

Modern Slavery Statement

Reporting Period: 2020

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PREAMBLE

Modern slavery is a global issue. The exploitation of an individual's rights and freedoms through coercion, threats or deception must be challenged wherever it exists. At Griffith University ('Griffith', 'the University', 'we', 'us', 'our'), we are committed to protecting and respecting human rights, and have a zero-tolerance approach to slavery and human trafficking in all its forms. We are taking modern slavery risks seriously, and the following document constitutes Griffith University's Modern Slavery Statement for the reportable period 1 January to 31 December 2020.

PART A—REPORTING ENTITY

The *Griffith University Act 1998* establishes Griffith University as a statutory body of the Queensland Government. It is governed by the University Council, who oversee several core committees and sub-committees. The University is organised into four academic groups: Arts, Education and Law; Griffith Business School; Griffith Health; and Griffith Sciences. Griffith also hosts central academic and student support services, campus and corporate services, and research services. It is a world-class university that is ranked in the top 2 per cent of universities globally and has over 200,000 alumni across 130 nationalities, with five physical campuses stretching down the Brisbane-to-Gold Coast corridor, as well as a Digital campus.

In the 2020 reporting period, Griffith University comprised approximately 4,400 staff and 50,000 students, with an annual turnover of \$968 million.

Griffith University's Strategic Plan 2020–2025 sets out six key commitments, underpinned by the University's core principles of excellence, ethical behaviour and engagement, to transform lives and add to human knowledge and understanding in a way that creates a future that benefits all. Griffith supports the [United Nations Sustainable Development Goals](#), and by 2025 we seek to be ranked in the top 200 universities globally for meeting them.

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

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

Griffith University's procurement spend over the 2020 reporting period was \$301 million, across 3,547 active suppliers.

PART B—STRUCTURE, OPERATIONS & SUPPLY CHAINS

STRUCTURE

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

To learn more about Griffith University's Corporate Governance, please refer to our [Corporate Governance website](#).

OPERATIONS (Teaching & Research)

As a university, Griffith's operations centre on delivering high-quality learning and research outcomes for students and researchers. But we were also designed to be different—since our inception, we have prioritised teaching and research practices that result in positive social, economic, and environmental impacts for our communities.

Locations

Griffith University operates its teaching and research primarily from five physical campuses located at:

- **Nathan, Brisbane, QLD**
- **South Bank, Brisbane, QLD**
- **Mt Gravatt, Brisbane, QLD**
- **Meadowbrook, Logan, QLD**
- **Southport, Gold Coast, QLD**

Additionally, with more than 20 years' experience teaching online, we've reinforced our commitment to giving our students the flexibility and support they need to succeed in their studies with a thriving Digital campus.

Study areas

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

- **Architecture, construction, and planning**
- **Business and government**
- **Criminology and law**
- **Education**
- **Engineering, IT, and aviation**
- **Humanities, languages, and social science**
- **Medicine, dentistry, and health**
- **Music and performing arts**
- **Science and environment**
- **Visual and creative arts**

Research institutes and centres

Griffith maintains a number of research institutes and centres, with most aligning to our four Academic Groups and 10 study areas with their cutting-edge research helping to inform our degrees.

Institutes	Centres
Australian Rivers Institute	Centre for Catalysis and Clean Energy
Cities Research Institute	Centre for Governance and Public Policy
Environmental Futures Research Institute	Centre for Quantum Dynamics
Griffith Asia Institute	Centre for Work, Organisation and Well Being
Griffith Criminology Institute	Griffith Centre for Social and Cultural Research
Griffith Institute for Drug Discovery	Law Futures Centre
Griffith Institute for Educational Research	Queensland Conservatorium Research Centre
Griffith Institute for Tourism	Queensland Micro- and Nanotechnology Centre
Institute for Glycomics	Australian Research Centre for Human Evolution
Institute for Integrated and Intelligent Systems	Griffith Centre for Design and Innovation Research
Menzies Health Institute Queensland	Griffith Centre of Biomedical and Rehabilitation Engineering
Advanced Design and Prototyping Technologies Institute	

Movements internationally

Many Griffith staff and students work and study internationally, with some spending a significant amount of their time outside of Queensland and Australia. Due to the COVID-19 pandemic in 2020, Griffith followed Queensland Health guidelines and paused international and domestic travel, and rapidly deployed improved functionality to enable staff and students to work and study remotely. Throughout much of the 2020 reporting period, Griffith was able to provide a hybrid teaching model (blending remote and in-person teaching) for its students. Griffith has no solely owned facilities or locations based internationally. If the need arises, the University will partner with another university or institute to provide this temporarily.

