



Modern Slavery Statement 2024

Edith Cowan University

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Note: The cover of ECU's Modern Slavery Statement 2023, as published in the Modern Slavery Register, erroneously stated the year 2024. That statement's contents relate to 2023, as confirmed by the Attorney-General's Department. This statement covers January to December 2024, as per the date on its cover.

This document is available online at ECU's website: <https://www.ecu.edu.au/about-ecu/reports-and-plans/modern-slavery>. It is available in alternate formats upon request.

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 Australian campuses stand.

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Introduction

Nearly 50 million people live in modern slavery globally. Modern slavery includes forced labour, human trafficking, servitude, deceptive recruiting for labour or services, the worst forms of child labour including child commercial sexual exploitation, debt bondage, and forced marriage.

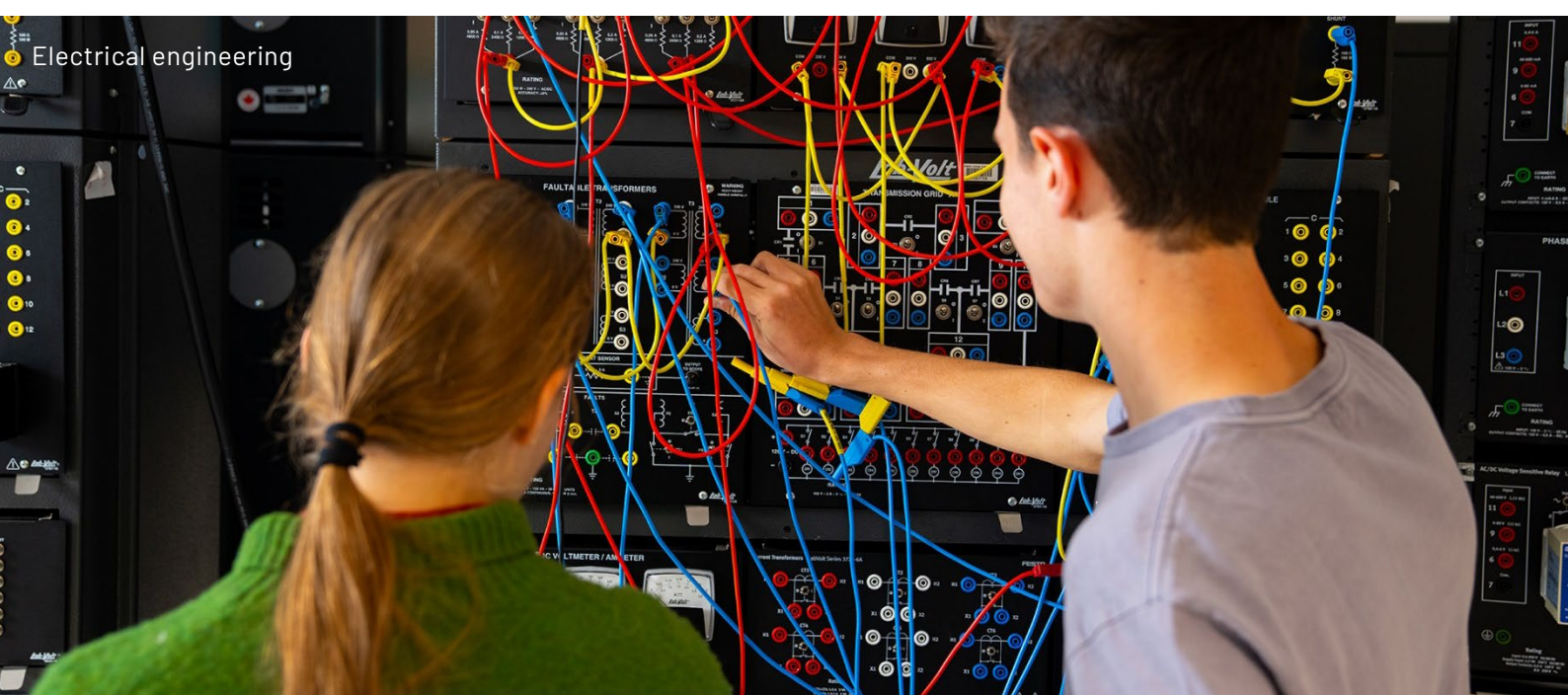
This is Edith Cowan University's fifth Modern Slavery Statement. Led by ECU's Deputy Vice-Chancellor (Students, Equity and Indigenous), the University's Modern Slavery Working Group develops strategies to assess and address ECU's modern slavery risks.

