Curtin University

Modern Slavery Statement 2022

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2022 Modern Slavery Statement

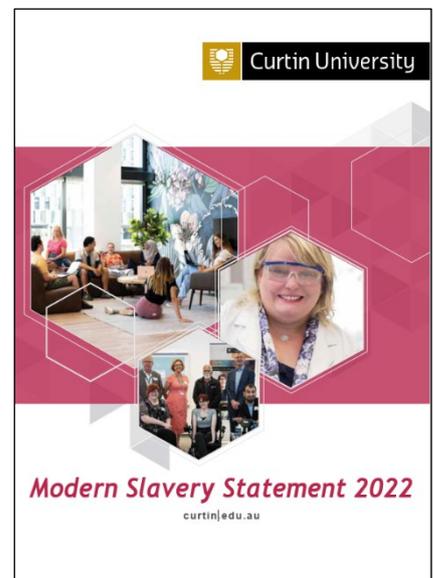## Acknowledgement of Country and First Nations Voices

We acknowledge First Nations Australians who looked after this land for more than 60,000 years. We pay our respects to Elders past, present and future. We deeply respect their cultural, spiritual and educational practices and aspire to learn from their ways of working. We are honoured and grateful to have the privilege to maintain campuses on Whadjuk and Wungatha Country.

We are committed to amplifying First Nations voices and including traditional custodians in our decision making. This Sustainable Development Strategy outlines a direction which will be achieved through the consultation and involvement of First Nations Australians.

Our future plans, actions and strategies will be developed with the traditional custodians of the lands on which Curtin operates.

Cover image:

1. A new era of living and learning has begun at Curtin's Perth campus with the opening of its new accommodation facilities in the heart of the academic precinct. Students are pictured here at Twin Dolphin Hall, which offers a range of independent living options to students. Catered accommodation and a supportive program of student activities is provided at the adjacent St Catherine's College. Both the attractive multi-story facilities are a short stroll from classes, from the Curtin Stadium's many recreation facilities, from the busy Curtin bus interchange and from the growing number of food and entertainment venues now populating the Exchange precinct, including a boutique grocer.

2. Congratulations to John Curtin Distinguished Professor Kliti Grice who was named Scientist of the Year at the 2022 Premier's Science Awards. The internationally renowned organic geochemist and evolution expert has made great strides in understanding formation of life on Earth, the evolution of species, dinosaur extinction and microplastic pollution.

3. Curtin was very excited to launch its new Disability Access Inclusion Plan during the year. The new plan focuses on embedding Universal Design thinking into all its activities, supporting Curtin's vision to build student experience, staff engagement and community belonging.
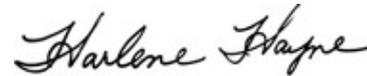
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Statement of Compliance

This Modern Slavery Statement has been prepared in accordance with the provisions of the *Modern Slavery Act 2018* . It was approved by the University's Council in its role as principal governing body on 28 June 2023.

Dr Andrew Crane
Chancellor

Professor Harlene Hayne
Vice-Chancellor

About the Chancellor

Dr Andrew Crane has served on Curtin's governing body, University Council, since 1 April 2015 – initially as a member appointed by the Governor, and then as Chancellor since 1 January 2019. He has held executive positions in marketing, trading, manufacturing, strategy and business development and was most recently the CEO of the CBH Group. He holds a Bachelor of Science in Environmental Studies, a PhD in Remote Sensing of Agriculture and is a Fellow of the Australian Institute of Directors. In 2020, University Council elected Dr Crane to continue in the position of Chancellor for another three years, following the expiry of his first term of office on 31 March 2021.

Introduction from Vice-Chancellor

This is Curtin University's third Modern Slavery Statement. This statement sets out Curtin's approach to identifying, assessing and addressing modern slavery risks in our operations and supply chain for the year ended 31 December 2022.

Over the past two centuries, the world has made remarkable strides in education and technology. Despite large improvements in basic education and access to technology, hundreds of millions of people still live in extreme poverty lacking the basic food, sanitation, shelter, health care and education they need to survive and thrive; women and children are disproportionately affected. Our insatiable appetite for technology and other goods currently threatens the sustainability of our planet, through devastating impacts on our land, water, air, and climate. Each of these issues can contribute to the risk of modern slavery in the world today.

Curtin, together with higher education institutions across Australia, is committed to identifying and implementing measures which will contribute to the prevention, mitigation, and remediation of the risks of modern slavery in its supply chains and operations. Universities are committed, at their core, to the discovery of new knowledge through research, the dissemination of new knowledge through teaching, and the use of new knowledge to solve the big problems facing our communities and our planet. Collectively, we have the time, the talent, and the resources to tackle important issues like poverty, modern slavery, gender equality, climate change, and water quality. At Curtin, we recognise the power and the responsibility that we have to make a difference to the world.

This statement improves transparency by making information available to our staff, students, alumni, suppliers, business partners and the broader community on our efforts to address modern slavery risks.