Code of Conduct

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

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

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

Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy

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

All staff, students and University partners, including downstream partners and third-party providers, involved with Griffith in the delivery of DFAT business are expected to act in accordance with the principles and reporting requirements outlined by [DFAT's Preventing Sexual Exploitation, Abuse and Harassment \(PSEAH\) Policy](#), in addition to upholding and abiding by the policies and procedures that relate to preventing sexual exploitation, harassment and assault at Griffith.

Arrangements with suppliers

Griffith engages with suppliers in a variety of ways, from single, low-cost transactions through to strategic longer-term contracted relationships where significant amounts of money are spent with the supplier. Griffith has the general capacity to transact with its suppliers via purchase order, payment request (invoice only payment), credit card, trade card and direct bank transfer. Griffith's Purchasing Policy requires that competitive quotations are received for most expenditure, with formal tenders for significant expenditures.

SUPPLY CHAIN

Spend categories

Like many Australian-based universities, Griffith University's supply chains are varied, covering a number of spend categories including:

- **Facilities Management**
- **Design, Planning and Construction**
- **Human Resources**
- **IT Hardware**
- **Software**
- **IT Services**
- **Laboratory and Research**
- **Library Services**
- **Corporate Professional Services**
- **Lecturer and Teaching Expenses**
- **Logistics and Storage**
- **Marketing and Advertising**
- **Office Supplies and Furniture**
- **Engineering**
- **Student Services**
- **Telecoms**
- **Travel and Events**
- **Utilities and Renewables**

PART C—RISKS OF MODERN SLAVERY PRACTICES IN THE OPERATIONS & SUPPLY CHAINS OF THE UNIVERSITY AND ANY SUBSIDIARIES

Griffith University expended a lot of effort in 2020 to identify the modern slavery risks in its operations and supply chains. Griffith's modern slavery risks are similar to those faced by other universities in Australia. The work done with AUPN helped Griffith University better understand its modern slavery risks. AUPN participating organisations built an understanding of their supply chains through accessing information from specialist modern slavery sites such as globalslaveryindex.org and mapping that to spend data for Griffith and for other participating universities.

Griffith was then able to use the output obtained via AUPN, and supplement it with information from other sources and with analysis from the University's staff, to form a point of view on the modern slavery risks in its operations and supply chains.

Griffith University's key modern slavery risks can be summarised as follows:

Geographic risks

Griffith University's supply chains have many suppliers with operations in foreign countries. Some countries are known to be at higher risk of having modern slavery in the operations of organisations that operate from those countries.

Griffith's high-risk supply chains, based on the country from which Griffith sources directly, are all in Asia.

It should be noted that the view of geographic modern slavery risk in Griffith supply chains that are not directly sourced from a foreign country but have some of their supply chain linked to foreign countries is not well known to Griffith at this time. The best view we currently have of opaque geographic risk contribution to overall modern slavery risk is based on category risks. These category views are based on generally known or accepted research from modern slavery experts, in which some categories that typically have opaque supply chains have been shown to often lead back to high-risk geographies.

Category risks

Griffith University buys a broad range of products and services, and some of these are recognised to be in high-risk categories. Categories may be considered high-risk because of sector or industry risks, product and service risks, or supply chain model risks.

These categories may be high-risk because some of their supply chain is linked to high-risk geographies or because the nature of the category has high-risk inputs, irrespective of geography. By way of example, cleaning services is recognised as a high-risk category for Griffith due in large part to the labour input that includes risk related to the working conditions of cleaners.

Griffith University has significant annual spend in the following known high-risk categories:

- **Construction**
- **Cleaning Services**
- **Food and Beverage**
- **Health Care**
- **Electronics**

Supplier risks

Through overlaying geographic and category risk, Griffith now has a list of suppliers of interest due to the risk of modern slavery. It should be noted that just because a supplier is of interest to Griffith University, it does not mean that they do or will have modern slavery in their supply chain. However, it does mean that the supplier should be actively managed related to modern slavery risk.

