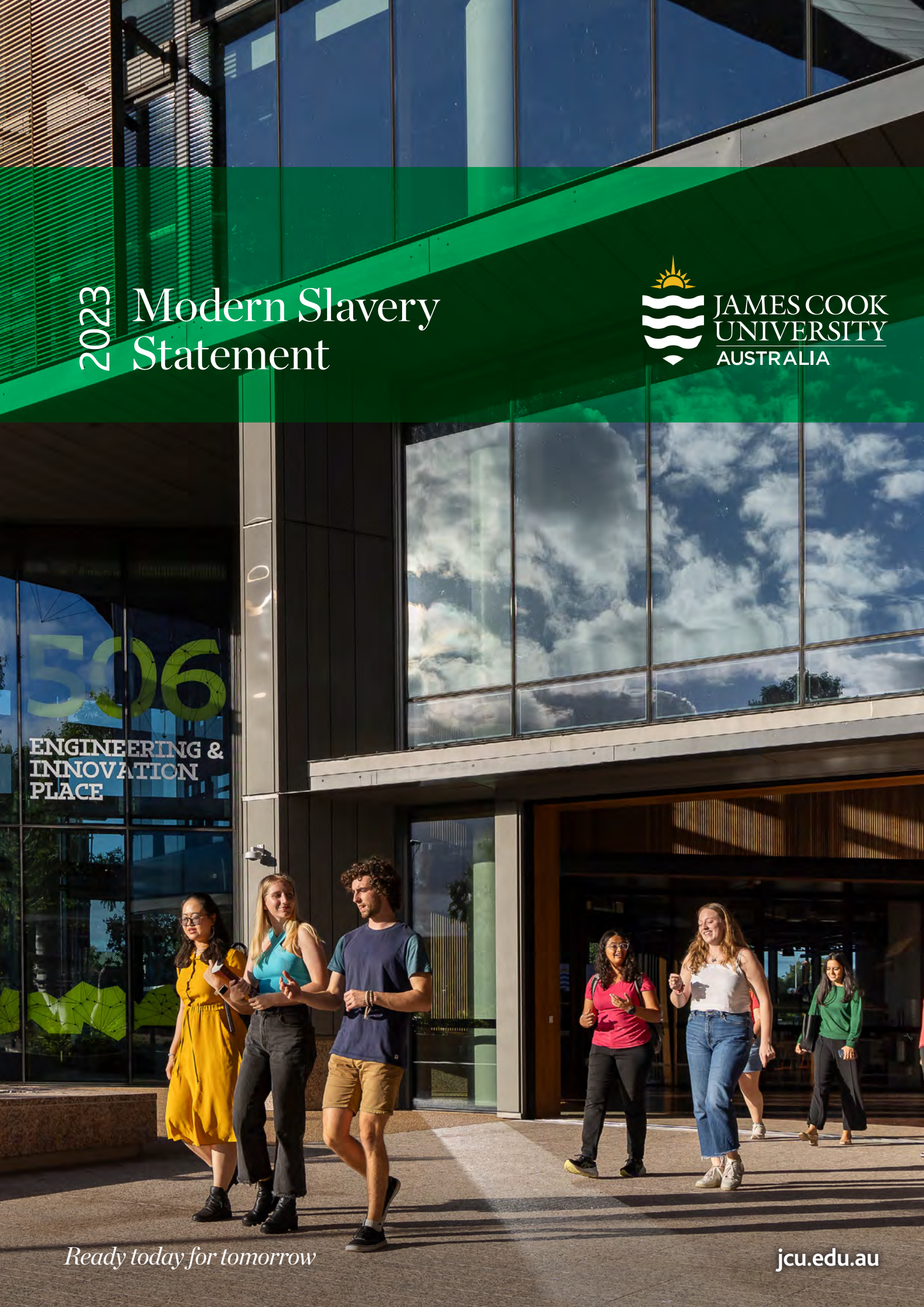
2023 Modern Slavery Statement

JAMES COOK UNIVERSITY
AUSTRALIA



Ready today for tomorrow

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Kassandra Savage (JCU Alumni), 'Coming Together and Respecting Difference', acrylic on canvas, 2014, 90cm x 90cm.