Professor Harlene Hayne CNZM

Vice-Chancellor
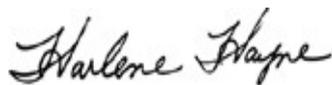
About the Vice-Chancellor

Professor Harlene Hayne commenced as Curtin Vice-Chancellor in April 2021. She was previously the Vice-Chancellor of the University of Otago in New Zealand. American by birth and a psychological scientist by training, she is a Fellow of the Royal Society of New Zealand and of the Association for Psychological Science. In January 2022 she was made a companion of the New Zealand Order of Merit (CNZM), one of the country's highest accolades, for her outstanding services to health and wellbeing. This follows the awarding of the New Zealand Order of Merit to her in 2009 for services to scientific and medical research. Professor Hayne received a Bachelor of Arts from Colorado College and a Master of Science and PhD in Behavioural Neuroscience from Rutgers University. She joined the University of Otago in 1992 and in 2011 became the Vice-Chancellor. In 2012 she received an Honorary Doctor of Science degree from Colorado College, USA, and in 2021 she received an Honorary Doctor of Laws from the University of Otago.

Reporting Entity (Criterion 1)

This statement is for Curtin University (ABN 99 143 842 569).

Curtin is a statutory body established under an Act of the Western Australian Parliament, the *Curtin University Act 1966*, with its registered office at Kent Street, Bentley, WA, 6102, Australia.

Curtin University Structure & Operations (Criterion 2)

Structure

Curtin University (*Curtin*) is Western Australia's largest university, with over 58,611 enrolled students across its Australian and international campuses in 2022. Of these students, over 21% held international citizenship.

Curtin has campuses in Australia, Malaysia, Singapore, Dubai and Mauritius. Curtin's largest campus, Curtin Perth, is in the suburb of Bentley, six kilometres south of the centre of Perth, Western Australia. Curtin has four other sites in the Perth central business district, a campus in east metropolitan Midland and a regional campus in Kalgoorlie.

Established in 1986 and opening its doors to students in 1987, the university takes its name from John Curtin, the influential and widely respected former Prime Minister of Australia and continues to embrace his philosophy to '*look ever forward*'', instilling a culture of innovation in its teaching and research, and inspiring staff and students to strive for a better future for all.

As a globally focused institution, Curtin offers a wide range of undergraduate and postgraduate courses in business, humanities, health sciences, resources, engineering, and science. Curtin's cultural diversity fosters tolerance and encourages the development of career-ready, well-rounded individuals. A combination of first-rate resources, staff and infrastructure makes Curtin a major contributor to tertiary education, both within Australia and internationally.

Curtin Strategic Plan 2017 – 2022

Curtin Strategic Plan for 2017 to 2022 was comprised of six themes, with strategic priorities designed to help position Curtin for future success, including:

1. **Learning and Student Experience** - Lead educational innovation and prepare graduates for the future.

2. **Research and innovation** - Deliver excellence and impact in research and innovation.

3. **Engagement and impact** - Make a difference globally through engagement and partnerships.

4. **People and Culture** - Empower our staff to lead as part of a diverse, innovative, and values-led organisation.

5. **Global Positioning** - Secure Curtin's position as a leading global university.

6. **Sustainable Future** - Embed a flexible and resilient business model to support our strategic ambitions.

The annual 'Plan on a Page' is developed each year providing a list of Curtin's priorities for that calendar year. Planning is undertaken to ensure alignment of activities across the across the large number of faculties, schools and areas. Curtin measures its performance on the Plan against key performance indicators and regularly reports progress against targets to Council and Academic Board.

In 2022, Curtin approved a new Strategic Plan that will guide Curtin's activities through to 2030 and which is covered later in this Modern Slavery Statement.

Governance

Curtin is governed by Curtin Council, whose powers are set out in the *Curtin University Act 1966*. There are fifteen members of the Council, and several committees and subcommittees, including:

• Audit, Risk and Compliance Committee

• Executive Committee

• Finance Committee

• Legislative Committee

• Nominations Committee

• University Council Health and Safety Committee

• Academic Board

The Academic Board has responsibility for ensuring the academic quality and integrity of Curtin's operations as an academic institution. The Academic Board is assisted in the performance of its responsibilities by the following sub-committees:

• Academic Board Executive

• Courses Committee

• Global Positioning Committee

• Learning and Student Experience Committee

• Research Committee.

Risk and Compliance

As part of Curtin's governance, Curtin has established a Compliance Management System (*CMS*) based on the best practice model and procedures contained in International Standards ISO 19600:2014. The CMS is reviewed regularly by the Audit, Risk and Compliance Committee and includes:

• Policy and Procedures

• Compliance training for staff and students

• Compliance Risk Assessment process including risk identification, analysis, controls and assessing residual risk

• Reporting, Internal and External Audit Improvement mechanisms

In compliance with the CMS, Curtin has developed and implemented a framework for assessing and managing the risk of modern slavery occurring in our supply chain and operations.

Academic Operations

Curtin's educational and research programs are spread across five teaching areas. Each teaching area equips its graduates with the knowledge, skills and industry experience needed to excel in their chosen profession:

• **Faculty of Business and Law**

  • Curtin Law School
  • Curtin Business School

• **Faculty of Health Sciences**

  • Curtin Medical School
  • Curtin School of Nursing
  • Curtin School of Allied Health
  • Curtin School of Population Health

• **Faculty of Humanities**

  • School of Design and the Built Environment
  • School of Education
  • School of Media, Creative Arts and Social Inquiry

• **Faculty of Science and Engineering**

  • School of Civil and Mechanical Engineering
  • School of Earth and Planetary Sciences
  • School of Electrical Engineering, Computing and Mathematical Sciences
  • School of Molecular and Life Sciences
  • WA School of Mines: Minerals, Energy and Chemical Engineering

• **Centre for Aboriginal Studies**

  The Centre for Aboriginal Studies offers a range of pathway, undergraduate, postgraduate and research programs which aim to broaden indigenous knowledge and contribute to Aboriginal communities and their wellbeing.