Procurement and supply process risks

Griffith University also recognises that modern slavery risk can be mitigated by improved processes and operations. After review, Griffith recognised opportunities to improve the following key processes:

- **Sourcing, including RFx documents and due diligence processes**
- **Contract and supplier relationship management**
- **Risk identification through ongoing monitoring of global supply chain events that relate to modern slavery**
- **Production of improved and reliable modern slavery-related data that supports risk assessment and action coordination**
- **Collaboration with other universities to address modern slavery**

PART D—ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

Griffith University took the following actions in order to assess and address modern slavery risks in our operations and in our supply chains.

Engage with AUPN

Griffith University participated in the AUPN Modern Slavery Program all through 2020 and continues to do so. Part G in this report contains details of the scope of the program. Participation in the program has supported Griffith in understanding our obligations, risks, and actions that can and should be taken. It has also provided synergy with other universities that will make a larger difference in helping to reduce and remove modern slavery in many Australian supply chains.

The remainder of this section focuses on specific work that Griffith has done in addition to participating in the AUPN Modern Slavery Program.

Organisation ownership and change management

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

Strategic Procurement and Supply brought together a core team of diverse internal stakeholders to form a working group who together would work to understand the legislation and then support the implementation of the Act across the University.

Understand the legislation

An external law firm with expertise in modern slavery was engaged to assist Griffith University by providing training as well as advice on taking sensible actions and creating meaningful reporting.

Following discussions with the Australian Universities Procurement Network (AUPN), it was agreed that a sector-wide approach to the Act would be the most effective and efficient means to combat modern slavery in our collective supply chains. Griffith's focus and efforts will be on enabling and leveraging the AUPN collaboration.

Data analysis to identify risks

Griffith University extracted spend data from our systems so that we could send it to AUPN as input to identify our geographic and category modern slavery risks associated with our spend. The AUPN modern slavery risk dashboard requires all data to be classified using the AUPN spend category taxonomy, which is different from the Griffith spend category taxonomy. Griffith was able to organise for data to be reclassified from 2018, 2019 and 2020. This was then uploaded into the AUPN modern slavery dashboard to support analysis.

This has enabled Griffith to develop an informed view of our geographic and category modern slavery risks as per the risk section noted above.

Procurement process updates

Griffith has made some changes to our procurement processes and operations to improve our ability to identify and manage modern slavery risks. Some are noted below.

- **Contract register implementation**

Griffith recognised the need to have an improved ability to track contracts with relevant risk information. This will support improved management of modern slavery risks by contract.

The University expended considerable effort across the 2020 reporting period to implement a new contract register that will supersede multiple contract registers previously utilised within the University.

All supplier contracts entered into this new register must be given a contract risk classification.

- **Sourcing documents update**

Griffith updated go-to-market sourcing documentation in order to improve our ability to combat modern slavery, make Griffith's position clear to potential suppliers, and to support improved due diligence on the suppliers that respond to our sourcing market approaches.

By way of example, the Griffith sourcing response schedule now specifically requests confirmation of compliance with the Modern Slavery Act and requests a copy of the organisation's latest Modern Slavery Statement where available. In addition, our offer clauses sent out as part of the sourcing requests, and under which offerors are deemed to be bound, now include reference to the Ethical Supplier Threshold as per the Queensland Government Procurement Policy. This threshold applies to organisations of any size and is aligned with the sentiments in the Modern Slavery Act.

Plan for the way forward

Griffith's knowledge of the risks and desired actions related to modern slavery that was developed during 2020 has allowed us to plan for the way forward, including building a list of actions that we wish to take in 2021 and beyond. These include the following noted below:

- **Continue to partner with AUPN, including implementing the new AUPN-sourced technology platform to support identifying risk, support reporting, improve supply chain transparency, inform actions, and track effectiveness, support sector collaboration and contribute to continuous improvement.**
- **Update sourcing documents with a modern slavery questionnaire.**
- **Develop and implement a supplier code of conduct that refers to modern slavery.**
- **Train Griffith staff on procurement activities that have an impact on modern slavery, including sourcing, contract management, and supplier relationship management.**
- **Update contract templates with improved modern slavery clauses.**
- **Update contract management processes to better consider modern slavery.**