Our commitment to Australian Aboriginal and Torres Strait Islander peoples

We acknowledge the Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the Australian lands and waters where our staff and students live, learn and work. We honour the unique cultural and spiritual relationship to the land, waters and seas of First Australian peoples and their continuing and rich contribution to James Cook University (JCU) and Australian society. We also pay respect to ancestors and Elders past, present and future. Aboriginal and Torres Strait Islander peoples are advised that this publication may contain names or images of people who have passed away.

RESPECT.
NOW.
ALWAYS.

James Cook University values and celebrates the diversity of our community, and is committed to ensuring our learning and working environment is safe and welcoming.

JCU is proud to be part of the Respect. Now. Always. campaign – a national initiative led by Universities Australia to highlight our determination to ensure our students and staff are safe from discrimination and sexual harassment. Further information about the campaign and free services available for students can be found at **jcu.edu.au/sew**

UNIVERSITIES AUSTRALIA

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Modern slavery means conduct which would constitute:

(a) an offence under Division 270 or 271 of the Criminal Code; or

(b) an offence under either of those Divisions if the conduct took place in Australia; or

(c) trafficking in persons, as defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, done in New York on 15 November 2000 ([2005] ATS 27); or

(d) the worst forms of child labour, as defined in Article 3 of the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour, done at Geneva on 17 June 1999 ([2007] ATS 38).

Introduction/Background

James Cook University (JCU), established in 1970, is dedicated to creating a brighter future for life in the Tropics and beyond through education and research that make a difference locally and globally. As a leading tertiary institution with a strong commitment to ethical standards and human rights, JCU embraces the Modern Slavery Act 2018 (Cth) and its mission to eradicate human exploitation from global supply chains. Our University, with its principal campuses in Townsville and Cairns, as well as a significant presence in Singapore, serves a diverse and vibrant community.

JCU's commitment to combatting modern slavery is rooted in our core values of excellence, integrity, and sustainability. In our fourth Modern Slavery Statement, we outline the significant steps taken in 2023 to address and mitigate modern slavery risks within our operations and supply chains. These actions include updating contract clauses, enhancing supplier due diligence, and raising awareness across our Strategic Procurement team and the entire University community.

By fostering a culture of transparency, accountability, and continuous improvement, JCU is determined to lead by example in addressing modern slavery risks. Our efforts are guided by our dedication to the well-being and security of all individuals, ensuring that every person interacting with JCU is treated with dignity and respect. Through strategic partnerships and collaborative initiatives, JCU remains steadfast in its mission to create a just and equitable future, free from modern slavery.

Our Progress in 2023

In the 2022 statement, JCU identified four key commitments. Through priority setting and stakeholder engagement, the University has met all commitments. In 2023, we have:

- Reviewed and updated contract clauses specific to modern slavery and collected data on modern slavery from suppliers participating in market activities.
- Implemented contracts and supplier due diligence for high-risk goods and services categories that are not currently under contract, including catering services.
- Enhanced awareness of the Modern Slavery Act and associated responsibilities within the Strategic Procurement team and across the entire University.
- Assessed and identified the risk of modern slavery in the University's operations and supply chain, including controlled entities.

CRICOS Provider Code 00117J

Criteria 1 - Reporting Entities

This is James Cook University's Modern Slavery Statement which has been prepared following the mandatory reporting requirements of the Modern Slavery Act 2018 (the Act) for the period 01 January 2023 to 31 December 2023. This is our fourth statement and is made on behalf of James Cook University (ABN 46 253 211 955) (JCU), and its controlled entities, herein referred to collectively as we, us, our or the University, which include:

- JCU Univet Pty Ltd (ACN - 138 879 419)
- JCU Health Pty Ltd (ACN - 099 496 232)
- JCU Early Learning Centres Pty Ltd (ACN - 061 144 769)
- JCU CPB Pty Ltd as Trustee for the CPB Trust (ACN - 153 630 445)
- Tropical Queensland Centre of Oral Health Pty Ltd (trading as JCU Dental) (ACN - 153 926 080)
- North Queensland Commercialisation Company Pty Ltd (ACN - 130 517 207)
- JCU College Pty Ltd (ACN - 607 713 691)
- Discover Sport Ltd (non-trading) (ACN - 626 386 641)
- JCU Enterprises (non-trading) (ACN - 011 005 888)
- James Cook Holdings Pte Ltd
- James Cook University Pte Ltd
- Tropical Futures Institute Ltd
- James Cook Academy Ptd Ltd
- James Cook Institute Pte Ltd
- JCU Innovation Holdings Limited (non-trading).