Curtin is a leading research institution, known for its strength in agriculture and environment, astronomy and astrophysics, business, defence, digital and emerging technologies, digital humanities, health and medicine, indigenous studies, minerals and energy, society and culture, space, and sustainability.

Curtin maintains close links with business, industry, government and the community, and its courses have a strong applied focus, with many involving work-integrated learning. As a result, Curtin graduates are seen as highly desirable by employers, with skills that enable them to be successful and make a genuine and positive contribution in a continuously changing world.

Other Operations

In 2022, Curtin's administrative functions were organized into the following functional areas:

• Corporate Services

• Strategy and Planning

• Legal Services

• Finance and Commercial Services

• Research Operations

• Learning and Teaching

• Corporate Relations

• Curtin Global

International Operations

Curtin has established a global presence through developing a network of global Curtin campuses in various offshore locations, including Malaysia, Singapore, Dubai, and Mauritius. The international campuses are operated and run by our partners and supported through the harnessing of Curtin's resources under our One Curtin global strategy.

Locations

PERTH

Kent Street, BENTLEY WA

PERTH CITY

Graduate School of Business
78 Murray Street, PERTH WA

Curtin Law School
57 Murray Street, PERTH WA

Curtin St Georges Terrace
137 & 139 St Georges Terrace PERTH, WA

MIDLAND

Curtin Centennial Place
Centennial Place, MIDLAND WA

KALGOORLIE

Curtin Kalgoorlie
117 Egan Street, KALGOORLIE WA

Malaysia
Curtin Malaysia
CDT 250, Lutong, 98009 Miri,
SARAWAK, MALAYSIA
curtin.edu.my

Singapore
Curtin Singapore
10 Science Park Road,
The Alpha, Science Park II,
Level 3, Unit 03-08,
SINGAPORE 117684
curtin.edu.sg

Dubai
Curtin Dubai
Block 11, 4th floor,
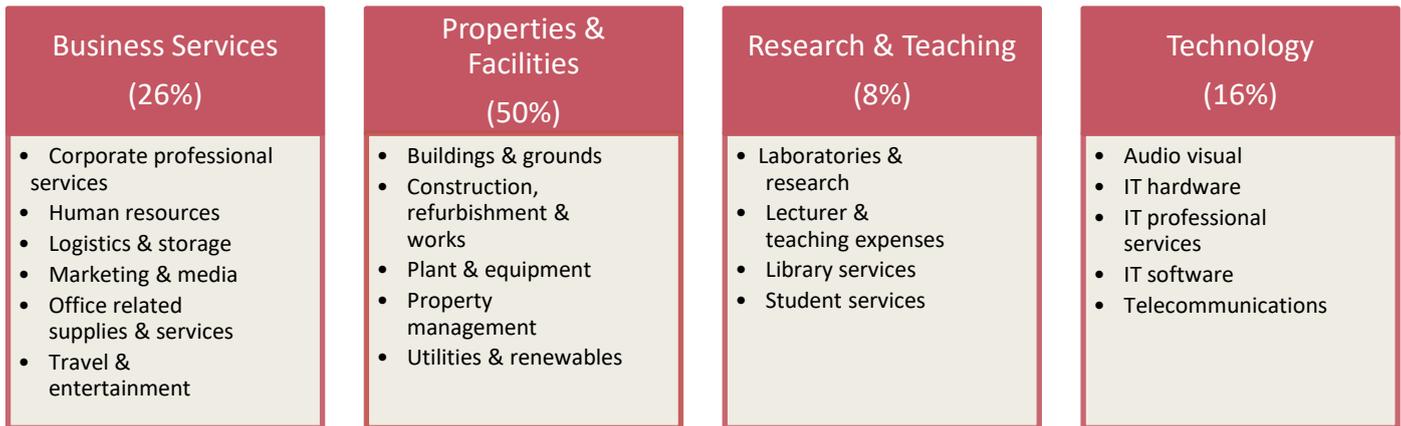Dubai International Academic
City, DUBAI
curtindubai.ac.ae

Mauritius
Curtin Mauritius
Telfair, MOKA,
REPUBLIC OF MAURITIUS
curtinmauritius.ac.mu

Curtin University Supply Chains (Criterion 2)

Spend Categories

Curtin's external spend for both operations and capital expenses in 2022 was over $490M, across over 5,000 vendors and 800 active contracts.

Curtin is a member of the Australian University Procurement Network (*AUPN*). AUPN is an unincorporated body established for procurement collaboration and consortium buying across the higher education members of Universities Australia. AUPN classifies Curtin's external spend using a four-tier hierarchy, across four key categories. The first two levels of the hierarchy are set out in the figure below:

Business Services (26%)	Properties & Facilities (50%)	Research & Teaching (8%)	Technology (16%)
• Corporate professional services • Human resources • Logistics & storage • Marketing & media • Office related supplies & services • Travel & entertainment	• Buildings & grounds • Construction, refurbishment & works • Plant & equipment • Property management • Utilities & renewables	• Laboratories & research • Lecturer & teaching expenses • Library services • Student services	• Audio visual • IT hardware • IT professional services • IT software • Telecommunications

Spend on Business Services in 2022

Curtin spent $129.8 million on general business services, representing 26% of Curtin's overall spend. Significant areas of expenditure included:

