents with information that support how the biospecimen was obtained
<p>Higher Degree Research (HDR) students being exploited in Australia in the workplace.</p>	<p>The Graduate Research Centre continued to provide information on modern day slavery at all HDR Student Orientation sessions, including avoiding exploitation and contacts should students wish to seek advice.</p>
<p>Supply of research infrastructure and equipment from international companies and supply chains involved/ implicated in acts of modern slavery.</p>	<p>All staff follow QUT's Procurement guidelines and, when purchasing equipment and wherever possible, use QUT's Terms and Conditions as both the purchasing (PO) and equipment supply contract T&C's address modern slavery as a standard purchasing/ contract requirement.</p>
<p>Research partners (industry and research grants) at risk of modern slavery.</p>	<p>In 2023, the Director, Legal Services (Research) has reviewed QUT templates and included modern slavery clauses where relevant.</p>
<p>Engaging international representatives (agents) for international student recruitment</p>	<p>QUT's standard Recruitment Services Agreement (RSA) template has been updated with a clause addressing modern slavery.</p> <p>55 RSAs were renewed in Q4 2023 on the updated template. All 190 total RSAs now include the clause.</p> <p>The agent training pack was updated in 2022 to include a slide on modern slavery awareness and obligations – as part of regular agent training by the regional teams. Regular agent training sessions across all regions were conducted in 2023 using the current slide pack.</p>
<p>QUT Students – undertaking exchange programs in other overseas universities – especially – those that are identified as medium and high risk for modern slavery</p>	<p>Four (4) sessions were held in 2023 with students that were attending out-bound pre-departures semester exchanges + some going on short term exchanges – briefing includes risk of modern slavery.</p>

Area	Completed Actions in 2023
Contractual arrangements with QUT's retailers	As part of our response, QUT reviewed and assessed our current lease template and has determined it is sufficient to cover our requirements and no change is needed. QUT's remediation approach also covers any breaches that may occur with our retailers.
Risk of modern slavery to overseas students volunteering and working in Australia	<p>In 2023, QUT continued our commitment to overseas students, who may be at risk. This included:</p> <ul style="list-style-type: none"> • online information sessions provided each semester by JobWatch, along with Q&A. • Presentation on Working in Australia on a Student Visa provided each semester by the Welfare Team. • Messaging on Work Rights and Workplace Safety including links to further information provided each semester via International Students Newsletter (HiQ Comms with Student Services guidance). • Individual support, information and advocacy provided via Student Services Counselling and Welfare teams. • Welfare staff check work conditions with students as part of basic psychosocial assessment and inform students of their rights and complaints mechanisms.
Risk of exploitation of students undertaking work integrated learning placements	<p>In 2023, additional clauses were considered by Legal and Governance to be added to QUT's Work Integrated Learning (WILs) templates for student placements. It was determined that these clauses were not required given the nature of the activity where students undertake learning activities with industry partners.</p> <p>Awareness raising has been included in training materials for students as part of compulsory pre-WIL requirements. A module has been developed for all students undertaking WIL placements.</p> <p>Information about modern slavery has been included in WIL risk management workshops for staff.</p>
Engagement of industry partners – particularly research partners (this includes international/overseas partners)	<p>In 2023, QUT worked to embed obligations in our due diligence process for the engagement of industry research partners.</p> <p>A review of standard contracts and agreements templates for industry partners was undertaken in 2023. It was determined through this review that additional Modern Slavery clauses were not required for these types of agreements used by Office of Industry Engagement.</p>
QUT's controlled entities	No change or action in 2023.
Students funded by Learning Potential Fund (LPF) scholarships as identified by Equity can be vulnerable to modern slavery practices external to QUT's environment or control	QUT Equity Scholarships and Bursaries are available to eligible students. Support and Wellbeing Advisors in Student Services provide ongoing welfare and financial support to all students, along with education and support on workplace rights and safety.
Ensuring ethical investments for QUT's investment Portfolio through QIC	<p>QIC believes that environmental, social, and corporate governance (ESG) factors have a material impact on long-term investment outcomes. Considering ESG factors is part of all QIC's investment decision-making processes. QIC exercises their voting rights either internally or via QIC external managers. QIC communicate QIC's approach to Responsible Investment on the QIC website and report on their activities to their clients annually.</p> <p>Company exclusions are considered on a case-by-case basis. QIC became a signatory to the United Nations-backed Principles for Responsible Investment initiative (UNPRI) in 2008.</p>