This Modern Slavery Statement was approved on 20 June 2024 by the Council of James Cook University, as defined by the Modern Slavery Act 2018 (Cth) (the Act).

Criteria 2 – Our Structure, Operations & Supply Chains

Our Structure

The principal governing body of the University is its Council, chaired by the Chancellor of the University, Professor Ngiare Brown. Management of the University is the responsibility of the Vice-Chancellor and President, Professor Simon Biggs. JCU has an academic division that oversees six Colleges and service divisions for research, education, services and resources, and the functions of the chancellery.

Academic Division and Colleges

- Arts, Society and Education: Offers coursework in humanities, social sciences, social work, and education.
- Business, Law and Governance: Provides coursework in law, business, conflict management, international business, political science, economics, governance, and management.
- Healthcare Sciences: Includes programs in nursing, midwifery, occupational therapy, physiotherapy, psychology, speech pathology, and sports and exercise science.
- Medicine and Dentistry: Focuses on medicine, dentistry, and pharmacy with practical experience in rural and regional communities.
- Public Health, Medical and Veterinary Sciences: Covers biomedicine, human physiology, genomics, health systems and policies, immunology, medical entomology, microbiology, public health, and veterinary science.
- Science and Engineering: Provides education in marine biology and aquaculture, zoology and ecology, earth and environmental sciences, planning, IT, physical sciences, and engineering.

Service Divisions

- Research: Manages research policy, builds research capability, and collaborates with government, industry, and other universities.
- Education: Oversees learning and teaching services, library and information services, and student support services.
- Services and Resources: Responsible for planning and performance, international student engagement, marketing, human resources, IT services, infrastructure planning, health and safety, campus maintenance, and student accommodation.
- Chancellery: Includes legal and assurance, media and communications, secretariat and records, finance, strategic procurement, and advancement, as well as offices of the Chancellor, Vice-Chancellor, and President, and Chief of Staff.

Map of JCU campus locations in Queensland

Our Operations

JCU is an international University as reflected in our people, our places, and our research. Our mission is to create a brighter future for life in the Tropics and beyond, through education and research that makes a difference locally and globally. The University takes pride in being recognised as a leading tertiary institution that consistently delivers outstanding student outcomes and highly employable graduates. The University provides a practical, experiential, and research-rich learning environment for students, fostering their professional expertise and intellectual curiosity. JCU is uniquely woven into the intellectual, economic, and social fabric of the communities it serves and is set amid irreplaceable ecosystems and cultures.

For more than 60 years, JCU has served the regional and remote communities of northern Queensland and remains dedicated to providing study and research experiences that are transformative and impactful. Students who study in northern Queensland, stay in northern Queensland. Most importantly, JCU remains committed to the success and well-being of its students, staff, communities, and local economies.

JCU has two main campuses in Australia located in Townsville and Cairns . The JCU Townsville, Douglas campus has been named Bebegu Yumba, which means "Place of Learning" in the Birri-Gubba language. JCU Townsville, Bebegu Yumba campus is located in the Townsville Tropical Intelligence and Health Precinct (TropiQ) in the suburb of Douglas. Set in a 386-hectare natural bush and parkland setting, 13 kilometres (8 miles) from the Townsville CBD, the campus houses around 1,400 students in colleges and halls of residence. Over 13,000 students are part of the JCU Townsville community, including approximately 1,500 international students.

JCU Cairns, Smithfield campus has been named Nguma-bada (pronounced nom-ah-bud-ah), which means belonging to tomorrow: "Place for tomorrow's learning, knowledge, and wisdom" from the Yirrgay (Yirrganydji) coastal dialect of Djabugay. Conveniently located 15 kilometres (9 miles) north of the city centre, the campus is surrounded on three sides by rainforest-covered mountains and is close to the northern beaches. Students enjoy a tranquil learning environment due to the abundance of lush greenery and spacious areas.