• Teaching, learning and research collaborations with other universities

• Insurance

• Travel

• Marketing and student recruitment

• Temporary staff expenses and staff recruitment

Spend on Properties and Facilities in 2022

Curtin has been investing significantly in creating a globally competitive campus including construction of onsite accommodation and various campus services. Our key areas of expenditure, representing 50% or $248.2 million, in Properties and Facilities, included:

• Construction

• Utilities

• Cleaning

• Security services

Spend on Research and Teaching in 2022

Curtin also spent approximately 8%, or $38.5 million, with suppliers of research and teaching goods and services specific to higher education. Typically, our key areas of expenditure in this category included:

• Major scientific equipment

• Academic publications

• Laboratory consumables including gases

Spend on Technology in 2022

Curtin spend approximately 16%, or $77.3 million, on technology to support teaching, learning, research and operations. The key areas of expenditure for Curtin in this category included:

- IT Hardware including end user computing, network hardware, servers, and mobile devices

- Cloud computing services

- Professional IT Services

- Software and software as a services

- Telecommunication services

Location of Suppliers

Over 99% of Curtin spend is with companies based in Australia. Curtin also has suppliers located in Brazil, United States, United Kingdom, New Zealand and other European countries.

Sourcing Approach

Curtin has implemented a *category management sourcing* approach to engaging its suppliers. This results in Curtin aggregating demand across the university to establish long term supply agreements that support its pricing, risk and sustainability goals.

The Financial and Commercial Services department includes a Strategic Procurement team, with Category Managers allocated to establishing supply agreements across a particular spend category.

Curtin supply agreements are established through various strategies including:

- Competitive sourcing through closed tenders

- Establishing Supply Panels for whole of university arrangements

- Preferred supplier arrangements

- Sole source negotiation with suppliers

- Purchasing from various Commonwealth and State Supply panels

- Collaborating with other universities through various Higher Education buying consortiums, such as AUPN, CAUDIT (Council of Australian Directors of IT), CAUL (Council of Australian University Librarians) and the University Procurement Hub

Curtin ensures that that a suitable strategy and plan is in place prior to approaching the market which reflects both market constraints, and Curtin's pricing, risk allocation and sustainability objectives.

Over time, Curtin supply agreements are reflecting a more consistent and strategic approach to prequalifying suppliers, running tenders and negotiations, and contracting and engaging with suppliers.

Modern Slavery Risks (Criterion 3)

Higher Education Sector Wide Approach in Australia

In 2018, higher education providers in Australia identified an opportunity to develop a collaborative approach to addressing the reporting requirements under the Modern Slavery Act 2018. As a first step, a working group was established under AUPN.

The first objective was to map the supply chain for the higher education sector and analyse the modern slavery risks using a consistent and research informed approach.

Through this process, a modern slavery risk analysis framework for the sector was developed under the supervision of an Academic Advisory Board established for that purpose. The framework includes a modern slavery risk rating based on category of spend and country of the supplier.

Using these risk ratings, Curtin's modern slavery risk has been mapped for the first tier of our supply chain at a country level and a category level.

What is Modern Slavery?

Modern slavery describes situations where offenders use coercion, threats or deception to seriously exploit victims and undermine or deprive them of their freedom. It does not include practices like substandard working conditions or underpayment of workers. However, these practices are also illegal and harmful and may be present in some situations of modern slavery. These practices also run the risk of escalating into modern slavery if not addressed.

Modern Slavery Risk Analysis of our Supply Chain – By Country

Countries that have a high risk of slavery typically are in poorer regions, with lower socioeconomic outcomes, and poor worker protection with high level of corruption in government. The countries with the highest prevalence of modern slavery are North Korea, Eritrea, Burundi, Central African Republic, and Afghanistan. However, modern slavery exists in all countries, including developed countries such as Australia, the United States, and the United Kingdom.

Curtin's modern slavery risk analysis of our supply chain based on country of the supplier, demonstrated that over 99% of our spend is with suppliers based in Australia. Only a small proportion (less than 0.2%) of our direct total spend is with suppliers based in countries that are classified as high-risk. Further, an analysis of high-risk categories of spend in high-risk countries demonstrated that the total spend in those countries was less than 0.01%. On this basis, Curtin has concentrated on using a category-based risk framework and has not focused on country of supplier.

Modern Slavery Risk Analysis of our Supply Chain – By Category

Curtin's analysis of our modern slavery risk against our spend categories demonstrated the following about our supply chain in 2022:

- **LOW** – 50% of our spend is on goods and services that have a low risk of modern slavery in their supply chain. These are typically purchased from Australian organisations, with a high level of knowledge workers, or which are locally owned managed and controlled. These categories include utilities, cloud services and insurance.

- **MEDIUM** – 35% of our spend is on goods and services with a medium risk of modern slavery in their supply chain. These include construction, trade services or temporary labour services that are provided by local suppliers subject to Australian labour laws.

- **HIGH** – 15% of Curtin's spend occurs in the categories that have been identified as high risk of having modern slavery in their supply chains. In general, the spend in this category has the following factors in common:

  o The supply originates from countries where labour laws are weak or poorly enforced, and workers may be subject to long working hours, low pay, and poor working conditions.

  o The supply requires the use of raw materials, such as plastics and chemicals, which may be linked to human rights abuses, including forced labour, child labour, and human trafficking, where workers are coerced into working against their will, often under the threat of violence or intimidation.

  o The supply relies heavily on sub-contracting, with multiple tiers of suppliers and sub-suppliers, making it difficult to trace the origin of raw materials and labour used in the production process. This lack of transparency creates opportunities for labour exploitation and human rights abuses in the supply chain.

