



Edith Cowan University: Modern Slavery Statement 2024

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This document is available online at ECU's website: <https://www.ecu.edu.au/about-ecu/reports-and-plans/modern-slavery>. It is available in alternate formats upon request.

Introduction

Edith Cowan University (ECU) is an Australian public university, established under the *Edith Cowan University Act 1984* (WA). As a large organisation, ECU is required to publish a modern slavery statement each year, in accordance with the *Modern Slavery Act 2018* (Cth).

ECU's internal modern slavery working group develops strategies to address the University's modern slavery risks. The working group reports to the ECU's Senior Deputy Vice-Chancellor.

The University is a member of the Australasian Universities Procurement Network (AUPN), which facilitates a collaborative approach to procurement matters across 41 member universities. In 2023, the AUPN's actions included running a monthly University Modern Slavery Forum; developing a portal with training resources; running training sessions; establishing a media alerts process to increase awareness and education within the sector and influence suppliers to act; engaging with ArcBlue to provide modern slavery dashboards; and engaging with community and industry, including initiating the Australian Red Cross International Student Worker Exploitation Hub project.

The FRDM tool implemented by the AUPN was unable to deliver on the promised outcomes. AUPN members reverted to the previous tool provided by ArcBlue, and the AUPN is seeking a new solution. Due to this change, ECU has not yet completed its audit of Tier 2 suppliers. ECU has developed its own supplier risk assessment questionnaire to send to suppliers not used by multiple members of the AUPN. In 2023, three potential suppliers in high-risk countries were unable to demonstrate adequate processes, and consequently, ECU did not proceed with these procurements with these suppliers.

In 2023, over 95 per cent of ECU's spend was with suppliers located in Australia. ECU procured services from three of the top 10 countries with the highest prevalence of modern slavery (0.01 per cent of ECU's expenditure), in low risk spend categories such as student recruitment and advertising, journal publications, and student exam supervision. The University's largest spend category was "new build works", and its largest supplier was Multiplex Constructions Pty Ltd. Multiplex is the head contractor for the ECU City Campus in central Perth, opening in 2026.

ECU Sri Lanka opened in 2023 in Colombo. The campus is managed by the Australian College of Business and Technology (Private) Ltd (ACBT), through an academic services agreement. ACBT is part of the Navitas Group, within Marron Group Holdings Pty Ltd.

ECU undertook two audits related to modern slavery in 2023: a contract management framework audit that showed ECU has a good control environment, and an audit into the governance and management of ECU Sri Lanka, which found an adequate control environment.

The University's online reporting process enables staff, students, and the public to notify ECU of suspected modern slavery practices. The University received no reports in 2023.

The University has three controlled entities: Edith Cowan Accommodation Holdings Pty Ltd, Australian Pathway Education Group Pty Ltd (this entity did not trade in 2023), and ECU Holdings Pty Ltd.

ECU's Modern Slavery Statement 2023 has been prepared in accordance with the provisions of the *Modern Slavery Act 2018*, and was approved by the University's Council on 27 June 2024.

Slavery is defined in Australian legislation as the condition of a person over whom the powers of ownership are exercised. Slavery-like offences include servitude, forced labour, deceptive recruiting for labour, forced marriage, and debt bonding. Slavery also includes trafficking in persons, and the worst forms of child labour such as commercial sexual exploitation or work likely to harm health or safety.



About ECU

Edith Cowan University (ECU) is one of Western Australia's oldest higher education institutions, and its youngest university. ECU has over 30,000 students, and approximately 2,000 staff (full-time equivalent).

ECU's purpose is to transform lives and enrich society. The University's vision is to lead the sector in educational experience, research with impact, and in positive contributions to industry and communities. The University's students, staff, and governing body are guided by ECU's values of integrity, respect, rational inquiry, personal excellence, and courage.

ECU's eight schools – Arts and Humanities; Business and Law; Education; Engineering; Medical and Health Sciences; Nursing and Midwifery; Science; and the Western Australian Academy of Performing Arts (WAAPA) – deliver a variety of on-campus and online courses and undertake research across a range of disciplines.

The University has three campuses in Western Australia, at Joondalup, Mount Lawley, and Bunbury (ECU South West), and one in Colombo, Sri Lanka (ECU Sri Lanka). ECU Sri Lanka opened in 2023.

The University was established by the Edith Cowan University Act 1984 (WA). ECU is a Table A provider as per the Higher Education Support Act 2003 (Cth), and a registered training organisation (RTO) as per the National Vocational Education and Training Regulator Act 2011 (Cth). ECU is recognised as a self-accrediting authority by the Tertiary Education Quality and Standards Agency (TEQSA), and as a registered training organisation by the Australian Skills Quality Authority (ASQA).

