

# Modern Slavery Statement

2024





# QUT

# QUT

QUT acknowledges the Turrbal and Yugara, as the First Nations owners of the lands where QUT now stands. We pay respect to their Elders, lores, customs and creation spirits. We recognise that these lands have always been places of teaching, research and learning. QUT acknowledges the important role Aboriginal and Torres Strait Islander people play within the QUT community.



# Contents

Introduction	02
About QUT	03
QUT structure	04
Operations	05
Supply chain	06
Risks of modern slavery practices	08
Actions taken to assess and address risks	11
Remediation actions in 2024	16
Australasian University Procurement Network (AUPN) modern slavery approach and achievements in 2023	17
Measuring effectiveness	19
Consultation	21
Other information/next steps	22
Approval	24





# Introduction

Since coming into effect on 1 January 2019, the Australian Government's ***Modern Slavery Act 2018 (Cth)*** (the Act) has played a pivotal role in driving greater transparency and accountability in addressing modern slavery risks across global operations and supply chains.

The Act requires large entities to publish annual modern slavery statements detailing their efforts to assess and mitigate modern slavery risks.

At Queensland University of Technology (QUT) (ABN 83 791 742 622), we remain committed to ethical, socially responsible and environmentally sustainable business practices. We recognise our responsibility to identify, prevent and address the risk of modern slavery across both our operations and our supply chains—direct and indirect.

This marks the university's fifth *Modern Slavery Statement*, covering the reporting period from 1 January 2024 to 31 December 2024.

Like many Australian universities, QUT has faced broader strategic and resourcing challenges in 2024. These factors have impacted the pace at which our anti-slavery Program has evolved. While our approach has not matured as significantly as we had hoped, we continue to maintain sound processes and controls to

manage modern slavery risks. Our strong foundations, combined with a clear commitment to continuous improvement, position us well to further embed anti-slavery practices.

This statement outlines the actions we have taken in 2024 and our ongoing commitment to reducing the risk of modern slavery through continuous improvement, collaboration and transparency.





# About QUT

Queensland University of Technology (QUT) is an ambitious and innovative institution, a global leader in sustainability and ranked 17<sup>th</sup> in the world in the 2024 Times Higher Education (THE) Young University Ranking. Our growing research output is focused on technology and innovation, aligning with our commitment to real-world impact.

With more than 50,000 students, QUT offers academic programs across diverse fields, including business, creative industries, education, engineering, health, law, science and social justice delivered through our five faculties.

The QUT community acknowledges that our two inner-city Brisbane campuses at Gardens Point and Kelvin Grove stand on Aboriginal lands, the Country of the Turrbal and Yugara people—lands that were never ceded. QUT acknowledges the Turrbal and Yugara, as the First Nations owners of the lands where QUT now stands. We pay respect to their Elders, lores, customs and creation spirits. We recognise that these lands have always been places of teaching, research and learning. QUT acknowledges the important role

Aboriginal and Torres Strait Islander people continue to play within the QUT community.

The release and implementation of the Australian Universities Accord and sustained uncertainty surrounding the regulation of international student enrolments across the higher education sector in 2024 compelled QUT to revisit its framework of interconnecting themes and values contained in the strategic vision through *Connections: the QUT Strategy 2023 to 2027*—particularly with regard to international student growth, but the renewal of the strategy in 2025 will present an opportunity for new directions, while also progressing existing strategic priorities and projects.

Financial challenges continue across the Australian higher education sector with planned growth in international

student revenue impacted by delays in international student visa processing and a continued decline in real funding for the indirect costs of research. A strong focus has been placed on improving student experience and outcomes, growing high-quality research and continuing the university's strong focus on sustainable cost management.

QUT continues to adapt and evolve, maintaining our commitment to addressing modern slavery risks within our operations and supply chains.

More information about the university's business, history, operations and *Connections – the QUT Strategy 2023 to 2027* can be found in our 2024 annual report and on our website at [www.qut.edu.au](http://www.qut.edu.au).

# QUT Structure

The university's governing body is the QUT Council, which oversees and reviews proper and effective management and operation of the university and its controlled entities.

QUT Council is chaired by the Chancellor, Ms Ann Sherry AO. Management of the university is the responsibility of the Vice-Chancellor and President, Professor Margaret Sheil AO.



The QUT structure is as follows:

- Academic Division
- Administrative Division
- Chancellery Division
- Faculty of Business and Law
- Faculty of Creative Industries, Education and Social Justice
- Faculty of Engineering
- Faculty of Health
- Faculty of Science

The full university structure can be found on our website at [qut.edu.au/about/our-university/organisational-structure](https://qut.edu.au/about/our-university/organisational-structure).

The university has eight (8) controlled entities to support our operations. During the reporting period, five (5) of these were operating as identified below:

- Brisbane Business School Pty Ltd (ABN 38 085 931 611)
- QUT Student Managed Investment Fund (ABN 92 718 723 234) (operating)—please note this is defined as a fixed trust
- QUT Enterprise Holdings Pty Ltd (ABN 97 097 319 778)
- QUT Enterprise Holdings Trust (ABN 28 928 640 473) (operating)
- qutbluebox Pty Ltd (ABN 34 118 773 096)
- qutbluebox Trust (ABN 97 041 405 905) (operating)
- Australian Battery Testing Centre Pty Ltd (ABN 95 672 332 237) (commenced operating late 2024).





# Operations

The core operations of QUT are learning and teaching and research.