ECU is a member of the Australasian Universities Procurement Network (AUPN), which facilitates a collaborative approach to procurement and assessing and addressing modern slavery risks in the university sector. In 2024, the AUPN continued its modern slavery forums, portal, and community and industry engagement activities. The AUPN implemented Sievo, a software tool offering enhanced reporting and analytics capabilities compared to the previous tool. ECU continues to cleanse data extracted from its Oracle enterprise resource planning system to ensure the integrity and accuracy of information feeding into Sievo.

In 2024, ECU's Dr Cecilia Anthony Das initiated a project titled *Board Oversight in Modern Slavery Reporting: Comparative Insights from Australia and the UK*. The project explores board oversight of modern slavery obligations in Australia and the United Kingdom, comparing their approaches to identify ways for Australian boards to strengthen their compliance. Boards hold direct accountability for modern slavery risks.

ECU undertook two audits in 2024 with links to modern slavery risks, focused on the employee-related links to modern slavery. The Employee Recruitment and Retention internal audit considered the design and effectiveness of controls in place to manage ECU's ability to attract and retain employees, including staff safety and wellness. The internal audit report specifically highlighted the University's proactive approach to capturing staff perceptions and satisfaction. The Workplace Relations internal audit considered the frameworks and processes to comply with key high-risk workplace legislation and operationalisation of the University's Enterprise Agreement. Both the legislation and Enterprise Agreement encourage a workplace that supports the rights and responsibilities of employees and employers.

ECU's Modern Slavery Statement 2024 has been prepared in accordance with the provisions of the [Modern Slavery Act 2018](#) (Cth). The statement was approved by the University's Council on 26 June 2025.



About ECU

Edith Cowan University (ECU) is one of Western Australia's oldest higher education institutions, and its youngest university. ECU has over 31,200 students, and approximately 2,280 staff (full-time equivalent).

ECU's purpose is to transform lives and enrich society. The University's vision is to lead the sector in educational experience, research with impact, and in positive contributions to industry and communities. The University's students, staff, and governing body are guided by ECU's values of integrity, respect, rational inquiry, personal excellence, and courage.

ECU's 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) – deliver a variety of on-campus and online courses and undertake research across a range of disciplines.

The University was established by the Edith Cowan University Act 1984 (WA). ECU is a Table A provider as per the Higher Education Support Act 2003 (Cth), and a registered training organisation (RTO) as per the National Vocational Education and Training Regulator Act 2011 (Cth). ECU is recognised as a self-accrediting authority by the Tertiary Education Quality and Standards Agency (TEQSA), and as a registered training organisation by the Australian Skills Quality Authority (ASQA).

The University has three campuses in Western Australia, at Joondalup, Mount Lawley, and Bunbury (ECU South West), and one in Colombo, Sri Lanka (ECU Sri Lanka).



- **Joondalup**
270 Joondalup Drive,
Joondalup WA 2027, Australia
- **Mount Lawley**
2 Bradford Street,
Mount Lawley WA 6050, Australia
- **South West**
585 Robertson Drive,
Bunbury WA 6230, Australia
- **Sri Lanka**
288 Sri Jayawardenapura Mawatha,
Rajagiriya, Sri Lanka

ABN	54 361 485 361
TEQSA ID	PRV12160
RTO Code	4756
CRICOS No.	00279B

Structure and operations

Edith Cowan University provides higher education and vocational education and training, and conducts research and development.

