

# **Australian Catholic University**

# **2023 Modern Slavery Statement**

1 January – 31 December 2023

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## Disclosure note

This statement has been made on behalf of Australian Catholic University.

This statement covers all entities owned or controlled by ACU.

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# Statement from Vice-Chancellor and President Professor Zlatko Skrbis

ACU is pleased to present its fourth annual Modern Slavery Statement demonstrating continuous improvement and compliance with the *Modern Slavery Act 2018 (Cth)*. This Statement is part of the 2023 Australian Catholic Antislavery Network (ACAN) Compendium of Modern Slavery Statements and highlights ACU's anti-slavery efforts across the organisation.

As a Catholic university, we are committed to upholding the dignity of every individual and community with any connection to ACU's supply chain and operations. I commend the efforts of ACU's modern slavery working group on their work to address the mandatory reporting criteria and continuously improve ACU's response.

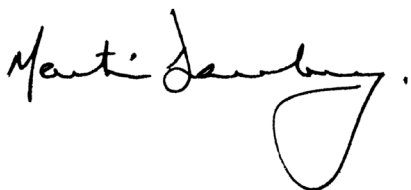
# Statement, Approval and Signature from Chancellor The Honourable Martin Daubney AM KC

In an era marked by complex global issues including modern slavery, fostering a culture of integrity, empathy, and global citizenship in students has become paramount. Therefore, ACU's commitment also involves equipping students with the ethical acumen to navigate and lead through the world's social, environmental, and economic challenges.

On behalf of the ACU Senate and Advisory Committee, I approve this report to the Australian Government and renew ACU's commitment to take an active role in eliminating modern slavery from the world.

This Modern Slavery Statement was approved by the principal governing body of Australian Catholic University as defined by the *Modern Slavery Act 2018 (Cth)* ("the Act") on 13 June 2024.

This Modern Slavery Statement is signed by a responsible member of Australian Catholic University as defined by the Act.



The Honourable  
Martin Daubney AM KC  
Chancellor  
Signed: 13 June 2024



Professor Zlatko Skrbis  
Vice Chancellor and President  
Signed: 13 June 2024

# Criterion 1: About Australian Catholic University (ACU)

ACU was established in 1990 through incorporation as a public company limited by guarantee, incorporated pursuant to the Corporations Act. ACU is a public university, funded by the Commonwealth Government, and is open to students and staff of all religious beliefs.

ACU has more than 32,000 students and around 2,500 staff, across seven Australian campuses - in Ballarat, Blacktown, Brisbane, Canberra, Melbourne, North Sydney and Strathfield, with two leadership centres (in Adelaide and Townsville) and one international campus in Rome. ACU's headquarters are in North Sydney.

ACU is a world-leading research university in our priority areas of education, health, theology and philosophy. Our culture of research excellence is founded on the principles of social justice and attracts global experts, students and collaborators. Refer: [ACU Key statistics/Research excellence](#).

Our research institutes collaborate with strategic partners across Australia and internationally to create real impact in our priority areas. Their research is founded on the principles of social justice and the common good.

**ACU's 2023 annual consolidated revenue is \$575,637,000.**



## ACU mission

Within the Catholic intellectual tradition and acting in Truth and Love, Australian Catholic University is committed to the pursuit of knowledge, the dignity of the human person and the common good.

## Mission, identity and values

We are guided by our clear mission, strong sense of identity and firm set of values. All three influence the decisions we make as an institution of higher education and guide our staff and students in their day-to-day lives.

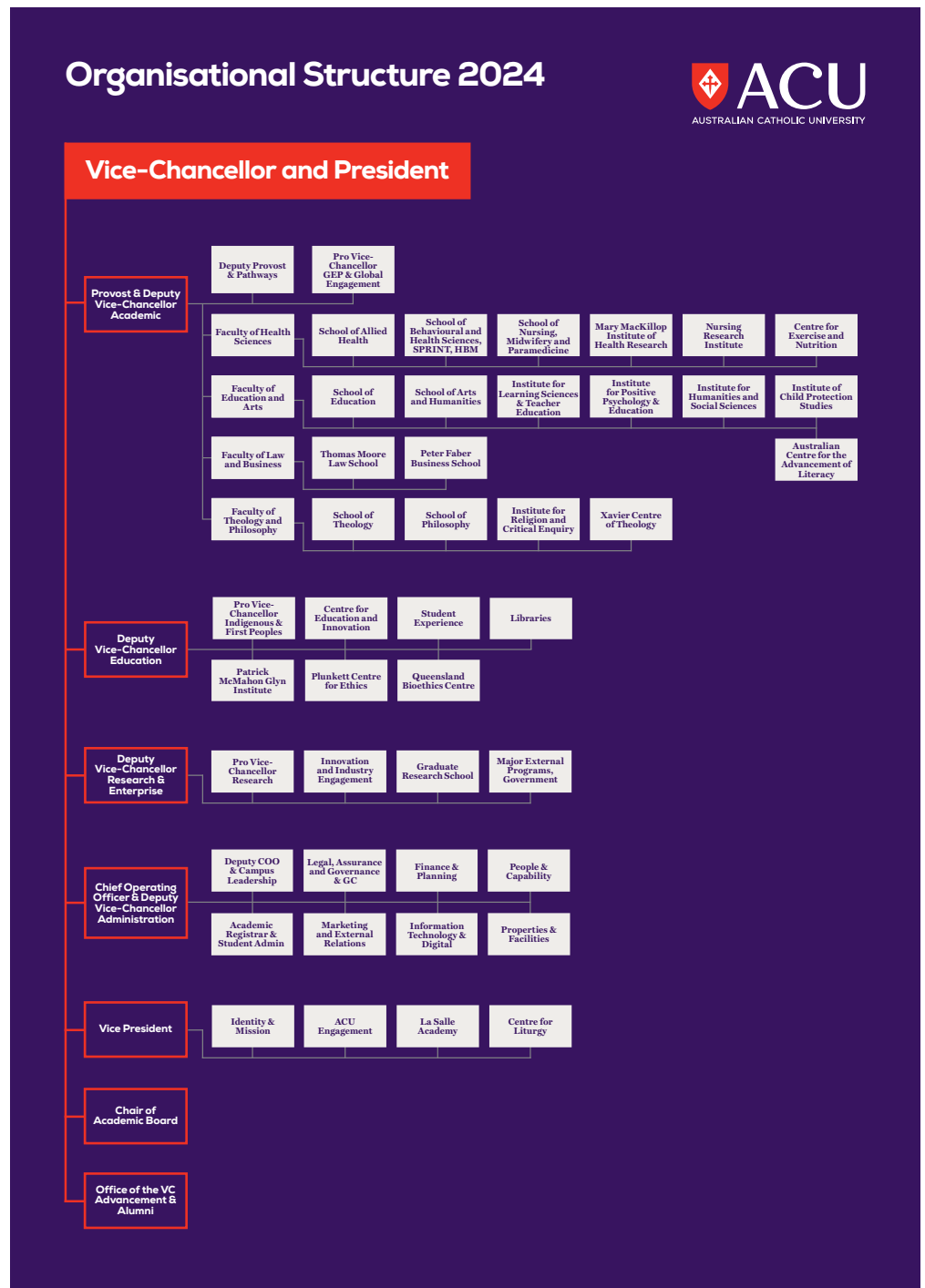
Our mission is at the heart of everything we do at ACU. It guides our approach to learning and teaching, our welcoming and engaging on-campus culture, and our commitment to building a better society by producing graduates willing to invest in this same commitment. In this mission, we engage the Catholic intellectual tradition to bring a distinct perspective to higher education.

Our university is founded on a long history of commitment to our core values of truth, academic excellence and service. But there are other important values that enhance the ACU experience for students and staff – including equity, diversity, accessibility, wellbeing and sustainability.

# Criterion 2: ACU's structure, operations and supply chains

## Our Structure

This diagram represents ACU's organisational structure at the end of 2023.



## Our governance framework

ACU's anti-modern slavery initiatives have been incorporated into the governance structure, requiring the approval of ACU's Audit and Risk Committee and ACU's Senate. Our key leaders and governance bodies are as follows:

### CHANCELLOR

ACU's Chancellor chairs the Senate, the chief governing body of ACU.

### PRO-CHANCELLOR

The Pro-Chancellor sits on the Senate, acts as deputy to the Chancellor, and chairs the Finance and Resources Committee.

### CORPORATION

ACU is a public company. The Corporation, as enshrined in our constitution, is responsible for maintaining a university that adheres to the Catholic faith and is committed to the pursuit of truth through academic enquiry.

### VICE-CHANCELLOR AND PRESIDENT

The Vice-Chancellor and President is the chief executive officer of ACU, represents the university both nationally and internationally, and provides strategic leadership and management.

### PROVOST AND DEPUTY VICE-CHANCELLOR (ACADEMIC)

The Provost is responsible for the Academic Portfolio: ensuring academic quality is maintained, overseeing the faculties, and providing the operational delivery of ACU's academic programs.

