



# ECU Modern Slavery Statement 2020

ECU recognises the significance of Aboriginal and Torres Strait Islander peoples' communities, cultures, and histories. ECU acknowledges and respects its continuing association with the Whadjuk people and Wardandi people of the Noongar nation, who are the original custodians of the land upon which the University's campuses stand in Australia.

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This document is available online at the link below. It is available in alternate formats upon request.

<https://www.ecu.edu.au/about-ecu/reports-and-plans>

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4756

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00279B

# Introduction

## Executive summary

The [Modern Slavery Act 2018](#) (Cth) requires large organisations in Australia to publish annual modern slavery statements to address the risks of slavery in their businesses and supply chains.

Edith Cowan University (ECU) is an Australian public university. It was established by the [Edith Cowan University Act 1984](#) (WA) and achieved university status in 1991.

The University has three controlled entities: ECU Holdings Pty Ltd, Edith Cowan Accommodation Holdings Pty Ltd, and Australian Pathway Education Group Pty Ltd.

ECU is committed to identifying and addressing any risks of modern slavery in the University's supply chain. Initial analysis, particularly of Tier 1 suppliers, shows that the risks are low, but further assessment will be undertaken and reported in subsequent annual statements.

ECU's suppliers can be broadly divided into four categories: professional services; property and facilities; research and teaching; and technology. Nearly 90 per cent of ECU's supplier spend was within Australia.

Potential risks in ECU's supply chain relate to information technology hardware, medical personal protective equipment (particularly during the COVID-19 pandemic), clothing and apparel, construction materials, and cleaning services.

ECU's Modern Slavery Statement 2020 has been prepared in accordance with the provisions of the [Modern Slavery Act 2018](#), and was approved by the University's Council on 26 June 2021.

## About modern slavery

Slavery is defined in Australian legislation as the condition of a person over whom the powers of ownership are exercised. Slavery-like offences include servitude, forced labour, deceptive recruiting for labour or services, forced marriage, and debt bonding. Slavery also includes trafficking in persons, and the worst forms of child labour that constitutes their serious exploitation. The term 'modern slavery' is used to distinguish current practices from historical slavery, and to highlight that slavery still occurs.

The Walk Free Foundation's [Global Slavery Index 2018](#) (GSI) assessed Australia as a low prevalence country for modern slavery (ranked 163 out of 167 countries). However, the GSI estimated that over 40 million people were living in modern slavery in 2016, including 15,000 people in Australia.

The [Modern Slavery Act 2018](#) (Cth) was passed by the Australian Parliament in 2018, and came into force on 1 January 2019, following the Australian Joint Standing Committee on Foreign Affairs, Defence and Trade 2017 report [Hidden in Plain Sight](#).

Under the [Modern Slavery Act](#), large businesses and entities in Australia are required to publish annual modern slavery statements to address risks in their businesses and supply chains. The statements detail organisations' efforts to identify and mitigate risks of causing or contributing to modern slavery practices, or through connections to others linked to modern slavery.





## About ECU

[Edith Cowan University](#) (ECU) is both Western Australia's oldest higher education institution and its youngest university. ECU has over 31,000 undergraduate and postgraduate students from over 100 countries, and more than 2,000 staff. The University has campuses in Joondalup, Mount Lawley, and Bunbury in Western Australia.

ECU has eight schools – Arts and Humanities; Business and Law; Education; Engineering; Medical and Health Sciences; Nursing and Midwifery; Science; and the Western Australian Academy of Performing Arts (WAAPA) – that deliver a range of on-campus and online courses.

ECU is the only university in Australia named after a woman, Edith Dircksey Cowan (1861–1932). Edith Cowan believed that education was fundamental to tackling social issues, and that it was the key to growth, change and improvement. She fought tirelessly to improve conditions for women, children, families, the poor, the under-educated, and the elderly. Edith Cowan was the first Australian woman member of Parliament, and she is depicted on Australia's \$50 note. Like Edith Cowan, ECU is committed to improving equity and social justice.

## Vision

The University's vision is to be recognised for our world ready graduates and leading edge research.

## Purpose

ECU's purpose is to transform lives and enrich society through education and research.