ECU's services and products include:

- Teaching and educational services.
- 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 its charitable foundation.
- Professional services to support the University's operations.

Governance

ECU is governed by a University Council, which oversees the operation, affairs, concerns, and property of the University, in accordance with ECU's Corporate Governance Statement and the *Edith Cowan University Act 1984*.

The University Council, led by the Chancellor, and the senior management team, led by the Vice-Chancellor, work together to ensure that the University achieves its strategic goals. ECU's Council establishes committees to assist in meeting its responsibilities, which report to Council or Academic Board as appropriate.

Staff

ECU and its controlled entities employed the following numbers of staff in 2024:

Organisation	Staff
Edith Cowan University	2,277
ECU Holdings	2
Edith Cowan Accommodation Holdings	2
Edith Cowan S L Services (Private)	0

*Note: Staff numbers for Edith Cowan University are provided in full-time equivalent (FTE) and include an estimate of casual staff. *Edith Cowan Accommodation Holdings displays the headcount of unpaid officers/board members.*

Further information about the composition of ECU's staff is as follows:

Category	Staff
Academic	972
Teaching and research	394
Research only	120
Teaching focused	455
Other	3
Professional	1,305
TOTAL	2,277

Note: Full-time equivalent (FTE) numbers shown. FTE is a measure of staff resources expressed in terms of the number of full-time staff who would be required in a full year to perform equivalent duties. FTE includes vocational education and training staff. 2024 FTE includes an estimate of casual staff. Due to rounding, numbers may not sum to totals.

Seven ECU staff members were based in overseas locations for 2024: two in New Zealand, three in the United States, and two in Thailand.

Controlled entities

ECU Holdings Pty Ltd

ACN 635 918 286

270 Joondalup Drive
Joondalup WA 6027, Australia

ECU Holdings generates revenue via commercial activities for re-investment in the University's academic activities.

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 provides residential and commercial accommodation and related activities to offer an affordable and supportive living environment for ECU students residing on campus in Australia. These services are provided through a single supplier, Campus Living Villages.

Edith Cowan S L Services (Private) Ltd

ECU is the sole shareholder of Edith Cowan S L Services (Private) Ltd, a company registered in Sri Lanka on 2 August 2024. The company is directed by representatives of ECU. As of 2024, it had not commenced trading activities or employed any staff.



Supply chains

ECU's suppliers can be categorised as follows:

- Technology
- Professional services
- Property and facilities
- Research and teaching

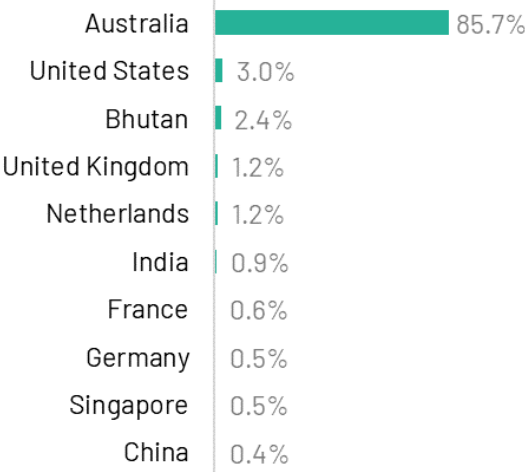
ECU holds long-term relationships with its major suppliers, supported by regular review and competitive tendering processes. Since ECU is a large organisation with teaching and research across diverse fields, the University also has many occasional or one-off suppliers.

ECU's largest supplier by spend in 2024 was Nippon Telegraph and Telephone Corporation (NTT). NTT supplies information technology network hardware and ancillaries to support both wired and wireless transmission networks across all ECU campuses, including ECU City campus, which is currently under construction. Second highest was BGIS, a facilities management provider, then the Government of Australia (various products and services), Synergy (electricity), and ISS (commercial cleaning).