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TEQSA ID PRV12160, Australian University
RTO Code 4756
CRICOS No. 00279B

Joondalup

270 Joondalup Drive
Joondalup WA 6027
Australia

Mount Lawley

2 Bradford Street
Mount Lawley WA 6050
Australia

South West

585 Robertson Drive
Bunbury WA 6230
Australia

Sri Lanka

288 Sri Jayawardenapura
Mawatha, Rajagiriya
Sri Lanka

ECU acknowledges and respects its continuing association with the Whadjuk people and Wardandi people of the Noongar nation, who are the original custodians of the land upon which the University's Australian campuses stand.



Structure and operations

Edith Cowan University provides higher education and vocational education and training, and conducts research and development.

ECU's services and products include:

- Teaching and educational services.
- Research and research support services, and collaborations with other organisations.
- Educational outreach in schools and communities.
- External products and services in areas such as training, consultancy, fitness, arts, entertainment, and health care.
- Facilities for hire and lease.
- Student accommodation.
- Academic scholarships and prizes through its charitable foundation.
- Professional services to support the University's operations.

Governance

ECU is governed by a University Council, which oversees the operation, affairs, concerns, and

property of the University, in accordance with ECU's Corporate Governance Statement and the *Edith Cowan University Act 1984*.

The University Council, led by the Chancellor, and the senior management team, led by the Vice-Chancellor, work together to ensure that the University achieves its strategic goals. ECU's Council establishes committees to assist in meeting its responsibilities, which report to Council or Academic Board as appropriate.

Staff

ECU and its controlled entities employed the following numbers of staff in 2023:

| Organisation | Staff |
|------------------------------------|-------|
| Edith Cowan University | 2,009 |
| ECU Holdings | 0 |
| Edith Cowan Accommodation Holdings | 2* |

*Notes: Staff numbers for Edith Cowan University are provided in full-time equivalent (FTE) and include an estimate of casual staff. *Edith Cowan Accommodation Holdings displays the headcount of unpaid officers/board members.*



Controlled entities

Australian Pathway Education Group Pty Ltd

ABN 25 607 580 969
ACN 607 580 969
RTO Provider 41472

Australian Pathway Education Group (APEG) was an Australian registered training organisation providing vocational education and training programs to high school students in China. APEG ceased operating in mid-2022, and formally wound-up in 2023.

APEG is not included further in this modern slavery statement because it did not undertake any business activities during 2023.

ECU Holdings Pty Ltd

ACN 635 918 286

270 Joondalup Drive
Joondalup WA 6027, Australia

ECU Holdings generates revenue via commercial activities for re-investment in the University's academic activities.

Edith Cowan Accommodation Holdings Pty Ltd

ABN 80 135 260 383
ACN 135 260 383

270 Joondalup Drive
Joondalup WA 6027, Australia

Edith Cowan Accommodation Holdings provides residential and commercial accommodation and related activities to offer an affordable and supportive living environment for ECU students residing on campus in Australia. These services are provided through a single supplier, Campus Living Villages.

ECU Sri Lanka

ECU Sri Lanka is not an ECU controlled entity; it is managed in Sri Lanka by the Australian College of Business and Technology (Private) Ltd (ACBT). ACBT's company registration number is PV 10622, and it is located at 442 Galle Road, Colombo, Sri Lanka.

Through an academic services agreement, ACBT provides facilities and associated services to ECU students enrolled at ECU Sri Lanka. ACBT is part of the Navitas Group, and Marron Group Holdings Pty Ltd is Navitas's parent company.

Marron Group Holdings publishes an annual *Modern Slavery and Human Trafficking Statement*, which describes the organisation's responses to modern slavery risks and its associated prevention strategies. Therefore, these matters in relation to ECU Sri Lanka are not addressed in this statement.





Supply chains

ECU's suppliers provide goods and services that can be divided broadly into four categories:

- Professional services, such as insurance, staff training, and advertising.
- Property and facilities, including cleaning and facilities management services, and utilities.
- Research and teaching; for example, research supplies and equipment.
- Technology, such as hardware, software, and printing.

Typically, ECU has long-term contractual relationships with major suppliers, underpinned by regular market testing and competitive tendering to ensure value. Due to the diversity of its operations, ECU also deals with numerous occasional or one-off transactional suppliers.

Controlled entities

Edith Cowan Accommodation Holdings has only one supplier, Campus Living Villages, which provides all goods and services. **ECU Holdings** follows ECU's procurement policies and uses ECU's corporate services, and therefore its suppliers are a subgroup of the University's.