## Values

What we do at ECU, and the way we interact with others, is underpinned by our values:

- **Integrity:** Being ethical, honest, and fair.
- **Respect:** Considering the opinions and values of others.
- **Rational Inquiry:** Motivated by evidence and reasoning.
- **Personal Excellence:** Demonstrating the highest personal and professional standards.

# Structure

Edith Cowan University (ECU) was established by the [Edith Cowan University Act 1984](#) (WA).

ECU is a listed Table A provider in the [Higher Education Support Act 2003](#) (Cth), and as a registered training organisation (RTO) as per the [National Vocational Education and Training Regulator Act 2011](#) (Cth).

The University is recognised as a self-accrediting authority by the [Tertiary Education Quality and Standards Agency](#), and as an RTO by the [Australian Skills Quality Authority](#).

## Governance

ECU is governed by a University Council which controls and manages the operation, affairs, concerns, and property of the University, in accordance with ECU's [Corporate Governance Statement](#) and the *ECU Act 1984*.

The University Council and the senior management team work together to ensure that the University achieves its goals.

ECU's Council establishes committees to assist in meeting its responsibilities, as structured below.

### Edith Cowan University Council

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- |  |   |   |
|--|---|---|
| <ul style="list-style-type: none"><li>- <b>Council Executive</b></li><li>- <b>Resources Committee</b></li><li>- <b>Quality, Audit and Risk Committee</b></li><li>- <b>Governance and Nominations Committee</b></li><li>- <b>Legislative Committee</b></li><li>- <b>Council Remuneration Committee</b></li><li>- <b>Honorary Awards Committee</b></li><li>- <b>ECU South West Campus (Bunbury) Advisory Board</b></li><li>- <b>WAAPA Advisory Board</b></li><li>- <b>ECU Foundation Board</b></li></ul> | <ul style="list-style-type: none"><li>- <b>Academic Board</b><ul style="list-style-type: none"><li>- Education Committee</li><li>- Research and Higher Degrees Committee</li><li>- Internationalisation Committee</li><li>- Student Appeals Committee</li><li>- Human Research Ethics Committee</li><li>- Animal Ethics Committee</li><li>- Radiation Bio-Safety Hazardous Substances Committee</li></ul></li></ul> | <ul style="list-style-type: none"><li>- <b>Vice-Chancellor</b><ul style="list-style-type: none"><li>- University Executive</li><li>- Vice-Chancellor's Student Advisory Forum</li><li>- Equity and Diversity Committee</li><li>- Disability Access and Inclusion Sub-Committee</li><li>- Kudjikat Wow-r-ing</li><li>- Pride@ECU Committee</li><li>- ECU Athena SWAN Charter Committee</li><li>- ECU Health Centre Committee</li><li>- Respect. Now. Always. Advisory Group</li><li>- University Health and Safety Committee<ul style="list-style-type: none"><li>- School/Service Centre OSH Committees (x12)</li></ul></li><li>- University Remuneration Committee</li></ul></li></ul> |
|--|---|---|



## Organisational chart

### Edith Cowan University Council

#### - Vice-Chancellor

| - Executive Dean,<br>School of Arts<br>& Humanities                         | - Senior<br>Deputy Vice-<br>Chancellor            | - Pro-Vice-<br>Chancellor<br>(Equity &<br>Indigenous) | - Deputy Vice-<br>Chancellor<br>(Education) | - Deputy Vice-<br>Chancellor<br>(International) | - Deputy Vice-<br>Chancellor<br>(Research) | - Deputy Vice-<br>Chancellor<br>(Strategic<br>Partnerships)                  | - Vice-President<br>(Corporate<br>Services)     | - Vice-President<br>(Enterprise and<br>Development) |
|---|---|---|---|---|--|--|---|---|
| - Executive Dean,<br>School of<br>Business & Law                            | - Digital &<br>Campus<br>Services                 | - Kurongkurl<br>Katitjin                              | - Centre for<br>Learning &<br>Teaching      | - Pro-Vice-<br>Chancellor<br>(Emirates)         | - Defence<br>Research &<br>Engagement      | - Office of the<br>Deputy Vice-<br>Chancellor<br>(Strategic<br>Partnerships) | - Finance &<br>Business<br>Services<br>Centre   | - Office of<br>Development<br>& Alumni<br>Relations |
| - Executive Dean,<br>School of<br>Education                                 | - Human<br>Resources<br>Services<br>Centre        | - Access &<br>Equity                                  | - Library<br>Services<br>Centre             | - Pro-Vice-<br>Chancellor<br>(China)            | - Graduate<br>Research<br>School           |  | - Business<br>Growth &<br>Development           | - Brand &<br>Marketing                              |
| - Executive Dean,<br>School of<br>Engineering                               | - Strategic &<br>Governance<br>Services<br>Centre |   | - Student<br>Life                           | - International<br>Office                       | - Research<br>Services                     |  | - University<br>Project<br>Management<br>Office |   |
| - Executive Dean,<br>School of<br>Medical &<br>Health Sciences              | - Student<br>Administration                       |   |   |   |  |  |   |   |
| - Executive Dean,<br>School of<br>Nursing &<br>Midwifery                    | - Enterprise<br>Analytics &<br>Performance        |   |   |   |  |  |   |   |
| - Executive Dean,<br>School of Science                                      |   |   |   |   |  |  |   |   |
| - Executive Dean,<br>Western<br>Australian<br>Academy of<br>Performing Arts |   |   |   |   |  |  |   |   |
| - Dean, South<br>West Campus  |   |   |   |   |  |  |   |   |