PART E—ASSESSMENT OF THE EFFECTIVENESS OF ACTIONS

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

Action	Effectiveness
1 Engage with AUPN	This has been very successful and has been the single most important action that we have taken based on the results. Results include outcomes that we could not have achieved on our own, including access to specialist academic advisors from across Australia, synergies building the modern slavery dashboard and future system, etc.
2 Organisation ownership and change management	Having the Strategic Procurement & Supply team take responsibility for progressing efforts related to modern slavery has worked well. This has supported linking with other universities in the most effective way. It has also meant that the area that has the most influence on supplier engagement has become much more educated about all things related to resolving modern slavery.
3 Understand the legislation	Griffith now has a reasonable understanding of the legislation and is taking action to continue to comply with the law as well as the intent behind it.
4 Data Analysis to Identify Risks	While reasonable progress was made in 2020, much is still to be done in order to ensure that our process for extracting and processing data is seamless and easy so that more time can be spent analysing the data. Data improvement is part of the 2021 focus areas.
5 Procurement Process Updates	It has been successful in raising the modern slavery matter with all suppliers in our go-to-market documentation. Some updates were made to our processes with more to come in 2021.
6 Plan for the way forward	Going through the actions that we have has supported progress and also helped us identify a list of actions on which we need to focus moving forward.

Overall, Griffith University has taken effective action and is making good progress in identifying and addressing the modern slavery risks in our supply chains.

PART F—CONSULTATION

Consultation on addressing modern slavery was primarily within Griffith University and across the university sector. Some consultation of external legal experts helped in the early part of 2020.

Given that Griffith University is the reporting entity and (with the exception of the two subsidiary entities) is not reporting on behalf of any other entities, there was no further consultation required. In relation to the two subsidiary entities, Griffith staff are board members of the two subsidiary entities, which will enable ongoing dialogue on modern slavery expectations and oversight of any procurement activities involving those entities.

PART G—OTHER INFORMATION

This section contains an overview of the AUPN Modern Slavery Program, in which Griffith University is participating, and is included for information.

AUPN Modern Slavery Program overview

The Australian University Procurement Network is leading a sector collaboration to support all member universities to meet the challenge of human rights transparency and risk management in their supply chains, and contribute to the fulfillment of members’ reporting requirement to the Modern Slavery Act 2018 (Cth).

In the beginning of 2019, the AUPN established a Modern Slavery Working Group (MSWG) with nine universities actively contributing time and effort on a voluntary basis. The MSWG underwent a discovery phase and developed the following sector-wide Modern Slavery (MS) Program:

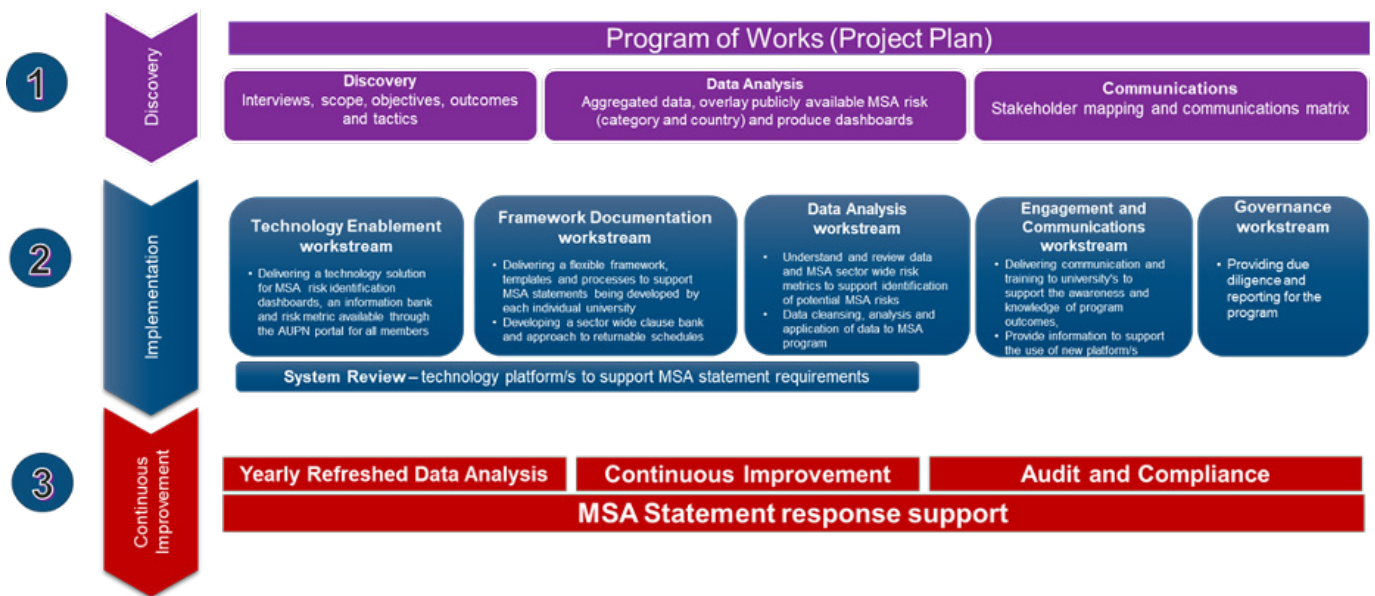


Image 1. AUPN MS Program—Developed by MSWG with support from ArcBlue Consulting.

This Program aims to deliver:

- a collection and aggregation of sector procurement data
- a solution that allows members to identify risk, focus resources and inform action, supported by a third-party technology enablement solution
- a sector approach/action plan for addressing, mitigating and / or remediating identified risks
- flexible templates and guidance
- continuous improvement.

It is envisaged that both the AUPN members and their suppliers will benefit from the improved operational efficiencies of the collaboration and become more effective in mitigating risk and improving social performance within supply chains.

The MSWG completed the discovery phase of the MS Program in December 2019 and is currently in the implementation phase.

- **Templates and guidance**

The MSWG have developed the following templates and guidance available to all AUPN members via a dedicated online AUPN portal:

- **Supplier Assessment Questionnaire or Response Schedule**
- **Standard Contract clauses**
- **Supplier Code of Conduct Guidelines**
- **Supplier Engagement Terms of Reference and Communication approach**

- **Data gathering**

As part of the discovery phase, a Modern Slavery Risk Dashboard was developed and made available to all AUPN members in January 2020 via the AUPN portal. To date, up to 27 Australian universities have submitted 2018 to 2020 spend data into the dashboard and MS Program.

The dashboard is the first step in the AUPN's MS Program journey, providing an indication of a university's potential risk of modern slavery applied against two different lenses:

1. spend categories using the AUPN taxonomy
2. country locations using supplier head office location.

These risks have been determined through publicly available modern slavery risk indices (e.g. Global Slavery Index) and relevant information together with some reasonable assumptions. The dashboard provides only an indicative view of where risks may exist, and the AUPN aims to continue to evolve risk ratings over time as the analytics matures.

The aggregated data reflects the broad supply chains of the sector. Analysis of the provided spend data covers over \$14.6 billion annualised spend across more than 183,800 individual suppliers. Suppliers with the highest spend are in the construction, information and communications technology (ICT), and research markets.

As at the end of 2020, MSWG were undergoing a two-stage tender process seeking a third-party technology solution that will further support its members to gather and interrogate expenditure supplier data, identify risk, focus resources, and inform action.

- **Support from consultants**

In the beginning of 2019, ArcBlue Consulting was engaged to facilitate the discovery phase and supported development of the AUPN MS Program and the Modern Slavery Risk Dashboard. ArcBlue continues to support the AUPN with managing the online AUPN portal, including maintaining the Risk Dashboard and shared modern slavery documentation.

Modern slavery specialist Pillar Two was engaged in May 2020 following a tender process to provide modern slavery subject matter expertise (SME) and support for our MS Program. To date, Pillar Two has provided:

- **a complete review of the AUPN MS Program, including 25 recommendations to enhance the sector's approach**
- **modern slavery SME support throughout the entire technology solution tender process**
- **a review of the Modern Slavery Risk Dashboard and risk ratings.**

Given the resources available, the MSWG aim to action several of Pillar Two's recommendations in 2021 and provide

indicative timeframes to deliver remaining initiatives.

- **Academic Advisory Board**

An Academic Advisory Board was established in July 2020, consisting of 12 academics from nine universities with experience and expertise in modern slavery. The board aims to enrich the sector approach. Meetings were held monthly in 2020 and were structured to review and refine AUPN-developed artefacts and initiatives.

- **High-risk-identified industries**

Using the Risk Dashboard and aggregated sector data, a list of suppliers with potentially a high risk of modern slavery presence in their supply chain and high spend with multiple universities was considered for further engagement by the AUPN MSWG.

Declaration

This statement is made pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and constitutes the Modern Slavery Statement of Griffith University for the year ending 31 December 2020. The statement has been approved by the Griffith University Council.



Professor Carolyn Evans
Vice Chancellor and President



griffith.edu.au