Categories that have a High Risk of Modern Slavery in our Supply Chain

The following table sets out the types of goods and services Curtin buys for high-risk categories, and provides some detail to further understand the risks for these markets:

Laboratory Equipment and Consumables including Medical PPE (< 4%)	As a teaching and research institution, Curtin procures a range of laboratory and teaching equipment and consumables, including lab chemicals, lab gases, glassware, plasticware, labware, life science reagents and medical personal protective equipment (PPE). Laboratory and teaching consumables have the largest supplier count and are among Curtin's high-risk categories.
	The risk of modern slavery in the production and supply of lab consumables is often associated with the same factors that contribute to labour exploitation in other manufacturing sectors. In particular, the COVID-19 pandemic led to a surge in demand for PPE, including masks, gloves, gowns, and other medical supplies, which in turn increased the risk of modern slavery and labour exploitation in PPE supply chains.
	Many lab consumables including medical PPE, are produced in countries where labour laws are weak or poorly enforced, and workers may be subject to long working hours, low pay, and poor working conditions. Further, the rush to meet global demand for PPE created conditions that were susceptible to exploitation.
	The production of lab consumables also often requires the use of raw materials, such as plastics and chemicals, which may be linked to human rights abuses, including forced labour, child labour, and human trafficking, where workers are coerced into working against their will, often under the threat of violence or intimidation.
	This industry relies heavily on sub-contracting, with multiple tiers of suppliers and sub-suppliers, making it difficult to trace the origin of raw materials and labour used in the production process. This lack of transparency creates opportunities for labour exploitation and human rights abuses in the supply chain.
Clothing & apparel (< 1%)	Curtin procures, or requires its students to procure, different types of clothing and apparel for various purposes, including uniforms for students, faculty, and staff, sports teams, or promotional events, or volunteering initiatives. Some examples of clothing and apparel that are purchased include regalia, t-shirts, sweatshirts, hoodies, caps, jackets, bags, and accessories such as socks, gloves, and ties.
	The clothing and apparel industry is one of the sectors with the highest risk of modern slavery and labour exploitation, due to its complex and opaque supply chains, reliance on low-wage workers, and high demand for cheap and fast fashion. Modern slavery encompasses a range of abusive practices, including forced labour, child labour, debt bondage, and human trafficking.
	Many clothing and apparel brands and retailers source their products from developing countries where labour laws are weak or poorly enforced. Workers in these countries may be subject to long working hours, low pay, and poor working conditions, which can lead to situations of forced labour, debt bondage, and other forms of modern slavery, where workers are coerced into working against their will, often under the threat of violence or intimidation.
	The industry also relies heavily on sub-contracting, with multiple tiers of suppliers and sub-suppliers, making it difficult to trace the origin of raw materials and labour used in the production process. This lack of transparency creates conditions that are ripe for exploitation and abuse of vulnerable workers.
	The production of clothing and apparel requires a significant number of raw materials, such as cotton and leather, which are often linked to human rights abuses, including forced labour, child labour, and exploitation. For example, the cotton industry in Uzbekistan has been associated with the use of forced labour, where workers, including children, are compelled to pick cotton under threat of punishment.
IT hardware (< 4%)	Curtin procures IT hardware to facilitate its operations, research, and teaching. This includes a broad spectrum of equipment, ranging from audio-visual and multimedia tools to teleconferencing equipment, networks, and servers. Additionally, Curtin procures a diverse range of IT devices such as laptops, desktops, tablets, printers, phones, and mobiles, along with various accessories like keyboards, mice, cables, data storage devices, and headsets, amounting to thousands of items.
	Modern slavery is a serious and pervasive issue in the global electronics industry, and the risk of its occurrence is high due to the complex and opaque supply chains that underpin the sector. The electronics industry is highly fragmented, with multiple tiers of suppliers and sub-suppliers, making it difficult to trace the origin of raw materials and labour used in the production process. This lack of transparency creates conditions that are ripe for exploitation and abuse of vulnerable workers.
	The electronics industry relies heavily on low-skilled labour, often sourced from developing countries where labour laws are weak or poorly enforced. In these countries, workers may be subject to long working hours, low pay, and poor working conditions. These conditions can lead to situations of forced labour, debt bondage, and other forms of modern slavery, where workers are coerced into working against their will, often under the threat of violence or intimidation.
	The risk of modern slavery in the electronics industry is increased due to the use of conflict minerals, such as tin, tungsten, tantalum, and gold, which are often sourced from countries with weak governance structures and high levels of conflict. The extraction and trade of these minerals are often linked to human rights abuses, including forced labour, child labour, and exploitation.
Cleaning (2%)	Curtin purchases cleaning services from external suppliers which include a variety of ordinary cleaning tasks. The cleaning services are provided regularly and cover various areas such as public teaching spaces, research facilities, offices, and common areas. The cleaning service also includes preventative cleaning in high touchpoint areas to reduce the spread of germs and viruses.
	Cleaning contracts carry risks of modern slavery due to various factors such as subcontracting, which may result in insufficient scrutiny of labour practices; low wages and poor working conditions, which could be detrimental to the health and wellbeing of cleaning workers; language barriers, which may make it difficult for workers to understand their rights and raise concerns; lack of transparency, which could make it challenging for Curtin to identify and address modern slavery risks; and the employment of migrant workers, who may be more vulnerable to exploitation due to their status.