### THE VICE-CHANCELLOR'S ADVISORY COMMITTEE AND VICE-CHANCELLOR'S EXECUTIVE BOARD

The Vice-Chancellor's Advisory Committee (VCAC) is an advisory forum with the purpose of advising the Vice-Chancellor and President on key strategic and operational university matters. Strategic matters discussed at VCAC are referred to the Vice-Chancellor's Executive Board (VCEB), the university's key management committee, for ratification.

### THE UNIVERSITY CONSULTATIVE COMMITTEE

The University Consultative Committee (UCC) includes leaders from across various ACU leadership groups and is chaired by the Chair of Academic Board. This committee meets twice a year, once virtually and once in person, providing the opportunity for strategic discussion, information sharing and engagement.

### VICE PRESIDENT

The Vice President is responsible for Catholic-related operations of the university. This portfolio includes the Directorate of Identity and Mission, Campus Ministry and ACU Engagement. The Office of the Vice President animates programs and activities that engage, celebrate and support the university community's development in and understanding of the mission, Catholic identity and living traditions.

### CHIEF OPERATING OFFICER AND DEPUTY VICE-CHANCELLOR

The Chief Operating Officer is responsible for the Corporate Services Portfolio. This portfolio covers a broad range of areas including properties and facilities, student administration, information technology and finance.

### DEPUTY VICE-CHANCELLOR (RESEARCH AND ENTERPRISE)

The Deputy Vice-Chancellor (Research and Enterprise) oversees this growth area for ACU and works with researchers to foster ACU's culture of research excellence and maintain our world-leading research outputs.

### DEPUTY VICE-CHANCELLOR (EDUCATION)

The Deputy Vice-Chancellor (Education) has responsibility for developing and leading ACU's ethical capacity, including the Catholic intellectual context, and for raising ACU's ethics impact in the University, community and internationally.

### SENATE

The Senate is ACU's chief governing authority. Its members' roles include managing the budget, creating policy, overseeing university operations, and ensuring adequate risk management procedures are implemented and followed. ACU's Chancellor and Pro-Chancellor head up our Senate and ensure ACU is governed in accordance with our constitution.

### STATE CHAPTERS

To connect ACU with local communities, we have State Chapters in the Australian Capital Territory, New South Wales, Queensland and Victoria. These chapters report to the Senate and act as advisory bodies but have no direct governance role.

### ACADEMIC BOARD

Our Academic Board reports to the Senate and is responsible for all academic matters, including conducting quality assurance, developing academic policy, recommending new courses to the Senate, and initiating course reviews.

### SENATE AND BOARD ELECTIONS

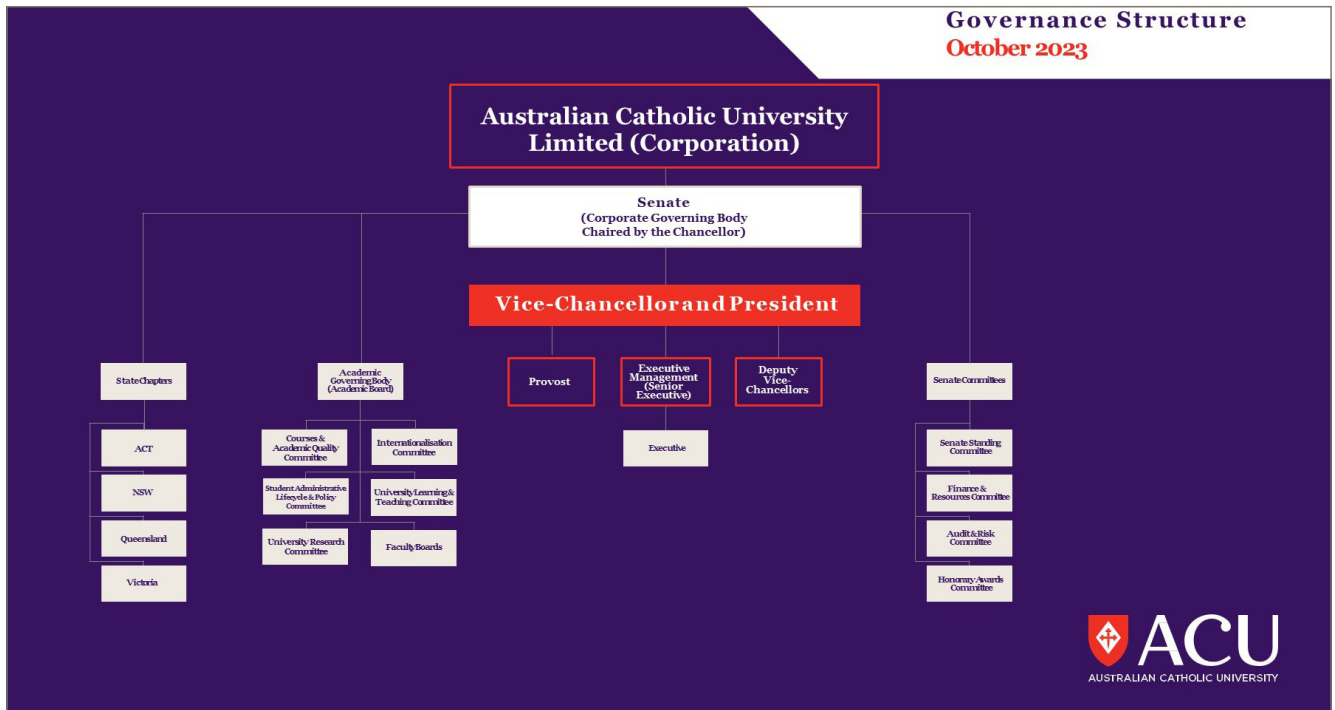
Elections are held to appoint members to the Senate and Academic Board from the university's academic and student bodies. The Senate also holds elections to appoint a professional staff member.

For a visual representation of the governance structure of ACU, please see the Governance Structure chart below.

ACU's Governance Directorate has a suite of policies and procedures which relate to the conduct, decision making, risk management, internal organisation and management of the university.

### ERADICATING MODERN SLAVERY (EMS) WORKING GROUP

ACU's Eradicating Modern Slavery (EMS) Working Group is chaired by the Vice President and Director, Identity and Mission, and comprises members of the ACU senior executive, other key ACU personnel and representatives from the Catholic Archdiocese of Sydney's Anti-Slavery Taskforce. It was established in 2020. Its remit is to look at further eradicating modern slavery and human trafficking risks in ACU's operations, policies, procedures, supply chains, business partnerships and employment and to raise anti-slavery consciousness across the whole University. (More detailed information about its role and objectives can be found under Criterion 4).



## Our operations

ACU is a publicly funded teaching and research organisation with four primary faculties (education and arts, health sciences, law and business, and theology and philosophy) and a corporate services division, itself made up of a number of directorates, including: Legal, Assurance and Governance; Properties and Facilities; People and Capability; Finance and Planning; Marketing and External Relations; and Student Administration.

Students are both domestic and international.

ACU operates across seven Australian campuses – Ballarat, Blacktown, Brisbane, Canberra, Melbourne, North Sydney and Strathfield - with one international campus in Rome, and leadership centres in Adelaide and Townsville. Our headquarters are in North Sydney.

The following details are provided about ACU:

NB: Some of this information is in a process of change or being updated.

The year the data represents is indicated where applicable.

- Approximately 2,500 staff (FTE) (2023)
- Approximately 32,300 students (2023)
- Approximately 139,000 alumni (2023)
- Approximately 4,200 international students from 96 countries enrolled (2023)
- More than 200 international partners across six continents (2023)
- More than 1,000 ACU students have studied at our Rome Campus (2023)

## Our strategic plan

Modern slavery is identified as an important objective in ACU strategic planning and was included in the *ACU Strategic Plan 2020 - 2023*:

- **1. All our endeavours, grounded in mission**
  - 1.8. Strengthen our leadership role in creating and sustaining child-safe organisations and the prevention of harm to children, through education, research and industry partnerships.

- **6. Service, stewardship and sustainability**
  - 6.8. Take bold and decisive action on environmental, social and economic sustainability, and the eradication of modern slavery.

Extensive consultation was undertaken in 2023 to establish an updated strategy, and ACU's *Vision 2033* has since been released in early 2024. *Vision 2033* sets the direction for the next stage of ACU's journey and presents ACU with the opportunity to build a stronger, more agile and resilient ACU.

# Criterion 3: Modern slavery risks in operations and supply chain

ACU has submitted data to the risk assessments platforms undertaken on behalf of both the Australian Catholic Anti-Slavery Network (ACAN) and the Australasian University Procurement Network (AUPN).

These assessments present an overall picture of risk based on the types of goods and services being procured and the country of origin. Such assessments help ACU to focus our attention on what are generically regarded as high inherent risk activities.

## Operational risks

Since key operational activities are performed by Tier 1 suppliers, the potential for operational risk is the risk posed with respect to the provision of services.

These risks are therefore being addressed under supplier risk categorisation and action.

Otherwise, measures to address operational risks are by assessment of the extent to which internal processes and practices are sufficiently updated to reflect necessary requirements. Please refer to ACU's 2023 Modern Slavery Maturity Assessment (under Criterion 5).

