



Modern Slavery Statement

2024



Acknowledgement of Country

Griffith University acknowledges the people who are the traditional custodians of the land and pays respect to the Elders, past and present, and extends that respect to all Aboriginal and Torres Straits Islander peoples.

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Message from the Vice Chancellor

This 2024 Modern Slavery Statement is aligned with Griffith University's (Griffith) Creating a future for all Strategic Plan 2020 – 2025 and details the commitment Griffith has undertaken in addressing and eradicating modern slavery, supported by our vision for social justice and ethical collaboration with our valued partners.

Griffith has focused on leveraging relationships with third parties to maintain progress of the 2024 modern slavery commitments. This included a sector-wide approach for assessing our supply chains and human rights due diligence.

Another key milestone was the launch of a modern slavery training module, designed to provide staff with the knowledge and skills required to identify and respond to modern slavery within operations and supply chains.

Griffith continued to refine supplier due diligence processes by collaborating and adopting a continuous improvement methodology with suppliers, to enhance the supplier experience and reporting capabilities.

Griffith incorporated an improvement plan process into the contract management framework, including steps to monitor and assess improvement plans as part of the contract management planning phase of the procurement lifecycle.

Collaboration has continued to be a cornerstone of our approach— particularly engagement with peers and civil society organisations. This collaboration enables Griffith to stay informed of emerging trends, leverage capability and support operations more efficiently, enhancing our collective ability to advance human rights.

Griffith is proud of the progress made in 2024, during these uncertain times. Griffith acknowledges addressing modern slavery is a long-term goal and human rights challenges are dynamic, necessitating constant vigilance and adaptability. Guided by our values of excellence, engagement and ethical behaviour, Griffith remains committed to creating a just and brighter future for all.

Introduction and progress

Griffith's vision is to transform lives and add to human knowledge and understanding in a way that creates a future that benefits all. This is Griffith's fifth Modern Slavery Statement pursuant to its obligations under Section 13 of the Modern Slavery Act 2018 (Cth) (the Act). This year Griffith has focused on collaborating with the Australian University Procurement Network and Informed 365, our supplier assessment preferred supplier.

Griffith's stance against all forms of exploitation continues to be aligned with the United Nations Sustainable Development Goals (SDGs), particularly Goal 8, which focuses on promoting sustained, inclusive and sustainable economic growth, full and productive employment, and decent work for all.

Griffith also supports Goal 12, as it is committed to upholding public procurement practices that are sustainable and in accordance with national policies and priorities.

Furthermore, Griffith's commitment extends to Goal 16, aiming to promote peaceful and inclusive societies for sustainable development, provide access to justice for all, and build effective, accountable and inclusive institutions at all levels.

Griffith reports publicly against all 17 goals in its annual Sustainability Report, showcasing the University's comprehensive approach to sustainability and social justice.



Progress

In the 2023 Statement, Griffith committed to continue to deliver on its Modern Slavery Action Plan, complete with specific KPIs targeted at our operations, our supply chains and our students.

This year Griffith leveraged its relationship with its strategic partners to strengthen our response to addressing Modern Slavery and achieving the actions in our 2024 Action Plan. Griffith has made significant progress on the actions it set out to achieve. Recognition must be given to the valuable contributions of our strategic partners, the Australian University Procurement Network, Informed 365, the Mekong Club and Electronics Watch.

CRITERION 1

The reporting entity

This statement is made on behalf of Griffith University and its non-operational subsidiary International Water Centre Pty Ltd. Griffith University (ABN 78 106 094 461) is a statutory body established under the Griffith University Act 1998 (Qld). Its principal office is at Parklands Drive, Southport QLD 4222.

In the 2024 reporting period, Griffith University's revenue was over A\$1 billion. It therefore qualifies as a reporting entity under the Act. Griffith University has no subsidiaries or joint ventures that meet the requirements to be a reporting entity in its own right.