Driving Change: QUT's Engagement with High-Risk Suppliers in the Fight Against Modern Slavery

As part of QUT's ongoing strategic supplier management activities, 12 suppliers in high-risk categories (technology, facilities management, and clinical consumables) submitted information and were engaged in conversations about their response to addressing modern slavery. Spend with the 12 suppliers engaged is valued at \$45,734,923 and is 11% of QUT's total addressable procurement spend.

40 of our top 100 suppliers (by spend) have published modern slavery statements which were reviewed to inform our supplier management approach and topics for discussion at supplier meetings and annual performance review. Spend with those 40 suppliers is valued at \$107,910,911 and is 26% of QUT's total spend.

Remediation actions in 2023

QUT's published Remediation Plan remained in place in 2023, and only had one instance of anti-slavery that required remediation during the reporting period.

QUT's published Remediation Plan remained in place in 2023, and only had one instance of anti-slavery that required remediation during the reporting period.

In September 2023, QUT through our AUPN affiliation received notice that there was a Modern Slavery breach for one supplier used by QUT. Working alongside AUPN and with a University of Queensland representative, we approached the supplier to address the breach and

raise our concerns. QUT investigated our specific involvement with the supplier identified and discovered we had only engaged with their Queensland arm of the parent company, which is under a different ABN number.

An in-person meeting was held with the supplier on 9th October 2023 to speak to their representatives and obtain clarity. Afterwards a formal written response was provided from the supplier informing the AUPN that

they had taken proactive measures to remediate the oversights and had activated controls and removed the risk of reoccurrence. QUT's Anti-Slavery Reference Group was informed of the breach and the subsequent remediation actions taken by QUT and AUPN and was determined that the supplier posed no immediate risks to QUT or the rights of workers within QUT's supply chains.



Australasian University Procurement Network (AUPN) Modern Slavery Approach and Achievements in 2023

QUT is a member of the AUPN, the peak body for strategic procurement in the higher education sector in Australia and New Zealand.

Membership of the AUPN comprises 41 member institutions. QUT plays an active role in the AUPN, with a representative on the AUPN's Executive Committee and Co-Chairing the committee.

As outlined in previous Statements, QUT actively participates in the sector-wide collaboration led by the AUPN. The objectives of the University Anti-Slavery response 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.

The benefits for the Program:

Compliance	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.
Efficiency	Working together will minimise the duplication of activities and associated costs across individual universities, including risk assessment, implementation of systems and remediation.
Effectiveness	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.
Capability	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.
Cooperation	AUPN members are an engaged group of procurement professionals within publicly spirited organisations, operating in a uniquely collaborative sector.