ACU's commitment to the principles of eradicating modern slavery is demonstrated by their inclusion for risk assessment, focus and action within ACU's Operational Risk Registers, and by the implementation of mitigating control measures to ensure ACU meets and complies with Australian Federal and State's Anti-Slavery reporting obligations.

### PRODUCT AND RISK CATEGORISATION SYSTEMS AND SOFTWARE TOOLS

Both ACAN and the AUPN have developed risk categorisation systems based on various aspects of the supply chain, such as the type of goods or services, and where services are provided or made.

ACU has submitted our data and spend to both ACAN and the AUPN. Further analysis is being undertaken to categorise risk for key areas of spend.

The purpose of the software tools can be broadly described as follows:

- to describe the product and risk categorisations
- to allocate specific suppliers to their respective product and risk categorisations, which may include the assignment of primary, secondary or other tier levels of risk
- to enable the collation of suppliers' information
- to enable suppliers to provide information directly to the tools via portal access
- to collate suppliers' actions
- to enable suppliers to provide a sector-wide response
- to be a single point of contact for all suppliers to avoid suppliers having to make multiple responses to different entities.

The tools will help with ongoing supplier risk assessment and actions required within supply chains to help mitigate modern slavery activity.



# Our supply chain

ACU's annual consolidated revenue in 2023 was \$575,637,000, with 76.1 per cent of this revenue derived from government grants.

We have more than 3,500 suppliers of goods and services in our supply chain. However, just over 183 of these suppliers represent the top 80 per cent of spend. Based on an overall supplier spend of approximately \$150 million in 2023, the major categories that represent the top 80 per cent of spend are as follows:

LEVEL 1 SPEND CATEGORY	2023 APPROX. SPEND (\$000S)
Building and construction:	\$29,974
Information technology – equipment and services:	\$21,302
Student placements:	\$17,885
Facilities management:	\$4,332
Consulting services:	\$9,733
Marketing and communication services:	\$9,308
Utilities:	\$3,985
Other office and workplace supplies:	\$3,245
Cleaning:	\$5,278
Student recruitment – international:	\$11,644
Plant and equipment:	\$8,980
Security services:	\$3,559
Insurance premiums:	\$3,137
Travel and accommodation:	\$7,441
Library books, systems and services:	\$7,907

\* ACU Annual Report 2023



# Sourcing of goods and services

Our supply chain activities include working with supply chains from many different sectors. Goods and services may be sourced from overseas, as well as locally, generally via Tier 1 suppliers and not directly. Therefore, ACU has in the supply chain those areas and geographic locations that at some stage in the overall chain would be regarded as representing some type of modern slavery risk. The university, through our finance division, also engages in investment activities.

ACU uses a spend categorisation system. This system best explains the variety of goods and services procured across ACU to meet our many operational demands.

Therefore, goods and services may be sourced in any of the following categories, which have been simplified and amalgamated for this report:

- architectural design services
- audio visual equipment and services
- building and construction – supplies, fit outs, demolition and services
- business and finance systems
- civil engineering and construction services
- cleaning – equipment and services
- clothing and footwear – corporate, promotional and general
- conservation and heritage services
- education services
- environmental services
- equipment disposal services
- event management services
- facilities management – bookshops, catering, maintenance, landscape/gardening and security
- financial services, including valuation services
- health – equipment, consumables and services
- hire equipment and services
- human resources services – employee assistance, recruitment, training and other HR services
- industrial supplies – electrical, hardware and chemicals
- information technology – computer desktops, laptops, copiers, printer and other peripherals
- information technology – software, systems, design, installation and implementation services
- information technology – training, web services, cybersecurity and other professional services
- insurance – providers, brokers and consultancy services
- laboratory supplies – equipment and consumables
- library – books, periodical, equipment, software and services
- marketing and media services – advertising, creative, photography and digital services
- office supplies – equipment and consumables
- printing services
- other professional services – asset management, auditing, legal, procurement, risk and quality
- property and realty services
- safety apparel, equipment and consumables
- telecommunications – commodities, equipment, carrier and installation services
- transportation and logistics services – courier, freight, postal, relocation and warehousing
- travel and accommodation – agencies, hotels, airlines, trains and vehicles
- utilities – energy, water, equipment, maintenance and related services
- vehicles – supply, rental, fleet management and cleaning services
- waste management services
- water treatment and sewage services
- workplace health and safety services.

Professional services are generally provided by locally based Tier 1 suppliers. In some cases, these Tier 1 suppliers utilise overseas support staff to conduct some of the more transactional aspects of their service offering. This may include services provided out of countries such as India, China and the Philippines.

Equipment, commodities and clothing are generally be sourced from overseas, mainly China and South-East Asia, once again via Tier 1 suppliers located in Australia.

ACU, through our membership with Supply Nation, is looking to increase sourcing from locally based Indigenous suppliers, who may nevertheless source some of the items from overseas manufacturers.

# Modern slavery risks in investments

(refer to Criterion 4 ‘Actions to address modern slavery risks in investments’)

ACU has approximately \$27.2 million in investments, managed through JBWere. The investment sector has very specific benchmarks around ethical investments. There are specific fund managers who only undertake ethical investments; these managers will only invest funds with an organisation where they can obtain complete satisfaction that the organisation is trading ethically and as stated.

However, modern slavery risks in the investment sector could potentially include low visibility across multi-tiered international supply chains, which may involve other high-risk sectors and geographies. In addition to the resulting potential exploitation of victims of modern slavery, identified modern slavery in ACU’s investment providers’ supply chains could lead to reputational risk which could have a negative impact on the organisation.

# Modern slavery risks to students

(refer to Criterion 4 ‘Actions to address modern slavery risks to students’)

Students and young people are at a much higher risk of experiencing modern slavery, with international students the most vulnerable, as they are likely to have lower English language skills, fewer nearby family or support networks, and may not be aware of Australian workplace laws.

In 2022, ACU began to consider the risks of modern slavery to international students posed by education recruitment agents in its network overseas. These risks may include unlawful and deceptive recruitment and misleading information by agents, which can lead to debt bondage or increase vulnerability of students to exploitation.

ACU currently has 226 registered international education agents and anticipates that approximately 8,000 international students will be recruited from overseas over the next five years.

We have 30 clauses in our agreements with international student recruitment agents outlining their responsibilities to:

- promote the university in an honest and ethical manner
- provide accurate information on courses, the university and services offered to students
- comply with the ESOS Act 2000 and National Code 2018 with a particular focus on Standard 4 and Standard 6 of The Code
- maintain confidentiality
- act in the best interest of the students.

Any arrangements between students, their families and education agents outside of the above agreements are difficult to monitor in source countries.

# Modern slavery risks around apparel/ student uniforms

(refer to Criterion 4 ‘Actions to address modern slavery risks around apparel/student uniforms’)

The clothing industry (including uniforms) is at very high risk for modern slavery practices. ACU purchases uniforms (for student activities related to nursing, allied health and across other faculties - and for adhoc events and promotional purposes) from a preferred uniform supplier, who employs several overseas factories, and so scrutiny and visibility

can be more challenging. This can make it harder to both monitor and address labour practices effectively. Risks are many and include forced labour, child labour, trafficking, underpayment, excessive overtime, insecure labour contracts and lack of worker empowerment. Laws vary across different countries, which means disparities as to how modern slavery risks are handled and addressed.

# Our people

ACU has a diverse workforce of staff with different cultural backgrounds, ethnicities, and gender. Our Code of Conduct and our comprehensive suite of policies and procedures reflect our terms and conditions, as well as expected standards of behaviour. All policies and procedures are documented, available on the ACU website and reviewed and updated in accordance with quality review protocols on a scheduled and as needed basis. Included is a policy relating to Protected Disclosures.

Our People Plan 2022 – 2025 was launched in 2022 and sets out a suite of initiatives in support of ACU’s mission and strategic priorities. These include building leadership capability, enhancing health safety and wellbeing and supporting a diverse workforce and culture of inclusiveness.

ACU has an Enterprise Bargaining Agreement (EBA) in place that came into effect in February 2023. The EBA sets out conditions of employment including entitlements and remuneration. Both academic and professional staff are remunerated based on a classification methodology that is transparent and equitable.

## IN DEVELOPMENT

When recruiting staff through third party recruitment agencies, ACU uses a preferred supplier panel, selected via a formal open tender process. To ensure the panel in place will continue to comply with our rigorous procurement standards and values, ACU went out to market again in 2023, with the view to appointing a revised supplier panel, commencing early 2024.

A new Staff Learning Hub, in preparation in 2023, has launched for all staff in early 2024. It includes up to date, engaging modules on subjects related but not limited to: health, safety, wellbeing, managing risk at ACU, staff obligations under our Code of Conduct and a modern slavery module to support ACU’s commitment to working for the eradication of modern slavery and human trafficking. The hub also includes a refreshed induction program in line with our commitment to equip commencing staff with the ability to perform their roles safely, effectively, and responsibly from the outset of their employment.

A program of work continues to educate staff around key enterprise agreement and policy requirements. This includes a human resourcing metrics dashboard, to provide visibility and transparency over key workforce data and enable effective decision making.

