



Central Queensland University

Modern Slavery Statement

Period: 1 January to 31 December 2021



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Introduction

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

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

About Us

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

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

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

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

Our Vision

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

Our Purpose

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

Our Values

Engagement

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

Can Do

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

Openness

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

Leadership

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

Inclusiveness

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

Our Structure

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

Our Entities

The University has the following controlled entities:

- CQU Travel Centre Pty Ltd, ABN 84 067 862 391
- Australian International Campuses Pty Ltd, ACN 088 382 012, as trustee for the Australian International Campuses Trust, ABN 27 585 479 146
- C Management Services Pty Ltd, ACN 088 415 829
 - PT CQU Executive Business Training Centre (established in Indonesia, NIB 9120002743602)
- Mask-Ed International Pty Ltd (dormant), ACN 151 764 046
- DataMuster Pty Ltd (dormant), ACN 625 765 942.

Australian International Campuses Pty Ltd and C Management Services Pty Ltd do not have employees or conduct business. Mask-Ed International Pty Ltd and DataMuster Pty Ltd are dormant.

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

Our Operations

CQUniversity is Queensland's only dual sector university and delivers more than 300 education and training offerings, from short courses and certificates, through to undergraduate, postgraduate and research degrees. Study areas include apprenticeships, trades and training, business, accounting and law, creative, performing and visual arts, education and humanities, engineering and built environment, health, information technology and digital media, psychology, social work and community services, science and environment, and work and study preparation.

As a pioneer in distance education delivery, CQUniversity continues to be a leader in online study with around one third of the current student cohort studying off campus, many of those in rural and remote areas. CQUniversity's flexible approach to learning and teaching, and continued innovation in this space, has provided opportunities for thousands of students to complete qualifications, regardless of their geographical location or personal circumstances.

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

CQUniversity places a strong emphasis on social innovation and global outreach and fosters several key partnerships with communities, industry and government, both in Australia and overseas. This commitment to engagement and social advancement has led to CQUniversity being recognised as Australia's first and only Changemaker Campus by Ashoka U, an exclusive global social innovation group of member institutions across the world.

CQUniversity's unique vision for diversity, outreach, engagement, research, learning and teaching, and inclusiveness, combined with its growth aspirations and continued expansion of student success, research excellence, social innovation and community engagement, has led to it being recognised within several world university rankings, and among the world's best 'young universities' by both the *Times Higher Education* and *QS World University Rankings*.

2021 At a Glance

Total students: 31 931 [^]	VET students: 10 478	New students in 2021: 10 881	On-campus students: 19 008 ^{^*}	Online / distance / mixed mode students: 13 283 ^{^*}
Students enrolled in a pathway or enabling course: 2119	Indigenous students: 1944 [^]	International students: 2956 [^]	Students from regional/remote backgrounds: 21 722 [^]	Research Higher Degree students: 650
Alumni: 121 939 International Alumni: 48 422	Graduating students: 7343 ^{#^}	Students awarded scholarships or financial support: 1524	Financial support and scholarships offered: \$4.1m	VET and higher education courses offered: 340
Micro-credentials offered: 221	Total employees: 1853 ⁺	2021 competitive research grant funding: \$22.7m	Invested in facilities and infrastructure: \$18.4m	2021 technology and digital investment: \$24.9m

[^] Combined higher education and vocational student numbers

^{*} Combined total number of on-campus and online students exceeds total number of actual students due to some students being enrolled in both online and on-campus units as at 31 December 2021

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

⁺ Full Time Equivalent continuing and fixed-term appointments (excludes casual appointments)

Employees and representation

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

The Central Queensland University Enterprise Agreement 2017 was in place for the reporting period. Employee rights are also protected through the University's comprehensive policy framework.

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



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

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

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

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

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

Our Supply Chains

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

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

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

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

Modern Slavery Risk Assessment and Response

CQUniversity has several measures to detect potential modern slavery occurrences in our supply chains. During the tendering process, all respondent suppliers are required to complete and sign a statement identifying any previous breach of modern slavery laws in their business and supply chains. These statements are reviewed during the tender review and recommendation process to ensure compliance; non-compliant suppliers are managed in line with legislative requirements. Furthermore, all CQUniversity contracts include

modern slavery provisions requiring our suppliers to represent and warrant that they conduct their business in a manner that is consistent with the Modern Slavery Laws and to notify us of any change to their compliance status or instances of modern slavery identified in their supply chain.

Effectiveness of Actions and Looking Ahead

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

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

Acknowledging the above risk profile, our primary areas of focus where Modern Slavery may occur are overseas recruitment agents and entry level facilities management services. Review of these areas of focus has been conducted with the finding that our agents are primarily sole traders, and our facilities management services are conducted by organisations with social outcome goals.

Our Procurement Policy and Procedure includes requirements, explanations and provisions of modern slavery compliance and is regularly reviewed. Our contractual agreements include modern slavery provisions.

Whilst we did not identify any instances of modern slavery in this reporting period, we will continue to work and collaborate with our supply chain to understand areas of underreporting. The new supplier statements implemented in our tendering suite in 2020 continue to have a positive uptake of the provision of information in this space. Continuing the trend of 2020, no instances of modern slavery have been identified, and the affirmative statements of compliance continue to paint a picture of the market scape for us.