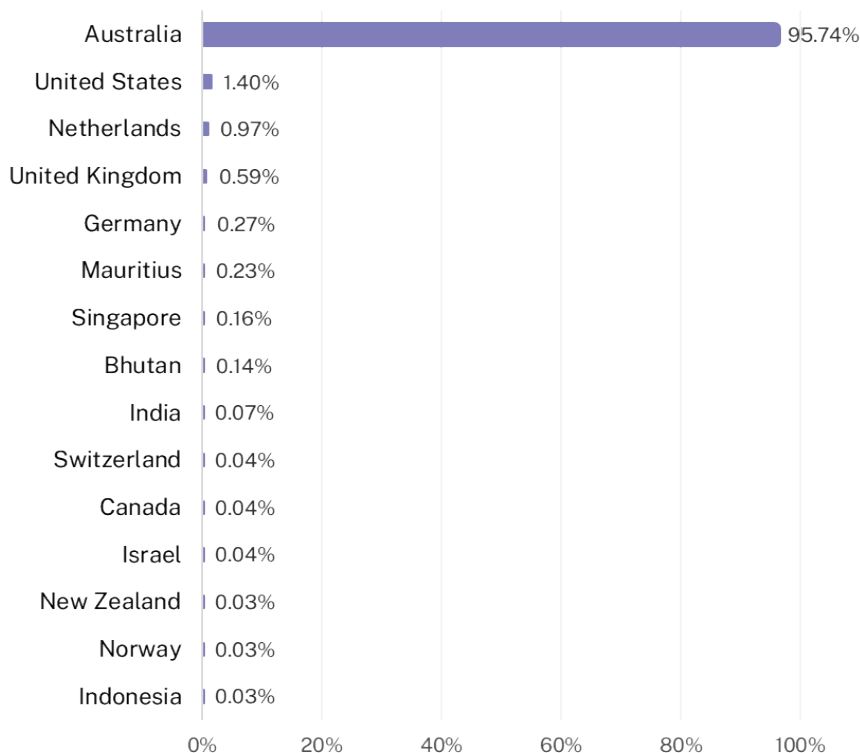
Spend by country

In 2023, over 95 per cent of ECU's spend was with suppliers located in Australia.

ECU procured services from three of the top 10 countries with the highest prevalence of modern slavery, as per the Global Slavery Index 2023. This spend totalled 0.01 per cent of ECU's

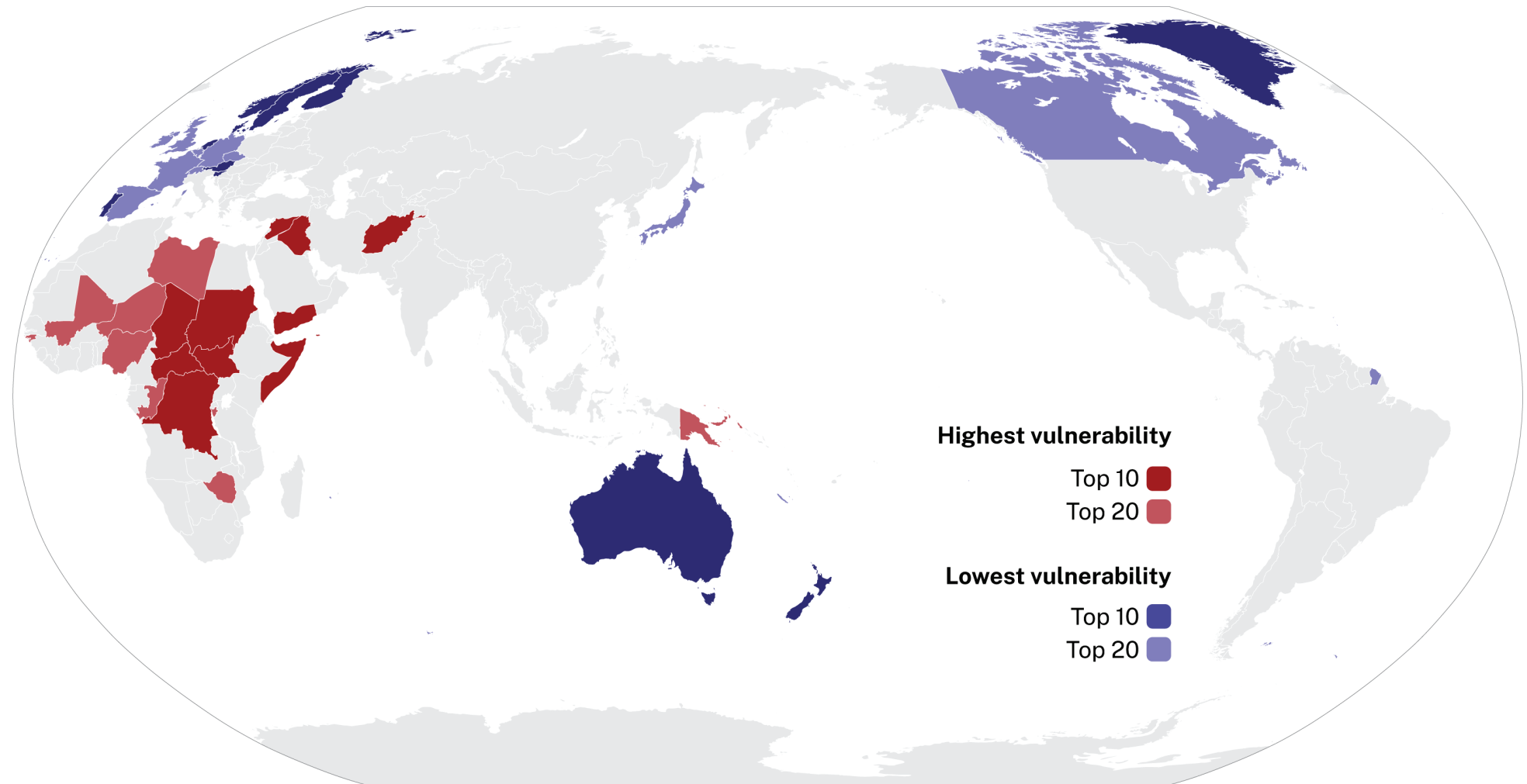
expenditure (\$26,317) and was related to student recruitment activities and advertising (Saudi Arabia and United Arab Emirates), journal publications (Türkiye), and student exam supervision (Saudi Arabia). These are low risk activities for modern slavery practices.