The ECU Sri Lanka campus is managed by the Australian College of Business and Technology (Private) Ltd (ACBT) under a services agreement. Many products and services at ECU Sri Lanka are provided through ECU's contracts with its other suppliers, such as software licensing and electronic library access. ACBT is part of the Navitas Group, with Marron Group Holdings Pty Ltd as Navitas's parent company. Marron Group Holdings publishes an annual [Modern Slavery and Human Trafficking Statement](#) that describes the organisation's responses to modern slavery risks and its associated prevention strategies.

Spend by country

In 2024, 85.7 per cent of ECU's spend was with suppliers located in Australia, followed by the United States (3.0%), Bhutan (2.4%), United Kingdom (1.2%) and Netherlands (1.2%).



Spend by country, 2024

ECU procured services from three of the top 10 countries with the highest prevalence of modern slavery, as per the Global Slavery Index 2023: United Arab Emirates, Saudi Arabia, and Türkiye. This spend totalled 0.04 per cent of ECU's expenditure (\$81,905), up from 0.01 per cent in 2023 due to an increase in marketing-related expenditure in the UAE.

The expenditure in high-risk countries related to student recruitment and exam supervision. These activities are considered to have a low risk of modern slavery practices.

10 countries with the highest prevalence of modern slavery	Spend
Democratic People's Republic of Korea (North Korea)	Nil
Eritrea	Nil
Mauritania	Nil
Saudi Arabia	\$21,067.74
Türkiye	\$13,999.82
Tajikistan	Nil
United Arab Emirates	\$46,837.64
Russia	Nil
Afghanistan	Nil
Kuwait	Nil

Spend by category

Categories of products and services have varying risks of modern slavery. ECU's procurement of marketing services, IT software licences, library materials, insurance, utilities, student placements, and professional memberships and subscriptions has a low risk of modern slavery.

Other spend categories inherently have higher risks. This includes those with complex supply chains, that predominantly use low-skilled labour, that have informal or unregulated operations, and those staffed by individuals at a higher risk of modern slavery (e.g. vulnerable due to financial pressures, precarious work or visa situations, or isolation from family and friends).

Tracking and eliminating modern slavery practices related to information technology hardware is particularly difficult due to the complexity of global supply chains. ECU's suppliers of IT and communications hardware operate in Australia, and as such, they are required to comply with Australian laws, including the Modern Slavery Act. ECU makes its purchasing decisions with consideration of suppliers' approaches to ethics and sustainability, and responses to modern slavery questionnaires from the AUPN and ECU.

Property, construction and facilities maintenance activities are generally considered to have a high risk of modern slavery. Most of ECU's construction spend in 2024 related to the development of ECU City, a new campus located in Perth's central business district, opening in 2026. As this work is conducted in Australia, by Australian suppliers, ECU believes that its modern slavery risks are low. ECU acknowledges that Australia is not immune to modern slavery within its borders, and the University is actively involved in monitoring the onsite construction.

Commercial cleaning is a spend category with a high risk of modern slavery practices. ECU's cleaning services are primarily provided by ISS (99.7 per cent of this spend), with just two other suppliers in this category. ISS submits a Modern Slavery Statement annually.

ECU's agricultural expenditure consists of agricultural products and services used for research and teaching purposes, rather than food. Hospitality services is an area where further investigation is needed.

Categories at high risk of modern slavery practices	Spend
Agriculture	\$148,911.79
Construction	\$15,259,469.38
Cleaning	\$4,276,176.47
Hospitality	\$2,654,521.32
Meat processing	Nil
Textiles production	Nil
Manufacturing	Nil

Note: High risk categories determined as per the United Nations Global Compact Network Australia's [Modern Slavery Risk Management publication](#), June 2023.

Controlled entities

Edith Cowan Accommodation Holdings has only one supplier, Campus Living Villages. The suppliers for **ECU Holdings** are a subset of the broader University's. **Edith Cowan S L Services** has not commenced trading.