JCU also has study centres located in Emerald, Mackay, Mount Isa, Rockhampton, and Thursday Island. JCU Singapore, established in 2003, is a wholly owned international campus. JCU Brisbane is operated by Russo Higher Education and delivers JCU degrees under license.

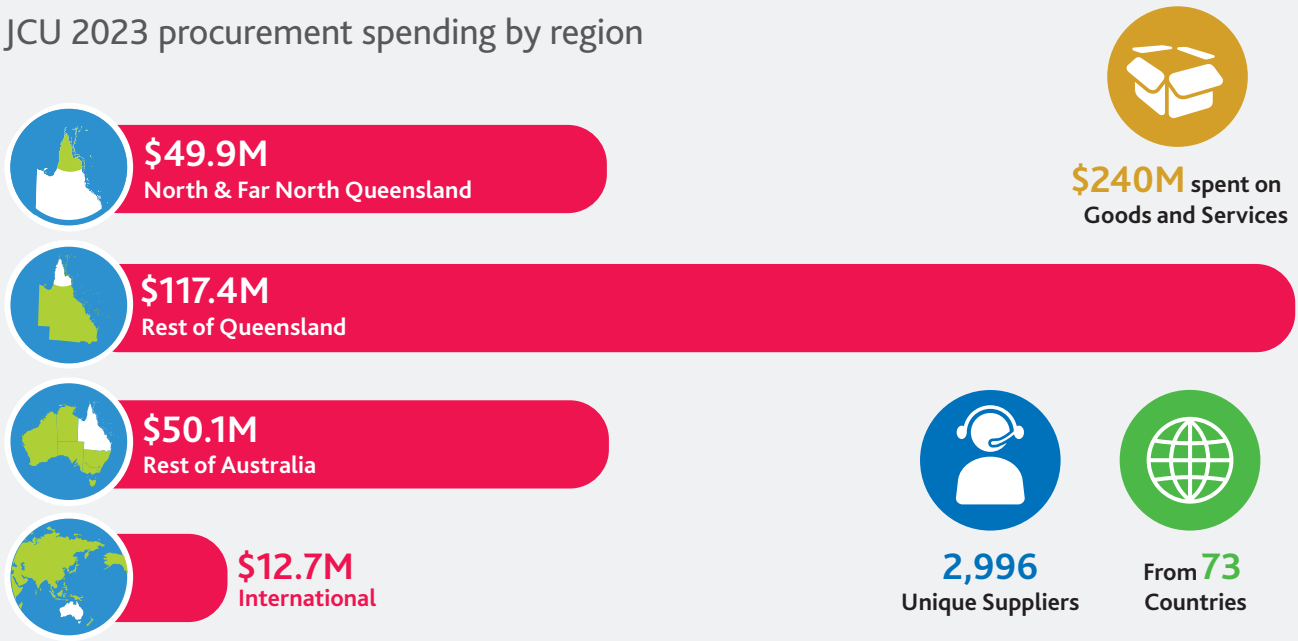
Our Supply Chains

Supporting the teaching and research activities and campus operations of the University requires a diverse range of goods and services provided by a large and complex supply chain. The University purchases materials required to deliver its core teaching services; construction and facilities management services; office equipment including computers and phones; catering services and meals; accommodation for staff travelling; laboratory supplies including consumables, pharmaceuticals, and scientific equipment; and many more goods and services.

In 2023, the University spent over $240 million on goods and services with 2,996 unique suppliers. The approximate spend summary by location was:

- $49.9 million: North & Far North Queensland
- $117.4 million: Rest of Queensland
- $50.1 million: Rest of Australia
- $12.7 million: International

JCU 2023 procurement spending by region



Criteria 3 – Identifying and Addressing Our Modern Slavery Risks

Our procurement policies and procedures include modern slavery provisions and are communicated to suppliers throughout the request for quote, tender, and contract management processes. Our tools and templates assess and address modern slavery risks throughout our end-to-end procurement process.

In 2023, the University purchased from 2,996 unique suppliers located in 73 countries, which support our education, research, financial & business services, and estate functions. 94.7% of direct spend is with suppliers headquartered in Australia, followed by the United States with 1.1%.

