



Central Queensland University

Modern Slavery Statement

Period: 1 January to 31 December 2020



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Acknowledgement of Country

CQUniversity recognises that its campuses are situated on Country for which Aboriginal people have been custodians for many centuries. In acknowledging this, the University pays respects to the Elders, past, present and future, for they hold the memories, the traditions, the cultures and hopes of Indigenous Australia.

Introduction

This statement meets the University's reporting obligations under the *Modern Slavery Act 2018 (Cwlth)*. The Modern Slavery Act requires entities based, or operating, in Australia, which have an annual consolidated revenue equal to or greater than \$100 million, to report annually on the risks of modern slavery in their operations and supply chains, and actions to manage, lessen and where possible remove those risks.

Central Queensland University, trading as CQUniversity Australia, is committed to the prevention of slavery and human trafficking in all University activities and to ensuring our supply chains are free from slavery and human trafficking.

About Us

Central Queensland University, ABN 39 181 103 288, trading as CQUniversity Australia, is established by the *Central Queensland University Act 1988 (Qld)*. The University is located at 554-700 Yaamba Road, Norman Gardens, Queensland.

Founded in Rockhampton in 1967 as the Queensland Institute of Technology Capricornia, CQUniversity Australia was granted full university status in 1992 and now has more than 35,000 students studying online and on campus across Australia.

CQUniversity is proud to be recognised as Australia's most inclusive university with some of the highest ratios of students from disadvantaged, mature age, Aboriginal and Torres Strait Islander, and first-in-family backgrounds. This inclusive approach and commitment to access and participation means the University defines itself by who it embraces, rather than who it excludes.

This strong focus on participation and accessibility has seen CQUniversity firmly establish itself as one of the largest universities based in regional Australia, and the only university with a campus in every mainland state of Australia. The University operates campuses in Adelaide, Brisbane, Bundaberg, Cairns, Emerald, Gladstone, Mackay, Melbourne, Perth, Rockhampton, Sydney and Townsville, and also has a strong track record of working in partnership with regional university centres across the country. In 2020, CQUniversity also established an international presence with a delivery site in Jakarta, Indonesia.

Our Vision

To be Australia's most accessible, supportive and engaged university, recognised globally for innovative teaching and research excellence.

Our Purpose

To provide world-class, transformative education and research for our students, partners and communities across Australia and internationally.

Our Values

Engagement

We strive to be Australia's most engaged university by connecting and collaborating with students, stakeholders, industry and communities. We value strong, productive and mutually beneficial partnerships that influence positive outcomes for those we seek to serve.

Can Do

We exceed expectations and work together to identify opportunities and apply sustainable solutions to challenges. We support each other to be our best, with an ethos that is underpinned by evidence-based continual improvement. We aspire to greatness in everything we do and take decisive action to ensure we are meeting the needs of those we seek to serve.

Openness

We empower everyone to be a problem solver and decision maker. We operate with integrity at all times and build trust through a commitment to consistency, fairness, quality, probity and transparency in everything we do.

Leadership

We exhibit courage in our leadership by daring to be different, being bold and responding to the needs of our students, staff, alumni and communities. In doing so, we demonstrate excellence and innovation in learning, teaching, research, engagement and governance. We accept our responsibility to be leaders both inside and outside the University and sector.

Inclusiveness

We embrace and celebrate diversity and strive to improve access and participation. We promote respect, honesty and unity with safe and inclusive environments. We work together to create positive and tangible change with our communities.

Our Structure

The University is governed by the Council of Central Queensland University as required by the *Central Queensland University Act 1998* (Qld). The Vice-Chancellor and President is the chief executive officer of the University. The University is structured into five Divisions, each headed by a Vice-President: Tertiary Education, Research, Student and Corporate Services, Global Development, and the Vice-Chancellor and President's Division.