Source Ref: AUPN Anti-Slavery Program Summary 2023

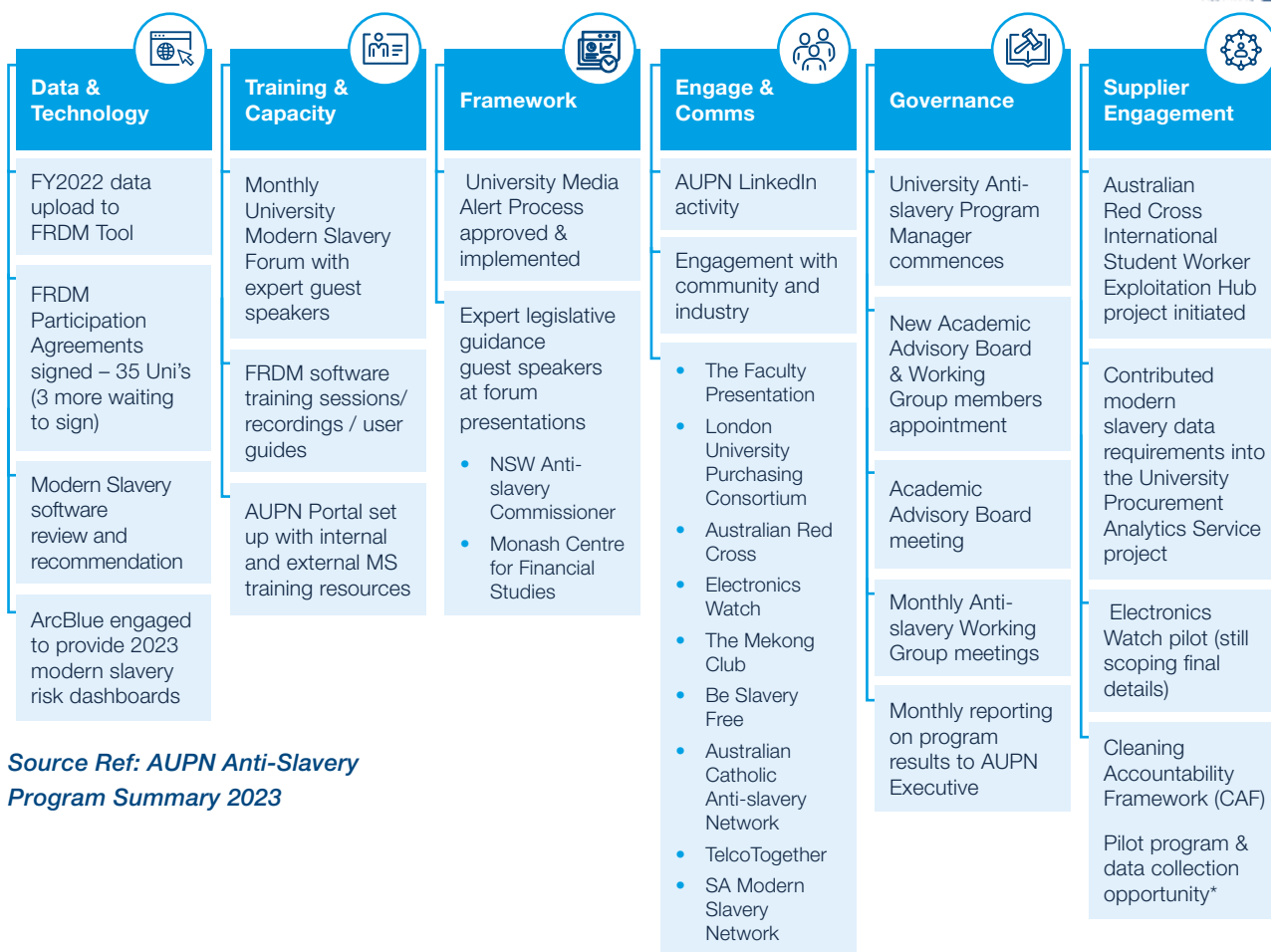
2023 Program Pillars

Key areas of focus for the program in 2023



Risk Software	Capability Uplift	Engagement	Issues/Risk Collaboration	Third Party Program Support
<ul style="list-style-type: none"> • Training and training materials • University support • Data uploads and quality • Operational processes • Issues and remediation 	<ul style="list-style-type: none"> • Academic Advisory Board • University modern slavery forums • Expert insights • Sector risk insights 	<ul style="list-style-type: none"> • Resources for stakeholder engagement • External collaborations • Presentations to university stakeholder groups 	<ul style="list-style-type: none"> • Supplier questionnaire and analysis • Subgroups to act on category risks and issues • Media alter action collaboration 	<ul style="list-style-type: none"> • Cleaning Accountability Framework (CAF) • Electronics Watch review • Australian Red Cross – international student risk • Others

Program key achievements



Source Ref: AUPN Anti-Slavery Program Summary 2023

2023 Program highlights and challenges

The AUPN have their own university-wide Anti-Slavery Working Group which continued to meet regularly in 2023 and represent the view of the sector. While QUT, are not part of the Working Group (due to capacity at QUT) – we do actively participate in the Program and initiatives including the below 2023 Program highlights.