Further related information may be found in the latest ACU annual report:

[ACU Annual Report 2023](#)

# Supply chain risks

## SPEND RISK ASSESSMENT

ACU undertakes a number of risk assessments. These assessments are provided in part to ACU from platforms developed by the AUPN. These platforms help to inform ACU where attention may be directed to help address or mitigate modern slavery activities, in conjunction with other means. The data upon which the below analysis is based is subject to review and may be regarded as continually evolving – however it forms an excellent basis for developing ongoing planned activities.



# Criterion 4: Actions to assess and address risk

## SUMMARY OF ACTIONS TAKEN

Below is a summary of some of the actions taken by ACU to date. Some of these items are referred to, or elaborated on, in this and other sections of this report:

- Participation in ACAN and AUPN activities and internal working groups (to share knowledge and assess compliance requirements and risk), including ACAN's year four modern slavery risk management program and ACU's Eradicating Modern Slavery (EMS) Working Group.
- Collation and submission of spend data, including supplier information, to both ACAN and AUPN risk assessment systems.
- Involvement of key managers and directors from the most at-risk sectors within ACU in supplier engagement workshops.
- Discussions with key suppliers in identified high-risk supply chains, such as construction, clothing and critical services. Plans underway to have further interactions with prioritised suppliers to address compliance and verification strategies in relation to anti-modern slavery initiatives.
- Implementation planned of additional reporting and compliance requirements through the use of the ACU Tender Portal.
- A vendor category of 'fair trade' has been created in the vendor master of ACU's purchasing system. This allows certified fair-trade companies to be identified for future purchasing activity.
- The ACU online 'New Supplier Request Form' contains a comprehensive modern slavery questionnaire to be completed by each new supplier prior to onboarding into our finance system.

Specifically, the following actions are in progress or planned:

- a) To continue to use toolsets created by both ACAN and the AUPN to gather information about modern slavery, anti-modern slavery activity, and legislative requirements.
- b) Further engagement with ACU's national and state-based managers to reinforce their role and obligations regarding anti-modern slavery measures when making purchasing decisions.
- c) To deploy to all ACU personnel the online training programs developed by ACAN on the broad requirements of anti-slavery measures and activities.
- d) To continue to use the detailed maturity assessment to monitor continuous improvement across any impacted areas of ACU.
- e) To develop aspects of the ACU Tender Portal to allow it to be used as a due diligence tool to help educate suppliers and to monitor supplier compliance activity in relation to anti-modern slavery measures.
- f) To continue the engagement with key suppliers in areas of high risk.
- g) To deploy a SharePoint site which will contain all the initiatives that ACU is currently undertaking in response to modern slavery.
- h) ACU's membership of the University Procurement Hub (UPH), and increased use of UPH's robust specialised services, which provide the opportunity of source-to-contract cost savings by aggregating spend from participating universities across particular categories. UPH also offers associated benefits such as improved process efficiency, spend visibility and effective spend analysis from richer data and marketing intelligence, with the aim to drive continuous improvement.

# ACU's Properties Directorate – Addressing modern slavery risks

Facilities management, a responsibility within ACU's Properties Directorate, is a recognised area of high risk – particularly in relation to cleaning and security. To this end, the Properties Directorate has undertaken a number of measures to mitigate this risk, as follows:

- Ensuring all national tenders have a mandatory Q&A field in relation to this issue with respect to:
  - supply chain management
  - wages, salaries, benefits and sub-contracting.
- Continuing to audit and retain documentation of three levels of supply chain for selected high-risk items; level one is ACU, then the Tier 1 supplier (ie. the engaged service provider), and then the Tier 2 supplier (ie Tier 1's sourcing supplier).
- Annually seeking, for all engaged service contracts, a statutory declaration from the vendor and/or their staff confirming the following for each member of staff engaged to provided services to ACU:
  - their name

- they are a direct employee of the engaged contractor (vendor) with ACU
- they are employed at the specified ACU campus
- they are paid in accordance with the modern industrial award stated in the service agreement
- they receive all their salary benefits, including insurance, superannuation and leave entitlements
- the statement is made under their own free will and without influence.

Where this information is not able to be provided directly by the vendor's personnel, ACU will attempt to verify the information through other validation processes.

In 2023, the UPH (via Accenture), commenced two formal and stringent tender processes, to select both a security services company and a cleaning company to service participating universities, including ACU's seven national campuses. Sustainability and ethical considerations formed part of the evaluation criteria of the two tender documents and a new supplier will be selected in 2024.

## Development and expansion of Sedex to monitor, report on and mitigate ACU supplier risk

Sedex is the world's largest online platform for collecting, sharing and auditing ethical supply chain information. Sedex enables self-reporting of suppliers against industry sector databases.

In mid-2021, ACU signed an ACAN agreement to use Sedex and, in late 2021, commenced the supplier onboarding process. We initially invited 49 high-risk ACU suppliers to join Sedex, requesting they complete a detailed self-assessment questionnaire about their organisation and connect with ACU. This ongoing onboarding process allows us to build and gain strong visibility and compliance capabilities over our supply chain and its inherent risks. As of the end of 2023, 64 ACU suppliers are on Sedex, with 179 suppliers having completed ACAN's Supplier Survey.

The Sedex tool has a number of useful capabilities, and it is our intention to continue into 2024 and beyond to expand our knowledge and use of these. In late 2023, ACU provided its supplier spend data and contacts to ACAN, for the purposes of confirming correct ACAN taxonomy, and to cross-reference with and build information for ACAN's existing supplier base, in order to facilitate ACAN's assistance in 2024 to coordinate for ACU:

- supplier invites to webinars and pre-assessment questionnaires; and
- further supplier Sedex onboarding.

The Sedex platform/process can be used to:

- easily find existing suppliers within the sector and create relationships with them
- check supplier progress as they complete the steps in the onboarding process
- review each supplier individually and engage with them around improvement
- put higher-risk suppliers into an audit program
- create intuitive data reports and insights
- identify deficiencies for discussion in more detail with the supplier
- pull out specific topics of concern and take a specific issue-based approach.

Sedex representatives continue to offer training to member staff, depending on where they are on their supplier compliance journey, offering assistance and guidance to use the tool effectively.

Across 2023 and moving forward, ACU continues to increase its utilisation of ACAN related services, including supplier base analysis and the resulting further onboarding of suppliers to Sedex.

The use of Sedex complements the similar process also being undertaken through the AUPN tool.

## ACU PROCUREMENT POLICY

Supplier engagement is in accordance with the ACU Procurement Policy, which underwent substantial revision in 2014 and again in 2022. In 2022, a clause was introduced stating ACU's commitment to tackling modern slavery practices at every level, including that:

“Staff purchasers of university goods and services are required to take steps to identify and minimise any modern slavery risks and to take into consideration the principles of the **Modern Slavery Act 2018** (Cth), the commitments made by ACU to date towards eradicating modern slavery and human trafficking, and to ensure suppliers to ACU:

- 8.1.14.1. conduct their businesses in a manner that is consistent with the principles of the *Modern Slavery Act*; and
- 8.1.14.2. “take reasonable steps to ensure that there is no modern slavery in the supply chains of their agents, contractors, and/or sub-contractors or any part of their respective businesses or dealings.”

The Procurement Policy sets out how sourcing decisions may be undertaken by ACU staff. The policy is underpinned by procedural and reference materials, which establish minimum requirements for key suppliers.

## ACU SOURCING PROCESS – TENDER, MINIMUM SUPPLIER AND NEW SUPPLIER REQUIREMENTS, AND RELATED DOCUMENTATION

We have transitioned to addressing modern slavery as it relates to our new supplier touchpoints upfront – when undertaking tenders and onboarding suppliers, and as existing supplier contracts are extended or renewed – while continuing to review our existing supplier base.

ACU has included requirements for sustainable and ethical sourcing, including anti-slavery measures, in our tender and contract template documentation for a number of years. These continue to be upgraded, with input from ACU legal counsel, to reflect more stringent requirements, and have been applied to all procurement activities that utilise ACU's formal sourcing processes.

These have included sourcing in relation to high-risk sectors such as corporate apparel supply. These minimum requirements reference sustainability, ethical sourcing and anti-slavery requirements. ACU requires suppliers to provide information about countries and places of manufacture and what auditing and compliance requirements they have in place.

To this end, specific and robust anti-modern slavery clauses have been built into ACU's full suite of tender and contract template documentation (which includes tailored documentation for services, goods, contractors, consultants and technology). Our online 'New Supplier Request Form' contains a comprehensive modern slavery questionnaire to be completed by each new supplier prior to onboarding into our finance system.

All suppliers of goods to ACU in tender situations must answer a detailed tender assessment criterion titled 'Commitment to Ethical Sourcing', which requires a supplier's comprehensive written response as to their commitment, policies, processes and actions in relation to sustainability, ethical sourcing and modern slavery. This question is also included in our 'Minimum Requirements For Suppliers of Goods and Services to ACU – In Non-Tender Situations'. This is to provide transparency that everything possible is being done to avoid slavery practices in the supply chain.