Breakdown of Procurement Spend

- Academy: 15.3% of total spend with 1501 suppliers for lab and teaching consumables and services.
- Chancellery: 24.5% of total spend with 297 suppliers for advancement services, financial and business services, legal services, memberships, and business-related goods and services.
- Education: 3.6% of total spend with 214 suppliers for education enhancement, student services, and library services.
- Research: 6.0% of total spend with 804 suppliers for research and innovation services.
- Services and Resources: 50.6% of total spend with 889 suppliers for estate services, marketing, human resources, WH&S, and technology solutions.

Our Supply Chain

The University recognises that there are risks of modern slavery in the supply chains of all the goods and services we purchase. The relative risks for any of the goods and services the University purchases can only be determined by assessing factors such as product or service type and manufacturing or operating locations.

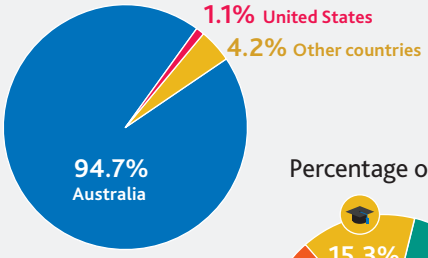
The University also recognises that there are additional risk factors for modern slavery in supply chains beyond geography and industry, including in particular business models such as subcontracting.

During the 2023 reporting year, the University continued to participate in the AUPN's consolidated data analysis and risk mapping process to better understand the scope of risk of modern slavery in its supply chain.

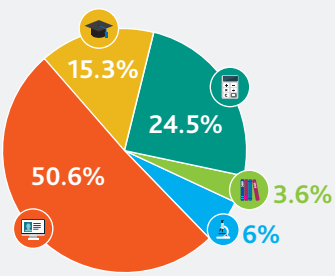
The resulting analysis allowed the University to identify where supply chains extend into goods and service categories and geographic locations that are of higher risk for the presence of modern slavery. Goods and services categories identified as being both high risk for modern slavery in the supply chain and proportionally high spend by the University includes:

- Commercial cleaning
- Digital technologies
- Building construction and maintenance services
- Catering and meals
- Laboratory consumables and safety equipment

Percentage of suppliers by region



Percentage of total spend



Number of suppliers used by each division

In 2023, the distribution of the University's suppliers reflected a reassuring trend; 94% of suppliers were located in countries categorized as low risk of modern slavery concerns. Another 5% were located in countries with medium to high risks, while less than 1.0% of the University's suppliers were located in countries with a high risk of modern slavery.

The University acknowledges that supply chains are global and expects suppliers located in low-risk countries to have supply chains that extend into higher-risk countries. The University will continue to monitor the location of suppliers as a known risk indicator and, along with others in the AUPN, continue to apply due diligence assessments to its supply chain.

Risks in Operations

The University has assessed the likelihood and consequences of modern slavery in core operations to be low. Given the nature of the University's workforce and operations, and the robust legislative environment in which it operates, modern slavery risks are possible but are not expected to routinely arise and are capable of being monitored and controlled by a targeted management strategy.

The basis for this assessment and the management measures that mitigate modern slavery risk are described in detail in the following sections.

Risks in the Management of Human Resources

Continuing, fixed-term, and casual employees at the University are covered by the James Cook University Enterprise Agreement 2022, which has been approved by the Fair Work Commission. This agreement encompasses all aspects of employment, such as working conditions, compensation, leave, and other benefits.