Our Entities

The University has the following controlled entities:

- CQU Travel Centre Pty Ltd, ABN 84 067 862 391
- Australian International Campuses Trust and Australian International Campuses Pty Ltd, ACN 088 382 012
- C Management Services Pty Ltd, ACN 088 415 829
 - PT CQU Executive Business Training Centre (established in Indonesia, NIB 9120002743602)
- CQU Development Pte Ltd (established in Singapore, ACRA 201713994E)
- Mask-Ed International Pty Ltd (dormant), ACN 151 764 046
- DataMuster Pty Ltd (dormant), ACN 625 765 942.

Australian International Campuses Pty Ltd and C Management Services Pty Ltd do not have employees or conduct business. CQU Development Pte Ltd ceased operations in 2019 and is in the process of being wound up. Mask-Ed International Pty Ltd and DataMuster Pty Ltd are dormant.

Further details about CQU Travel Centre Pty Ltd are provided in Appendix 2. Further details about PT CQU Executive Business Training Centre are provided in Appendix 3.

Our Operations

CQUniversity is Queensland's only dual sector university and delivers more than 300 education and training offerings, from short courses and certificates, through to undergraduate, postgraduate and research degrees. Study areas include apprenticeships, trades and training, business, accounting and law, creative, performing and visual arts, education and humanities, engineering and built environment, health, information technology and digital media, psychology, social work and community services, science and environment, and work and study preparation. As a pioneer in distance education delivery, CQUniversity continues to be a leader in online study with around one third of the current student cohort studying off campus, many of those in rural and remote areas. CQUniversity's flexible approach to learning and teaching, and continued innovation in this space, has provided opportunities for thousands of students to complete qualifications, regardless of their geographical location or personal circumstances.

After more than half a century working with stakeholders in regional Australia, CQUniversity is now a renowned research institution in several key disciplines and the benchmark leader for how universities should engage and collaborate with communities and industry. The University's applied research focus is oriented towards impact and real-world outcomes, with the purpose of providing solutions to challenges and identifying new opportunities for advancement in its regions and beyond.

CQUniversity places a strong emphasis on social innovation and global outreach and fosters several key partnerships with communities, industry and government, both in Australia and overseas. This commitment to engagement and social advancement has led to CQUniversity being recognised as Australia's first and only Changemaker Campus by Ashoka U, an exclusive global social innovation group of only 45 education institutions across the world. CQUniversity's unique vision for diversity, outreach, engagement, research, learning and teaching, and inclusiveness, combined with its growth aspirations and continued expansion of student success, research excellence, social innovation and community engagement, has led to it being recognised within several world university rankings, and among the world's best 'young universities' by both the Times Higher Education and QS World University Rankings.

2020 At a Glance

Total students: 35 226	VET students: 9854	New students in 2020: 12 567	On-campus students: 17 877	Online / distance / mixed mode students: 17 765
Students enrolled in a pathway or enabling course: 2253	Indigenous students: 1659	International students: 5985	Students from regional/remote backgrounds: 21 658	Alumni: 115 621
International Alumni: 46 822	Graduating students: 7450 [#]	Students awarded scholarships or financial support: 2300	Financial support and scholarships offered: \$4.4 million	VET and higher education courses offered: 339
Short courses and micro-credentials offered: more than 160	Total employees: 1667 [^]	2020 competitive research grant funding: \$21.4 million	Invested in facilities and infrastructure: \$14.2 million	2020 technology and digital investment: \$15.7 million

[#] Excluding enabling, non-award and other non-Australian Qualifications Framework courses

[^] Full Time Equivalent continuing and fixed-term appointments (excludes casual appointments)

Employees and representation

Our employees are employed directly, on a permanent, fixed term or casual basis. Employees are located across Queensland, New South Wales, Victoria, South Australia and Western Australia, reflecting the University's broad footprint.

The Central Queensland University Enterprise Agreement 2017 was in place for the reporting period.

Employee rights are also protected through the University's comprehensive policy framework.

Our University Code of Conduct: *The Standards We Live By* sets the behavioural standards for everyone who works for, or on behalf of, the University. Our Code of Conduct (Code) provides guiding principles and standards requiring CQUniversity employees to work with integrity, diligence, honesty and respect to deliver the University's aim to be a great university. The Code reflects the commitment of our University to ensure fair and ethical behaviour in an institution dedicated to the pursuit of enquiry and academic excellence, engagement with people and ideas, as well as equity and diversity amongst our students and employees.