- Monthly forums with expert guest speakers:
 - 50+ attendees across 40 universities each session
 - Range of topics covered including strategies, case studies and leadership.
- Media Alert response process established:
 - Media Alerts – summarised at each Forum
 - High risk/high influence alerts – due diligence & other action.

- Cleaning Accountability Framework – pilot progress
- Access to Modern Slavery literature and training tools (available through AUPN portal)
- ArcBlue Modern Slavery Risk Dashboards for 2023 data
- Addressing International Student Risk with Australian Red Cross and ACRATH.

Unfortunately, the program does not come without challenges and barriers to progress a unified approach, including (but not limited to) the following five areas.

1. **Our sector technology platform** – extracting value and fulfilling expectations. Slowed down risk analysis and supplier engagement.
2. **Aligning actions and approach** – many similarities but ~40 individual entities working at different paces and with different risk appetites.

3. **Maintaining momentum** – onboarding new staff and keeping working groups moving.
4. **Limited capacity** – volunteer dependent and most universities don't have dedicated anti-slavery resources.
5. **Third party programs** – set up to support individual businesses, not a sector approach.

The AUPN sector response will continue to mature in 2024, and QUT will continue our active involvement into four key focus areas:

1. Technology review and refresh
2. Deeper risk and issue collaboration
3. More engagement with third party collaborations
4. Capability uplift considering legislation changes.



Pilot Program – Cleaning Accountability Framework (CAF)

The Cleaning Accountability Framework (CAF) is an organisation whose mission is to improve labour practices in the cleaning industry. CAF works with cleaners, tenants, contractors, property owners, facility managers, and investors across the supply chain to ensure ethical labour practices.

Full details of CAF are available here via their website: www.cleaningaccountability.org.au

In 2021, CAF sought submissions from Australian Higher Education Providers (HEP) to participate in a pilot expansion of their existing building certification framework to cover contract cleaning and security at HEP campuses in accordance with a grant from the Fair Work Ombudsman. QUT was approved as one of three Australian Universities to participate in the pilot program.

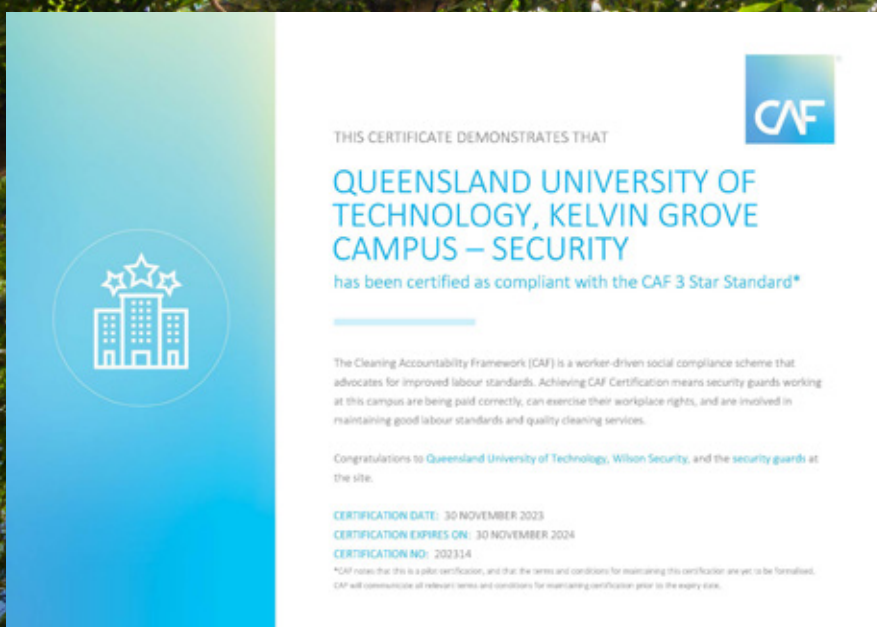
The aim of the pilot is to develop a certification framework that will be taken up more broadly by HEPs. The pilot relies on full cooperation by involved stakeholders, (including staff, suppliers, university representatives and the relevant union body).