CRITERION 2

The University's structure, operations and supply chains

Structure

Griffith's governing body is the University Council, with two of its members elected as Chancellor and Deputy Chancellor. Council must appoint a Vice Chancellor who is the Chief Executive Officer of the University. Griffith's Council has delegated some of its powers to the Vice Chancellor, to various committees and to appropriately qualified Council members or staff members other than the Vice Chancellor.

Griffith is organised into four academic groups (groups). Groups in turn are organised by schools or departments, research institutes and research centres.

The four groups are:

- Arts, Education and Law
- Griffith Business School
- Griffith Health
- Griffith Sciences

Griffith also has an array of administration services that support staff and students, as well as research, teaching and learning.

Griffith's organisational structure is shown below, followed by each academic group's organisational structure.

Griffith aims to practice good corporate governance, including adhering to the Griffith University Act and governance requirements of other relevant legislation.

Griffith complies with the Universities Australia and University Chancellors Council Voluntary Code of Best Practice for the Governance of Australian Public Universities (amended May 2018). To learn more about Griffith's corporate governance, please refer to our Corporate website.

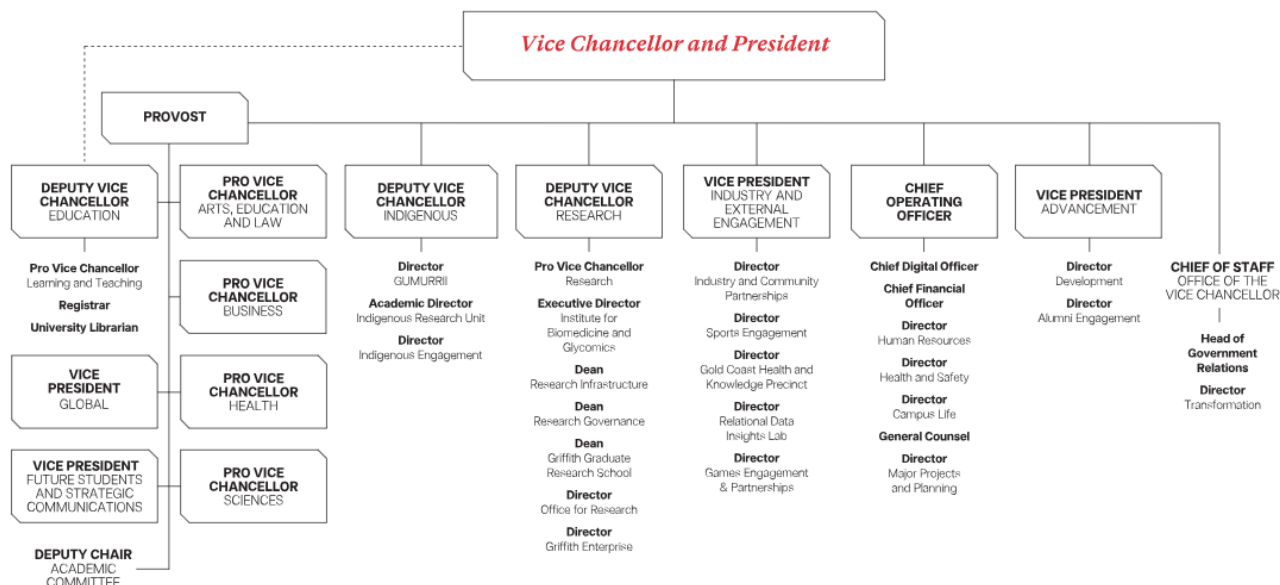


Figure 1 Griffith's organisational structure

Operations

Griffith delivers high-quality learning, research and social outcomes for students and researchers, with a focus on practices that have a positive social, economic and environmental impact on communities.

Griffith also provides members of its community and other third parties with services such as day care and health clinics.