In delivering this commitment within a truly great university, we operate in accordance with our organisational values as well as abiding by the Federal and State ethics acts, the *Human Rights Act 2019 (Qld)* and other relevant legislation, and the Academic Board Position Statement – Academic Freedom. We do this not only because we are legally obligated to do so, but because it is right and just.

The Code applies to all employees and individuals affiliated with the University, including casual, honorary and adjunct employees, consultants and contractors, and members of the University Council and all University committees.

In addition, the following policy documents are the most relevant to preventing modern slavery in our operations:

- Code of Conduct for Research
- Complaints Policy and Procedure
- Conflict of Interest Policy and Procedure
- Employee Visa Policy
- Recruitment and Selection Policy and Procedure
- Fraud and Corruption Control Framework
- Public Interest Disclosure Management Policy and Procedure
- Sexual Harassment Policy and Procedure
- Workplace Harassment, Workplace Bullying and Unlawful Discrimination Policy and Procedure
- Procurement Policy and Procedure.

All staff participate in a Corporate Induction upon joining CQUniversity which covers their obligations under the Code of Conduct and the above policies. A biennial corporate induction refresher is required of all staff.

Our Supply Chains

Our supply chain consists of a broad range of suppliers across multiple procurement categories, located locally, nationally and internationally.

The largest categories of spending were facilities management, energy resources and student recruitment. This spending supported our core business of educating students across a national footprint in regional and metropolitan centres. Within these supply chains, overseas student recruitment is the primary area with potential for modern slavery to occur. These supply chains are reviewed and monitored accordingly, though it can be noted that many of these recruiters are sole agents.

Our procurement model follows a primarily de-centralised design with our purchasing and contractual agreements administrated at a departmental level and the procurement advice team completing an advisory, assistance and compliance review role.

Significant and strategic purchases are procured via formal tender processes and under formal contracts. CQUniversity utilises a mixture of Queensland government Standing Offer Arrangements and contracts as a result of our own tenders. Routine purchases are managed via a quotation process, with governing terms managed via Purchase Order terms, or short form contracts.

Modern Slavery Risk Assessment and Response

Due to the nature of the services we primarily procure, the risk of modern slavery in our supply chain has been assessed as low. As a statutory body of the Queensland government our procurement processes were already driven by government best practice with a preference to support local and national industry. International engagement has primarily been for unique services that are not able to be provided nationally, with our risk appetite lending itself to extra compliance requirements for overseas suppliers.


CQUniversity has implemented several measures to detect potential modern slavery occurrences in our supply chains. During the tendering process, all respondent suppliers are required to complete and sign a statement identifying any previous breach of modern slavery laws in their business and supply chains. These statements are reviewed during the tender review and recommendation process to ensure compliance; non-compliant suppliers are managed in line with legislative requirements. All CQUniversity contracts have been updated with modern slavery provisions requiring our suppliers to represent and warrant that they conduct their business in a manner that is consistent with the Modern Slavery Laws and to notify us of any change to their compliance status or instances of modern slavery identified in their supply chain.

Effectiveness of Actions and Looking Ahead

Effective systems and a strong policy framework are key to supporting the elimination of modern slavery generally, and in our operations and supply chains specifically.

Through due course of review our procurement policy and procedure was updated to include requirements, explanations and provisions of modern slavery compliance; furthermore, our contractual agreements were updated with modern slavery provisions.

Whilst we did not identify any instances of modern slavery in this reporting period, we plan to continue to dive deeper and collaborate with our supply chain to understand areas of underreporting.



With the implementation of the new supplier statements in our tendering suite, we have seen a positive uptake of the provision of information in this space. Whilst no instances of modern slavery have been identified, the affirmative statements of compliance have begun to paint a picture of the market scape for us.