ECU's top 15 countries by spend

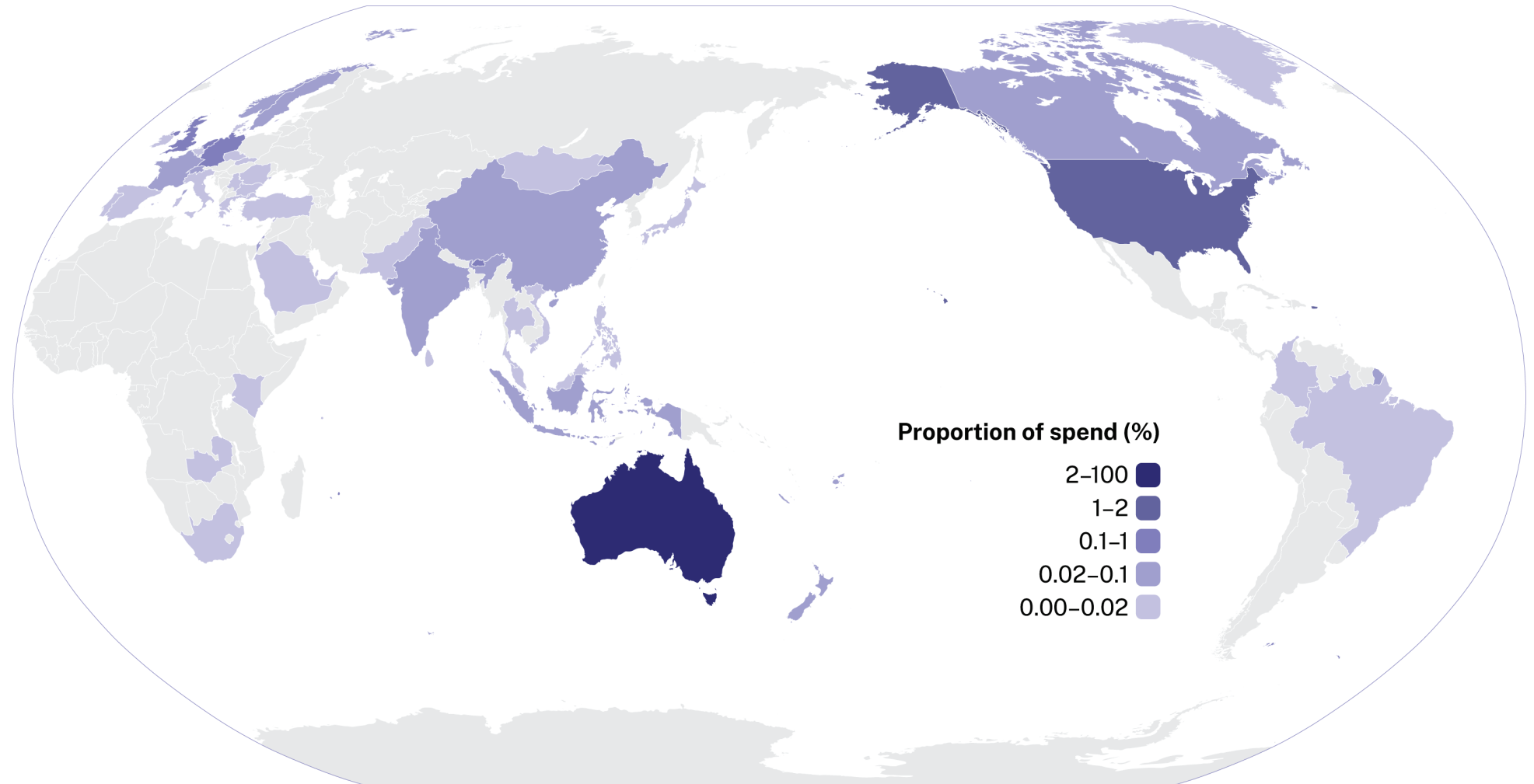


Modern slavery vulnerability by country

Data from per the Walk Free Foundation's 2023 Global Slavery Index.