Griffith at a Glance

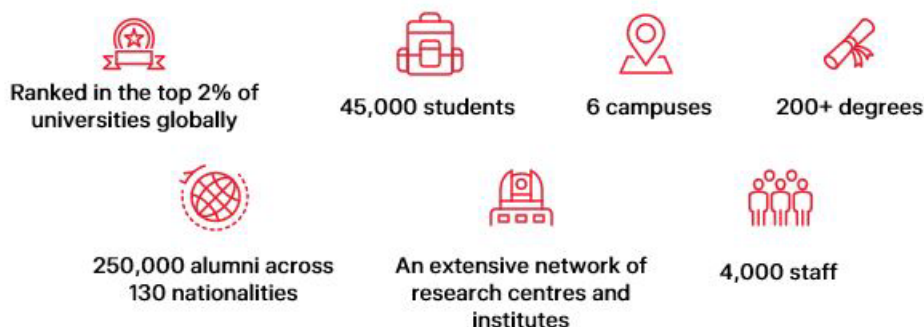































Figure 2 Griffith at a Glance

Areas of Study

Griffith offer hundreds of degrees spanning 29 study areas:

 Architecture, construction and urban planning	 Allied health	 Accounting, finance and economics
 Arts and humanities	 Aviation	 Business, leadership and HR
 Criminology	 Dentistry	 Design
 Education and teaching	 Engineering	 Environment and sustainability
 Film and screen	 Healthcare leadership	 International relations and political science
 IT, analytics and cyber security	 Languages and English	 Law
 Marketing	 MBA and management	 Media and communications
 Medicine, pharmacy and medical sciences	 Music and performance	 Nursing and midwifery
 Nutrition and sports	 Psychology, social work and human services	 Science
 Tourism, hospitality and event management	 Visual arts	

Locations



Supply Chain

Griffith's 5 major procurement categories are:

- Business Services
- Information Communication and Technology
- Labour and Professional Services
- Property, Construction & Facilities Maintenance
- Research and Teaching – Equipment & Services

The majority of goods and services (90%) were purchased from suppliers within Australia. Griffith's major overseas supply chains are located in United States, United Kingdom and Netherlands. They account for 5% of the market and provide Research and Teaching equipment and Services and Information Communication and Technology.

CRITERION 3

The risks of modern slavery in our operations and supply chains

Griffith's approach to modern slavery risk

Griffith uses four key focus areas to assess risks of modern slavery. These key focus areas are defined in Figure 2 and have remained the same from our 2023 statement. Supplier Assessment Questionnaires (SAQ) continue to be used to assess risks associated with existing and new suppliers. Griffith participated in a pilot with the Australian University Procurement Network (AUPN) to conduct a sector wide risk assessment on Laboratory Consumables and Medical Equipment. This approach also simplifies the effort required for suppliers as they only need to complete one assessment for the sector on this category, rather than individual assessments from each university. In July 2024 Electronics Watch released a Human Rights Due Diligence Maturity Matrix for its affiliates. The Maturity Matrix was inspired by a tool developed by Daria Toschi from Griffith University, to assess the maturity of practices aimed at combatting modern slavery. Electronics Watch affiliates have access to this, together with other resources, via the [Electronics Watch intranet](#)

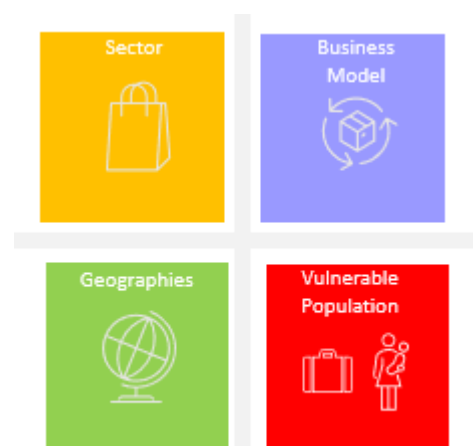


Figure 3 Modern Slavery Assessment KFA's

The below diagram is Griffith's Maturity Matrix. Griffith's maturity continues to sit at the Proactive phase.