Modern Slavery Risks in our Domestic and International Operations

Curtin assessed the risk of modern slavery in our employment and staffing practices and did not identify any characteristics that might give rise to a higher risk of modern slavery. Curtin's workforce is highly skilled and generally employed under the terms of Curtin's Enterprise Agreement, which has been approved by the Fair Work Commission.

Curtin does not use overseas recruitment firms that may subject our employees to recruitment fees or personal or property security deposits and we verify all employees have the right to work in Australia.

Curtin's international campuses are operated and run by our partners who are required to comply with all applicable laws in their operations (including relevant modern slavery laws) and we have completed a contract review of the campus agreements to confirm that position. Curtin is not directly responsible for their operations; however we recognise that these campuses form an important part of our overall responsibility. We have reviewed the country risks for the campus locations as set out in the table below. We will continue to work with the international campus operators in 2023 to consider their overall modern slavery risks.

Extracts from Global Slavery Index (Walk Free Foundation) Report

Campus Location	Estimated Prevalence of Slavery[1] (Per 1,000 population)	Government Response[2] (Score and Rating) (Best is 75.2 worst is -5.6)	Vulnerability to Modern Slavery Overall Weighted score[3] (100 is worst, 1 the best)
Malaysia (Miri)	6.9	38.2 (CCC)	39.2
Singapore	3.4	32.8 (CCC)	13.4
United Arab Emirates (Dubai)	1.7	47.8 (B)	26.8
Mauritius	1.0	34.9 (CCC)	21.2
Australia	0.6	63.8 (BBB)	4.3

Source: Global Slavery Index (Walk Free Foundation) latest published report
1. Estimated prevalence of modern slavery by country - Table 4
2. Government response rating by country - Table 7
3. Vulnerability to Modern Slavery Overall Weighted score – Table 14

Modern Slavery Risks for our Students

Curtin assessed the risk of modern slavery for our domestic students and did not identify any characteristics that might give rise to a higher risk of modern slavery.

We also assessed the risk of modern slavery for our international students. Some international students across the sector are recruited using overseas student recruitment agencies, which may have a risk of modern slavery. The risks of modern slavery in international student recruitment agents for Australian universities can stem from various factors. Recruitment agents may charge excessive fees to students for their services or provide funding, which can lead the student to enter debt bondage or other exploitative situations to clear the debt including working in substandard conditions, working longer hours than agreed, or working for lower wages than promised.

Student recruitment agents are actively managed against the Education Services for Overseas Students Act 2000. Current agent contracts are being reviewed as an on-going continuous improvement process to ensure they meet the needs of Curtin, including modern slavery requirements.

International students in Australia may have limited knowledge of their rights and protections under Australian law and may fear that speaking out could lead to deportation or other negative consequences in relation to their visa conditions. Students are actively informed about their rights under the regulations.

# *Actions Taken to Assess and Address Risks (Criterion 4)*

Collaborative approach across Australian Higher Education Sector

Curtin has worked with the Australian and international higher education industry (through the collaboration with AUPN) to ensure we develop a best practice research informed approach to maximise our impact on reducing modern slavery as an industry. AUPN currently has 38 member institutions working together to improve both procurement practices and the skills of procurement professionals in the higher education sector. Since 2019, the Modern Slavery Working Group has been working under AUPN to develop an aligned set of objectives and a program of activities to respond to the passing of the *Modern Slavery Act 2018.*

The key workstreams under the AUPN program include:

*   **Technology Enablement Workstream:** This workstream included selecting and enabling a collaboration platform (*FRDM*) to share supply chain analysis, due diligence, media alerts and risks across the higher education sector and its suppliers. It enables the sector to drill down through the multiple tiers of its supply chain over time and share the results.

*   **Framework and Documentation Workstream:** This workstream provided various procurement and contracting templates, risk analysis, policies, processes, and guidelines to enable the sector to implement governance in a consistent way, to enable collaboration and reduce rework for the sector and its suppliers.

*   **Data Analysis Workstream:** This workstream analysed the supply chain data across the sector providing a common categorisation and risk analysis framework.

*   **Engagement and Communications:** This workstream developed an online portal for universities to share information and included regular forums and updates to communicate progress and feedback on issues. The forum has also been used to improve communication on modern slavery issues between procurement professionals in the sector and to accelerate progress through collaboration.

*   **Governance**: this workstream established a working group to create a roadmap, make decisions and allocate resources to the sector wide program. It included establishment of an Academic Advisory Board with the country's leading academics in modern slavery to ensure its approach was best practice and research informed.