Assessing the risks

Edith Cowan University is aware that all organisations have modern slavery risks in their supply chains and operations. It is critical to assess these risks so meaningful mitigation and remediation can occur.

Within ECU's operations, the University has determined that its risk of directly *causing* modern slavery is very low. The University's activities are governed by its risk management framework, key policies, and compliance with Australian legislation. Risks of causing modern slavery practices include the use of forced labour, debt bondage, or human trafficking.

ECU's procurement and human resources policies and processes, and its internal governance structures, mitigate risks of *contributing* to modern slavery. Risks of contributing to modern slavery include unrealistic pricing or delivery expectations being placed upon suppliers.

The risks of being *linked* to modern slavery practices are higher than the previous two categories. Organisations can be linked to modern slavery through the activities of partner organisations, their partners' partner organisations, and so on. Particularly, there are inherent risks in technology regarding the origins of materials. This is a complex area, but it is assessed as low risk because the University primarily procures from large multinational

corporations that are required to comply with Australian law, including the *Modern Slavery Act 2018* (Cth).

The University continues to evaluate and monitor these risks through its membership in the Australasian Universities Procurement Network (AUPN). Working with 41 other universities across Australia and New Zealand reduces duplication for universities and suppliers, and enables efficient and effective risk assessments through self-assessment questionnaires, and joint remediation actions.

In 2024, the AUPN's Modern Slavery Working Group implemented Sievo, a software tool offering enhanced reporting and analytics capabilities compared to the previously used tool, FRDM, which was decommissioned in 2023. ECU continues to cleanse data extracted from its Oracle enterprise resource planning system to ensure the integrity and accuracy of information feeding into Sievo. This is critical to enable comprehensive auditing of both Tier 1 and Tier 2 suppliers.

ECU's online reporting process enables staff, students, and the public to notify the University of suspected modern slavery practices within its supply chain or operations. The University received no reports of modern slavery practices in 2024.





The University also conducts research into modern slavery practices. In 2024, relevant ECU publications included:

- Barnes, J., Aston, J., Naser, M., & Afroz, T. (2024). UDHR and Modern Slavery: Exploring the Vulnerability Approach to Address Migrants' Slavery-Like Situations. *Human Rights after 75 Years of the Universal Declaration of Human Rights: Reflections from the Global South* (473–491). Brill. https://doi.org/10.1163/9789004517967_024.
- Aston, J., & Anthony Das, C. (2024). Orphaned by Fate or Design: Navigating the Human Rights Dilemma. *Comparative Law: Unraveling Global Legal Systems* (101–108). Springer. https://doi.org/10.1007/978-981-97-7815-7_7.

ECU also initiated a project last year titled *Board Oversight in Modern Slavery Reporting: Comparative Insights from Australia and the UK*. The project, led by Dr Cecilia Anthony Das, explores board oversight of modern slavery obligations in Australia and the United Kingdom,

comparing their approaches to identify ways for Australian boards to strengthen their compliance. Boards hold direct accountability for modern slavery risks, being required to review, approve, and sign their organisation's modern slavery statements.

The project's key areas of focus include the quality of modern slavery reporting and the expertise of board members in addressing these issues. By highlighting best practices and areas for improvement, the study will offer practical guidance to enhance board-level governance and effectively manage modern slavery risks in Australia and the UK.

Controlled entities

The modern slavery risks for **Edith Cowan Accommodation Holdings** are assessed by Campus Living Villages Pty Ltd, its sole supplier. The risks for **ECU Holdings** are a subset of those managed by the University. **Edith Cowan S L Services** has not yet commenced trading.

Addressing the risks

ECU practises a 'three lines of defence' model of risk assurance. With the specific modern slavery risks in ECU's supply chains and operations, the first line of defence primarily involves the procurement function. The second line of defence are the University's risk management and compliance functions, which assess the effectiveness of controls through regular reviews. The third line is internal audit, which provides further oversight of controls and independent assurance that the framework is functioning well.