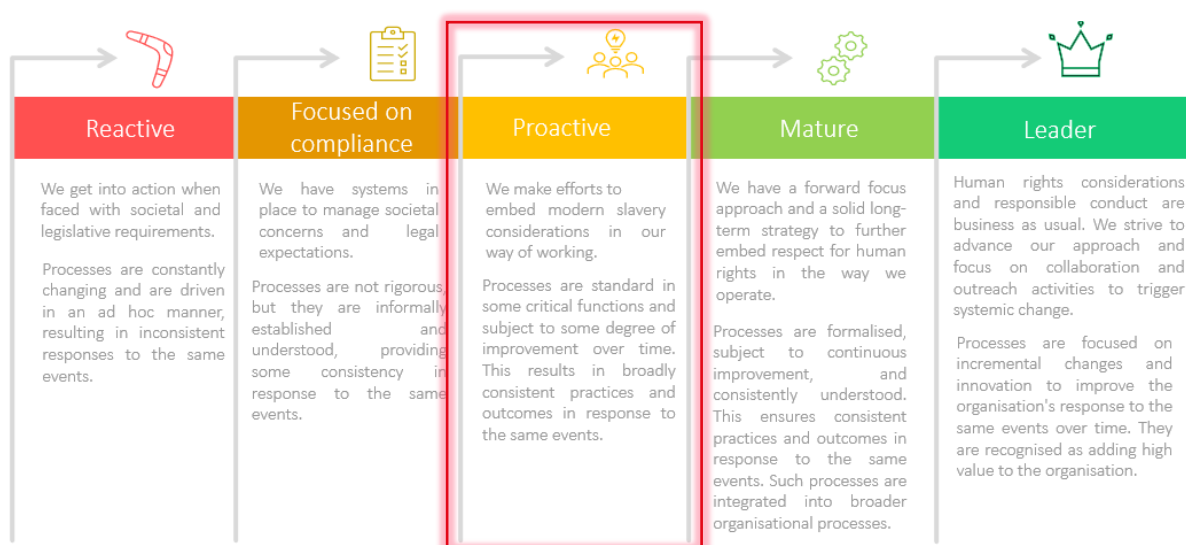


Figure 4 Griffith Maturity Matrix

Supply Chain Risks

In addition to Griffith's ongoing efforts to assess new suppliers, Griffith focused on two major risk areas in 2024: international student recruitment and laboratory consumables and equipment. Griffith's supplier Risk Assessment Framework continued to be embedded in its sourcing templates, ensuring supplier evaluation of modern slavery risks were assessed using its supplier risk assessment platform during sourcing activities.

International Student Recruitment

Australian universities often use offshore agencies to support the recruitment of international students. The key potential risks within this industry are:

- Recruitment Fees and Debt Bondage – Students being charged exorbitant recruitment fees by the education agents, leading them to becoming trapped in debt bondage. This can create a situation where students are vulnerable to exploitation and unable to exercise their rights freely.
- Deceptive Recruitment Practices – Some education agents may engage in deceptive practices, misrepresenting the conditions and opportunities available to prospective students. This can include false promises regarding employment prospects, educational quality, or visa requirements. Such practices can result in students being exploited.
- Exploitative Financial Practices – Some education agents may exploit students' financial vulnerabilities by offering loans or financial assistance with high interest rates or unfavorable terms. This can result in students becoming trapped in cycles of debt and vulnerable to potential exploitation or coercion.
- Dependence on Unscrupulous Employer – Students who face financial difficulties may be compelled to accept any available employment, regardless of the working conditions or labour rights. This dependence on employment opportunities can make them susceptible to exploitation, forced labour, or other forms of abusive practices.
- Trafficking and Exploitation – In certain cases, international students may be vulnerable to human trafficking and exploitation. They could be deceived or coerced into traveling to Australia under false pretenses, only to find themselves trapped in exploitative situations with limited freedom and control over their lives.
- Recruitment Scams – Additionally, Griffith acknowledges that limited visibility in certain overseas markets increases the risk of modern slavery, particularly in the secondary tiers of the supply chain for provision of student recruitment services.