In 2023, QUT dedicated significant time and effort to participate in the pilot program to gain Certification for our Cleaning and Security Contracts.

As part of the pilot program, QUT worked through CAF's due diligence process to assess, address, and mitigate risks of labour exploitation across these two important areas. This due diligence process included a compliance register outlining any areas that needed to be addressed to achieve certification. This register was actioned through a collaborative approach with CAF; our contracted cleaning and security suppliers and their staff; unions; and internal stakeholders. Any areas raised through the CAF process, were worked through with stakeholders and the supplier, including documented evidence to support a submission to the CAF Certification Panel.

In December 2023, QUT's Kelvin Grove Security Contract achieved CAF certification – the CAF's 3 Star rating, with the cleaning services certification still underway.

QUT also participated in the AGM meeting on 30th of November 2023 and attended several CAF events including the Introduction to CAF's Pricing Schedule Webinar and 10 Year Anniversary Event.



Measuring effectiveness

At QUT, we know it's important to ensure we do not have modern slavery in our operations and with those we buy from.

In 2023, we set three simple and clear objectives for our modern slavery program. In 2024, we will measure our effectiveness against these three objectives using the measures below. We will not be setting strict KPIs for each objective – given our maturity – however we have clear measures in place to ensure we are maturing our approach and program and are committed to anti-slavery in our supply chains and operations.

Objective 1	Proactively understand and mitigate our modern slavery risks across our operations and supply chain.
Objective 2	Empower our staff with the knowledge, skills and systems to effectively identify, respond and mitigate modern slavery risks.
Objective 3	Empower and support our students to understand their rights, report incidents and access services to prevent and remedy exploitation.

In 2024, we will measure the effectiveness of our Modern Slavery program through how well we have met our three set objectives.