Supply arrangements resulting from formalised tender processes are generally managed under formal contract agreements involving key performance indicators for effective performance management. Contract and tender documentation is maintained in SharePoint databases, and formal tendering processes for sourcing projects utilise a hosted tender portal arrangement.

## EMARKETPLACE CATALOGUE

The ACU eMarketplace catalogue displays products from a range of different suppliers which can be selected by staff using ACU's TechOne online system for requisitioning and purchasing. The catalogue is restricted to preferred suppliers and their products. The eMarketplace administrators have started working with the network suppliers to start tagging their catalogue products, in order to track ESG spend moving forward, so suppliers will be able to start tagging their own sustainable and Indigenous source products and their Modern Slavery compliance.

## MODERN SLAVERY – STAFF TRAINING

ACU has been using the online training program modules developed by ACAN to educate key directors and managers across ACU on the broad requirements of anti-slavery measures and activities. This was supplemented by an in person workshop run by ACAN. ACU's People and Capability Directorate worked with ACAN to add the training modules developed by ACAN to the suite of training modules available to all ACU personnel.

All staff members involved in purchasing and procurement decision-making are required to undertake, and have undertaken, the available ACAN modern slavery training modules. Other interested staff members are actively encouraged to increase their awareness and understanding of the impacts of modern slavery by undertaking the modules.

Directors and managers were advised that while all staff would have the option to elect to complete the training modules (as also communicated in ACU's internal communication, the Staff Bulletin), it is a mandatory requirement for certain staff groups (as follows), including those that make purchasing and procurement decisions as part of their role, including:

1. Group 1. Management levels 5 and 6 including National and State Managers.
2. Group 2. Faculty Finance Managers, Finance Portfolio Management Accountants, Finance Procurement personnel, Properties Facilities Managers at site or state level and Properties Capital Development and Project Managers, if not at Levels 5 or 6.
3. Group 3. Designated purchasing staff within a faculty or directorate as nominated by management level 6 or higher.

At the end of 2023, approximately 330 staff (including directors and managers) had completed the two introductory modules 'Modern Slavery 101' and 'Business Relevance'. Two additional modules are expected to be rolled out to relevant staff by end 2024.

ACU's People and Capability Directorate is currently reviewing its processes regarding enrolment into the Modern Slavery training modules, to improve completion rates and outcomes. Moving forward this is expected to include:

- automated enrolment for the target audience
- completion reminder notifications to those enrolled
- expected timelines for completion.



## ACU membership of key affiliated associations

**ACAN Anti-Modern Slavery Working Group:** 10 teleconference meetings and six supplementary webinars were attended by ACU representative(s) in 2023.

**AUPN Modern Slavery Working Group Anti-slavery Forum meetings:** Nine meetings were held in 2023.

**ACU's Eradicating Modern Slavery (EMS) Working Group** was established towards the end of 2020. The EMS Working Group comprises members of the ACU senior executive, other key ACU personnel, and representatives from the Catholic Archdiocese of Sydney's Anti-Slavery Taskforce. Three meetings were held in 2023.

The EMS Working Group's objectives are to:

- provide input and advice to the university on issues related to modern slavery
- actively support the development and implementation of ACU's Modern Slavery Action Plan
- help ACU to determine priority actions to be undertaken and to establish annual goals and targets
- monitor and review actions taken to assess and address modern slavery risks and evaluate their effectiveness
- ensure ACU meets the requirements of the Modern Slavery Act 2018 (Cth)
- raise awareness across ACU, including among students and professional and academic staff.

Across 2022 and 2023, key focus points for ACU's EMS Working Group have included:

- The redesign, expansion and enhancement of the ACU website's eradicating modern slavery information page.

- Actions to support the successful embedding of modern slavery as an ongoing subject in ACU's Core Curriculum unit UNCC300 (see Criterion 7 for update).
- Providing a forum to facilitate information flow and debate on modern slavery risks across ACU's operations and supply chain.
- Continuing to raise awareness about modern slavery risks (and advise on potential actions to address these) across the university.
- Monitoring and reviewing actions taken to assess and address modern slavery risks and evaluate their effectiveness.

Moving forward into 2024, the Working Group's focusses will include:

- Working with relevant staff to embed anti-slavery principles into ACU's staff induction program, and the organisation's suite of policies and procedures relating to conduct, decision making, risk management, internal organisation and management.
- Reviewing the ACU website to look for opportunities to link in MS references and educational resources, such as case studies.
- A review of the working group's structure, membership and activities - to ensure it is optimised to fulfil its purpose.



# ACU's general framework for addressing the potential for modern slavery

ACU has developed a planned response and adopted the following measures to aid the eradication of modern slavery in supply chains.

## ACU's five anti-modern slavery (AMS) pillars of support

Throughout its anti-slavery initiatives, ACU will consider and consolidate into its actions five fundamental pillars of support to help eliminate slavery in its supply chains.

For several years, ACU staff have actively contributed to the anti-slavery working groups of both ACAN and the AUPN.

### PILLAR 1: A PURCHASING COMMITMENT

A definitive statement on the position of ACU in having sourcing arrangements with suppliers which have identified slavery practices in their supply chains:

- It is ACU's policy not to have supply arrangements with suppliers that have modern slavery practices in the supply chain of the goods or services being provided. New tendering opportunities and contractual arrangements are to specify this requirement. Where it becomes evident an existing supply arrangement has modern slavery practices within the supply chain of a supplier, then to the extent that the supplier is directly responsible for this practice, this will be a cause for immediate termination of the supply arrangement, unless satisfactory remedial action is able to be taken and it can be shown there were mitigating factors to help exonerate the supplier from any deliberate or criminal behaviour. Before any decision to terminate, the supplier will be given the opportunity to address the issues raised.
- Where it becomes evident an existing supply arrangement has modern slavery practices within a supplier's supply chain, then to the extent that the identified practice is linked to the immediate supplier and that the immediate supplier is not directly responsible for this practice, the immediate supplier will be given a timeframe (to be negotiated, but generally no greater than 12 months) to take the actions necessary to eliminate or mitigate the identified modern slavery practices in its supply chain, which can be verified to ACU's satisfaction.
- Where modern slavery practices are understood to exist within global supply chains and are not readily amenable to corrective actions, or where taking such action may severely impact those personnel to whom anti-slavery initiatives are designed to protect, then ACU will collaborate with organisations to help mitigate slavery practices, protect the people concerned, and help bring about positive change to the extent possible given the circumstances.
- This commitment extends to illegal, unethical, unfair and exploitative practices in relation to the engagement of workers in the supply chain, where those practices are able to be established, and the same responses as detailed above shall apply.

A number of the actions required to give effect to the following five pillars of support are joint endeavours being managed either by ACAN or the AUPN, while some are ACU's specific responses.

These actions are detailed under the following anti-modern slavery (AMS) pillars of support.

**ACTION:** ACU has anti-modern slavery requirements built into all of our template contract and tender documents. These are subject to ongoing review. A comprehensive modern slavery questionnaire must be completed by all new suppliers, through the onboarding process.

### PILLAR 2: ONGOING TRAINING AND EDUCATION

To use both sector-based resources and ACU-specific resources to help educate both ACU employees and suppliers about the existence of modern slavery, how it may be identified, what actions they can take to mitigate modern slavery activity, and what ACU's expectations of them are.

**ACTION:** The following are in progress and in various stages of completion:

- ACU has access to the toolsets created by both ACAN and the AUPN in relation to information about modern slavery, anti-modern slavery activity and legislative requirements.
- ACU has provided information to ACU's national and state-based managers, who have a responsibility for purchasing decisions, about pending activity associated with anti-modern slavery measures.
- ACU has used the online training programs developed by ACAN to educate key directors and managers across ACU on the broad requirements of anti-slavery measures and activities. This was supplemented by an in-person workshop run by ACAN.
- ACU's People and Capability Directorate worked with ACAN to add the training modules developed by ACAN to the suite of training modules available to all ACU personnel. Two modules have been rolled out and another three will be made available to suitable ACU staff by the end of 2024.
- ACAN has provided an online self-assessment tool to assist participating ACAN entities to assess where additional education and action from different sections may be required. This self-assessment was conducted and results are presented in as a Maturity Assessment (**Refer to Criterion 5**).
- The ACU Tender Portal will continue to be used to provide information to suppliers on modern slavery, anti-modern slavery activity and legal requirements, and to obtain from suppliers a response to their awareness of the issue, and measures they have, or are taking, to address this.

### **PILLAR 3: A PRODUCT AND RISK CATEGORISATION SYSTEM AND SOFTWARE TOOLS**

Both ACAN and the AUPN have developed a risk categorisation system based on various aspects of the supply chain, such as the type of good or service, and where services are provided or made.

**ACTION:** ACU will continue to provide data and spend to identify relevant risk categorisations. The supporting software tools will be utilised to further analyse the data, as well as to:

- Describe the product and risk categorisations.
- Allocate specific suppliers to their respective product and risk categorisations, which may include the assignment of primary, secondary or other tier levels of risk.
- Enable the collation of suppliers' information.
- Enable suppliers to provide information directly to the tools via portal access.
- Collate suppliers' actions.
- Enable suppliers to provide a sector-wide response.
- Be a single point of contact for all suppliers, to avoid suppliers having to make multiple responses to different entities.

