



Curtin University



# MODERN SLAVERY STATEMENT 2020

## INTRODUCTION

Curtin University (*Curtin*) aspires to be one of the finest universities in the world, transforming lives and communities through education and research.

We are committed to promoting environmental and social responsibility and to embedding sustainability into all aspects of our operations, teaching and learning, research, and engagement. As a recognised leader in sustainability research, we strive to build sustainability into the very fabric of Curtin and are in the process of creating a world class sustainable campus.

This statement, pursuant to the Australian Modern Slavery Act 2018 (Cth), sets out the actions taken by Curtin to address modern slavery and human trafficking risks in our business and supply chain for the financial year ending 31 December 2020.

Curtin's approach to addressing modern slavery is embedded in our core values:

- Integrity: To act ethically, honestly and with fairness
- Respect: To listen, value and acknowledge
- Courage: To lead, take responsibility and question
- Excellence: To strive for excellence and distinction
- Impact: To empower, enable and inspire.

The principles and standards that Curtin has consulted and considered in our development of this Statement include:

- The United Nations (UN) Declaration of Human Rights
- The UN and International Labour Organisation conventions
- The UN Global Compact's ten principles
- The UN Sustainable Development Goals.

This is Curtin's first statement, and it describes our actions over the past financial year to develop a strategic, industry wide and informed approach in collaboration with the Australian University Procurement Network (*AUPM*), and in line with the requirements of the Australian Modern Slavery Act. It outlines Curtin's approach to develop a framework to detect the risk of modern slavery and human trafficking across our business and supply chain and implement appropriate responses.

Curtin is a public university located in Perth Western Australia. It is a body corporate established under the Curtin University Act 1966 (WA).

## STRUCTURE, OPERATIONS & SUPPLY CHAIN

### OPERATIONS (Teaching & Research)

Curtin is a leading Australian university with 9 campuses in Western Australia, Malaysia, Singapore, Dubai and Mauritius. The main campus is in Bentley, Western Australia, set out over 116 hectares with over 100 buildings and landscaped gardens.

It is the largest university in Western Australia, teaching around 60,000 students across four faculties of Science and Engineering, Humanities, Health Sciences and Business and Law. Curtin is a world class research university, receiving over \$100M in research funding in 2020 from both public and private sources. We have agreements with more than 80 international partner institutions in almost 20 countries and participate in 16 Cooperative Research Centres.

Curtin employs over 3,500 staff in teaching, research, and support roles. Most staff are employed under an Enterprise Bargaining Agreement negotiated in conjunction with the NTEU.

Curtin's annual revenue is around \$1B. Approximately 55% of revenue is received from the Australian Government for both research and teaching purposes. Other revenue sources include student fees and charges and consultancy and contract research income.

### SUPPLY CHAIN

Curtin's external spend for both operations and capital expenses in 2020 was over \$350M, across over 5000 vendors and 800 active contracts.

Curtin, in collaboration with 35 other Australian universities through AUPN, classifies our external spend using a four-tier hierarchy, across four key categories:

Business Services (35%)	Properties & Facilities (40%)	Research & Teaching (10%)	Technology (15%)
<ul style="list-style-type: none"><li>• Corporate professional services</li><li>• Human resources</li><li>• Logistics &amp; storage</li><li>• Marketing &amp; media</li><li>• Office related supplies &amp; services</li><li>• Travel &amp; entertainment</li></ul>	<ul style="list-style-type: none"><li>• Buildings &amp; grounds</li><li>• Construction, refurbishment &amp; works</li><li>• Plant &amp; equipment</li><li>• Property management</li><li>• Utilities &amp; renewables</li></ul>	<ul style="list-style-type: none"><li>• Laboratories &amp; research</li><li>• Lecturer &amp; teaching expenses</li><li>• Library services</li><li>• Student services</li></ul>	<ul style="list-style-type: none"><li>• Audio visual</li><li>• IT hardware</li><li>• IT professional services</li><li>• IT software</li><li>• Telecommunications</li></ul>

- **Business Services:** General business services represents a large proportion of Curtin purchases, including spend on research and teaching collaborations with other universities, student recruitment and advertising, and temporary staff expenses.

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- **Properties and Facilities:** A significant proportion of Curtin's external spend is dedicated to maintaining and developing the campus infrastructure needed to support the teaching, learning and research activities.
- **Research and Teaching:** Curtin also spends around 10% with suppliers of research and teaching goods and services specific to higher education.
- **Technology:** Technology to support teaching, learning, research and operations makes up around 15% of our external spend.

Curtin is a significant contributor to the Australian economy. Over 90% of Curtin's external spend in 2020 was with companies established within Australia. The remaining 10% was spent across the United States (4%), Europe (3%), Asia (2%) and elsewhere (1%).

### RISKS OF MODERN SLAVERY PRACTICES IN CURTIN'S OPERATIONS & SUPPLY CHAINS

Curtin's approach to addressing modern slavery practices in our operations and supply chain starts by applying AUPN ratings to identify high risk markets and countries we purchase from. Together with industry, we have developed plans to increase transparency and continuously improve our approach to removing modern slavery practices from our supply chain. The plans and the results are reported to the senior executive and Council and published annually in Curtin's Modern Slavery Statement.