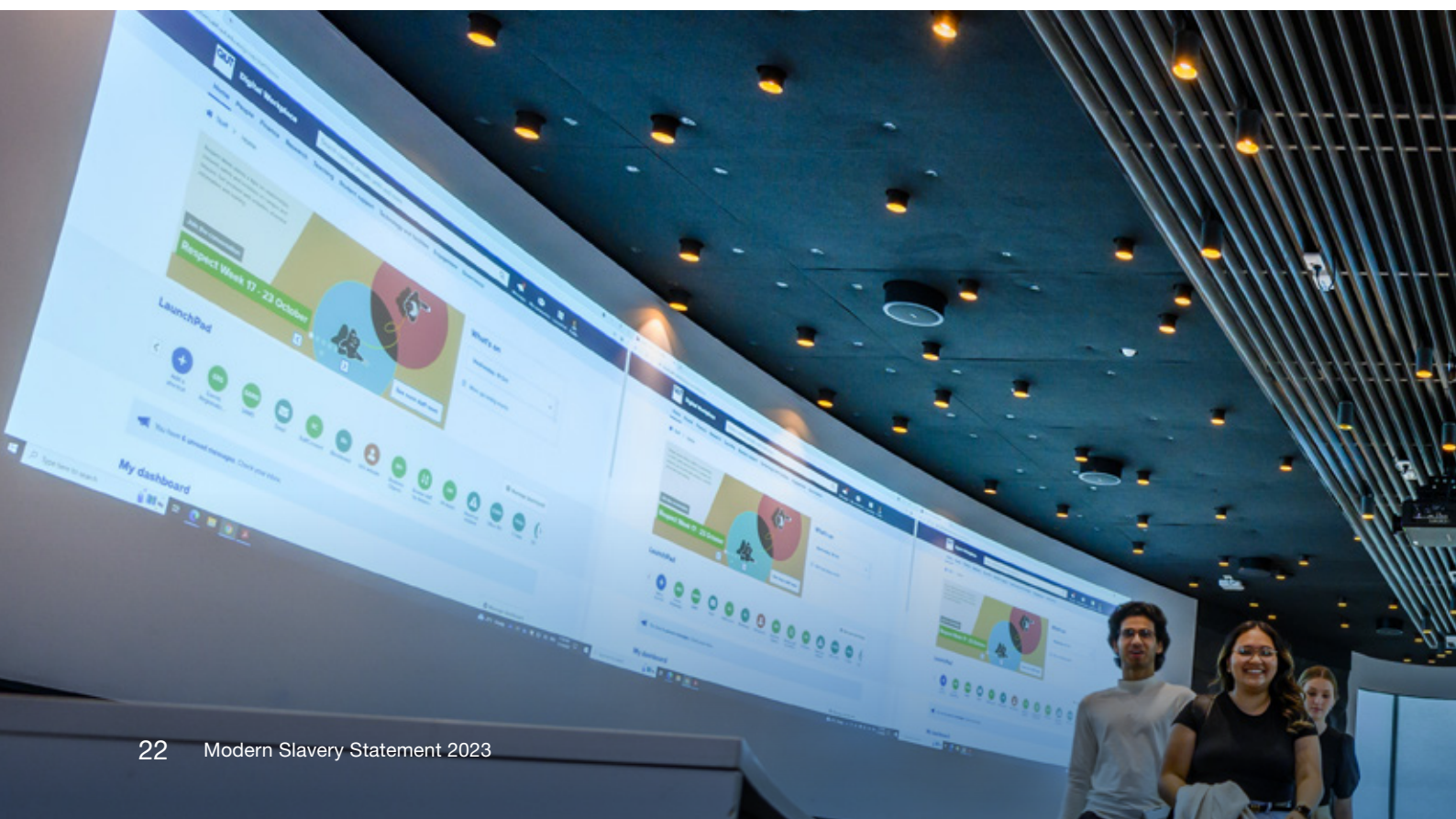
Objective 1 - Proactively understand and mitigate our modern slavery risks across our operations and supply chain.	
1. Supplier engagement	Focus on engagement of top 100 suppliers by spend (approximately 60%). Measure the number or percentage of suppliers contacted or engaged regarding modern slavery policies and compliance within a given period (including statements in place and contract clauses).
2. Risk Assessment	<p>Ensure a risk assessment of QUT's operations and supply chains is undertaken quarterly and recorded by individuals within the Anti-Slavery Reference Group and discussed at the quarterly meetings of the group.</p> <p>Undertake risk assessment of top 20 suppliers – in line with the risk assessment data tool (including where appropriate a review of Modern Slavery Statements and / or supplier questionnaires).</p> <p>Ensure the QUT Anti-Slavery Reference Group comprises members from all areas of QUT's operations.</p>
3. Partnership and Collaboration	<p>Actively contribute to the AUPN sector-wide response to modern slavery.</p> <p>Establish at least two other partnerships with NGOs, industry alliances, or other institutions focusing on combating modern slavery to commence proactive engagement.</p>
4. Incident Reporting	<p>Keep track of reported incidents or suspicions related to modern slavery within the supply chain or operations and how they were addressed – ensuring these follow QUT's documented remediation process.</p> <p>Ensure support for victims – as and when required.</p>

Objective 2 - Empower our staff with the knowledge, skills, and systems to effectively identify, respond and mitigate modern slavery risks.