The tools will help with ongoing supplier risk assessment and actions required within supply chains to help mitigate modern slavery activity.

### **PILLAR 4: REMEDIAL ACTION**

Remedies to identify modern slavery practices will take a variety of forms, as summarised below:

- Managing supplier relationships in accordance with Pillar 1: A Purchasing Commitment.
- Using specialist organisations (when selected) to help identify modern slavery practices in existing supply chains, and to advise or assist with remedial action.
- Adopting an appropriate remedy pathway of Domus 8.7 as promoted by ACAN.

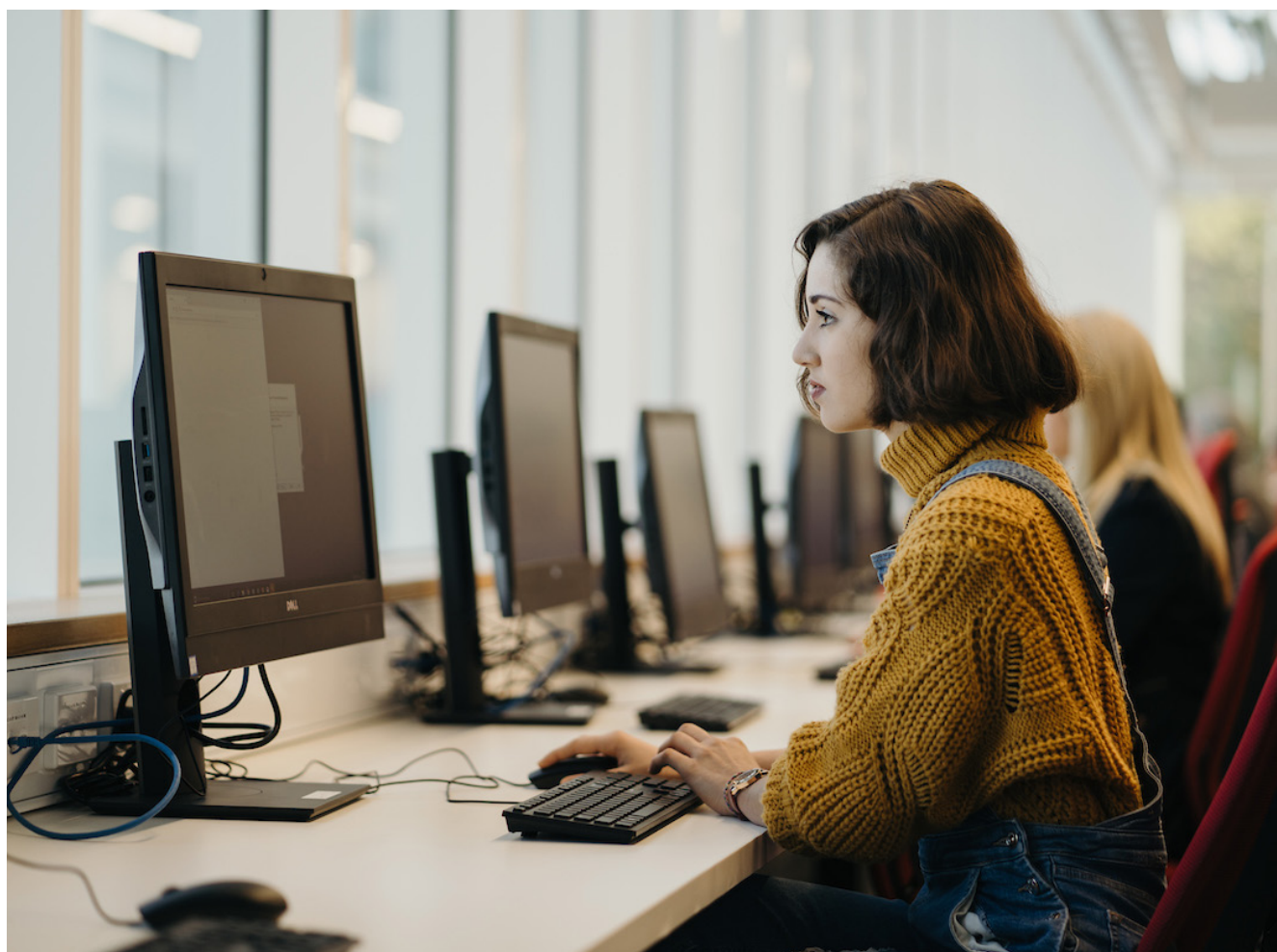
**ACTION:** ACU will implement the above.

### **PILLAR 5: REPORTING CONSISTENCY**

Reporting needs to meet legislative requirements and be consistent with the reporting format of the organisation, or organisations, with which ACU is participating in producing a consolidated report, where that may occur.

**ACTION:**

- ACU will continue to collaborate with ACAN to submit a consolidated report.
- Key ACU personnel responsible for generating the ACU report have attended ACAN report writing workshops.
- ACU is using guidance and feedback provided by ACAN to create its annual report.



# Modern slavery action plan and road map

## ROADMAP OF AREAS REQUIRING FURTHER ACTIVITY - IN RESPONSE TO ACU'S MATURITY ASSESSMENT

The roadmap below is based on areas identified through ACU's ongoing Maturity Assessment process (refer Criterion 5) and indicates key areas of activity required to be implemented. It summarises ACU's current position and indicates where additional undertakings are required.

MANAGEMENT SYSTEMS	HUMAN RESOURCES AND RECRUITMENT	PROCUREMENT AND SUPPLY CHAIN	RISK MANAGEMENT	CUSTOMERS AND STAKEHOLDERS
ACU Senate and management commitment to anti-modern slavery (AMS).	Management across ACU is aware of modern slavery. Further involvement through planned training platforms to extend this knowledge.	AMS requirements have been incorporated into processes and tender and contract documentation. Need to be reviewed and updated as necessary.	MS risks have been captured in ACU's formal risk management system. The documented risks are to be periodically reviewed and actioned as required under ACU's risk management protocols.	ACU's customers are students and shareholders, who are themselves underpinned by the Sustainability Bond. The mission and values espoused by ACU make AMS initiatives of critical interest and importance to its customer and stakeholder base. ACU will continue to engage with these vital groups to present our activity in this area.
Further integration into business processes is required.	Key staff including senior managers and directors have been involved in supplier training workshops and have undergone training themselves.  Two of a series of five training modules developed with ACAN have been made available to all staff and made mandatory for certain groups including managers and those who make purchasing and procurement decisions. The remaining modules are expected to be rolled out to relevant staff by the end of 2024.	More formalised mechanism to assess MS risks, to be considered for inclusion into sourcing and contracting activities. All new suppliers now required to complete comprehensive MS questionnaire. ACU membership of UPH, increased use of UPH specialised procurement services.	Some aspects of the key supply chain could be susceptible to MS risks, especially in: the construction sector due to the large amount of capital infrastructure underway; critical facilities services, such as cleaning and security; and key commodity supplies such as apparel and computers (including computer recycling and e-waste services). Although these are understood and monitored accordingly, ACU will continue to be vigilant in these aspects of our supply chain.	ACU is keen to openly share our AMS activities through various public fora. This includes this statement, the ACU Tender Portal when that function is developed, the Catholic Archdiocese newsletters and other publicly available media. In doing so, suppliers will not be named, confidential information will not be shared, and the privacy of entities with which ACU has dealings will be respected.
Further action is required to educate suppliers and verify their AMS initiatives.	Hiring policies and HR systems to be further reviewed to ensure key requirements relating to AMS initiatives are incorporated.	ACAN and AUPN tools, in conjunction with other data analysis tools, are to be used to provide updated supplier and spend MS risk assessments, including the use of specialist service providers.	Risks in the extended supply chain are to be monitored via the industry-based tools being made available to ACU from both ACAN and the AUPN.	ACU is to develop a more formalised mechanism to receive feedback about MS issues from inside the university as well as from suppliers.
Development of organisational and supply chain reporting of modern slavery (MS) risks.	AMS initiatives are made known during recruitment and to relevant agencies. Needs review to ensure existing practices are adequate.	Tools being developed to ensure AMS initiatives and requirements are made readily available to all suppliers to ACU, including via ACU eMarketplace's upcoming supplier self-tagging of catalogue products regarding their MS compliance.  The above tools will enable supplier MS risks to be monitored and corrective actions taken to address concerns where they arise.	MS risks are reported through the ACU risk management system. Other reporting mechanisms will be considered for development.	ACU needs to consider what methods may be appropriate to allow direct communication with workers in supply chains in order to receive feedback directly and not from management in a candid, private and non-threatening manner.
		A continuing effort to engage with, and provide opportunities to, certified fair-trade organisations.		