Collaboration with our top tier buyers to educate on modern slavery has led to us gaining a broader picture of the supplier landscape. Looking ahead, we plan to roll out education to all buyers and staff to build awareness and increase uptake of information sharing with suppliers to combat modern slavery.

Consultation and Approval

CQUniversity consulted with key stakeholders of each active controlled entity to compile this Statement. Our Executive team serve on the Boards of the active controlled entities, and have been involved in the endorsement of this Statement for approval.

The Council of Central Queensland University is the governing body of the University, with the power to manage and control the University's affairs and property. Its primary role is to provide effective governance and oversight of the University's operations.

On 23 June 2021 the Council approved this Statement for the year ending 31 December 2020 on behalf of the University and its controlled entities that are reporting entities pursuant to the *Modern Slavery Act 2018 (Cwlth)*.



Nick Klomp
Vice-Chancellor and President

Appendix 1: Definitions

Modern slavery: describes situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery includes eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

Trafficking in persons: the recruitment, harbouring and movement of a person for exploitation through modern slavery.

Slavery: situations where the offender exercises powers of ownership over the victim, including the power to make a person an object of purchase and use their labour in an unrestricted way.

Servitude: situations where the victim's personal freedom is significantly restricted and they are not free to stop working or leave their place of work.

Forced labour: situations where the victim is either not free to stop working or not free to leave their place of work.

Forced marriage: situations where coercion, threats or deception are used to make a victim marry or where the victim does not understand or is incapable of understanding the nature and effect of the marriage ceremony.

Debt bondage: situations where the victim's services are pledged as security for a debt and the debt is manifestly excessive or the victim's services are not applied to liquidate the debt, or the length and nature of the services are not limited and defined.

The worst forms of child labour: situations where children are:

- exploited through slavery or similar practices, including for sexual exploitation, or
- engaged in hazardous work which may harm their health, safety or morals, or
- used to produce or traffic drugs.

Deceptive recruiting for labour or services: situations where the victim is deceived about whether they will be exploited through a type of modern slavery.

Acknowledgement: These definitions, which expand upon those set out in the *Modern Slavery Act 2018 (Cwlth)*, are set out in the Commonwealth Modern Slavery Act 2018 – Guidance for reporting entities.

Appendix 2: CQU Travel Centre Pty Ltd

Structure

CQU Travel Centre Pty Ltd, ABN 84 067 862 391, is an Australian proprietary company limited by shares and a wholly-owned subsidiary of Central Queensland University. The Board comprises University Executives. CQU Travel Centre Pty Ltd is a small business enterprise with four employees located on the University's North Rockhampton campus, Level 1, Commercial Centre, 554-700 Yaamba Road, Norman Gardens, Queensland.

Operations

CQU Travel Centre Pty Ltd, trading as The Travel Crew, provides corporate travel services to the University and leisure travel services to University employees and students and to the general public.

Employees

Company employees are employed directly, on a permanent basis, in accordance with the General Retail Award 2020.

All employees are required to adhere to the agency's employee agreement which sets the standards required of employees. This agreement provides guidance on the ethical and behavioural standards required.

Supply Chain

The company facilitates customers' purchase of travel services, such as accommodation, cruises, tours, flights, and hire cars, from Australian-based travel service providers.

The remaining company purchases were for office and operational supplies, which were purchased locally from reputable local and national businesses.

Risk Assessment and Response

The company recognises the potential for modern slavery to occur within the tourism industry, particularly with overseas operators. A key mitigation strategy is the use of only Australian-based providers. The company does not have contracts with the travel service providers it uses, which limits the company's ability to impose anti-modern slavery requirements on those providers.

Assessment work has commenced to review the Modern Slavery Statements, where published, of travel service providers used to enable informed decisions. The company acknowledges its responsibility to reduce the risk of modern slavery in its supply chain and to take steps to address those risks through its activities and business relationships.

Effectiveness of Actions and Looking Ahead

Process reviews are under way to examine how the company can ensure, to the best of its ability, that facilitated travel bookings are not supporting modern slavery.