As at 31 December 2020.





## Controlled entities

### **Edith Cowan Accommodation Holdings Pty Ltd**

*ABN 80 135 260 383*

*ACN 135 260 383*

270 Joondalup Drive  
Joondalup WA 6027, Australia

Edith Cowan Accommodation Holdings (ECAH) provides residential and commercial accommodation and related activities to offer an affordable and supportive living environment for ECU students residing on campus in Australia.

### **ECU Holdings Pty Ltd**

*ACN 635 918 286*

270 Joondalup Drive  
Joondalup WA 6027, Australia

ECU Holdings is an entity established primarily to generate revenue for re-investment in ECU's academic activities.

### **Australian Pathway Education Group Pty Ltd**

*ABN 25 607 580 969*

*ACN 607 580 969*

*RTO Provider 41472*

Unit 3, 15 Barron Parade  
Joondalup WA 6027, Australia

Suite 15, Level 40, 669 XinZha Road  
Jing'An District, Shanghai  
People's Republic of China

Australian Pathway Education Group (APEG) is an Australian registered training organisation (RTO) focused on the delivery of vocational education and training programs to high school students in China.

# Operations

Edith Cowan University provides higher education and vocational education and training across a broad range of disciplines and conducts research and development under the themes of health; society and culture; natural and built environments; and securing digital futures.

ECU's services and products include:

- Teaching and educational services (e.g. library resources, academic support, counselling, medical services, sports and fitness services, technology) to students.
- Research and research support services, and collaborations with other organisations.
- Educational outreach in schools and communities.
- External products and services in areas such as training, consultancy, fitness, arts, entertainment, and health care.
- Facilities for hire and lease.
- Student accommodation.

- Academic scholarships and prizes through the charitable ECU Foundation.
- Professional services to support operations.

ECU's global partnerships involve facilitating students transferring courses between universities (articulation arrangements), delivering ECU's academic programs overseas, student exchange programs, development of joint PhDs, and research collaboration. In addition, ECU has a significant presence in Sri Lanka, and the Australian Pathway Education Group delivers education services in China.

As detailed on the previous page, ECU's controlled entities provide student accommodation, revenue generation activities, and vocational education and training.

Typically, ECU has long-term contractual relationships with major suppliers, underpinned by regular market testing to ensure value. Due to the diversity of University operations, ECU also deals with a number of transactional suppliers.

## Staff

ECU and its controlled entities employed the following numbers of staff in 2020:

| Organisation  | Staff |
|---|-------|
| Edith Cowan University ( <i>full-time equivalent</i> )  | 1,979 |
| Australian Pathway Education Group ( <i>headcount</i> ) | 14    |
| ECU Holdings ( <i>headcount</i> )                       | 0     |
| Edith Cowan Accommodation Holdings ( <i>headcount</i> ) | 30    |





# Supply chains

ECU's top 10 procurement categories, by total spend, over the past year were:

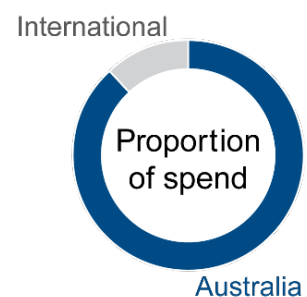
1. Building construction and refurbishment
2. Advertising and marketing services
3. Other professional services
4. Cleaning
5. IT software
6. Student placements
7. Utilities
8. IT services
9. Training expenses
10. Library materials

*Note: Categorised as per Level 3 of the Australian Universities Procurement Network's framework.*

ECU's suppliers can be divided broadly into four categories:

- Professional services, such as insurance, staff training, and advertising.
- Property and facilities, including cleaning and facilities management services, and utilities.
- Research and teaching; for example, research supplies and equipment.
- Technology, such as hardware, software, and printing.

Over 12 months, ECU purchased over \$1 million of goods and services. Over 88% of this spend was with suppliers in Australia.



| Country        | Percentage of ECU's total spend (%) | Estimated prevalence of modern slavery (%) | Vulnerability to modern slavery (out of 100) |
|----------------|-------------------------------------|--|--|
| Australia      | 88.1                                | 0.06                                       | 4.3  |
| United States  | 2.5                                 | 0.13                                       | 15.9   |
| Netherlands    | 1.6                                 | 0.18                                       | 6.1  |
| Sri Lanka      | 1.4                                 | 0.21                                       | 42.5   |
| Singapore      | 1.4                                 | 0.34                                       | 13.4   |
| India          | 1.1                                 | 0.61                                       | 55.5   |
| United Kingdom | 0.7                                 | 0.21                                       | 11.1   |

*Note: Figures in the 'Estimated prevalence of slavery' and 'Vulnerability to modern slavery' columns are from the Walk Free Foundation's Global Slavery Index (GSI) 2018. The prevalence of modern slavery, as a percentage of the population, includes estimates of forced labour and forced marriage drawn from national surveys, the International Organization for Migration's trafficking database, and secondary sources for assessing state-imposed labour (prisons, labour camps, and military facilities). The GSI's vulnerability model maps 23 risks across: governance, access to basic needs, inequality, disenfranchised groups, and conflict, resulting in a total score out of 100.*

Over 12 months, 0.2 per cent (approximately \$300,000) of ECU's total procurement spend was from companies in Pakistan, and related to student placements. Pakistan was assessed by the Global Slavery Index 2018 as a top 10 country for the estimated prevalence of modern

slavery. Suppliers in India also represent a risk in ECU's supply chain (1.1% of the University's spend), as India ranks 53 (out of 167 countries) for the prevalence of slavery. Again, these expenses primarily related to study abroad experiences for students.



## Risks of modern slavery

All organisations are subject to the risks of modern slavery within their supply chains and operations, but this does not mean that modern slavery practices occur.

Generally, risks include directly *causing* modern slavery practices (e.g. through using exploited labour), *contributing* to modern slavery through behaviour (e.g. through unrealistic pricing or delivery expectations placed on suppliers), or by being *linked* through the activities of a partner organisation, including organisations where there is no direct contractual relationship (e.g. the partner of a partner organisation). For example, an organisation may purchase mobile phones manufactured under fair working conditions, but containing materials mined using forced labour. The complexity of supply chains can make these issues difficult to identify.

In ECU's operations, the University has determined that the risk of modern slavery practices is very low. The University's activities are governed by its risk management framework, key policies, and compliance with legislation such as employment laws.

Currently, ECU has assessed the risks of modern slavery practices in its Tier 1 supply chain, following the University's risk management framework. To date, ECU has not identified issues regarding modern slavery within its operations or supply chains.

ECU is committed to exploring the risks of modern slavery in its Tier 2 supply chain in 2021 and 2022. (Tier 1 refers to ECU's direct suppliers, Tier 2 to the suppliers of ECU's Tier 1 suppliers, and so on.)

The risks in ECU's Tier 1 supply chain are captured and assessed through the Australian Universities Procurement Network's (AUPN) modern slavery risk dashboard. The AUPN is supported by HES Pty Ltd, a not-for-profit organisation owned by Universities Australia.

The AUPN established a modern slavery working group that provides resources for universities, including a discussion forum, documents and templates, and the modern slavery risk dashboard. The AUPN is also investigating sourcing a technology solution to assist universities further analyse supply chains.