## The university's functions are to:

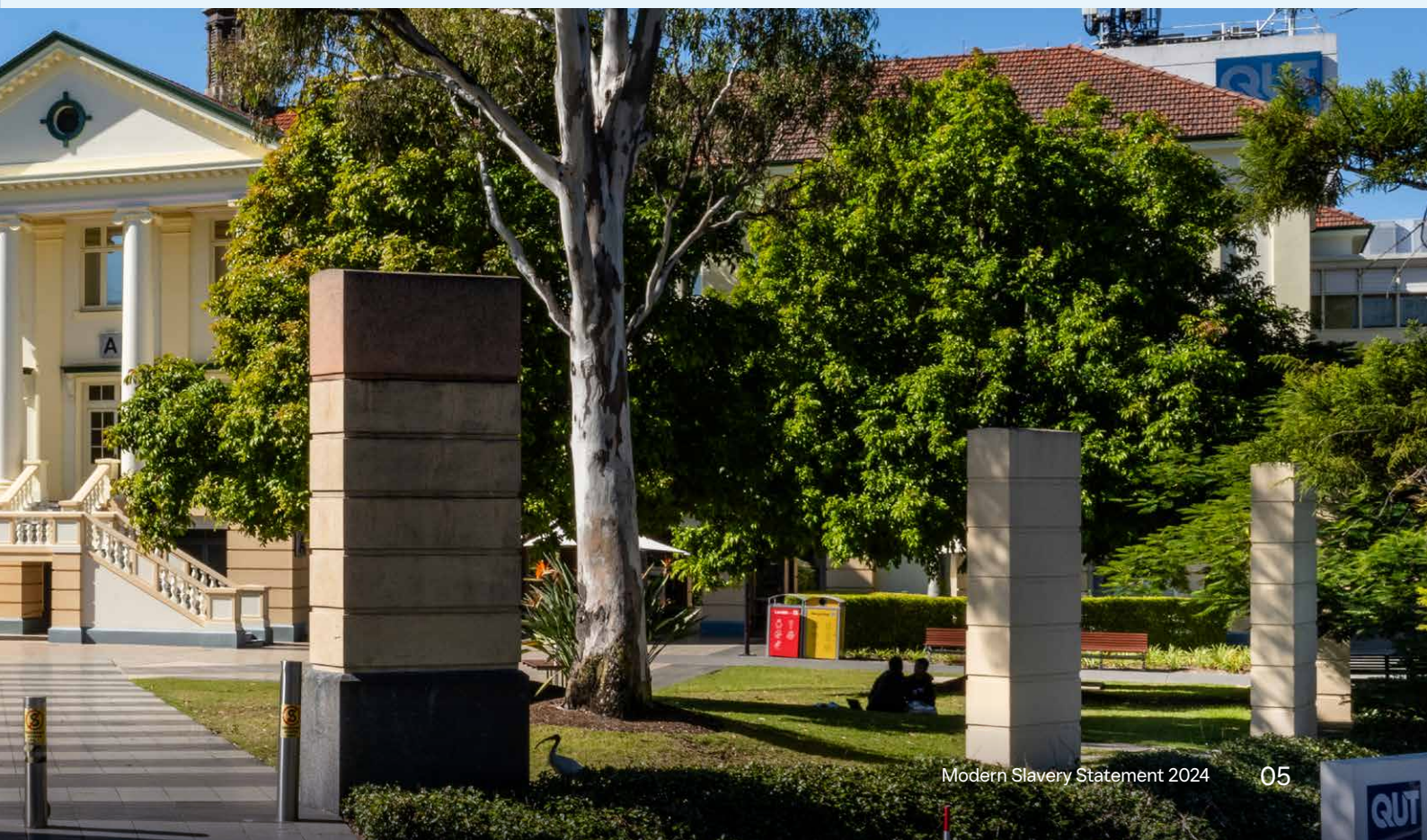
- provide education at university standard
- provide facilities for, and encourage, study and research
- encourage the advancement and development of knowledge, and its application to government, industry, commerce and the community
- provide courses of study or instruction (at the level of achievement QUT Council considers appropriate) to meet the needs of the community
- confer higher education awards
- disseminate knowledge and promote scholarship
- provide facilities and resources for the wellbeing of the university's students, staff and other persons undertaking courses at the university
- exploit commercially, for the university's benefit, a facility or resource of the university including, for example, study, research or knowledge, or the practical application of study, research, or knowledge, belonging to the university—whether alone or with someone else
- perform other functions given to the university under the *QUT Act* or another *Act*.

Our activities are largely undertaken across our two campuses at Gardens Point and Kelvin Grove

and various distributed sites located in Queensland, Australia and one located in Canberra, Australia. QUT does not own or operate overseas campuses. Some staff and students may travel overseas from time to time to undertake work or study associated with the university. The university's controlled entities operate in Queensland, Australia.

## As outlined in the 2024 annual report, in 2023 QUT had:

- 52,427 students (37,630 full-time and 14,797 part time), including 943 Aboriginal and Torres Strait Islander students
- a total of 4,605 full-time equivalent (FTE) staff members
- \$1.34 billion in revenue.



# Supply chain

QUT recognises that there are modern slavery risks across the goods, services and works that we purchase and is committed to identifying and addressing these.

In 2024, QUT transacted with 19,596 unique suppliers. This figure now includes all of the university’s spend with external suppliers including corporate card transactions and suppliers. As a result, the number of unique suppliers has increased significantly since 2023, however, including spend through corporate card ensures better visibility and transparency across all of our external supplier spend.

QUT spent \$401.22 million with external suppliers in 2024 across the below areas, inclusive of approximately \$31 million in corporate card spend across 16,725 suppliers.

Table 1: QUT spend per category

Category	Includes, but is not limited to
Research, equipment and consumables	Equipment, scientific and medical consumables, chemicals, gases, and laboratory supplies.
Property and facilities	Construction, operations, maintenance, fleet, security, waste, cleaning, transportation services and minor works.
Technology	Computer hardware and accessories, software and licensing (including as a service), and audio visual and ICT services.
Business and teaching services	Professional services, human resources, library services, contingent labour, marketing, and media, legal, audit, logistics, freight, postage, financial services, banking, catering, uniforms, travel and insurance.
Non-procurement spend	Non-procurement/non-addressable spend (including QUT investments) and any spend that we are not able to currently categorise accurately.

The data provided for this year’s statement is in line with the university’s 2023 statement, which is through the Australasian University Procurement Network (AUPN) Anti-Slavery Dashboards.