For those few instances where the company has a contract in place, suppliers will be requested to complete a supplier questionnaire to enable the assessment of risks of modern slavery within those companies and their supply chains. Renewed contracts will include, wherever possible, requirements around modern slavery detection and prevention.

Appendix 3: PT CQU Executive Business Training Centre

Structure

PT CQU Executive Business Training Centre was established in March 2020 under Indonesia law as a foreign company, Perseroan Terbatas Penanaman Modal Asing (NIB 9120002743602). Some members of the University Executive serve on the company's Board of Commissioners (its governing body). The Chair (President Commissioner) of the Board is the University's Vice-Chancellor and President.

The company is a wholly-owned subsidiary company of C Management Service Pty Ltd, which is a wholly-owned subsidiary company of Central Queensland University.

The company has 15 employees and is located at Sopo Del Office Tower A, 18th Floor Jl. Mega Kuningan Barat III Lot 10.1-6, Jakarta Selatan 12950, Indonesia.

Operations

PT CQU Executive Business Training Centre facilitates the University's partnership with Bakrie University in Indonesia to offer joint postgraduate and undergraduate courses, as well as Corporate Training for industry.

The Company's corporate training focuses on corporate governance, including ethical supply chain management to the Indonesian government to encourage ethical procurement.

Employees

Company employees are employed directly, on a permanent or fixed term basis in accordance with the Indonesian Government Employment and Labour Laws and Regulations 2021. Employee rights are also protected by Manpower Employment Laws in Indonesia which secure work rights for all employees.

All employees are required to adhere to the company's Code of Conduct which sets the standards required of employees. The Code provides guidance on the ethical and behavioural standards required when working for the Company, which largely mirror CQUniversity Australia's Code of Conduct.

In addition, the following policy documents are the most relevant to preventing modern slavery in our operations:

- Cash Management Policy
- Recruitment and Selection Policy
- Compliance Management Policy and Procedure
- Workplace Harassment (including sexual harassment), Workplace Bullying and Unlawful Discrimination Policy and Procedure
- Procurement Policy and Procedure
- Expenditure Policy
- Complaints Policy and Procedure.

Supply Chain

The Company facilitates and delivers tertiary education services for CQUniversity and Bakrie University, such as the dual Masters of Management/Masters of Business Administration. In addition the Company delivers corporate training to industry on project management, business financial management, and supply chain logistics. The Company purchases from highly reputable and recommended suppliers similar to or used by the Indonesian Government and partner academic institutions, where possible.

Our supply chain consists of a broad range of suppliers across multiple procurement categories, located locally, nationally and internationally.

The largest categories of spending were facilities management and student recruitment. This spending supported our core business of educating students in Jakarta. Within these supply chains, domestic and overseas student recruitment is the primary area with potential for modern slavery to occur.

Our procurement model follows a centralised design with our purchasing and contractual agreements administrated by our Finance Officer with procurement advice from the President Director.

Significant and strategic purchases are procured under formal contracts. Routine purchases are managed via a quotation process, with governing terms managed via Purchase Order terms, or short form contracts.

Risk Assessment and Response

The company recognises the potential for modern slavery to occur within the education sector and the services it may purchase to deliver day-to-day operations. A key mitigation strategy is to access and purchase from highly reputable and recommended suppliers similar to or used by the Indonesian Government and partner academic institutions, where possible.

Assessment work has commenced to review the Modern Slavery Statements in the tertiary education sector in Indonesia, where published, to enable the Company to make informed decisions. The company acknowledges its responsibility to reduce the risk of modern slavery in its supply chain and to take steps to address those risks through its activities and business relationships.

Effectiveness of Actions and Looking Ahead

Process reviews are under way to examine how the company can ensure, to the best of its ability, it works with suppliers who are not involved in modern slavery practice.

Over the course of the coming year the company will continue to monitor Indonesian practice regarding the use of suppliers and will continue to take advice from Government support agencies such as Queensland Investment Corporation (Indonesia Office), and Austrade to manage against the risk of securing suppliers who do not align with parent company values.

The company is currently developing a Fraud and Corruption Framework which is anticipated to assist in the company detecting and managing modern slavery risks.