<p>1. Training completion</p>	<p>100% of QUT's Anti-Slavery Reference Group, Strategic Procurement and Finance Support have completed Modern Slavery training.</p> <p>Offer awareness training – free of charge to all QUT staff. Track the uptake of this training and ensure published on the Digital Workplace.</p>
<p>2. Awareness raising</p>	<p>Quarterly article in newsletters / Digital Workplace and /or other internal communication channels raising awareness and offering training for staff.</p> <p>Up to date information on QUT's intranet including searchable links to our Statements, remediation and awareness raising articles.</p>
<p>3. Integration into Processes</p>	<p>Clearly demonstrate the integration of a modern slavery risk identification and mitigation into existing operational processes and workflows including incorporating risk assessment tools or checkpoints in procurement, supplier management, and other relevant areas.</p>

Objective 3 – Empower and support our students to understand their rights, report incidents and access services to prevent and remedy exploitation.

<p>1. Training completion</p>	<p>Offer awareness training – free of charge to QUT students. Track the uptake of this training and ensure available on the Digital Workplace.</p>
<p>2. Awareness raising</p>	<p>Ensure WIL students and students travelling overseas to study are briefed on Modern Slavery and track numbers.</p>
<p>3. Incident Reporting/ Handling</p>	<p>Target zero tolerance for incidents of modern slavery and ensure a clear and effective reporting process for any suspicions or cases identified. Aim for timely and appropriate handling of reported incidents, with investigations completed within a set timeframe (e.g., within 30 days of reporting).</p>



Consultation

In addition to consultation with the AUPN as outlined above, QUT continued its Modern Slavery Reference Group – which was renamed Anti-Slavery Reference Group in 2023 (in line with industry naming to represent a commitment to “Anti-Slavery”).

Consultation and engagement with the representatives of this group is a critical part of our response, with the Group meeting four times in 2023. The Group will continue to meet quarterly in 2024.

The Anti-Slavery Reference Group provides a platform to enable consultation across various university departments and disciplines – representing key stakeholders from our operations and those that manage our supply chain. This group will continue to evolve and expand as we mature as an organisation. It was agreed at the last meeting in 2023 to expand the membership to include a representative from Human Resources and Commercial Operations. The Reference Group now consists of representatives from the following areas:

- University Registrar’s Office
- Finance Services
- Facilities Management
- QUT International
- Digital Business Solutions
- Business Development
- Research
- Work Integrated Learning
- Student Services and Equity
- Assurance and Audit
- Faculty Operations
- Teaching (through a Head of School)
- Researcher in Modern Slavery
- Graduate Research Centre
- Human Resources
- Commercial Operations



Other information/next steps

In 2023, QUT developed an Anti-Slavery Action Plan – documenting all the things we said we would do to combat Modern Slavery in our supply chain and operations.

In 2023, we used the action plan to mature our response as outlined above.

For 2024, we will continue to hold ourselves to account through a

documented Action Plan that will evolve as we mature. The actions/ focus areas for 2024 are outlined below. Responses to the actions

are documented through QUT's Anti-Slavery Reference Group and will be published in our 2024 Statement.

