



Modern Slavery Statement 2025



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Deakin University CRICOS Provider Code: 00113B



Acknowledgement of Country

Deakin University acknowledges the Traditional Custodians of all the unceded lands, skies and waterways on which Deakin students, staff and communities come together.

We pay our deep respect to the Ancestors and Elders of Wadawurrung Country, Eastern Maar Country and Wurundjeri Country, where our physical campuses are located.

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Message from the Chancellor and Vice-Chancellor



Claire Higgins
Chancellor



Professor Iain Martin
Vice-Chancellor

Modern slavery is an affront to human dignity. It thrives in the shadows of global supply chains, hidden within systems many of us interact with daily—from the devices we use to the buildings we occupy.

As a public institution committed to shaping a better world, Deakin University has both a moral obligation and a practical responsibility to confront this reality.

The year 2025 marked an important evolution in our modern slavery response. We continued to advance our systems and processes, building on the strong foundations we had established through policies in 2024. The work we have done to operationalise these policies will enable us to be increasingly responsive to the complex and evolving environment of modern slavery.

This Statement reflects our commitment to transparency and due diligence. Through independent monitoring by Electronics Watch, we identified labour rights violations in factories producing ICT equipment we purchase. Through the Proxima risk assessment platform, we flagged concerns about glove manufacturing in our medical supply chains. Modern slavery exists in the supply chains of organisations across the world, regardless of good intentions or reputation, and we are scrutinising our own networks and practices with serious intent.

The scale and hidden nature of modern slavery demands humility. While 83.9% of our spending occurs with Australian-based suppliers in a low-risk regulatory environment, exploitation can occur anywhere, including in regions our international campuses are located.

Signed for and on behalf of Deakin University

Claire Higgins
Chancellor
Deakin University

Our responsibility extends beyond our direct employees to workers we may never meet—those in subcontracted services, those assembling electronics in Southeast Asian factories, those harvesting raw materials for products we purchase.

In 2024-2025, we participated in the Fair Futures¹ benchmarking assessment, which confirmed we have established the "right conceptual exoskeleton". Our framework covers 43 of 66 indicators aligned with the UN Guiding Principles on Business and Human Rights. We have structures; we now need implementation at scale.

Through our partnership with the Australasian Universities Procurement Network, we are working alongside 41 peer institutions to leverage our collective \$14 billion spending power for good. But collaboration does not absolve individual accountability. This Statement documents what we have built, what we have learned, and importantly, what we need to achieve.

Our commitment moving forward is clear. In 2026, we will strengthen our due diligence capabilities, develop systematic supplier engagement protocols, invest in training for our procurement team, and implement formal response procedures. We will continue to build toward measurable worker outcomes as our systems and expertise mature.

As an institution that educates future leaders and conducts research that shapes policy, Deakin has the opportunity—and obligation—to lead by example. This Statement represents our commitment to that leadership, grounded in transparency, accountability, and an unwavering focus on human rights.

¹ Fair Futures is a human rights consultancy that was founded to empower organisations to be at the forefront of social change. Founder and CEO, Fiona David, has championed anti-slavery progress as a leading expert in high-impact policy reform and systemic societal change.

Professor Iain Martin
Vice-Chancellor
Deakin University

About this Statement

This Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) for the reporting period 1 January 2025 to 31 December 2025. It describes the steps taken by Deakin University and its controlled entities to identify, assess and address modern slavery risks in our operations and supply chains.

Reporting entities

This statement covers:

- Deakin University (ABN 56 721 584 203)
- Controlled entities:
 - Deakin Residential Services Pty Ltd (ABN 46 072 532 784)
 - Institute for Regional Security Ltd (ABN 48 110 456 856)
 - Unilink Pty Ltd (ABN 72 005 382 954)
 - Universal Motion Simulator Pty Ltd (ABN 58 622 763 240).

Unless otherwise specified, references to Deakin or the University include all controlled entities.