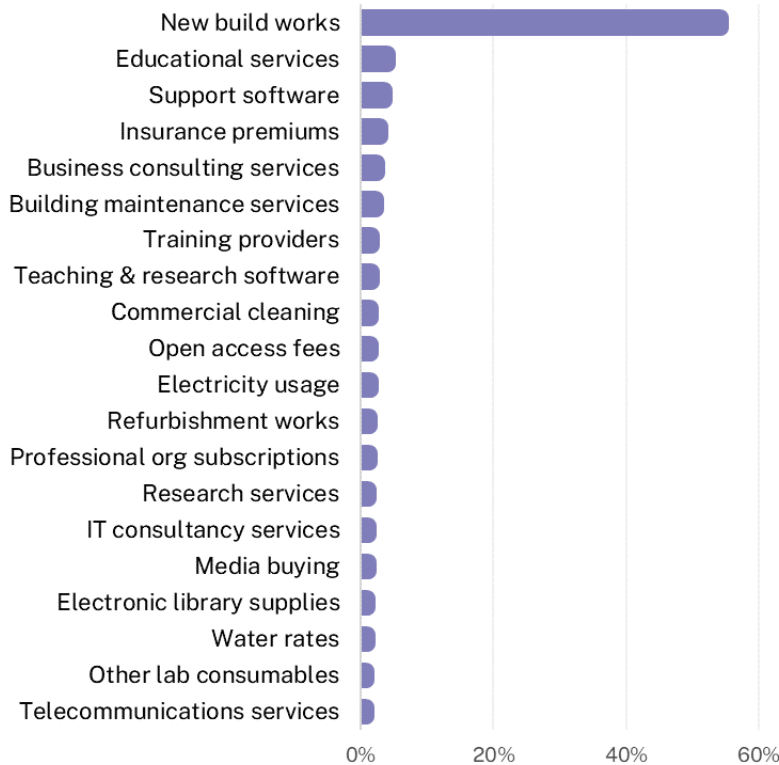


ECU's spend by country



Spend by category

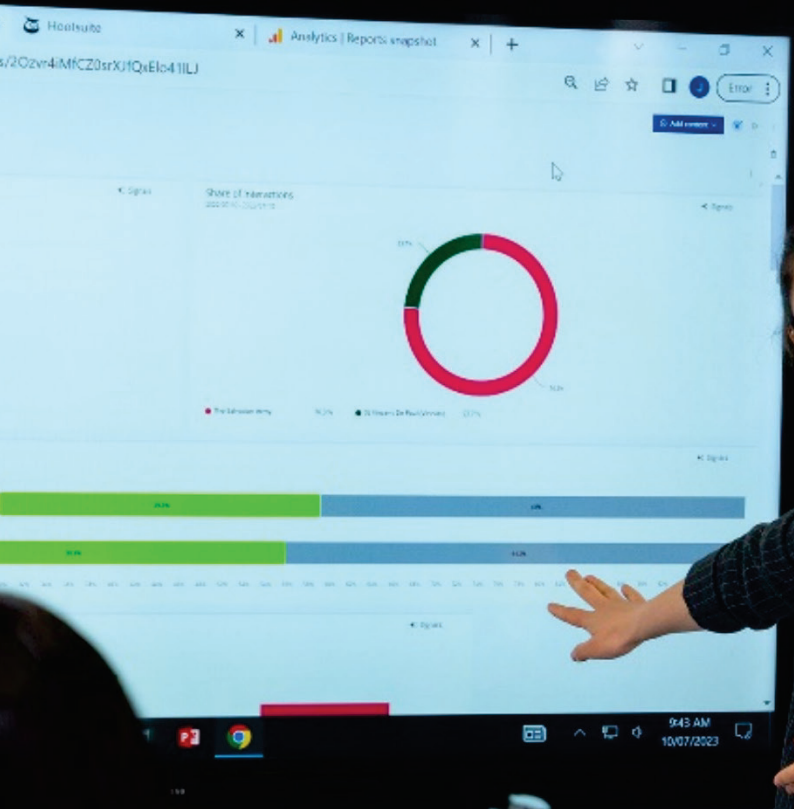
ECU's top 20 spend categories



ECU's biggest spend category was "New build works". Building and construction is a high-risk area for modern slavery; however, ECU's largest supplier in this category (and overall largest supplier in 2023) was Multiplex Constructions Pty Ltd. Multiplex is the head contractor for the construction of ECU's City Campus, in Perth's central business district. Multiplex is required to comply with, and report under, both Australia's *Modern Slavery Act 2018* (Cth) and the United Kingdom's *Modern Slavery Act 2015*. ECU's other suppliers for building and refurbishment works are headquartered in Australia, including Renascent.

Commercial cleaning is a spend category with a high risk of modern slavery practices. ECU's cleaning services are primarily provided by ISS (99.9 per cent of this spend). ISS submits a Modern Slavery Statement annually regarding compliance with *the Modern Slavery Act 2018* (Cth).

Accommodation services also have a high risk of modern slavery. ECU's accommodation providers in 2023 were either based in Australia, or part of the Marriott International or Wyndham Hotels & Resorts chains. As ECU is a university, it does not purchase directly from other high-risk industries such as meat works, agriculture, and fishing.



A woman with glasses and a dark blazer is standing between the two large monitors, gesturing with her right hand towards the left monitor. She appears to be presenting or explaining the data shown on the screens.

A person with long dark hair, wearing a blue blazer, is seated at a desk in the foreground, facing away from the camera and looking towards the monitors.

A person with long blonde hair, wearing a white blazer, is seated at a desk in the foreground, facing towards the camera and looking towards the monitors.



Assessing the risks

All organisations are subject to risks of modern slavery within their supply chains and operations.

Organisations can directly *cause* modern slavery by using exploitative labour practices, such as forced labour (people working against their will under threat of punishment), debt bondage (people forced to work to pay off debt without control of employment conditions or debt), or human trafficking (using violence or coercion to transport people for forced labour). Within ECU's operations, the University has determined that the risk of modern slavery practices is very low. The University's activities are governed by its risk management framework, key policies, and compliance with Australian legislation.