In 2024, the country risk by supplier:

- 90.9% (17,808 suppliers)—low risk
- 6.3% (1,241 suppliers)—medium risk
- 2.3% (448 suppliers)—high risk
- 0.19% (37 suppliers)—very high risk
- 0.31% (62 suppliers)—unknown/not categorised.

The very high-country risk engagements were with 33 suppliers in Papua New Guinea and four suppliers in Nigeria.

The engagements in Nigeria were for four transactions totalling \$717.73 including spend on a visa and hotel.

The spend for \$255,803.45 in Papua New Guinea was for the Partnerships for Improving Education (PIE) program. This program is designed to improve access, equity, and student learning outcomes in the early grades through a capacity development, systems-strengthening approach.



The PIE is a 5-year investment in teaching and learning with a focus on improving the delivery of access to and quality of education for children in the early grades of primary school in Papua New Guinea (PNG). The program began in July 2022 and is being implemented in close partnership with the PNG National Department of Education (NDoE).

In 2024, QUT faced several competing priorities and resource constraints that limited our ability to fully mature our anti-slavery approach as originally intended. Further analysis of procurement spend by supplier and detailed supplier risk assessments, both identified as priority actions, were not progressed to the extent anticipated. These activities remain critical to strengthening our anti-slavery response and while initial planning and foundational work occurred, implementation will continue into 2025. QUT recognises the importance of embedding this work into broader procurement and risk management processes—we remain committed to taking a measured and meaningful approach, with an understanding of the current operational environment.

To support this, QUT will take a more focused and tailored approach in 2025, leveraging collective sector knowledge and resources. Our continued participation in the Australasian University Procurement Network (AUPN) and its Supplier Risk Assessments will support us in understanding sector-wide risk indicators and help prioritise where action is most needed. In parallel, QUT is progressing the implementation of the University Procurement Analytics Service (UPAS), which will significantly improve the quality and accuracy of our procurement data. This enhanced visibility of our supplier base, when combined with AUPN's updated risk analytics platform, will enable a more targeted and evidence-based approach to managing modern slavery risks. Our 2025 action plan has been updated to build on the work and insights from 2024, with a focus on addressing suppliers and countries previously identified as high and very high risk, and implementing practical, risk-based mitigations.

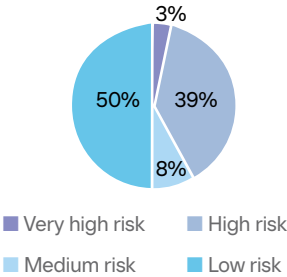
QUT is one of 33 universities that participates in the university spend dashboards through ArcBlue, with the following overall spend risks and categories identified.

# University spend and risks

Supply chain insights via the ArcBlue Inherent Risk Assessment Tool



Supplier overall risk levels



2,807 suppliers across 33 participating universities are identified as very high risk

Top 5 very high risk categories by spend

- 1. New build works
- 2. Temporary labour
- 3. Laboratory consumables
- 4. Scientific equipment
- 5. Marketing materials and promotional items



# Risks of modern slavery

In 2024, QUT assessed its overall risk of modern slavery as medium, consistent with other Australian universities and large organisations.

While the majority of our operations and activities are based in Australia—where the risk is generally lower—modern slavery risks remain present within our extended supply chains, particularly in high-risk categories and offshore manufacturing. QUT continues to take proactive steps to identify, manage, and mitigate these risks.

While no significant changes to the overall risk profile were identified, nor any additional risks to our supply chain and operations, we continue to acknowledge the inherent risks present in complex global supply chains and the importance of maintaining ongoing vigilance.

The QUT Anti-Slavery Reference Group (see further information below) remains focused on ensuring identified risks are regularly reviewed, validated and where necessary, refined. As part of our quarterly meetings, each member reviews risks specific to their functional area, reports on status and provides updates on mitigation strategies and actions.

The university's approach to risk management is underpinned by our Enterprise Risk Management Framework, approved by the QUT Council and overseen by the Risk and Audit Committee (RAC). This framework supports a systematic and proactive approach to risk and opportunity management across the university.

It continues to guide the Anti-Slavery Reference Group's assessment of modern slavery risks across QUT activities including research, teaching, investments, human resources and commercial operations, as well as across our procurement and supply chain arrangements. In 2024, this framework also informed broader strategic discussions as we worked to integrate risk insights into planning and operational decision-making.

## Teaching and student services

In 2024, QUT had 42,806 domestic students and 9,621 international students enrolled. These numbers remain broadly consistent with 2023 student levels, reflecting the ongoing appeal of our programs and student experience. University teaching and student support services continue to be delivered primarily in Australia by QUT-employed staff, in accordance with the university's employment policies and procedures.

QUT recognises that students, particularly international students, may face increased vulnerability to modern slavery risks, including when engaging in work or volunteering in Australia, or participating in work integrated learning (WIL) and international learning experiences. To support and protect students, QUT

provides education and awareness programs on their rights and ensures that student support services are easily accessible and well-communicated.

All WIL arrangements require industry partners to sign an agreement that includes obligations to comply with relevant legislation and provide appropriate varied tasks that support student learning outcomes. While additional modern slavery-specific clauses were previously considered for these agreements, it was determined that the nature of these learning activities and the existing contractual protections were sufficient to manage risk in this area.

In 2024, QUT had 2,295 higher degree research (HDR) students enrolled. All HDR students receive at least the minimum QUT scholarship rate of \$33,637 (2025 rate) per annum. International HDR students without scholarships must provide evidence that they can support themselves financially for the duration of their stay in Australia, with a minimum funding level of \$29,710 per year, in line with student visa requirements. In addition, QUT recommends limited working hours for HDR students while enrolled and scholarship recipients must obtain approval from both their supervisor and Head of School before undertaking additional work.