In addition, the University's Modern Slavery Working Group develops strategies to address the requirements of the *Modern Slavery Act 2018*. The working group includes representatives from procurement, human resources, compliance, planning, risk management, and student services. The working group reports to the Deputy Vice-Chancellor (Students, Equity and Indigenous). The Working Group assesses the effectiveness of the actions taken to address risks through a plan, tracking document, and regular oversight.

First line of defence: procurement and education

As detailed previously, ECU's procurement actions are undertaken with the Australasian Universities Procurement Network (AUPN). The AUPN's actions in 2024 included:

- Running implementation, onboarding and training sessions on using Sievo software.
- Providing modern slavery risk dashboards via ArcBlue.
- Monthly University Modern Slavery Forums, and facilitated workshops throughout the year to track progress and provide support for the sector.
- Community and industry engagement.
- Providing a portal with modern slavery training resources.

- Issuing over 70 self-assessment questionnaires to sector suppliers identified as having a high risk of modern slavery.

The barriers faced in this work remain unchanged from last year: the difficulties of maintaining a coordinated approach across varied institutions, maintaining momentum through staffing and resourcing changes, and gathering collective data with insightful analysis. The AUPN continues to work to address these issues.

In 2024, the University launched its new staff learning management system. One of the initial learning modules focused on integrity and included content on the risks of modern slavery. By including this content, the University aims to raise awareness among staff about the serious issue of modern slavery and ensure they are equipped to identify and address potential cases within their professional and personal environments. In addition, all ECU procurement staff have completed the Australian Border Force's online training course, *Modern Slavery in Public Procurement*.

ECU produced its first *Wellbeing Framework and Wellbeing Plan 2024-2025*, with offerings and initiatives to ensure ECU staff receive the holistic support they need to thrive personally and professionally. This includes the establishment of a University Executive Wellbeing Committee, and a network of supporting Wellbeing Committees across the University, underpinned by measures and metrics to assess outcomes.

The University launched a learning management system module titled *Strength in Diversity: Enhancing Your Employment Journey* in 2024, which supports ECU students with disability, Aboriginal and Torres Strait Islander students, international students, and students in the LGBTIQ+ community to navigate the transition to employment, and supports all ECU students and staff to be effective allies in the workplace. Complementing other topics, the module includes legal workplace rights, and acceptable workplace culture in Australia.

International students may be at a higher risk of experiencing modern slavery due to less well-developed local support networks, financial pressures, and lack of knowledge of Australian workforce laws. As such, ECU's orientation sessions for international students provide an overview of their employment rights in Australia, and the University's support services.

Second line of defence: risk management and compliance

The University's Enterprise Risk Register contains two risks with links to modern slavery considerations:

- The first is a broad framework risk which considers the risk of a material statutory compliance breach at the University. The risk outlines the key mechanisms and controls by which the University understands, meets and maintains its various statutory compliance obligations, including those from the Modern Slavery Act.
- The second risk relates to non-compliance with industrial relations legislation. This risk considers the mechanisms and controls by which the University ensures its processes are aligned with industrial relations legislation, which is designed to promote a fair workplace environment that balances the rights and responsibilities of both employees and employers.

In 2025 the University will embark on a series of risk workshops and reviews. This review and uplift will ensure that known drivers of modern slavery are adequately considered and profiled in risks as appropriate, including within procurement, contract management and employment. It will also include consideration regarding adding a standalone Modern Slavery risk to our Enterprise Risk Register to improve profiling of the University's modern slavery risk exposures, and the controls and treatments.



Music theatre

Third line of defence: internal audit

ECU undertook two audits in 2024 with links to modern slavery risks, focused on the employee-related links to modern slavery.