A summary of the roadmap is set out below:
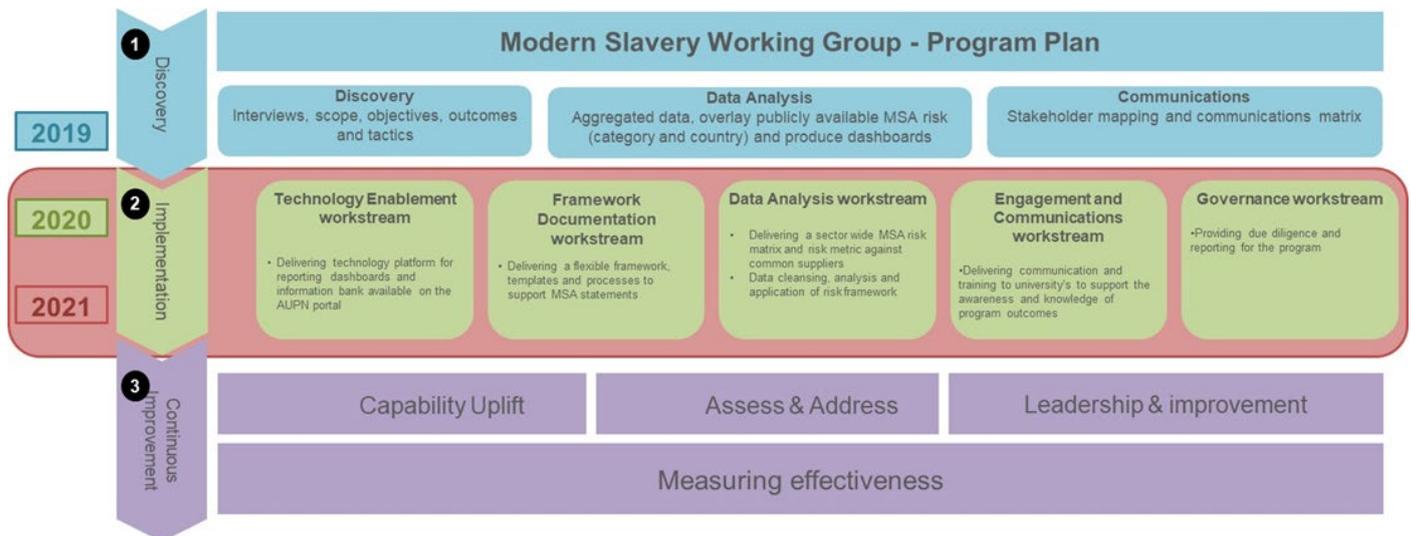
In 2022, the key achievements of the working group included:

*   Appointment of project manager and Academic Advisory Group members

*   Roll-out of new FRDM tool including 2021 data upload into FRDM

*   Engagement with community and industry including Electronics Watch, NSW Treasury, Belgium University Procurement

*   Roll-out of new strategy and Supplier Assessment Questionnaire

*   Creation of response plan for media alerts from FRDM tool

*   Pilot of Cleaning Accountability Framework

*   Creation of data improvement group

Spotlight on Collaborative Action - Supply Chain Mapping Technology

AUPN have partnered with FRDM to deploy a sector wide technology to tackle modern slavery within our supply chains. FRDM (pronounced *free•dom*), is a supply chain technology company that algorithmically identifies modern slavery risks throughout universities' supply chains, enabling each university or the sector collectively to make informed decisions and take action to address modern slavery risk.

In 2021, 34 participating universities engaged in the various components of the implementation phase: engaged in a Change Management Group and its activities and collated and categorised a collective $16.2 billion of procurement spend (Jan 20 – Jun 21).

In February 2022, AUPN went live with the platform. The FRDM tool will strengthen the sector's ongoing efforts to identify and address modern slavery risks across our supply chains. A live dashboard (illustrated below) and quarterly reporting is available to support, monitor, manage and impact assess relevant activities.

Spotlight on Curtin Action - Modern Slavery Risk and Compliance Management Framework

In 2022, Curtin has embedded a risk management framework to identify, mitigate and remediate modern slavery practices in its supply chain. These practices include:

- Implementing the Risk and Compliance Framework for Modern Slavery in accordance with Curtin governance requirements.

- Including a supplier due diligence for high risk spend categories as part of the prequalification and tender evaluation process.

- Implementing a Supplier Code of Conduct, setting out our expectations for suppliers to Curtin and including it in our contracts and purchase orders.

- Implementing the contract framework with AUPN recommended clauses and templates for the contracting and procurement process.

- Implementing a Curtin Supply Chain dashboard to provide transparency to the wider university regarding the modern slavery risks in our supply chain.

- Performing a training needs analysis for the organisation and identifying several training providers.

- Monitoring key electronics suppliers through Electronics Watch.

Spotlight on Curtin Action - IT Hardware

In 2020, Curtin identified that a key risk of modern slavery in our supply chain was in the purchase of technology hardware, including servers, network equipment, end user computing and telephones. In 2021, Curtin became the first organisation in Australia to join Electronics Watch and currently, [more than 900 organisations in Australia and Europe](#) have affiliated with Electronics Watch.

The mission of Electronics Watch is to enable public sector organizations to collaborate with local agencies that are monitoring local electronics manufacturing and production workforces in high-risk regions. By coordinating independent monitoring and remediation, Electronics Watch supports its affiliates to establish supply chain transparency for procured product models which protects the rights of workers in the supply chain. Factory disclosures for final assembly (tier 1) and component production (tier 2) give affiliates details on location of factories and allow Electronics Watch to deliver a general risk assessment. Electronics Watch also monitors selected factories to document potential risk and rights violations.

Monitoring is implemented by [monitoring partners](#) – local civil society organisations – using the Electronics Watch [Worker-Driven Monitoring Methodology](#). Guided by workers' rights and priorities, this methodology delivers high quality data that enables Electronics Watch to write a monitoring report on rights violations and risks for a specific factory.

To start the remediation process, the monitoring report is shared with the manufacturer and the brand(s) linked to the specific factory. Electronic Watch works with companies and the Responsible Business Alliance to improve compliance with relevant labour regulation and internationally recognized codes and worker rights standards. Since 2021 Electronics Watch has a [formalised a process](#) that takes place after a monitoring report has been shared with the industry. Throughout the process, affiliates have full transparency on process, methods, data and impact.

In 2022, Curtin began working with its technology vendors to introduce the relevant contract framework required for Electronics Watch to implement their process for those vendors.