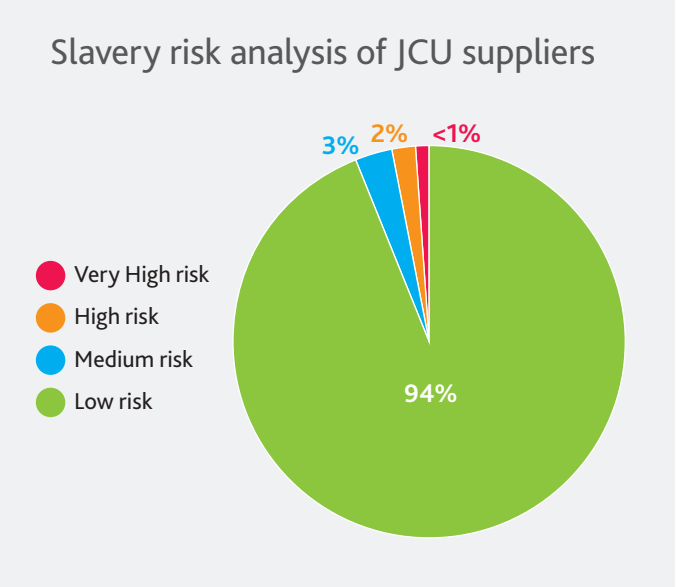
The University does not rely on foreign labour brokers to recruit staff and no staff member is required to pay recruitment fees or provide personal or property security deposits. Most employees are hired directly by the University, and where labour-hire companies are used, they are primarily based in Australia. In rare cases, overseas labour-hire companies may be used for short-term overseas assignments for a small number of employees.

The University takes great care in verifying that all new hires have the legal right to work in Australia. The majority of employees are located in Australia, and where work is performed abroad, employees are still covered by the Enterprise Agreement. In rare instances, some individuals may not fall under the purview of the University's Enterprise Agreement, although the University will still apply the provisions of the agreement where applicable.

To further mitigate the risks of modern slavery in its operations, the University has in place a variety of policies, procedures, and supporting documents, in addition to the Enterprise Agreement, these include:

- **Recruitment, Selection and Appointment Policy**;
- **Code of Conduct for the University Council**; and
- **Staff Code of Conduct**.

The University has established measures to prevent, detect, and address any suspected fraudulent or corrupt practices, child abuse, and regulatory non-compliance. These measures are outlined in the Staff Code of Conduct, the Code of Conduct for the University



Council and its Committees, the Crime and Corruption Act 2001 (Qld), and the Public Sector Ethics Act 1994 (Qld).

University employees and council members are considered public officers and must report any suspected corruption to the Crime and Corruption Commission Queensland (CCC). Furthermore, members of the public, including students, have the right to make complaints about suspected corruption or misconduct to the CCC. The Public Interest Disclosure Act 2010 (Qld) provides special protection for those who report such issues in the public interest, including concerns about unlawful, negligent, or improper conduct, as well as threats to public health and safety or the environment.

Risks in Teaching Operations

The University is committed to providing high-quality educational activities to its students, which are delivered by its dedicated and skilled employees. These employees are bound by the University's policies and procedures, which ensure that all aspects of educational activities are conducted in a professional, ethical, and equitable manner.

While the majority of these activities take place in Australia, some may be located overseas. The University takes great care to ensure that all educational activities are delivered to the same high standards, regardless of their location.

However, the University recognises that temporary visa holders in Australia, including international students, may face particular challenges and vulnerabilities when it comes to employment. The University is committed to providing support and resources to these students to help them navigate these challenges and protect their rights.

In particular, the University is aware of the risk of exploitative working conditions, such as underpayment of wages, that some international students may face when employed outside of the University. To address this risk, the University provides information and guidance to students on their employment rights and responsibilities and works closely with relevant government agencies and community organisations to ensure that international students are protected from exploitation.

Overall, the University is dedicated to providing a safe and supportive learning environment for all of its students, and to upholding the highest standards of ethical and professional conduct in all of its educational activities.

Risks in Research Operations

The University's research operations primarily involve providing research services. It is not involved in the production or selling of retail or commercial products. Although the University may develop prototypes and field-demonstrable products as part of its research services, these are handed over to clients before production.

The University takes great care in conducting research services in compliance with its policies and procedures, which provide clear guidelines for the ethical and responsible conduct of research. The majority of research services are carried out by the University's highly qualified and experienced employees, who are fully committed to upholding these standards.

In some cases, subcontractors may be engaged to support research activities. The University carefully selects and oversees subcontractors to ensure that they meet the same rigorous standards as its employees. These subcontractors may be located in Australia or overseas, and their contracts are reviewed and approved by the University's Legal and Assurance office and/or Research & Innovation Services contracts team.

When the research is funded by government sources, the University's contract with the funding agency sets out the terms and conditions for subcontractors, which are consistent with the University's policies and procedures. This ensures that all parties involved in the research are held to the same high standards of integrity and accountability.