Of ECU's ten top suppliers by spend, the majority relate to property and facilities, and the remainder provide technology, and professional services. There are inherent risks in the property and facilities sector, given the nature of subcontracting arrangements in building and cleaning. Likewise, there are risks in the technology sector, particularly regarding the origins of materials and production of devices. However, risks are greater in lower tiers of the supply chain.

In 2019, ECU's largest spend was with Multiplex Constructions Pty Ltd, which was engaged to construct ECU's new Science Building at Joondalup Campus, which opened in 2020. The Australian Universities Procurement Network's modern slavery tool rated this as a medium risk since construction is a leading industry for the use of forced labour. However, Multiplex, which operates globally, has provided a modern slavery report in the United Kingdom for a number of years. Multiplex has committed to addressing modern slavery, with policies and processes related to anti-slavery and human trafficking.

ECU's controlled entity, Edith Cowan Accommodation Holdings (ECAH) has only one supplier, Campus Living Villages Pty Ltd. The risk to ECAH is therefore through the activities of others. Campus Living Villages performs assessment and mitigation of these risks, which will be discussed in the following section.

Australian Pathway Education Group (APEG) has a limited number of suppliers that provide professional services, IT hardware and software, and teaching and learning supplies. For its Australian operations, the risks are similar to ECU's, and primarily relate to imported products. However, APEG's operations in China may experience additional risks of modern slavery practices, exacerbated by regional issues such as poverty, gender imbalance, and human trafficking. The Global Slavery Index 2018 rated China in the sixth group out of eight, for its government's response to modern slavery. Further investigation of these specific risks needs to be undertaken for APEG.

ECU Holdings is in a start-up phase and currently does not have any employees. The entity follows ECU's procurement policies and uses ECU's corporate services. Currently, its risks can be assumed to be a subset of those managed by the University, but this may change in future based on its investment activities.

ECU understands that the COVID-19 pandemic has also exacerbated the risks of modern slavery practices in some locations and industries, which may change initial risk assessments for individual suppliers. The impacts of the COVID-19 pandemic are likely to continue for some time.



## Addressing the risks

To address the requirements of the *Modern Slavery Act 2018*, ECU convened a working group that included representatives from procurement, human resources, compliance, planning, and risk management services. Representatives from ECU's controlled entities were invited to participate.

The working group also developed this modern slavery statement, supported by risk management procedures. The group made recommendations to ECU's executive committees regarding the development of future statements, and associated risk management procedures to be considered.

The Australian Universities Procurement Network (AUPN) provides a platform to assist universities to source goods and services to meet their needs. The aggregation allows universities to pool their knowledge, in addition to providing flexibility to meet evolving requirements. The AUPN's modern slavery discovery tool identifies and rates the modern slavery supplier risks.

ECU has updated the general conditions in its contracts and agreements to include a clause regarding modern slavery practices.

The University's controlled entities are at different stages of developing and implementing processes to address modern slavery risks. ECU will continue to monitor the development of these processes, and will offer support as appropriate. A new modern slavery self-assessment questionnaire assists the controlled entities to identify and manage their modern slavery risks, which will enable a more comprehensive view over time.

Edith Cowan Accommodation Holdings' sole supplier, Campus Living Villages (CLV), does not meet the threshold for required reporting under the *Modern Slavery Act 2018*. However, CLV considers the assessment and mitigation of modern slavery risks to be an important part of its environment, social and governance strategy. The organisation is developing modern slavery policies, procedures, and training, and has established a working group to implement a consistent approach across CLV.

Australian Pathway Education Group (APEG) has not yet developed formal modern slavery policies and procedures; however, the University will liaise with APEG in their development.

ECU Holdings currently follows ECU's risk management processes.

The University has developed an online integrity training module that includes information about modern slavery, which will be mandatory for all ECU staff. Subject to budget availability, ECU also intends to introduce additional, specific modern slavery training for procurement staff and those providing services that are higher risk.

## Policies and processes

The following policies are related to managing the risks of modern slavery practices, and are in accordance with ECU's values of integrity, respect, rational inquiry, and personal excellence.