An organisation may *contribute* to modern slavery practices if its actions facilitate or incentivise modern slavery, for example through unrealistic pricing, or delivery expectations placed on suppliers. ECU's procurement and human resources policies and processes, and internal governance structures, work together to mitigate these risks.

Organisations can be *linked to* modern slavery practices through the activities of a partner organisation, including organisations where there is no direct contractual relationship, such as the partner of a partner organisation. The complexity of supply chains can make these issues difficult to identify. The property and facilities sector, with its high level of building and cleaning subcontracting, is an area at higher likelihood of modern slavery, however, the risk to ECU is believed to be low. There are inherent risks faced by all organisations with Tier 2 suppliers (and beyond) in the technology sector regarding the origins of materials and device production. ECU primarily procures from large multinational corporations that are required to comply with Australian law, including the *Modern Slavery Act 2018 (Cth)*.



ECU is a member of the [Australasian Universities Procurement Network \(AUPN\)](#). The AUPN is supported by HES Pty Ltd, a not-for-profit organisation owned by Universities Australia. The AUPN established a Modern Slavery Working Group that provides resources for universities, including a modern slavery risk dashboard. ECU is a member of this working group. Through collaboration with 40 other universities in Australia and New Zealand, the working group minimises duplication for universities and suppliers and reduces the costs of risk assessments and remediation.

A key initiative of the AUPN Modern Slavery Working Group was the implementation of the [FRDM](#) tool to identify potential modern slavery risks in the supply chain. The FRDM tool was intended to deliver a raft of solutions, but it was unable to deliver on the promised outcomes, and AUPN terminated the contract in 2023. AUPN members reverted to the previous spend aggregation and visibility tool provided by ArcBlue. ECU's ArcBlue supplier spend risk dashboard provides information about supplier risk by category, country, and amount of spend, and can be drilled down to view details. AUPN is seeking to replace this software with a new solution, with greater reporting and data analysis capabilities. Due to this changeover, ECU was unable to complete its audit of Tier 2 suppliers in 2023.