Spotlight on Curtin Action - Laboratory Consumables and Medical PPE

During 2022, Curtin has implemented a common contract framework for engaging laboratory consumable suppliers, that includes standard clauses in line with AUPN recommendations to enable transparency and reduce the risk of modern slavery in these supply chains.

We have also implemented an e-marketplace, to enable us to limit the supplier catalogues available to our staff and students, and to remove products as required.

Spotlight on Curtin Action - Clothing and Apparel

During 2022, Curtin has reviewed its contracts with suppliers of key promotional merchandise and is developing a sustainability strategy to meet the organization's sustainability goals.

Spotlight on Curtin Action - Cleaning

During 2022 Curtin has included the assessment of modern slavery risk and mitigation during any contract reviews for existing cleaning suppliers. During any procurement planning and strategy process, modern slavery risks are clearly identified, and any requirements are built into the request for tender, contract development and supplier evaluation process.

Spotlight on Curtin Action - Responsible Investment

The University is committed to responsible investing, which addresses risks and opportunities related to environmental, social and governance (**ESG**) issues, and integrates responsible investing into its long-term investment strategy. In doing so, the University monitors – for the managed funds it invests in – ESG ratings; carbon footprints; proxy voting reports; and assessments of compliance with the UN Principles for Responsible Investment.

Assessment of Effectiveness of Actions (Criterion 5)

Effectiveness of University Sector-wide Collaboration

Collaboration in the university sector has been shown in the UK and Europe to be effective in reducing the risk of modern slavery, as it enables universities to share knowledge and resources, and to work together to address common challenges.

The key area where collaboration has been focused for the Australian university sector, is in developing the data analytics and tooling to enable transparency for modern slavery risks in supply chains. Australian universities are working together to develop common approaches to supply chain due diligence and to share information about suppliers and supply chain risks through the implementation of the FRDM tool. This will help to reduce the administrative burden on individual universities and to improve the quality of due diligence across the sector. The implementation of the FRDM tool will, over time, provide significant benefit however further work is required to leverage its full strengths.

Collaboration has also been effective in engaging with industry associations such as Cleaning Accountability Framework and Electronics Watch. By working together, universities can leverage their collective voice and influence to drive change and to promote best practices in addressing modern slavery.

The development of a common risk analysis framework and common risk management practices has reduced the workload and cost for universities to implement consistent and best practice approaches for the sector.

Effectiveness of Curtin's Approach

Curtin has made significant progress in creating the risk management and compliance framework across its supply chain.

The management framework includes a risk analysis in line with the Australian university sector, and we understand the key spend categories with a high risk of modern slavery.

Curtin has embedded reduction of modern slavery practices throughout its standard contracting and procurement approaches, and over time most suppliers for high-risk supply categories have contracts that comply with the new template requirements.

For high-risk categories such as IT hardware, engaging with Electronics Watch is the best practice approach for reducing the risk of modern slavery in the electronics industry, and Curtin has been an early adopter in this space.

For other high-risk categories such as cleaning, lab consumables, clothing and apparel, Curtin has included the assessment of modern slavery risk and mitigation during contract reviews for existing suppliers. In procurement planning and strategy processes, modern slavery risks are clearly identified, and any requirements are built into the request for tender, contract development and supplier evaluation process.

Owned and Controlled Entities (Criterion 6)

Curtin does not own or control any other entities.

Plans for the Future (Criterion 7)

Curtin 2030 Strategic Plan

Through partnership, we will make a difference for people and our planet.

The *Curtin 2030 Strategic Plan* introduces a new strategic direction for Curtin which focuses on how Curtin will make a difference in 2030. This will be implemented from 2023 onwards, with a revised vision built on a strategic framework of **People, Planet and Partnerships**:

- **People:** Our strategic theme *People* focuses on our students, staff, alumni, and local communities in which we operate. A key element of this theme is the experience people have in their engagement with Curtin, and the positive difference it makes to their lives.

- **Planet:** Our strategic theme *Planet* focuses on continuing Curtin's journey as a global university, and strengthens our commitment to social good, sustainability, and global impact.

- **Partnership:** Our *Partnership* theme focuses on working in partnership with students, alumni, communities, industry, and other stakeholders to make a difference. Curtin seeks to extend its ways of engagement to nurture relationships that enable value creation for our partners and Curtin and will ensure that we develop solutions which make a real-world difference to solving global challenges.

Curtin heads into the journey towards 2030 as a global university focused on making a positive difference through dedication to service and social good, providing a leading global student experience and world-class research, building lifelong relationships, and furthering our industry engagement.

Modern Slavery – Next Steps

Curtin recognises the importance of developing a clear reporting framework to measure effectiveness of our approach to addressing modern slavery risks and to enable a programme of continuous improvement.

Working together with AUPN, the intent is to develop an industry wide framework for reporting. In the fourth year of reporting, Curtin aims to continue to capture and measure our approach to the following four key activity streams:

- Training and awareness activities - including an increasing rollout of training programmes across Curtin, to create ongoing awareness from senior management, procurement personnel, staff, and students.

- Procurement activities - including the frequency and consistency of the application of modern slavery requirements in the tendering and selection process.

- Supplier activities - will involve an ongoing Supplier due diligence programme and working collaboratively with industry led initiatives such as Electronics Watch and the Cleaning Accountability Framework.

- Response activities - will involve an assessment of how Curtin is responding to identified modern slavery risks.

The development and implementation of the framework and the gathering of baseline data is an ongoing task. It will be aligned with AUPN, and Curtin 2030 Strategy.

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