Laboratory Consumables and Medical Equipment

As part of a sector wide initiative (via the AUPN), Griffith assessed the top eight supply categories to investigate how we could create the greatest influence and leverage meaningful impact. Griffith considered categories that shared the same suppliers across other participating universities and were in very high or high risk industries. The result of this was to conduct a sector wide assessment on Laboratory Consumables and Medical Equipment.

The Laboratory Consumables and Medical Equipment industry met the following criteria:

- Very High and High Risk Suppliers
- High number of shared suppliers across more than 10 universities
- Larger spend equals potentially good leverage
- Easier access to Australian based tier 1 suppliers
- Potential to influence policies, procedures and processes (collaborate with University Procurement Hub (UPH) which is renegotiating laboratory consumables now)
- Not yet heavily addressed like other industries (cleaning, construction, etc.)

Sourcing Activity Assessments

As part of Griffith's ongoing commitment to modern slavery due diligence, we continue to identify risks within the supply chain with the use of Griffith's Supplier Risk Assessments for all strategic sourcing activities.

Operational Risks

International Students

National Temporary Migrant Survey

Through Griffith's membership with the AUPN, Griffith participated in the 2024 National Temporary Migrant Survey. The Migrant Justice Institute (MJJ) is an independent not-for-profit research and policy organisation dedicated to ending exploitation and ensuring fair treatment of international students and other migrants in Australia and globally. It is led by co-founders Ass. Prof. Laurie Berg (UTS Faculty of Law) and Ass. Prof. Bassina Farbenblum (UNSW Faculty of Law & Justice). MJJ has partnerships with universities and is chaired by David Gonski AC.

In 2024, MJJ undertook a national survey of thousands of international students and other migrant workers across Australia, in collaboration with a range of community organisations. The survey is supported by Universities Australia (UA) and all Deputy Vice Chancellors responsible for student experience were contacted by UA, encouraging participation. The survey was funded through the Commonwealth Attorney General's Department Modern Slavery grants program.

These surveys have consistently revealed widespread exploitation in numerous industries in Australia. The questions are aimed at uncovering international students' understanding of their workplace rights, the problems they encounter at work including modern slavery indicators, and their decisions and perceptions regarding help-seeking. It included new un-researched areas such as workplace injuries and sexual harassment.

This survey will assist Griffith in collecting data on our international students' experiences of modern slavery indicators. Griffith had 359 students respond to the 2024 survey, based on the number of responses, Griffith will receive a tailored report detailing the survey findings in April 2025.

Work Right Hub – Australian Red Cross

The Work Right Hub (WRH) is an Australian digital platform aimed at preventing and addressing criminal labour exploitation by informing and empowering workers and frontline responders about the risks of exploitation and the avenues of support.

From March to September 2024, Griffith was one of 5 universities to form part of a steering committee to customise the WRH resources for International Students and Front-line Workers. The consultation process involved 30 student facing staff and 30 international students to codevelop resources and identified preferred internal dissemination channels.

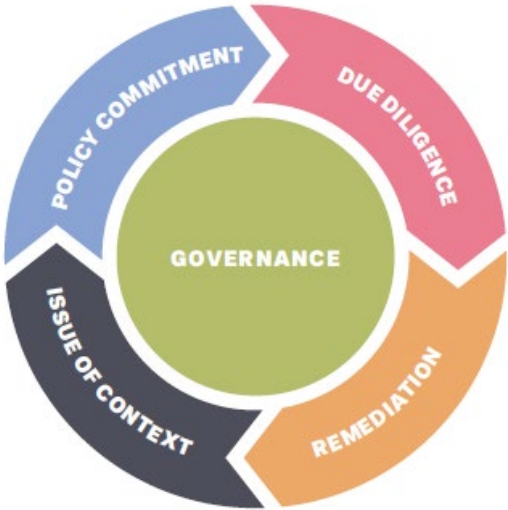
CRITERION 4

Griffith’s actions to assess and address the risks identified

Griffith continued to adopt its Modern Slavery Maturity Model, developed in 2023, that aligns with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