## Research

QUT undertakes diverse and impactful research activities, including collaborations and partnerships with local and international organisations. In doing so, we recognise the potential for modern slavery risks to arise, particularly in projects that:

- involve human participants based in countries with elevated risk profiles and/or
- require the procurement of goods, services, or equipment for research purposes, including the sourcing of human biospecimens from international biobanks.

All QUT researchers, including staff and students, are expected to uphold responsible research practices in accordance with the Australian Code for the Responsible Conduct of Research, as well as relevant ethics guidelines and legislative requirements. This commitment helps ensure that ethical, legal, and cultural standards are maintained across all research endeavours.

Research involving human participants continues to be reviewed by the University Human Research Ethics Committee (UHREC) or a delegated review body, applying the ethical principles set out in the National Statement on Ethical Conduct in Human Research 2023 (National Statement). This ensures consistency with national expectations and supports responsible, ethical research conduct.

The QUT Office of Research Ethics and Integrity (OREI) plays a critical role in supporting researchers through training, guidance, processes, and expert advice—embedding a strong research culture and enabling high standards of integrity and compliance.

As our research activity evolves, QUT is increasingly exploring innovative research supply models.

## Management of human resources

All permanent, fixed-term, and casual staff engaged by QUT are recruited through transparent processes in accordance with approved policies and the QUT Enterprise Agreements. These agreements govern the employment terms and conditions for both academic and professional staff, ensuring fair and equitable treatment across the workforce.

To supplement its workforce and meet temporary operational needs, QUT engages temporary staff through various mechanisms, including the Queensland Government Standing Offer Arrangement and the university's own contract or purchasing Terms and Conditions. These arrangements require labour hire providers to hold a valid labour hire licence, in compliance with Queensland legislation designed to protect workers from exploitation and uphold the integrity of the labour hire industry. QUT has also included

modern slavery clauses in contracts with labour hire and contingent workforce providers to strengthen supplier accountability and promote responsible employment practices.

## Investments

As part of its operations, QUT makes financial investments and is committed to responsible investment practices. QUT has appointed the Queensland Investment Corporation (QIC) to oversee and manage the university's investment portfolio. QIC has its own published *Modern Slavery Statement* and is committed to embedding environmental, social and governance (ESG) factors into its investment decision-making to support long-term, ethical and sustainable outcomes.

The QUT Finance and Planning Committee plays an active role in overseeing the university's investment strategy. The committee considers the selection of fund managers and provides ongoing advice and oversight regarding the performance, associated risks and management of our long-term investments and endowments. As our approach matures, QUT will continue to monitor the practices of investment partners, including how they assess and address modern slavery risks within their operations and supply chains.





## Commercial operations

In 2024, QUT had:

- 32 commercial licences, agreements, or leases at Gardens Point campus
- 33 commercial licences, agreements, or leases at Kelvin Grove campus
- 3 sub-leases at external sites in DaVinci Precinct (airport), Redlands and Samford.

These licences for space are used to undertake collaborative research.

Agreements cover all retailers on campus and include leases/licences with telecommunication companies, childcare providers and collaborative research agreements. These legal agreements have clauses covering compliance obligations with all relevant legislation.

## Engagement with industry partners

QUT engages with a broad range of industry partners across its operations, consistent with *Connections – the QUT strategy 2023–2027*. These partners may be Australian or international entities, located in a variety of countries. Engagement of industry partners includes a due diligence process to ensure the partner is a legitimate business operation. Any concerns identified through this process are

flagged with the accountable senior staff member for consideration and further action, if required. This process also includes potential major gift donors.

Contracts and agreements within the Office of Industry Engagement (OIE) were reviewed internally and it was confirmed that modern slavery clauses were not required for the agreements and deed templates specifically used by the OIE, given the nature of these engagements.

## Risk in controlled entities

In the 2024 reporting period, QUT had five operating controlled entities (as listed above). These entities had limited operations and no employees. The controlled entities had extremely limited (if any) supply chain activity undertaken. The risk of modern slavery within QUT controlled entities has been assessed again as part of the development of this statement and continues to be deemed as low, given the minimal activity.

In late 2024, QUT established a new controlled entity—the Australian Battery Testing Centre Pty Ltd (ABN 95 672 332 237). Once fully operational, this entity will be reviewed for any risks of modern slavery in its operations and supply chains.

## Engagement with donors

While QUT aims to engage with donors who align with our values and ethical standards, there remains a risk that some donors may have operations or supply chains linked to modern slavery practices. To help mitigate this risk, due diligence procedures are undertaken for major donors and appropriate clauses are included in donation agreements where necessary.

## Supply chain

QUT acknowledges that risks of modern slavery remain present in the supply chains of the goods and services we procure. Our supply chains continue to include industries, goods and services that are widely recognised as high risk, such as cleaning, security, catering, building maintenance, clothing/uniforms and computer hardware and accessories.

Suppliers engaged by QUT are required to comply with the university's Terms and Conditions, which apply across procurement activities—from standard purchase orders to comprehensive contract arrangements, depending on the value and risk profile of the procurement. These Terms and Conditions include clauses requiring compliance with all relevant legislation, including obligations under modern slavery laws.



# Actions taken to address risks

QUT tracks modern slavery risks through a shared risk register, which is reviewed regularly by the Anti-Slavery Reference Group. We also actively participate in the AUPN Anti-Slavery Reference Group. While QUT does not have dedicated staff working full-time on the program, we are committed to continuously reviewing and assessing our risks, ensuring that we have appropriate mitigations in place. Our approach focuses on identifying and addressing modern slavery risks.