# Actions to address modern slavery risks in investments

As investors, we have a responsibility to ensure, to the greatest extent possible, that modern slavery does not occur in the companies in which we invest, including in their supply chains where funds are invested via investment managers and self-managed investment portfolios (largely term deposits with banks). The university supports investments

in the charitable, religious and educational works of the Catholic Church as well as ethical and socially responsible investments (SRIs), and ensures investments are only made with entities that have corporate practices that promote environmental stewardship, consumer protection, human rights and employee diversity.

# Actions to address modern slavery risks to students

## STUDENTS - INTERNATIONAL

In late 2022, ACU Global Engagement committed to reviewing all agreements issued to overseas-based education agents for the recruitment of international students. In 2023, our International Education Agent agreements were updated to contain a comprehensive clause which relates specifically to the university's anti-modern slavery requirements, based on content provided by ACU Procurement to vendors, and in consultation with relevant internal ACU stakeholders, including the Office of the General Counsel.

The agreements continue to have comprehensive references to agents' responsibilities in the promotion of the university, and service provision that complies with the ESOS Act 2000 and The National Code 2018. Procedures are in place to address any potential misbehaviour or inappropriate conduct by agents.

Through direct communication, ACU can empower international students to understand their rights, disclose and seek support, including counselling and legal support, to address any unethical arrangements with recruiters or any exploitation experienced through work, housing or other arrangements post-arrival.

ACU Global Engagement provides information on Australian work rights each intake for commencing international students, based on a collaboration with the Fair Work Ombudsman. International students have equal work rights to all other workers in Australia. To ensure new international students understand this, we have developed and provide them with a short presentation on working rights in Australia, which includes information about minimum wage, maximum working hours, the role of the Ombudsman, and a case study video.

In addition to the ongoing support referenced above, from 2023 commencing students are asked upon arrival to complete ACU's onboarding survey - which contains questions that relate to their experience of the services provided by their education agent, with a focus on meeting TEQSA and National Code requirements in relation to orientation. The working group is meeting in early 2024 to strengthen the existing survey questions. The new survey will go live in late April 2024.

## STUDENTS - GENERAL

All students at ACU, including international students, have access to free, confidential counselling services on campus. ACU counsellors are experienced and trained psychologists or social workers who deliver specialised programs in the areas of mental health, emotional wellbeing and enhancing mental resilience. All students can access six free counselling

sessions per year. Each face-to-face session runs for 50 minutes and provides the opportunity to discuss any issues of concern in a supportive environment. Two 30-minute drop-in sessions are also available on campus each day.

In 2022, ACAN program managers delivered training to 12 ACU counsellors on how to identify and respond safely to disclosures of modern slavery, and made a recording of the session as an internal resource that can be viewed by new staff. ACAN program managers also created a new referral resource for counsellors that will help any students who disclose modern slavery indicators to seek further advice and assistance, including legal advice.

ACU students, including international students, have access to two free, confidential 45-minute legal advice sessions with a private law firm that includes access to written advice. ACAN program managers conducted outreach to the law firm in 2022 to discuss training for their staff on how to increase awareness of and respond to any indicators of modern slavery in 2023.

ACU's Careers and Employability team will undertake fair work training from the Ombudsman each year from 2024, so they are well-prepared to offer fair work support and advice in appointments around assisting students to access correct and current information.

ACU's Safeguarding and Student Safety team assists any student who may be facing difficult times or who may have experienced, observed or heard about sexual behaviour which may be illegal, inappropriate, threatening or concerning (including situations related to modern slavery).

Students can access the service via:

- an online form
- in-person via a Safety Support Officer, a trusted member of staff, an ACU counsellor or directly via the Safeguarding and Student Safety team
- phone via the National Security Centre
- legal services funded by ACU

Support is tailored to the specific situation and need, and may include (but is not limited to):

- access to free counselling and legal advice sessions
- academic adjustments and extensions
- assistance with reporting, including education around options
- assistance with accommodation/housing
- welfare checks.

While prepared to do so, to date the team have not dealt with any matters that relate to modern slavery.



## Actions to address modern slavery risks around apparel/student uniforms

ACU recognises the important responsibilities corporate clothing suppliers, and organisations that source products from global factories, have in ensuring human rights are respected, and that responsible operations are undertaken across their supply chain.

ACU's preferred uniform supplier's entire local supply chain has been audited and is accredited by Ethical Clothing Australia, to ensure the fair and proper treatment of every single worker.

The organisation employs several factories internationally for the manufacture of a number of garments. Each of their international manufacturers must meet SA8000

standards for workplace practices, which cover eight main areas important to social accountability in the workforce - including forced labour, working hours, remuneration, and health and safety.

The supplier's manufacturing partners are audited by third parties under the Business Social Compliance Initiative (BSCI) and Sedex supply chain management audits. Staff members make regular overseas trips to oversee production and engage with partners. The supplier's nominated factories and supply chain partners must have successfully passed auditing and must maintain this status as current, prior to receiving orders from the supplier.

# Criterion 5: Effectiveness assessment

## ACU Modern Slavery Maturity Assessment

To assess the ongoing level of maturity and progress made across all areas of ACU, a self-assessment is performed annually. ACAN has generated a Maturity Assessment from ACU's completed annual Entity Profile.

The ACAN Maturity Assessment provides a score card of an ACU's capabilities to mitigate the risk of modern slavery in its operations and supply chains. The score card is generated from a self-reported Entity Profile Survey. The score card will be used by our EMS Working Group to set future direction, establish a multi-year action plan and identify where to allocate resources for the most benefit.

The score card ranges from: 0 to 100.

Achieving a score of 100 – which signifies the complete demonstrated capability to assure modern slavery risks are not present in operations and supply chains through validated and verifiable evidence - is an aspirational and long-term goal.

The journey towards ending modern slavery is progressive, requiring sustained effort, learning, adaptation, capability and capacity-building and investment of resources proportionate to the complexity of the risks.

The score card provides for:

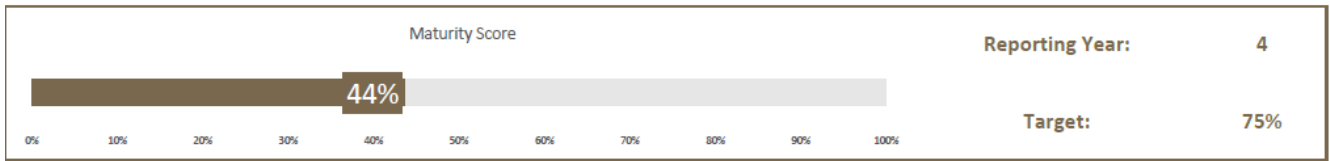
**Holistic overview:** Using a 0 to 100 scale provides an overall and long-term view of progress where even offering a strategic perspective can inform decision-making and strategic planning. By mapping progress on a more nuanced continuum, entities can show improvement through incremental steps towards broader, long-term objectives. Understanding that ending modern slavery is an ambitious goal, the scoring system is designed to recognise more granular actions and impacts.

**Contextual understanding:** Recognising that entities vary in size, sector, and operational complexity, the scoring system allows for a tailored assessment that considers these factors. A score should be interpreted in the context of the entity's specific challenges and opportunities for impact.

**Flexibility and adaptability:** Organisations are dynamic and their capabilities can change due to financial resources, organisational structures, the regulatory environment, technological infrastructure etc. The scoring is flexible so it can respond to these shifts.



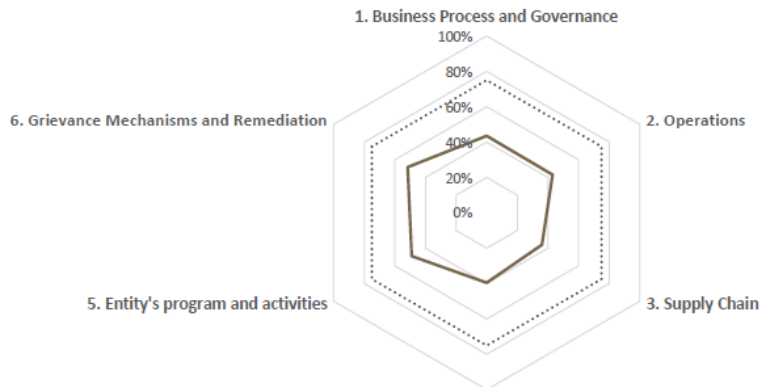
The 2023 result for ACU is as follows:



### Australian Catholic University (ACU) - 2023 Analysis by Pillar

Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2023
1. Business Process and Governance	49%	54%	35%	35%	44%
2. Operations	45%	55%	37%	36%	43%
3. Supply Chain	13%	80%	31%	21%	36%
4. Worker Engagement	36%	61%	25%	36%	40%
5. Entity's program and activities	85%	25%	50%	36%	49%
6. Grievance Mechanisms and Remediation	63%	60%	48%	36%	52%
Average	49%	56%	38%	33%	44%

Maturity Score 2023 individual scoring by pillar and sub pillar, including averages and total 2023 score



ACU's score falls in the 31% - 50% = **Emerging Practice** (Years 3 - 5) level. Emerging practices represent methodologies that are recognised as efficient and effective in managing modern slavery risks, based on current knowledge and evidence. These practices are benchmarked and serve as models for emulation. This means ACU's processes related to modern slavery risk management are well-defined, standardised, and integrated into the organisational culture and operations. The focus extends beyond individual projects to include organisation-wide standardisation and continuous process, accompanied by adequate staffing and resources.