It consists of two primary elements:

- framework: This component presents five stages of maturity that intersect with the UNGPs, outlining specific actions for each level. This framework was crucial in assessing the initial stance in combating modern slavery and in steering Griffith's advancement towards more sophisticated measures.
- diagnostic tool: Griffith used a self-evaluation tool, designed to pinpoint a baseline maturity level. It played a key role in identifying the current status, defining the objectives and clarifying the steps required to fulfill those goals.



Implementing this model and diagnostic tool was pivotal in shaping the three-year strategic plan, aimed at mitigating and addressing the risks identified in Griffith’s operation and supply chain, and progressively refining the approach to modern slavery.

Each element of the UNGPs includes internal and external facing actions to guide organisations in integrating modern slavery and, more broadly, human rights considerations into their business operations.

These actions are summarised below:

POLICY COMMITMENT	GOVERNANCE	DUE DILIGENCE	REMEDATION	ISSUES OF CONTEXT
Policy suite	Accountability and responsibilities	Risk identification	Remediation mechanisms	Compliance with local laws and International Human Rights standards
Stakeholder engagement	Communication	Risk assessment		
	Continuous improvement	Leverage and supply chain collaboration		
		Capability building for internal stakeholders		
		Capability building for external stakeholders		
		Monitoring and review		
		Reporting		
		Grievance		

Supply Chain Actions

Policy Commitment

During the reporting period Griffith's Strategic Procurement and Supply team undertook a review and updated the Modern Slavery Policy for approval along with its supplier due diligence questionnaire.

Governance

The modern slavery improvement plan process has been included in Griffith's Contract Management Framework. Contract Managers will be accountable for collaborating with suppliers on their improvement plan actions throughout the lifecycle of the contract.

Due Diligence

International student recruitment

To evaluate the inherent risks within the identified high-risk category, Griffith issued SAQ's to very high-risk suppliers. Three of the five invited suppliers responded to the questionnaire, with an overall risk rating of Low. These assessments provided Griffith with an understanding of the processes, systems and mechanisms these suppliers use to identify, address and account for modern slavery in their own operations and supply chains. Based on the low-risk rating, there was no further action required for these suppliers.

Sourcing Activities

Griffith continued to issue supplier questionnaires as part of strategic sourcing events. The insights gained assisted in creating risk profiles for each supplier, spanning from very low to medium risk. These profiles became a key criterion of the supplier selection process, facilitating a more informed and ethically grounded procurement strategy.

The average risk rating of the suppliers assessed in this reporting period was low, with 78% of the 25 suppliers assessed, having a country of origin in Australia. The offshore suppliers related to one Software Services supplier located in the United Kingdom and five Education Services suppliers located in Pakistan and Nigeria.