**Table 2: Actions completed to address modern slavery in 2024**

Area	Ongoing actions to address risks identified in the QUT supply chain and operations.
QUT supply chain risks	
<b>Awareness, understanding, education and training.</b>	<ul style="list-style-type: none"> <li>A cross-functional QUT Anti-Slavery Reference Group was established to provide oversight, governance and raise awareness (met four times).</li> <li>Online training program available via the Digital Workplace, along with a statement and remediation plan.</li> <li>Newsletter articles have been published in the Finance newsletter and on the QUT Digital Workplace (the QUT intranet site).</li> <li>All Strategic Procurement and Finance Support staff and Anti-Slavery Reference Group members have completed modern slavery training (and it has been added to the induction program for QUT).</li> <li>Representatives from Strategic Procurement and Finance Support teams participate in monthly AUPN Anti-Slavery Reference Group meetings and Queensland Government Community of Practice Sessions.</li> </ul>
<b>Contractual commitments for suppliers to ensure they have contractual obligations and mitigations in place to remediate (if required).</b>	<p>QUT purchase orders and standard contractual templates all include anti-modern slavery clauses—directly and through our suppliers’ supply chains.</p> <p>This includes clauses for:</p> <ul style="list-style-type: none"> <li>new contracts</li> <li>deeds of variation for existing contracts that are varied and/or extended.</li> </ul>
<b>Engaging new suppliers through a formal quotation or tender process.</b>	<p>The QUT Offer document (including RFO/RFQ) templates include questions around how suppliers are proactively working to combat modern slavery—directly and through their suppliers’ supply chains.</p>
<b>Engagement of all suppliers (with or without a contract).</b>	<p>All suppliers agree to QUT purchasing terms and conditions (included on our external website), which includes a modern slavery clause:</p> <p><i>The supplier must take all reasonable steps to identify, assess and promptly address risks of modern slavery practice in the operations and supply chains used in the provision of the goods, services, deliverables or works. If modern slavery is identified by the supplier over the course of the Purchase Contract, it must be notified immediately to QUT in writing.</i></p> <p>The onboarding and maintenance process for domestic suppliers continues to include a check of the State Government Procurement Compliance Portal to ensure that businesses supplying to the Queensland Government (including QUT) are ethical in their business practices.</p>



Area	Ongoing actions to address risks identified in the QUT supply chain and operations.
QUT operational risks	
Employees and temporary/fixed-term workers engagement.	QUT has a formal process in place to address these risks through policies, procedures, onboarding and engagement processes.
Research conducted overseas involving QUT research staff and students that may involve lack of voluntariness and exploitation of research participants.	Research conducted overseas by QUT investigators must comply with the <b>National Statement on Ethical Conduct in Human Research 2023</b> .
International suppliers of human cells lines and biospecimens procured for the purposes of research that may have been obtained in a manner inconsistent with the principles of the <b>National Statement on Ethical Conduct in Human Research 2023</b> (the National Statement). Supply chains include commercial entities based overseas and biospecimens shared between researchers.	<p>The OREI has guidance on the <b>use of stored biospecimens for research</b>. The following information should be obtained by researchers when selected suppliers of human biospecimens and cell lines for research:</p> <ul style="list-style-type: none"> <li>Information on the provenance of the biospecimen—how they have been obtained and managed consistent with the principles of the National Statement. Evidence of sample provenance include: <ul style="list-style-type: none"> <li>Template Participant Information sheet</li> <li>Material Transfer Agreements</li> <li>Other documents with information that support how the biospecimen was obtained.</li> </ul> </li> </ul>
Higher degree research (HDR) students being exploited in Australia in the workplace.	The Graduate Research Centre continued to provide information on modern day slavery at all HDR student orientation sessions, including avoiding exploitation and contacts should students wish to seek advice.
Supply of research infrastructure and equipment from international companies and supply chains involved/implicated in acts of modern slavery.	All staff follow the QUT Procurement guidelines and when purchasing equipment and wherever possible, use our Terms and Conditions as both the purchasing (PO) and equipment supply contract T&Cs address modern slavery as a standard purchasing/contract requirement.
Engaging international representatives (agents) for international student recruitment.	<p>QUT standard Recruitment Services Agreement (RSA) template has been updated with a clause addressing modern slavery. All RSAs in place include the clause.</p> <p>Regular agent training sessions across all regions were conducted in 2024 including information on modern slavery.</p>



Area	Ongoing actions to address risks identified in the QUT supply chain and operations.
<b>QUT students undertaking exchange programs in other overseas universities—especially those that are identified as medium and high risk for modern slavery.</b>	Pre-departure sessions were held in 2024 with students that were attending out-bound semester exchanges and short-term exchanges—with the briefing including risks of modern slavery.
<b>Contractual arrangements with QUT retailers.</b>	Lease templates sufficiently cover QUT requirements. The university's remediation approach also covers any breaches that may occur with our retailers.
<b>Risk of modern slavery to overseas students volunteering and working in Australia.</b>	QUT continues our commitment to overseas students who may be at risk including: <ul style="list-style-type: none"> <li>• Online information sessions provided each semester by JobWatch along with Q&amp;A.</li> <li>• Presentation on Working in Australia on a Student Visa provided each semester. Messaging on Work Rights and Workplace Safety include links to further information provided each semester via International Students newsletter.</li> <li>• Individual support, information and advocacy provided via Student Services Counselling and Support and Wellbeing teams.</li> <li>• Support and Wellbeing staff check work conditions with students as part of basic psychosocial assessment and inform students of their rights and complaints mechanisms.</li> </ul>
<b>Risk of exploitation of students undertaking work integrated learning placements.</b>	Additional clauses are not required given the nature of the activity where students undertake learning activities with industry partners. Awareness raising has been included in training materials for students as part of compulsory pre-WIL requirements. A module has been developed for all students undertaking WIL placements. Information about modern slavery has been included in WIL risk management workshops for staff.
<b>Engagement of industry partners—particularly research partners (this includes international/overseas partners).</b>	QUT has embedded obligations in our due diligence process for the engagement of industry research partners. Additional modern slavery clauses are not required for these types of agreements used by Office of Industry Engagement.
<b>QUT controlled entities.</b>	No change or additional actions.