Table 3: Actions planned to address Modern Slavery in 2024 and beyond

Action item*	QUT will continue to progress the following actions in 2024 and beyond to ensure we are committed to the eradication of Modern Slavery:
1	Work with QUT key suppliers, especially those who provide high-risk goods and services (as identified through the technology solution) to collect information relating to their reporting status, their policies, procedures, and actions taken within their own organisations to identify and address the risk of modern slavery. This will include continuing to mitigate risk of modern slavery in QUT's high value and high-risk cleaning and security contracts.
2	Further embed a technology solution to provide data analytics (including continued financial contribution) as standard across QUT's supply chain. This tool will help: <ul style="list-style-type: none"> • identify modern slavery risks • support our future reporting • improve supply chain transparency • inform actions and track effectiveness and identify mitigations • support sector collaboration • contribute to continuous improvement. Use the tool to address the countries and suppliers that are identified as high and very-high risk including documented evidence of actions taken to address and monitor these risks.
3	Participate in the AUPN sector-wide Anti-Slavery program including maturing our approach and response – moving to a more proactive approach, including sector wide responses to issues identified.
4	Evolve the cross-functional QUT Anti-Slavery Reference Group to raise awareness, and provide oversight, governance, and management of modern slavery across QUT supply chain and operations. Evolve the use of the Reference Group to identify risks (including potential new areas) and specific mitigations/actions for each individual risk identified.
5	Start to measure the effectiveness of QUT's Modern Slavery Program – using the measures agreed in 2023; continuing to evolve our response and introduce more tangible metrics (if appropriate).
6	Educate internal and external stakeholders and raise awareness across QUT of this issue and the importance of addressing modern slavery within our operations and supply chain including tailored training to different audiences.
RMIT1	Continue to ensure all owned and controlled entities, including all overseas operations, are included within the scope of reporting and consultation.
RMIT2	In addition to supply chain risks, continue to examine and address risks within the university's own operations, including a core focus on international students and research participants.

Action item*	QUT will continue to progress the following actions in 2024 and beyond to ensure we are committed to the eradication of Modern Slavery:
RMIT3	Ensure responsibility for compliance is shared, not outsourced, to suppliers. Universities should take joint responsibility for any harms they have caused or contributed to.
RMIT4	Embed responsible purchasing practices into the university's own procurement policies and processes, in such a way as to place limits on subcontracting, alleviate downward pressure on tender pricing, ensure prompt payment, guarantee workers are paid a living wage, prohibit financial penalties, and avoid short-term contracts and sudden changes in workload.
RMIT5	Beyond basic approval of the university's Modern Slavery statement, substantively involve executive leadership in the formulation and implementation of modern slavery strategy.
RMIT6	Support freedom of association and adopt a worker-centric approach in which workers, trade unions and civil society organisations are genuinely engaged every step of the way.
RMIT7	Continue to evolve QUT's remediation process including ensuring we have effective grievance mechanisms established that are co-designed with users and accessible to all workers, including supply chain workers.
RMIT8	Develop clear remedial policies and corrective action plans that ensure supply chain workers are appropriately compensated and receive full, fair, and timely remedies.
RMIT9	Disclose results from monitoring, use of grievance mechanisms, and outcomes of remedial measures, being transparent about harms that were found and what was done to address them.
RMIT10	Continue to ensure that each university responds to its own set of modern slavery risks specific to that university and its controlled entities. Collective sectoral responses should not replace or substitute the efforts of an individual university.
RMIT11	Situate efforts to address modern slavery within a broader human rights and labour rights framework by aligning the university's Modern Slavery response with core International Labour Organisation standards and the UN Guiding Principles on Business and Human Rights

* The Action items noted "RMIT" were identified through the RMIT Business and Human Rights Centre review on "Evaluating the Quality of Modern Slavery Reporting in the Australian University Sector".



Approval

This fourth *Modern Slavery Statement* provided by QUT is pursuant to Section 13 of the *Modern Slavery Act 2018 (Cth)* and has been approved by the Council of Queensland University of Technology.


Professor Margaret Sheil AO
Vice-Chancellor and President
 QUT

Sources of data:

- QUT annual report
- QUT website
- QUT Anti-Slavery Reference Group – Risk Identification matrix
- QUT Anti-Slavery Reference Group – Action Plan
- QUT Anti-Slavery Effectiveness Measures
- QUT spend data provided 17 February 2024 for Australian University Procurement Networking Benchmarking Data
- AUPN Anti-Slavery Dashboard
- QUT Power BI Dashboard with Procurement Spend (2024)
- Global Slavery Index 2023
- QUT Anti-Slavery Remediation Plan
- RMIT Business and Human Rights Centre review on “Evaluating the Quality of Modern Slavery Reporting in the Australian University Sector”
- AUPN – University Anti-Slavery Program Overview 2023