- [Staff Code of Conduct](#), which provides a framework for appropriate behaviour for staff.
- [Student Complaints](#) to provide support for students to make complaints, and staff to respond.
- [Public Complaints](#), which outlines the handling of complaints from the public.
- [Fraud and Misconduct Prevention and Management](#) that sets out the principles, strategies, and controls for preventing, detecting, and managing misconduct, fraud, and corruption.

The processes below are designed to complement the University's policies and operations.

- [Public Interest and Whistleblower Protection Disclosure Guidelines](#) to assist staff who report corrupt or improper conduct.
- [Sustainable Procurement Guidelines](#) to incorporate sustainability into purchasing decisions.



- *Fraud and Misconduct Prevention and Management Guidelines*, which support early detection and appropriate responses to acts of fraud, corruption, and misconduct.

ECU acts on the principles of natural justice, confidentiality, protection of complainants from retaliation or discrimination, and consistent and fair decision-making and the right of response for persons of interest.

Edith Cowan University is subject to legislative obligations, including the following:

- [Modern Slavery Act 2018](#) (Cth)
- [Fair Work Act 2009](#) (Cth)
- [Corruption, Crime and Misconduct Act 2003](#) (WA)
- [Corporations Act 2001](#) (Cth)
- [Public Interest Disclosure Act 2003](#) (WA)

In addition, ECU supports the following international conventions and guidelines:

- [United Nations \(UN\) Universal Declaration of Human Rights](#)

- [UN Guiding Principles on Business and Human Rights](#)
- [International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#)
- [Ten Principles of the UN Global Compact](#)

ECU also endorses the United Nations [Sustainable Development Goals](#), such as:

- 8.7 Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.
- 16.2 End abuse, exploitation, trafficking and all forms of violence and torture against children.

ECU was ranked 101–200 overall in the [Times Higher Education Impact Rankings 2021](#), a global assessment of universities' performance against selected Sustainable Development Goals.

## Assessment of actions taken

The University's 'three lines of defence' model of risk assurance involves the following:

*First line of defence:* Systems and processes, culture, and controls present at the operations level. With the specific risks of modern slavery practices in ECU's supply chains and operations, this primarily involves the procurement function.

*Second line of defence:* ECU's risk management and compliance functions, which include assessing the effectiveness of controls through regular risk reviews, self-assessment reviews, and a formal compliance review program.

*Third line of defence:* Internal audit, which provides further oversight of controls, including independent assurance that the framework is functioning correctly. ECU is evaluating how to extend relevant internal audits, such as procurement and contract management, to consider modern slavery risks.

When the modern slavery training is launched, ECU will be able to monitor uptake and ensure training is undertaken by all staff as required, particularly responsible for procurement.

As part of the University's modern slavery statements, an annual assessment will be undertaken against planned actions.



## Consultation and approvals

We hereby submit the Modern Slavery Statement of Edith Cowan University for the year ending 31 December 2020, for publication on the Australian Government's [Online Register for Modern Slavery Statements](#).

The Statement was completed in consultation with relevant representatives from ECU's three controlled entities: Edith Cowan Accommodation Holdings, ECU Holdings, and Australian Pathway Education Group.

In addition, the University also consulted with the sole supplier for Edith Cowan Accommodation Holdings, Campus Living Villages.

The entities were represented by senior staff members, including the Head of Operations (Australia and New Zealand) for Campus Living Villages, and the Chief Executive Officer for Australian Pathway Education Group.

The Hon Kerry Sanderson AC CVO  
Chancellor  
26 June 2021

The representatives for controlled entities were invited to participate in ECU's modern slavery working group meetings, and were requested (along with Campus Living Villages) to complete a self-assessment questionnaire to:

- Identify modern slavery risks.
- Foster collaboration between ECU and its controlled entities to address these risks.
- Improve transparency.
- Identify areas for further due diligence.

The information gathered from the consultation process was used to inform ECU's Modern Slavery Statement 2020, and will further be used to assist controlled entities to develop relevant modern slavery policies and procedures, as necessary.

ECU's Modern Slavery Statement 2020 is made in accordance with the *Modern Slavery Act 2018*. It is provided pursuant to a resolution of the University's Council on 26 June 2021, following endorsement by University Executive and the Quality, Audit and Risk Committee.

Professor Steve Chapman CBE  
Vice-Chancellor  
26 June 2021