Area	Ongoing actions to address risks identified in the QUT supply chain and operations.
<b>Major gift pledges from donors.</b>	<p>QUT continues to undertake modern slavery checks within the due diligence procedures for major donors.</p> <p>Appropriate clauses have been incorporated into donation contracts to ensure donors comply with modern slavery requirements.</p>
<b>Students funded by Learning Potential Fund (LPF) scholarships as identified by Equity can be vulnerable to modern slavery practices external to the university's environment or control.</b>	<p>QUT Equity Scholarships and Bursaries are available to eligible students. Support and Wellbeing Advisors in Student Services provide ongoing welfare and financial support to all students, along with education and support on workplace rights and safety.</p>
<b>Ensuring ethical investments for the university's investment portfolio through QIC.</b>	<p>QIC believes that environmental, social, and corporate governance (ESG) factors have a material impact on long-term investment outcomes. Considering ESG factors is part of all QIC's investment decision-making processes. QIC exercises their voting rights either internally or via QIC external managers. QIC communicate QIC's approach to Responsible Investment on the QIC website and report on their activities to their clients annually. Company exclusions are considered on a case-by-case basis. QIC became a signatory to the United Nations-backed Principles for Responsible Investment initiative (UNPRI) in 2008.</p>
<b>Volunteers to QUT—incoming and outgoing.</b>	<p>QUT has reviewed the risk of modern slavery within our volunteer community—both incoming and outgoing. It was determined no further action was required.</p> <p>Volunteering, by its nature is based on the individual's choice to offer their time and skills without monetary compensation. It's crucial to differentiate volunteering from slavery, which involves forced labour, coercion and lack of freedom.</p> <p>Volunteering is a form of service where individuals willingly contribute to a cause they support, without any element of coercion or exploitation. It's an opportunity to make a positive impact, gain experience and contribute to a society in various ways without being compelled to do so.</p> <p>While there might be instances where volunteer work can be exploited or misused, categorising volunteering as modern slavery would be inaccurate and diminish the severity and horrors of actual slavery. It's crucial to ensure that volunteering remains a free and voluntary activity, respected for the positive contributions it makes to communities and causes worldwide.</p>

# Remediation actions in 2024

The university's published remediation plan remained in place in 2024 and only had one instance of anti-slavery that required remediation during the reporting period.

In 2024, a potential breach of modern slavery practices was flagged through the Australasian University Procurement Network's (AUPN)—involving a supplier that QUT engaged in 2017 and 2023 for minor transactions. The issue stemmed from the supplier's supply chain that links to two separate logistics companies associated with sanctioned entities under the UFLPA in the US. However, investigations

by the supplier and through a review of the data confirmed no direct or indirect transactions between the supplier and the sanctioned entities. The flagged risk was attributed to high-risk associations through shared logistics providers rather than specific modern slavery breaches.

The University of Melbourne led discussions on behalf of QUT and two other universities, concluding that the risk associated with the supplier

was low and recommended closure of the matter. This case highlighted the need for enhanced escalation processes and clarified coordination responsibilities for multi-university modern slavery investigations, which is underway. It has been proposed to the AUPN Anti-Slavery Working Group to review these processes and develop strategies for addressing high-risk scenarios flagged by association.





# Australasian University Procurement Network (AUPN) modern slavery approach and achievements in 2024

QUT is a member of the AUPN, the peak body for strategic procurement in the higher education sector in Australia and New Zealand.

Membership of the AUPN comprises 41 member institutions. QUT plays an active role in the AUPN, with a representative on the AUPN's Executive Committee that is currently the Co-Chair.

QUT actively participates in the sector-wide collaboration led by the AUPN. The objectives of the university anti-slavery response are to support members to improve supply chain human rights transparency, reduce individual university costs and resources, collaborate on risks and issues for greater impact and contribute to reporting requirements.

The University Anti-Slavery Program (2024) under the Australasian University Procurement Network (AUPN) focuses on enhancing human rights transparency in supply chains, reducing university costs, collaborating on risks, and supporting modern slavery reporting. It involves 38 Australian and 3 New Zealand universities working together to improve procurement practices.

## Key objectives and benefits:

- **Transparency and compliance:** Support universities to meet legal requirements and demonstrate leadership in combating modern slavery.
- **Cost efficiency:** Reduce duplication of activities and costs through collaborative risk assessment, system implementation and remediation efforts.
- **Effectiveness:** Leverage collective buying power to identify and address modern slavery risks across university supply chains.
- **Capability:** Collaborate with civil society organisations and stay updated on emerging issues.

## Program focus areas:

1. **Risk software:** Pilots and implementations, such as the FRDM refresh and ArcBlue dashboards, to assess supplier risks.
2. **Capability uplift:** Monthly forums, training resources and newsletters to enhance knowledge and capacity among university procurement professionals.
3. **Engagement:** Educational programs for students and staff, including collaboration with organisations like ACRATH and Australian Red Cross and supplier education.

4. **Collaboration:** Engaging in supplier remediation, risk working groups and international student risk assessment through surveys and focused projects.

## Key achievements (2024):

- **Risk software implementation:** 33 universities used the ArcBlue Portal to assess 91,000 suppliers, with a focus on high-risk categories.
- **Training and capacity:** Monthly forums featured guest speakers and topics on modern slavery risk management and sector collaboration.
- **Supplier remediation:** A pilot program tested collaborative approaches with five suppliers to address risks and develop remediation plans.
- **Community and industry engagement:** Participated in external events and collaborated with organisations to promote awareness and solutions to modern slavery.
- **Engagement and communications:** Regular communication through LinkedIn, newsletters and webinars to raise awareness and share best practices across universities.

In 2024, there were several challenges and barriers to the progress of the program, including but not limited to:

- Aligning actions and approach—many similarities but ~35 individual entities working at different paces and with different risk appetites.
- Data quality—data inconsistency and supplier normalisation challenges.
- Maintaining momentum—onboarding new staff and keeping working groups moving.
- Limited capacity—volunteer dependent and most universities don't have dedicated anti-slavery resources.
- Third party programs—set up to support individual businesses, not a sector approach.