Overall, the University is committed to conducting research services with the utmost professionalism and integrity, and to ensuring that all stakeholders are fully aware of their roles and responsibilities in upholding these standards. The University has a Code for the Responsible Conduct of Research that outlines expectations for the conduct of everyone involved in research conducted under the University's auspices. This code was adapted from the Australian Code for the Responsible Conduct of Research, which was jointly developed by the National Health and Medical Research Council, the Australian Research Council, and Universities Australia.

Risks in Controlled Entities

The University's operating controlled entities and the risks of modern slavery in their operations and supply chains are detailed below:

Controlled Entities Incorporated in Australia

- Discover Sport Limited: Incorporated in 2018 to promote awareness and benefits of healthy exercise via sports and games. Currently not trading.
- JCU College Pty Ltd: Focused on international student pathways, deregistered with ASIC on 30 June 2023 due to COVID-19 impacts.
- JCU CPB Pty Ltd: Acts as trustee of the CPB Trust, managing commercial spaces on the Bebegu Yumba (Douglas) campus.
- JCU Early Learning Centres Pty Ltd (JCU ELC): Provides non-profit childcare for children of students, staff, and graduates. Operates two childcare centres on the Bebegu Yumba (Douglas) Campus.
- JCU Enterprises Pty Ltd: Owns shares in James Cook Holdings Pte Ltd, does not trade in its own right.
- JCU Health Pty Ltd: Provides non-profit medical services, education, and clinical training for University staff and students.
- JCU Univet Pty Ltd (JCU Vet): Trades from Townsville's only animal hospital, providing facilities for study, research, and clinical education in Veterinary Science.
- North Queensland Commercialisation Company Pty Ltd (NQCC): Provides research commercialisation services to JCU, acts as trustee of The JCU Asset Trust.
- Tropical Queensland Centre for Oral Health Pty Ltd t/as JCU Dental: Provides clinical placements for dental students and improves oral health services in Northern Queensland.

Controlled Entities Incorporated Outside Australia

- James Cook Holdings Pte Ltd: Registered in Singapore as a holding company, does not trade.
- James Cook University Pte Ltd: Operates JCU's Singapore campus, the first private education institution to attain an EduTrust Star quality mark.
- James Cook Institute Pte Ltd: Provides short courses in technology and soft skills for working professionals in Singapore.
- Tropical Futures Institute Ltd: Established in Singapore to provide region-specific research to Singapore and the wider ASEAN region.
- JCU Innovation Holdings Limited (non-trading): Registered in the UAE, will own shares in James Cook University Middle East LLC.
- James Cook Academy Pte Ltd: Registered in Singapore, owns shares in James Cook Institute Pte Ltd, deregistered in early 2023.

Criteria 4 – Actions Taken to Assess & Address Risks

The University recognises the presence of modern slavery risks in its supply chains and has taken steps to address them. During the past reporting year, the University focused on conducting due diligence with suppliers and participating in the AUPN Modern Slavery Users Forum (MSUF). These activities aimed to identify, assess, and mitigate the risk of modern slavery practices in the University's operations and supply chains.

Contracts

The University includes modern slavery clauses in its contractual terms, including the expectation that suppliers comply with the University's Supplier Code of Conduct. They also include the University's right to audit and take action if we discover any breach of modern slavery laws or the Code.

Market Approach

The University has incorporated a returnable schedule into its standard tender and market approach documentation to gain a deeper understanding of its supply chains. Prospective suppliers responding to market approaches are requested to answer questions regarding their reporting status under the Modern Slavery Act, their policies and training practices related to modern slavery, and the measures they have taken to identify and address the risks of modern slavery in their supply chains and operations.

Guiding Documents

The University's Procurement Procedures incorporate the University's obligations under the Modern Slavery Act as a key principle that must be followed during any procurement activities.

Supplier Questionnaires

The University has an extensive and complex supply chain that covers more than 150 different categories of goods and services. As part of every tender process, suppliers are required to complete a questionnaire that gathers crucial information about their business practices, including:

- Their reporting status under the Modern Slavery Act
- Their policies, procedures, contracts, and other relevant documents
- The supply chains of the goods they sell
- The measures they have taken to identify and address the risks of modern slavery in their supply chains and operations.
- Completion of the questionnaire is mandatory and is taken into account as a criterion during the evaluation of offers.