ECU has developed its own supplier risk assessment questionnaire to send to high-risk suppliers unique to ECU (i.e., suppliers that are not used by multiple AUPN members), managed by Open Windows Software's Ready Contracts contract management system. In 2023, three potential new suppliers in high-risk countries were not able to sufficiently demonstrate they had adequate processes in place in their responses to the risk assessment questionnaire, and as such, ECU did not proceed with procurements from these suppliers.

ECU's online reporting process enables staff, students, and the public to notify the University of suspected modern slavery practices within its supply chain or operations. The University received no reports in 2023.

The University also undertakes research into modern slavery practices. In 2023, ECU's research included:

- Aston, J., & Anthony Das, C. (2023). Submission to the Joint Standing

Committee on Foreign Affairs, Defence and Trade's *Inquiry into the Rights of Women and Children*.

<https://www.aph.gov.au/DocumentStore.ashx?id=1c3deef1-d1b0-4319-ae44-89a2482d623e&subId=748465>

- Barnes, J., Naser, M. M., & Aston, J. (2023). A vulnerability approach to irregular migration and modern slavery in Australia. *Australian Journal of Human Rights*, 29(1), 121-140.

<https://doi.org/10.1080/1323238X.2023.2229619>

Controlled entities

Campus Living Villages Pty Ltd (Campus Living Villages), the sole supplier for **Edith Cowan Accommodation Holdings**, assesses and mitigates its modern slavery risks. **ECU Holdings** acts as a holding trust for University investments and does not have any employees. Its risks are a subset of those managed by the University.



Addressing the risks

The University's 'three lines of defence' model of risk assurance involves the following:

- *First line of defence:* Systems and processes, culture, and controls present at the operations level. With the specific risks of modern slavery practices in ECU's supply chains and operations, this primarily involves the procurement function.
- *Second line of defence:* ECU's risk management and compliance functions, which include assessing the effectiveness of controls through regular risk reviews, self-assessment reviews, and a formal compliance review program.
- *Third line of defence:* Internal audit, which provides further oversight of controls, including independent assurance that the framework is functioning correctly.

ECU's internal modern slavery working group develops strategies to address the requirements of the *Modern Slavery Act 2018*. The working group includes representatives from procurement, human resources, compliance, planning, and risk management services. Representatives from ECU's controlled entities are also invited to attend and participate in meetings of the working group. The working group reports to the University's Senior Deputy Vice-Chancellor.

First line of defence: procurement and education

All ECU procurement staff have completed the Australian Border Force's online training course, *Modern Slavery in Public Procurement*. In 2023, ECU began deploying its new staff learning management system, and as such, the roll-out of a University-wide integrity training module, with content regarding modern slavery, was not completed.

The University regularly reviews the content of the units it teaches, and in 2023, introduced a lecture specific to modern slavery in CRI3109 International Human Rights. This covers modern slavery in general, then takes a closer look at the Australian context. Students were required to analyse Australia's modern slavery strategy in their assessment.

In 2023, the actions of the Australasian Universities Procurement Network (AUPN) included:

- Running a monthly University Modern Slavery Forum with expert guest speakers.
- Development of an AUPN portal with modern slavery training resources.
- Training sessions on use of the FRDM software.
- Engagement of ArcBlue to provide modern slavery risk dashboards.
- Engagement with community and industry.
- Initiation of the Australian Red Cross International Student Worker Exploitation Hub project.
- A process for establishing media alerts to increase awareness and education within the sector and influence suppliers to act.

In collaboration with migrants, the Australian Red Cross created a website resource called [Work Right Hub](#), to prevent and address criminal labour exploitation. The Australasian University Procurement Network is working with the Australian Red Cross to develop a bespoke section of the website to assist international students. International students are at a higher risk of exploitation in the workplace, and the section will focus on assisting students to report and address exploitation, and assisting frontline responders, like university staff and colleagues, to provide support. ECU has provided feedback to this project, and the work continues into 2024.

Some barriers to the work of the AUPN in 2023 included the technology platform delaying risk analysis and supplier engagement; the difficulties of maintaining a coordinated approach, as universities have different risk appetites and levels of internal resourcing; and, maintaining momentum with onboarding new staff and managing ongoing participation in working groups. Gathering data collectively and extracting valuable insights for decision-making has also proved challenging. The AUPN is working to best address these issues.

Second line of defence: risk management and compliance

ECU did not undertake risk management or compliance reviews related to modern slavery in 2023.

Third line of defence: internal audit

In 2023, two audits related to modern slavery. The Contract Management Framework Internal Audit reviewed the adequacy of ECU's contract management framework to manage contract performance, key contractual requirements, and risks. It found that ECU has a good control environment for contract management.