These challenges have been reviewed and assessed, with opportunities identified for 2025 across the sector. The program will continue to focus on training, supplier collaboration and sector-wide reporting to strengthen universities' responses to modern slavery risks and ensure ongoing compliance and improvement.

## Exciting opportunities in 2025

Scale supplier self-assessment questionnaires (SAQ) and remediation plans

Deeper risk and issue collaboration

More engagement with 3<sup>rd</sup> party collaborations

Capability uplift in light of legislation changes

Data spend analytics tool sector adoption

## Case study: risk collaboration

International student 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.

- March – September:** Six universities formed part of the steering committee to customise the WRH resources for international students and university front line supporters.
- Consultation process** with 30 student facing staff and 30 international students to codevelop resources and preferred internal dissemination channels.
- September:** International student work right hub resources launched.



Name	University
Sylvia Young	University of Sydney (NSW)
Reshme Gunash	University of Melbourne (VIC)
Jacqui Harding	Queensland University of Technology (QLD)
Melinda Chadwick	Macquarie University (NSW)
Kiri Bishop	Griffith University (QLD)
Renee Griffin	University of New South Wales (NSW)



# Measuring effectiveness

At QUT, we are committed to ensuring that modern slavery is not present in our operations or supply chains.

In 2024, given the constraints, our focus was on maintaining the established measures to mitigate modern slavery risks within both our operations and supply chains. While we continued to uphold the objectives set in 2023, the primary emphasis was on ensuring that our existing policies, procedures and supplier engagements remained effective in managing and mitigating risks in both areas.

As we continue to mature our approach, we are planning to formally measure the effectiveness of our Anti-Slavery Program in 2025. This will provide an opportunity to assess our progress, refine our strategies and ensure that modern slavery risks are being actively managed across our operations and supply chains.

Objective 1	Proactively understand and mitigate our modern slavery risks across our operations and supply chain.
Objective 2	Empower our staff with the knowledge, skills and systems to effectively identify, responds and mitigate modern slavery risks.
Objective 3	Empower and support our students to understand their rights, report incidents and access services to prevent and remedy exploitation.

In 2025, we will formally measure the effectiveness of our Anti-Slavery Program through how well we have met our three set objectives, with progress and status for 2024 tracked below.

Objective 1: Proactively understand and mitigate our modern slavery risks across our operations and supply chain.		Progress/status from 2024
1. Supplier engagement	Focus on engagement of top 100 suppliers by spend (approximately 60%). Measure the number or percentage of suppliers contacted or engaged regarding modern slavery policies and compliance within a given period (including statements in place and contract clauses).	Underway
2. Risk assessment	Ensure a risk assessment of the university's operations and supply chains is undertaken quarterly and recorded by individuals within the Anti-Slavery Reference Group and discussed at the quarterly meetings of the group.	Completed and ongoing
	Undertake risk assessment of top 20 suppliers—in line with the risk assessment data tool (including where appropriate a review of Modern Slavery Statements and/or supplier questionnaires).	Underway
	Ensure the QUT Anti-Slavery Reference Group comprises members from all areas of our operations.	Completed and ongoing

Objective 1: Proactively understand and mitigate our modern slavery risks across our operations and supply chain.		Progress/status from 2024
<b>3. Partnership and Collaboration</b>	Actively contribute to the AUPN sector-wide response to modern slavery. Establish at least two other partnerships with NGOs, industry alliances or other institutions focusing on combating modern slavery to commence proactive engagement.	<b>Completed and ongoing</b>  <b>Underway</b>
<b>4. Incident Reporting</b>	Keep track of reported incidents or suspicions related to modern slavery within the supply chain or operations and how they were addressed—ensuring these follow the university's documented remediation process. Ensure support for victims when required.	<b>Completed and ongoing</b>  <b>Ongoing</b>
Objective 2: Empower our staff with the knowledge, skills and systems to effectively identify, respond and mitigate modern slavery risks.		Progress/status from 2024
<b>1. Training completion</b>	100% of the QUT Anti-Slavery Reference Group, Strategic Procurement and Finance Support have completed modern slavery training. Offer awareness training—free of charge to all QUT staff. Track the uptake of this training and ensure published on the Digital Workplace.	<b>Completed and ongoing</b>  <b>Underway</b>
<b>2. Awareness raising</b>	Quarterly article in newsletters/Digital Workplace and/or other internal communication channels raising awareness and offering training for staff. Up-to-date information on the intranet including searchable links to our statements, remediation and awareness raising articles.	<b>Completed and ongoing</b>  <b>Ongoing</b>
<b>3. Integration into processes</b>	Clearly demonstrate the integration of modern slavery risk identification and mitigation into existing operational processes and workflows including incorporating risk assessment tools or checkpoints in procurement, supplier management and other relevant areas.	<b>Ongoing</b>
Objective 3: Empower and support our students to understand their rights, report incidents and access services to prevent and remedy exploitation.		Progress/status from 2024
<b>1. Training completion</b>	Offer awareness training—free of charge to QUT students. Track the uptake of this training and ensure available on the Digital Workplace.	<b>Underway</b> —Australian Catholic Religious Against Trafficking in Humans (ACRATH) has developed six (6) free 39-minute online modules that are downloadable.
<b>2. Awareness raising</b>	Ensure WIL students and students travelling overseas to study are briefed on modern slavery and track numbers.	<b>Completed and ongoing</b>
<b>3. Integration into processes</b>	Target zero tolerance for incidents of modern slavery and ensure a clear and effective reporting process for any suspicions or cases identified. Aim for timely and appropriate handling of reported incidents, with investigations completed within a set timeframe (e.g. within 30 days of reporting).	<b>Underway</b>  <b>Completed for 2024 and ongoing</b>







# Consultation

In addition to consultation with the AUPN as outlined above, QUT continued its Modern Slavery Reference Group, which was renamed Anti-Slavery Reference Group in 2023 (in line with industry naming to represent a commitment to ‘anti-slavery’).

Consultation and engagement with the representatives of this group is a critical part of our response, with the group meeting four times in 2024. The group will continue to meet quarterly in 2025.