Training and Awareness

The University employs a centralised approach for managing high-value and high-risk contracts within its procurement function while decentralising operations for all other contracts. The procurement function is managed by the Strategic Procurement Group within the Financial and Business Services Directorate. To raise awareness of the issue and ensure that key staff are aware of the University's responsibilities, training was initially conducted in 2022 and made available to relevant parties across the University. Additional training was provided in 2023, with standard monthly training sessions to be made available in 2024 as part of the new starter onboarding process.

Collaboration as a Sector

The University, along with 38 other institutions, voluntarily joined the AUPN's MSUF. In July 2020, the MSUF formed the Modern Slavery Academic Advisory Board, consisting of 12 members from 9 universities who have expertise and experience in modern slavery risk and supply chains. The board's goal is to enhance the sector approach. Meetings are held every month to review and refine AUPN-developed materials and initiatives. The sector-wide Modern Slavery Program aims to achieve the following:

- Collection and aggregation of sector procurement data
- A solution for members to identify risk, allocate resources, and inform action, supported by a third-party technology solution
- A sector-wide approach/action plan for addressing, mitigating, and/or remediating identified risks
- Flexible templates and guidance
- Continuous improvement.

AUPN members and their suppliers have benefited from the improved operational efficiency that has resulted from the collaboration, resulting in a better ability to mitigate risk and enhance social performance within supply chains.

Modern Slavery Technology Solution

In 2023, the AUPN Executive approved a recommendation by the AUPN Anti-Slavery Program to implement the ArcBlue Modern Slavery Solution. The ArcBlue solution will support universities in meeting the mandatory requirements by providing a dashboard of inherent modern slavery supply chain risks.

Criteria 5 – Assessment of the Effectiveness of Actions

At JCU, we believe that monitoring and reviewing the progress of our initiatives to eradicate modern slavery from our operations and supply chains is critical to improving our approach over time and addressing emerging issues. To that end, throughout 2023, we tracked and evaluated our approach in several ways:

- Actively engaged with the AUPN Modern Slavery Working Group to share good practices and create synergy for change.
- Provided training and awareness to all procurement staff and buyers within the University.
- Engaged with suppliers on modern slavery risks where issues are identified through the AUPN tool or as a result of a tender process.
- Undertook ongoing assessments on suppliers using the ArcBlue Modern Slavery Solution.

Criteria 6 – Consultation

To prepare this joint statement, we engaged with the reporting entities covered by this statement and consulted the entities we own or control.

CRICOS Provider Code 00117J

Criteria 7 – Other Information

Looking ahead, we remain committed to tackling modern slavery, not only through our due diligence practice but also through our research and education expertise. Throughout 2024 we will focus our efforts on maturing our understanding of risks and evolving our due diligence practices to effectively address these risks.

Next Steps

In 2024, the fifth reporting year under the Modern Slavery Act, the University plans to:

- Develop a JCU Modern Slavery Policy
- Work with our suppliers to increase the visibility of modern slavery risks beyond Tier 1, including further risk analysis, risk assessments, training, and ongoing engagement.
- Identify and develop pre-qualified panels to ensure suppliers are evaluated before use.
- Undertake a review of our grievance mechanism and our approach to remediation.
- Continue to utilise the ArcBlue Modern Slavery Solution tool to monitor risk and identify any instances of modern slavery in our supply chain, and conduct detailed assessments of high-risk suppliers.
- Continuously review and improve processes, controls, systems, and people.
- Expand JCU staff training and engagement with internal buyers as part of the new starter onboarding process.
- Embed modern slavery criteria within low-value requests for quote templates.
- By implementing these actions, JCU is committed to creating a safer, more ethical future for all those connected to our University and beyond.

Conclusion

While the University considers the risk of modern slavery in its activities to be low, it is proactively working to fulfill its obligations under the Modern Slavery Act, especially regarding its supply chains, by actively managing and reducing the risks. This statement is approved by the James Cook University Council.

Ngiare Brown

Chancellor

June 2024

CRICOS Provider Code 00117J

JCU: Ready today for tomorrow

JAMES COOK UNIVERSITY
AUSTRALIA

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