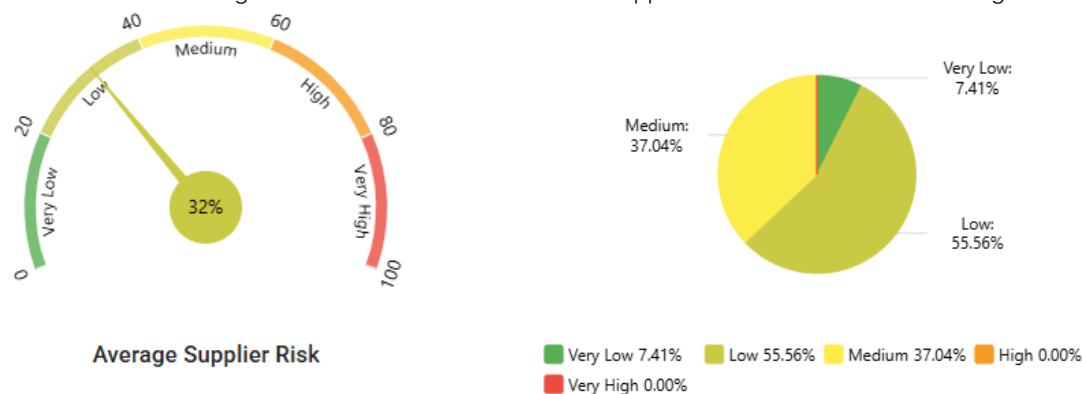


Table 1 Supplier Risk Assessment Ratings – Informed 365 Platform

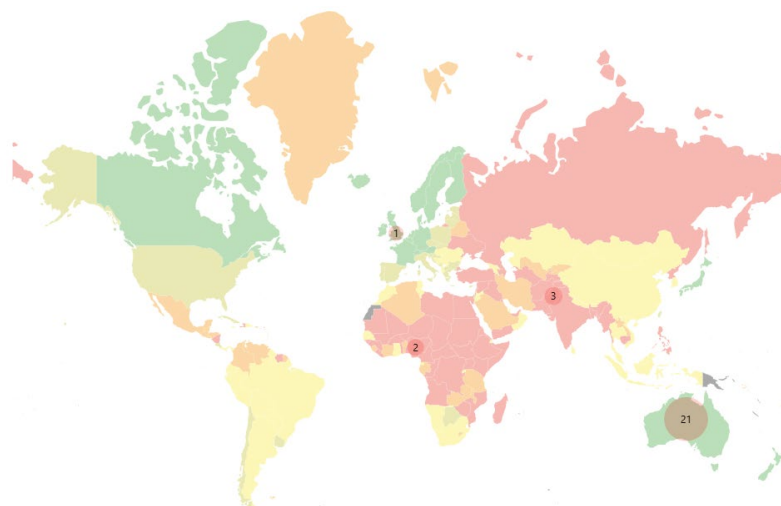


Table 2 Supplier Geography

Laboratory Consumables and Medical Equipment

A Risk Category Working Group was established, and 72 suppliers were sent SAQs to conduct due diligence into their modern slavery practices. In response to the assessment, 47 suppliers completed assessments. Below are the response highlights:

- Overall lack of policies and controls identified
- 33% of suppliers failed to map and assess risks across their supply chains
- 50% of suppliers' responses stated they do not conduct supplier training
- There was a high response to 'not being aware of sourcing materials from countries at risk' but answered yes to high-risk commodities (copper / minerals / silver / rubber / timber)
- Limited number of suppliers conducted responsible sourcing audits

The next step is to establish Supplier Remediation Plans. Five suppliers have been invited to participate in the pilot improvement plans.

Grievance Mechanisms

Risks were monitored through consistent oversight of the Your Call phone line, a grievance mechanism established in 2022 for contractors working on campus. There were no reported cases of modern slavery via this channel during this reporting period.

Supplier Risk Assessments

Griffith continued to use and collaborate with Informed 365 on its supplier risk assessment questionnaires. The link to the assessment is embedded in Griffith's tender documents and modern slavery is included in its evaluation criteria for impact procurement.

Operations Actions

Policy Commitment

Employee Code of Conduct

To demonstrate the University's commitment to eliminate modern slavery, the employee Code of Conduct was reviewed and updated to include reference to the Modern Slavery Policy. This ensures that employees are aware of the organisations and individual employees' obligation.

International Students Due Diligence

Work Right Hub – Australian Red Cross

In September 2024 the International Student Work Right hub [resources](#) were launched, providing students and front line workers with downloadable resources that explain human trafficking, forced labour and domestic servitude indicators, along with where to get help and educational videos.

National Temporary Migrant Survey

The following actions were achieved in 2024:

- 24 AUPN universities actively promoted the survey to their international students which ran from 8 July to 31 August 2024, including Griffith University.
- Individual universities with 150 plus responses would receive an individual summary report early in 2025. Griffith was successful in achieving this target.
- MJI will present the international student results and provide a sector wide report to all University Anti-Slavery Program Members at a forum in early 2025.
- University Anti-Slavery Program can create an evidence-based sector wide response in early-mid 2025
- The official report will be published in 2025.