Continued collaboration with our top tier buyers around modern slavery provides a broad picture of the supplier landscape. Educational resources are presently in development for rollout in late 2022 to assist our buyers in counteracting modern slavery in higher education procurement.

Consultation and Approval

Key stakeholders of each active controlled entity assisted with the compilation of this Statement. Our Executive team serve on the Boards of the active controlled entities, and have been involved in the endorsement of this Statement for approval.

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

On 29 June 2022 the Council approved this Statement for the year ending 31 December 2021 on behalf of the University and its controlled entities that are reporting entities pursuant to the *Modern Slavery Act 2018 (Cwlth)*.



Nick Klomp
Vice-Chancellor and President

Appendix 1: Definitions

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

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

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

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

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

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

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

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

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

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

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

Appendix 2: CQU Travel Centre Pty Ltd

Structure

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

Operations

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

Employees

The Company's four employees (3.19 full time equivalent) are employed directly, on a permanent basis, in accordance with the General Retail Award 2020, and offered above award wages. All employees are required to adhere to the agency's employee agreement which sets the standards required of employees. This agreement provides guidance on the ethical and behavioural standards required.

Supply Chain

Our supply chain involves a wide range of operators and suppliers of travel services, such as accommodation, cruises, tours, flights, hire cars and rail, using mostly Australian-based travel service providers. The remaining company purchases were for office and operational supplies and marketing, which were purchased locally from reputable local and national businesses.

Risk Assessment and Response

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

CQU Travel Centre Pty Ltd understands that there is a range of human right violations that constitute modern slavery risk and acknowledges that our operations and supply chain could be directly or indirectly linked to modern slavery practices. Assessment work will continue to review the Modern Slavery Statements, where published, of travel service providers used to enable informed decisions. In 2021, very little travel was undertaken, and the agency used only Australian airlines, hotels, car hire and trains.

Effectiveness of Actions and Looking Ahead

CQU Travel Centre Pty Ltd acknowledges its responsibility to reduce the risk of modern slavery in its supply chain and to take steps to address those risks through its activities and business relationships, and plans to continually build upon and improve our existing risk management and remediation frameworks as they relate to modern slavery and human trafficking. We will ensure to the best of our ability that facilitated travel bookings are not supporting modern slavery.

For those few instances where the company has a contract in place (which are operational in nature and not product-related), suppliers will be requested to complete a supplier questionnaire to enable the assessment of risks of modern slavery within those companies and their supply chains. Renewed contracts will include, wherever possible, requirements around modern slavery detection and prevention.

Appendix 3: PT CQU Executive Business Training Centre

Structure

PT CQU Executive Business Training Centre (PTCQUEBTC) was established on 9 July 2019 under Indonesia law as a limited liability company and the legal entity for the partnership with Bakrie to deliver high education dual degrees in Indonesia. The company's governance structure consists of a Board of Commissioners, Board of Directors and the General Meeting of Shareholders. Under Indonesian Law and Regulations, a foreign entity is only permitted to own up to 67% of the shares in an Indonesian limited liability company. Through an interposed entity, C Management Services Pty Ltd, CQUniversity is the majority shareholder of PT CQU Executive Business Training Centre, maintaining control of the company as the only voting shareholder.

The training centre is located at Sopo Del Office Tower A, 18th Floor Jl. Mega Kuningan Barat III Lot 10.1-6, Kawasan Mega KUNINGAN, KUNINGAN Timur Jakarta Selatan 12950, Indonesia.

Operations

PT CQU Executive Business Training Centre is the legal entity for the partnership with Bakrie University to deliver higher education dual degrees in Indonesia, and also delivers corporate training in its own right.

Employees

The company's 18 full-time academic and professional employees are employed directly, on a permanent or fixed term (sessional) basis in accordance with the applicable Indonesian employment and labour laws and regulations. Employee rights are also protected by Manpower Laws in Indonesia which secure work rights for all employees.

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

The company has adopted employment policies that comply with the requirements of the Indonesian Constitution and laws and regulations related to Industrial Relations and Employment. The company's employment contracts reflects these requirements.

Supply Chain

The company delivers higher education dual degrees in partnership with Bakrie University. The company also delivers corporate training to industry on project management, business financial management, and supply chain logistics, although delivery in 2021 was prevented by COVID-19 restrictions. The company purchases from highly reputable and recommended suppliers similar to or used by the Indonesian Government and partner academic institutions, where possible.

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

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

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

Risk Assessment and Response

The company recognises the potential for modern slavery to occur within the education sector and the services it may purchase to deliver day-to-day operations. A key mitigation strategy is to access and purchase

from highly reputable and recommended suppliers similar to or used by the Indonesian Government and partner academic institutions, where possible.

Risk assessments have been undertaken and the company acknowledges its responsibility to reduce the risk of modern slavery in its supply chain and to take steps to address those risks through its activities and business relationships.

Effectiveness of Actions and Looking Ahead

The company continues to review and improve its processes to ensure, to the best of its ability, it works with suppliers who are not involved in modern slavery practice.

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