The Governance and Management of Sri Lanka Campus Internal Audit commenced in 2023, with its report completed in 2024. This audit reviewed the governance and management arrangements in place for ECU Sri Lanka; in particular, the academic services agreement's consistency with ECU's international education partnership framework, and compliance with its partnership agreement with ECU's educational partner, the Australian College of Business and Technology (ACBT). Overall, the audit indicated an adequate control environment for the management of the Sri Lanka Campus.

Positive observations of the Governance and Management of the Sri Lanka Campus Internal Audit included:

- ECU formally reviews the Sri Lanka Campus operations through its annual Joint Management Committee (Operational) and Joint Management Committee (Strategic), and the Transnational Educational Partnerships Annual Report.
- The Joint Management Committee (Operational) meets annually to provide a comprehensive overview of student outcomes and the quality of the student experience for all courses delivered overseas at specified offshore locations.



Policies and processes

The following policies relate to managing the risks of modern slavery practices, in accordance with ECU's values of integrity, respect, rational inquiry, personal excellence, and courage.

- *Staff Code of Conduct*, which provides a framework for appropriate behaviour for staff.
- *Misconduct*, which establishes the strategies, controls and processes for the prevention, detection and management of misconduct, fraudulent and corrupt behaviour, and for fair dealing in specific matters pertaining to these behaviours.
- *Complaints*, which defines the principles that govern the approach taken by ECU in handling complaints made by students or members of the public.

The guidelines below are designed to complement the University's policies and operations.

- *Public Interest and Whistleblower Protection Discloser Guidelines* to assist staff who report corrupt or improper conduct.
- *Social and Sustainable Procurement Guidelines* to incorporate sustainability and social responsibility into purchasing decisions, including risks of modern slavery.
- *Misconduct Guidelines*, which outline the University's strategies to prevent and detect acts of fraud, corruption, and misconduct.

The University's supplier contracts contain clauses related to modern slavery practices. The clauses are included in all legal templates.

Legislation and guidelines

Edith Cowan University is subject to legislative obligations, including the following:

- *Modern Slavery Act 2018* (Cth)
- *Corporations Act 2001* (Cth)
- *Corruption, Crime and Misconduct Act 2003* (WA)

- *Fair Work Act 2009* (Cth)
- *Public Interest Disclosure Act 2003* (WA)
- *Work Health and Safety Act 2011* (Cth)
- *Work Health and Safety Act 2020* (WA)

In addition, ECU supports the following international conventions and guidelines:

- *United Nations (UN) Universal Declaration of Human Rights*
- *UN Guiding Principles on Business and Human Rights*
- *UN Sustainable Development Goals*
- *International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work*
- *Ten Principles of the UN Global Compact*

Controlled entities

The University continues to monitor its controlled entities' progress towards assessing and mitigating modern slavery risks. Controlled entities are required to complete ECU's modern slavery self-assessment questionnaire annually, which assists them in identifying and managing their modern slavery risks. The process also provides ECU with the opportunity to review the outcomes and work with the entities to address risks.

The sole supplier of **Edith Cowan Accommodation Holdings**, Campus Living Villages (CLV), voluntarily publishes a modern slavery statement, in accordance with its values. CLV also participates annually in the Global Real Estate Sustainability Benchmark (GRESB) *Real Estate Assessment*. GRESB assesses and benchmarks environmental, social and governance performance of real estate assets. In 2023, CLV received a score of 80 out of 100 and a three-star rating, which is globally top-quartile performance. All employees at CLV receive training on modern slavery risks within six months of commencing employment.

ECU Holdings follows the University's established policies and risk management strategies.



Consultation and approvals

We hereby submit the Modern Slavery Statement of Edith Cowan University for the year ending 31 December 2023, for publication on the Australian Government's [Online Register for Modern Slavery Statements](#).

The Statement was completed in consultation with relevant representatives from controlled entities Edith Cowan Accommodation Holdings and ECU Holdings. In addition, the University also consulted with the sole supplier for Edith Cowan Accommodation Holdings, Campus Living Villages. The information gathered from the consultation process was

used to inform ECU's Modern Slavery Statement 2023, and will be used to assist controlled entities to develop relevant modern slavery policies and procedures, as may be required.

ECU's Modern Slavery Statement 2023 is made in accordance with the *Modern Slavery Act 2018*. It is provided pursuant to a resolution of the University's Council on 27 June 2024, following endorsement by University Executive on 15 May 2024 and the Quality, Audit and Risk Committee on 27 May 2024.

Signatures



Denise Goldsworthy AO
Chancellor
27 June 2024



Professor Steve Chapman CBE
Vice-Chancellor
27 June 2024