International Student Recruitment

Griffith International reviewed their International Student Recruitment processes during 2024 and the following actions took place:

- The Agent Application Due Diligence form was updated to include modern slavery as a specific item, to elicit both information on current measures in place and seek confirmation that agency business operations are not contributing to modern slavery.
- Modern slavery clauses, and clauses related to fees charged to students were included in Griffith's Education Agent Annual Declaration of Compliance statements.
- A Modern Slavery section was added to Griffith's recruitment agent support website.
- Work commenced to update Griffith's recruitment agent training materials, to address compliance with Australian modern slavery laws and adhere to Griffith's ethical behaviour expectations.

CRITERION 5

How Griffith assesses the effectiveness of our actions

UNPG's	ACTION	ASSESSMENT EFFECTIVENESS
Policy Commitment	Continually reviewing relevant university policies and recruitment processes to ensure they reference Modern Slavery	Modern Slavery Policy was reviewed, updated, and approved by the Vice Chancellor and President. Employee Code of Conduct reviewed, updated and approved to include compliance to the Modern Slavery Policy.
Governance	Continue to embed the Improvement Plan processes into Griffith's Contract Management of highest risk suppliers.	Contract Management Framework was reviewed and updated to include Improvement Plan process.
Due Diligence	Conduct supplier questionnaires with student recruitment agencies.	Questionnaires were sent to high-risk suppliers. International Marketing have maintained strong SRM with suppliers, modern slavery clauses and definition are built into education agent agreements. It also includes detailed information regarding conduct, performance, monitoring and corrective action.
	Continue to assess existing suppliers with high-risk supply chains using Informed 365.	Collaborated with the Australian University Procurement Network Anti-Slavery Program to conduct a sector wide assessment on Laboratory Consumables and Medical Equipment. Griffith conducted assessments on education agents in high-risk countries who provide International Student Recruitment Services.
	Continue to use Informed 365 to assess suppliers' modern slavery risk during sourcing processes.	Griffith maintained inclusion of Modern Slavery supplier assessments under Impact Procurement in its tender response schedules.
		Supplier questionnaires continued to be completed using the Informed 365 Platform.

UNPG's	ACTION	ASSESSMENT EFFECTIVENESS
	Continue to promote scam awareness.	Griffith International worked with the Australian University Procurement Network Hub on the Migrant Justice Association Survey.
	Build capability for staff by rolling out modern slavery training.	Griffith rolled out a Modern Slavery training module. Corporate Executive staff and Strategic Procurement & Supply were the first to complete the training.
	Create an awareness campaign during recruitment and onboarding of international students	Griffith participated in the Migrant Justice Institutes national survey for International Students.
	Create an awareness campaign during recruitment and onboarding of international students	Griffith participated in the Red Cross Work Right Hub (WRH) and sat on the Steering Committee to help identify and support processes to nominate and engage international students and frontline responders in the development and review of materials of the WRH.
Remedy	Continue to actively promote Griffith's grievance channels to contractors working on campus	Grievance posters continued to be erected and maintained by Campus Facility staff. The posters provided onsite workers with access to the grievance line "Your Call".
	Continue to use Your Call as a mechanism for modern slavery grievances to be raised.	The Your Call line was monitored throughout 2024 by Griffith's Integrity Manager. There were no modern slavery related grievances received.
Issues of Context	Collaboration with key internal and external stakeholders to better understand risk in Griffith's supply chains.	Work with Student Life to increase awareness of forced marriages.

CRITERION 6

Consultation

This statement is made on behalf of Griffith University and its non-operational subsidiary International Water Centre Pty Ltd.

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 2024.

The statement was approved by the Griffith University Council on 16 June 2025 and has been signed by the Vice Chancellor and President on 20 June 2025.



Professor Carolyn Evans

Vice Chancellor and President