The Anti-Slavery Reference Group provides a platform to enable consultation across various university departments and disciplines—representing key stakeholders from our operations and those that manage our supply chain. This group will continue to evolve and expand as we mature as an organisation. The Reference Group now consists of representatives from the following areas:

- Finance Business Solutions
- QUT International
- Digital Business Solutions
- Business Development
- Research
- Work Integrated Learning
- Student Services and Equity
- Graduate Research Centre (GRC)
- Assurance and Audit
- Faculty Operations
- Teaching (through a Head of School)
- Graduate Research Centre
- Human Resources
- Commercial Operations





# Other information/next steps

The actions and focus areas identified for 2025 are consistent with those outlined in 2024.

This reflects the reality that effectively addressing modern slavery risks is a long-term undertaking that requires sustained effort, time and dedicated resources to make meaningful progress, particularly within large and complex institutions and supply chains.

Our continued focus is on embedding good practice, strengthening internal capability, improving supplier engagement, and maintaining visibility over high-risk categories. These actions remain essential as we mature our approach and ensure a consistent and responsible response across QUT.

As in previous years, implementation of the action plan will continue to be monitored and guided by the QUT Anti-Slavery Reference Group. The group remains committed to ensuring our actions are purposeful, practical and aligned with our broader ethical sourcing goals.

**Table 3: Actions planned to address modern slavery**

Action item	QUT will continue to progress the following actions in 2025 and beyond to ensure we are committed to the eradication of modern slavery.
1	Work with QUT key suppliers, especially those who provide high-risk goods and services (as identified through the technology solution) to collect information relating to their reporting status, their policies, procedures and actions taken within their own organisations to identify and address the risk of modern slavery. This will include continuing to mitigate risk of modern slavery in the university's high-value and high-risk cleaning and security contracts.
2	<p>Further embed the technology solution to provide data analytics (including continued financial contribution) as standard across the university's supply chain. This tool will help:</p> <ul style="list-style-type: none"> <li>• identify modern slavery risks</li> <li>• support our future reporting</li> <li>• improve supply chain transparency</li> <li>• inform actions, track effectiveness and identify mitigations</li> <li>• support sector collaboration</li> <li>• contribute to continuous improvement.</li> </ul> <p>Use the tool to address the countries and suppliers that are identified as high and very high risk including documented evidence of actions taken to address and monitor these risks.</p>
3	Participate in the AUPN sector-wide Anti-Slavery Program including maturing our approach and response—moving to a more proactive approach, including sector-wide responses to issues identified.
4	<p>Evolve the cross-functional QUT Anti-Slavery Reference Group to further raise awareness and provide oversight, governance and management of modern slavery across QUT supply chain and operations.</p> <p>Evolve the use of the Reference Group to identify risks (including potential new areas) and specific mitigations/ actions for each individual risk identified.</p>
5	Continue to measure the effectiveness of the QUT Anti-Slavery Program using the measures agreed in 2023—continuing to evolve our response and introduce more tangible metrics (if appropriate) including more formal measures.

Action item	QUT will continue to progress the following actions in 2025 and beyond to ensure we are committed to the eradication of modern slavery.
6	Educate internal and external stakeholders and raise awareness across QUT of this issue and the importance of addressing modern slavery within our operations and supply chain including tailored training to different audiences.
7	Continue to ensure all owned and controlled entities, including all overseas operations, are included within the scope of reporting and consultation.
8	In addition to supply chain risks, continue to examine and address risks within the university's own operations, including a core focus on international students and research participants.
9	Ensure responsibility for compliance is shared—not outsourced to suppliers. Universities should take joint responsibility for any harms they have caused or contributed to.
10	Embed responsible purchasing practices into the university's own procurement policies and processes, in such a way as to place limits on subcontracting, alleviate downward pressure on tender pricing, ensure prompt payment, guarantee workers are paid a living wage, prohibit financial penalties and avoid short-term contracts and sudden changes in workload.
11	Beyond basic approval of the university's modern slavery statement, substantively involve executive leadership in the formulation and implementation of modern slavery strategy.
12	Support freedom of association and adopt a worker-centric approach in which workers, trade unions and civil society organisations are genuinely engaged every step of the way.
13	Continue to evolve the university's remediation process including ensuring we have effective grievance mechanisms established that are co-designed with users and accessible to all workers, including supply chain workers.
14	Develop clear remedial policies and corrective action plans that ensure supply chain workers are appropriately compensated and receive full, fair and timely remedies.
15	Disclose results from monitoring, use of grievance mechanisms and outcomes of remedial measures, being transparent about harms that were found and what was done to address them.
16	Continue to ensure that each university responds to its own set of modern slavery risks specific to that university and its controlled entities. Collective sectoral responses should not replace or substitute the efforts of an individual university.
17	Situate efforts to address modern slavery within a broader human rights and labour rights framework by aligning the university's modern slavery response with core International Labour Organisation standards and the <i>UN Guiding Principles on Business and Human Rights</i> .





# Approval

This fifth *Modern Slavery* Statement provided by QUT is pursuant to Section 13 of the *Modern Slavery Act 2018 (Cth)* and has been approved by the Council of Queensland University of Technology.

A handwritten signature in black ink, appearing to read 'MSheil', is positioned above the name of the Vice-Chancellor and President.

**Professor Margaret Sheil AO**  
*Vice-Chancellor and President*  
QUT

## Sources of data:

- QUT annual report
- QUT website
- QUT Anti-Slavery Reference Group, Risk Identification matrix
- QUT Anti-Slavery Reference Group, Action Plan
- QUT Anti-Slavery Effectiveness Measures
- QUT spend data provided February 2025 for Australian University Procurement Networking Benchmarking Data
- AUPN Anti-Slavery Dashboard
- QUT Power BI Dashboard with Procurement Spend (2025)
- QUT Anti-Slavery Remediation Plan
- AUPN, University Anti-Slavery Program Overview 2024