**Baseline data** - ACU has introduced the ACAN Baseline Data table in 2023 that can also be used to demonstrate continuous improvement over time, by comparing to previous years.

ACTIVITY	AUSTRALIAN CATHOLIC UNIVERSITY
<b>INTERNAL / STAFF</b>	
Hours spent on modern slavery activities	600
Individual staff completed e-learning	366
E-learning modules completed	692
<b>EXTERNAL / SUPPLIER ENGAGEMENT</b>	
Total number of suppliers	3700
Number of suppliers across high-risk categories	453
Number of ACAN Supplier Surveys completed	82
Supplier staff attending capacity building webinars	126
Invited to join Sedex	12
Joined Sedex	4
Sedex SAQ completed	2
Social audits	2
Corrective actions	3
<b>DOMUS 8.7 EXTERNAL REFERRALS</b>	
Contacts made via worker voice / grievance mechanism	6
Referrals for advice and assistance	0
Individuals identified or referred for modern slavery assessment	0
Individuals with modern slavery cases remediated	0

## Measures to assess effectiveness of anti-modern slavery measures – in use or in development


The following measures are either already in use or in development to assess the effectiveness of anti-modern slavery measures and requirements, with respect to both Tier 1 suppliers and other suppliers further along the overall supply chain:

- Inclusion of stipulated contract review meetings and measurement of performance against key performance indicators, in all significant ACU contracts.
- Self-reporting of suppliers against industry sector databases where they exist (eg. Sedex).
- Use of third-party tools to investigate and assess anti modern slavery performance (eg. Sedex).
- Use of ACU reporting tools to receive information about performance (eg. use of the ACU Tender Portal).
- Receipt and assessment of supplier action plans designed to ensure modern slavery practices are avoided within the supply chains of Tier 1 suppliers.
- Establishment of auditing processes to verify compliance and performance by ACU and third-party auditors, including the review of audits initiated by suppliers.

These measures apply to all ACU campuses and operational personnel. The national and state managers are responsible for all of our campuses in Australia.







## **Criterion 6:** **Process of consultation with entities owned or controlled**

ACU does not own or control any other entities and therefore this criterion is not applicable.

# Criterion 7: Other relevant information

## **ACU CORE CURRICULUM AND SESU SCHOLARSHIP PROJECT 'DOMUS LINKS: MODERN ANTI-SLAVERY TRAINING FOR THE FUTURE WORKFORCE'**

The Stakeholder Engaged Scholarship Unit (SESU) is ACU Engagement's flagship initiative, established in 2020, to equip the university with a centralised avenue for initiating and activating community-led research. The SESU provides a unique offering to partners of the university to propose, co-design and deliver scholarship and research projects alongside university academics, especially where they will support communities experiencing disadvantage or marginalisation.

In 2023, the SESU completed a two-year project with the Anti-Slavery Taskforce of the Catholic Archdiocese of Sydney. The Anti-Slavery Taskforce is committed to increasing awareness of modern slavery across professional sectors, especially the education, health and social work sectors. The project entitled, 'Domus Links: Modern Anti-slavery Training for the Future Workforce', introduced the topic of modern slavery to young people before they embark on their professional journeys. This project saw e-learning materials on modern slavery weaved into the ACU undergraduate curriculum. Specifically, teaching materials on modern slavery were designed and integrated into each of the five modules of ACU's UNCC300 unit, a third-year level core curriculum unit on Justice and Change in a Global World.

Following a pilot of the new learning materials with a cohort of 772 students in Semester 2, 2022, the modern slavery curriculum was delivered to a total of 2655 students in 2023 across all ACU campuses, who were enrolled in UNCC300. There were approximately 100 ACU tutors involved in the teaching of these materials.

The e-learning materials equip students with a greater understanding of modern slavery, including the *Modern Slavery Act*. Importantly, students were provided with an understanding of modern slavery as it relates to their personal and professional selves and their community responsibilities. The materials build students' capacity to identify and safely respond to people impacted by severe forms of exploitation and slavery-related crimes; imperative knowledge as they graduate from university as professionals ready to join the workforce in 2024. Specific topics include: defining modern slavery; human rights; the *Modern Slavery Act*; indicators of modern slavery; the interdependence of modern slavery with environmental degradation; modern slavery as both entwined with and a functioning component part of broad, complex crises; fairtrade; supply chains; orphanage trafficking; engaged governance and community empowerment; anti-slavery advocacy.

Students are also exposed to a suite of 15 educational video resources, which were specifically produced for the core curriculum, to provide a range of perspectives on modern slavery and enable students to see how it intersects with many industries. Through the videos, students met nine inspirational people, including a rare opportunity to hear directly from a survivor about his personal experience of modern slavery in the Australian horticulture industry. This

was the very first time that Mr Moe Turaga shared his story on video. Mr Turaga was the face of the Commonwealth Inquiry into Establishing a Modern Slavery Act for Australia, and his story is documented in the Hidden in Plain Sight report. He is an important advocate for change. The other industry experts filmed were from several different organisations. Many are either at the forefront of responding directly to victims of modern slavery or are involved in key advocacy work. Students learnt first-hand through the videos about the following topics: crisis and accommodation support provided at the only trafficking and slavery safe house in Australia; orphanage trafficking and the risks of voluntourism; fairtrade products as an important tool for preventing modern slavery; key investment and financial considerations; sustainability and modern slavery; as well as human rights and the legal perspective. The project also saw us develop a bespoke animation to introduce students to the topic of modern slavery—the first of its kind bespoke animation for the core curriculum. To bring greater public awareness of key issues of modern slavery, the videos have been shared by the Anti-Slavery Taskforce with other organisations in their network and some of the videos have been made publicly available on the ACU website.

ACU intends to maintain this topic of modern slavery as a core part of the teaching materials in the ACU core curriculum.

## **ACU'S THOMAS MORE LAW SCHOOL PRO BONO WORK**

ACU continues to be proud of the pro bono work our law students are doing under the leadership of the Dean of the Thomas More Law School, Professor Patrick Keyzer. The students continue to complete their pro bono placements with the Anti-Slavery Taskforce of the Catholic Archdiocese of Sydney. To date, the collaboration has contributed around 9,000 hours of review, analysis and ranking. Prior to 2023, 70 ACU law students analysed more than 1,500 modern slavery statements, making it the largest study in the country. In May 2022, the Thomas More Law School and the Catholic Archdiocese of Sydney's Anti-Slavery Taskforce held the third in a series of webinars on the topic of eradicating modern slavery. ACU was represented by four of our final-year law students – Adeline Kassis, Eve Van Rhine, Patrick Beer and Phoebe Straube – who presented the findings of their analysis of dozens of modern slavery statements. In 2023, 50 interns from ACU analysed over 800 statements, equating to around 8,800 pages of written text, at an average of 11 pages per statement (graphics/other visuals not included in page count).

## **SAINT JOSEPHINE BAKHITA – PATRON SAINT OF ACU BLACKTOWN CAMPUS**

As we work to address the injustices inflicted upon the most vulnerable members of our communities, we draw inspiration from Saint Josephine Bakhita - the patron saint of our Saint Josephine Bakhita Campus in Blacktown, and patron saint of modern slavery victims and human trafficking.

## FACULTY OF EDUCATION AND ARTS ANTI-SLAVERY INITIATIVES

The below represents anti-slavery activities instigated by the Faculty of Education and Arts as regards integration into curriculum, teacher education and research.

ACTIVITY	DESCRIPTION
<b>Integration into curriculum</b> Initial Teacher Education	Anti-slavery awareness is engaged with in the unit TECH209 Textile Industries (TECH209 - <a href="http://TextileIndustries.acu.edu.au">Textile Industries (acu.edu.au)</a> ) in relation to allegations of the Fashion/Textile industry and regulatory measures.  Representative resources are: <b>Get The Latest Ethical Fashion Guide - Baptist World Aid</b> . And concepts like 'True Cost of Fashion' <b>'The True Cost' - Official Trailer - YouTube</b> and <b>modern slavery in fashion - Unseen (unseenuk.org)</b>
<b>Integration into curriculum</b> Bachelor of International Development Studies; International Development Studies minor sequence	Anti-slavery awareness is engaged with in several units in international development. In particular the unit <b>DVST200 Refugees and Forced Migration</b> looks at the intersection between asylum/human trafficking.
<b>Research</b>	Dr Kristie Flannery's research explores urban women's experiences of migration, labour, and love between slavery and freedom in the early modern Indo-Pacific world. Conducting this research allows better understanding of the dynamics of modern slavery, with education being at the core of changing behaviour.
<b>Supply chain research</b>	As part of its Initial Teacher Education programs, ACU makes payments to schools and organisations in Early Childhood settings to support Professional Experience Placements. The Faculty is working with Finance to update our processes to ensure that we meet requirements for eradicating modern slavery in our procurement supply chain.



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