Industries that employ vulnerable populations have the highest risk of modern slavery. Vulnerability has many causes, including poverty, age, gender, immigration status and lack of legislative support for human rights. In the last five years, there has been increasing published research to create transparency on industries and geographies that are particularly susceptible to modern slavery. AUPN has reviewed the research and has developed and published a risk rating (high, medium, and low) for Australian university supply chains at both a category level and a country level using the following tools:

- Global Slavery Index
- Verisk Maplecrafter Human Rights indices
- Global Compact Network
- TRACE International
- the Transparency International Corruption Perceptions Index
- OECD Due Diligence Guidance for Responsible Business Conduct
- the Modern Slavery Registry.

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

Approximately 10% of Curtin's spend occurs in categories that are classified as high risk. The following high risk categories have been identified:

- IT hardware
- Medical PPE

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- Clothing & apparel
- Construction
- Cleaning

Only a small proportion (less than 0.5%) of our direct total spend is with suppliers based in countries that are classified as high-risk .

### ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

During 2020, Curtin engaged with the higher education industry both nationally and internationally through the collaboration with AUPN to ensure we develop a best practice research informed framework, seeking to maximise our impact on reducing modern slavery as an industry.

With this as guidance, Curtin has developed an approach to managing the risk of modern slavery in our supply chain through the application of the following changes to our procurement processes:

- Procurement Planning stage:
  - Modern slavery training.
  - Development and roll out of a risk screening tool.
  - Requirements included in tender documentation and evaluation process.
- Evaluation and Selection stage:
  - Supplier Code of Conduct.
  - Supplier due diligence questionnaire pre-award.
  - Contract clauses in new contracts.
- Contract management stage:
  - Contract reviews include a modern slavery risk assessment.
  - Contract variations and extensions include contract clauses.
  - Supplier due diligence to identify and remediate issues and measure improvement.

During 2020, Curtin implemented the following specific risk management actions:

- Trained key procurement personnel in managing the risk of modern slavery in the procurement process.
- Commenced engagement with market wide international collaborative frameworks aimed at increasing transparency and enabling ethical purchasing decision making, such as Electronics Watch for IT equipment and the Cleaning Accountability Framework for cleaning.
- Introduced modern slavery reporting requirements for tender evaluation considerations for high-risk procurement activities.
- Inclusion of appropriate contract clauses and response schedules into new contracts, and contract variations for high-risk industries.

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- Developed a Supplier due diligence questionnaire to be sent to high-risk suppliers, to develop a baseline to measure effectiveness of our risk management approaches.
- Developed and circulated a draft Supplier Code of Conduct.
- Updated contract templates to include a requirement for Curtin's suppliers to comply with the Curtin Supplier Code of Conduct.

## ASSESSMENT OF THE EFFECTIVENESS OF ACTIONS

Curtin recognises the importance of developing a clear reporting framework to measure effectiveness of our approach to addressing modern slavery risks and to enable a programme of continuous improvement. In the first year of reporting, the challenge has been to develop a framework, in line with higher education and Commonwealth Government recommendations, and where applicable, gather the data necessary for a baseline. Curtin aims to capture and measure our approach to the following four key activity streams:

- Training and awareness activities - including an increasing rollout of training programmes across Curtin, to create ongoing awareness from senior management, procurement personnel, staff, and students.
- Procurement activities – including the frequency and consistency of the application of modern slavery requirements in the tendering and selection process.
- Supplier activities - will involve an ongoing Supplier due diligence programme and working collaboratively with industry led initiatives such as Electronics Watch and the Cleaning Accountability Framework.
- Response activities - will involve an assessment of how Curtin is responding to identified modern slavery risks.

To develop a baseline, we identified suppliers in the high-risk areas of our supply chain and asked them a series of questions to measure the maturity of their approach during the first reporting period. The intent will be to repeat the process regularly to measure any improvement on transparency and reduction of risk.

### COVID-19

The onset of the COVID-19 pandemic in 2020, created a unique set of issues within the global supply chain.

There was a significant and urgent increase in Curtin's requirements for Medical PPE (gloves, masks, gowns) and cleaning products. During this time, many of Curtin's regular suppliers did not have stock, and we purchased stock from a variety of sources. It is likely that increased purchase of PPE, including gloves and masks carried an increased risk of modern slavery, due to the turmoil in the supply chain, and lack of transparency on the source of supply. Curtin has since implemented long term supply agreements for Medical PPE that address these risks. During this time, it was identified that one of our suppliers may have been purchasing items from a manufacturer that was identified as having

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modern slavery in its supply chain. A due diligence was performed through AUPN and found that the supplier had already terminated the supply arrangement with the manufacturer.

### **APPROVALS**

This statement was approved by the Council of Curtin University on 12 May 2021.



Andrew Crane  
Chancellor  
24 June 2021



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Final Audit Report

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