The Employee Recruitment and Retention internal audit considered the design and effectiveness of controls in place to manage ECU's ability to attract and retain employees. The audit included the mechanisms for communicating ECU's wellbeing programs and initiatives, the review and integration of staff feedback, and the processes to identify and address retention issues. This supports ECU's endeavours to create a work environment where employees are valued and want to stay, and where issues threatening the work environment of employees are identified and managed. The internal audit report specifically highlighted the University's proactive approach to capturing staff perceptions and satisfaction related to working at ECU, noting that this feedback was used to inform strategies to improve satisfaction and in turn, staff retention.

The Workplace Relations internal audit considered the frameworks and processes to comply with key high-risk workplace legislation



and operationalisation of the University's Enterprise Agreement. This review provided insights to support the University in its implementation of processes to align with both the legislation and the Enterprise Agreement, both of which encourage a workplace that supports the rights and responsibilities of employees and employers.

Policies and processes

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

- *Staff Code of Conduct*: a framework for appropriate staff behaviour.
- *Misconduct*: the strategies, controls and processes for the prevention, detection and management of misconduct, fraudulent and corrupt behaviour, and for fair dealing in these matters.
- *Complaints*: the principles of ECU's approach to handling complaints from students and members of the public.

The guidelines below complement the University's policies and operations.

- *Public Interest and Whistleblower Protection Discloser Guidelines*: assist and protect staff who report corrupt or improper conduct.
- *Social and Sustainable Procurement Guidelines*: incorporate sustainability and social responsibility into purchasing decisions, including risks of modern slavery.
- *Misconduct Guidelines*: the University's strategies to prevent and detect acts of fraud, corruption, and misconduct.

The University's supplier contracts contain clauses related to modern slavery practices, and these are included in all legal templates.

Legislation and guidelines

Edith Cowan University's legislative obligations include the following acts related to governance, safety, wellbeing, grievance and complaints processes, and employee rights and working conditions:

- Modern Slavery Act 2018 (Cth)
- Corporations Act 2001 (Cth)
- Corruption, Crime and Misconduct Act 2003 (WA)
- Fair Work Act 2009 (Cth)
- Higher Education Support Act 2003 (Cth)
- Public Interest Disclosure Act 2003 (WA)
- Work Health and Safety Act 2011 (Cth)
- Work Health and Safety Act 2020 (WA)

ECU supports the following international conventions and guidelines regarding human rights and ethical conduct:

- United Nations (UN) Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- UN Sustainable Development Goals
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- Ten Principles of the UN Global Compact

The University has adopted the following voluntary codes related to human rights, as led by the University Chancellors Council:

- Code of Governance Principles, which sets out the composition of governing bodies, the need for their involvement in universities' risk management frameworks, and their oversight responsibilities.
- Model Code: Protection of Freedom of Speech, which ensures academic freedom, the freedom of staff and students to criticise ECU, and the freedom for staff and students to unionise.

Controlled entities

Controlled entities complete ECU's modern slavery self-assessment questionnaire annually. This assists them to identify and manage their modern slavery risks, and provides ECU with the ability to monitor and review the outcomes, and work with the entities to address the risks.

ECU Holdings follows the University's established policies and risk management strategies. **Edith Cowan S L Services** has not commenced trading. **Edith Cowan Accommodation Holdings'** sole supplier, Campus Living Villages (CLV), publishes an annual modern slavery statement.





Consultation and approvals

We hereby submit the Modern Slavery Statement of Edith Cowan University for the year ending 31 December 2024, for publication on the Australian Government's [Online Register for Modern Slavery Statements](#).

The Statement was completed in consultation with relevant representatives from its controlled entities. Their information informed ECU's Modern Slavery Statement 2024.

ECU's Modern Slavery Statement 2024 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 2025, following endorsement by the Quality, Audit and Risk Committee on 26 May 2025.



Gaye McMath
Chancellor
26 June 2025



Professor Clare Pollock
Vice-Chancellor
26 June 2025



Marine science