Our commitment

Deakin University is committed to:

Respecting human rights

in all our activities and relationships

Preventing modern slavery

in our operations and supply chains

Taking action

when risks or harms are identified

Transparency

in our approach and progress

Continuous improvement

in our systems and practices

Collaboration

with suppliers, peers, and stakeholders to address systemic issues

This commitment is embedded in our institutional values and supported by:

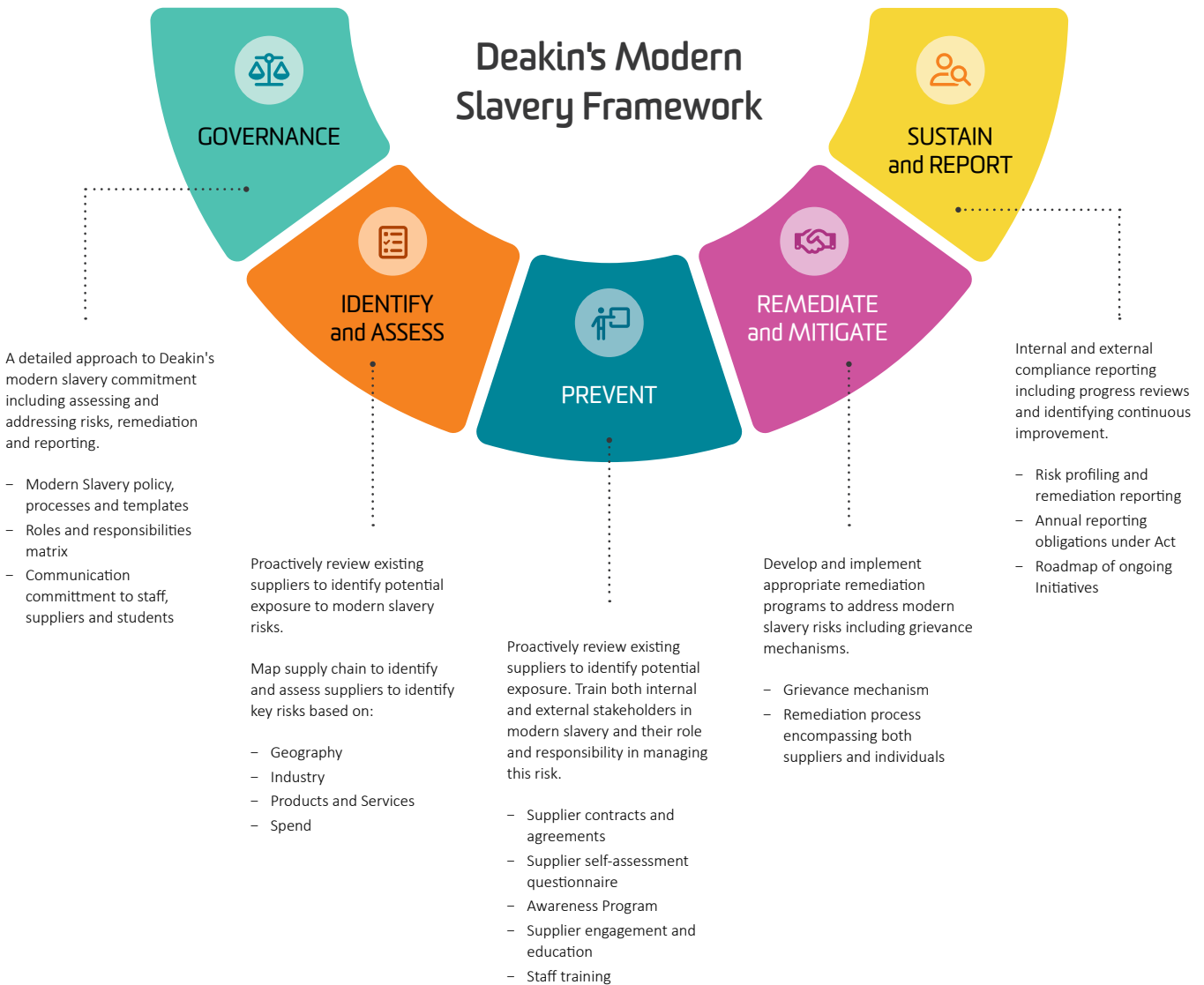
- Deakin University [Supplier Code of Conduct \(2024\)](#)
- Procurement [Policy](#) and [Procedure](#)
- [Gender-based Violence Prevention and Response Policy](#)
- [Academic Integrity Policy](#)
- [Staff Code of Conduct](#).

Our approach

Deakin's modern slavery framework

Deakin's Modern Slavery Framework aligns with the UN Guiding Principles on Business and Human Rights and provides a systematic approach to identifying, preventing and addressing modern slavery risks across our operations and supply chains.

Figure 1: Framework structure: Five interconnected elements



Our structure, operations and supply chain

Our structure

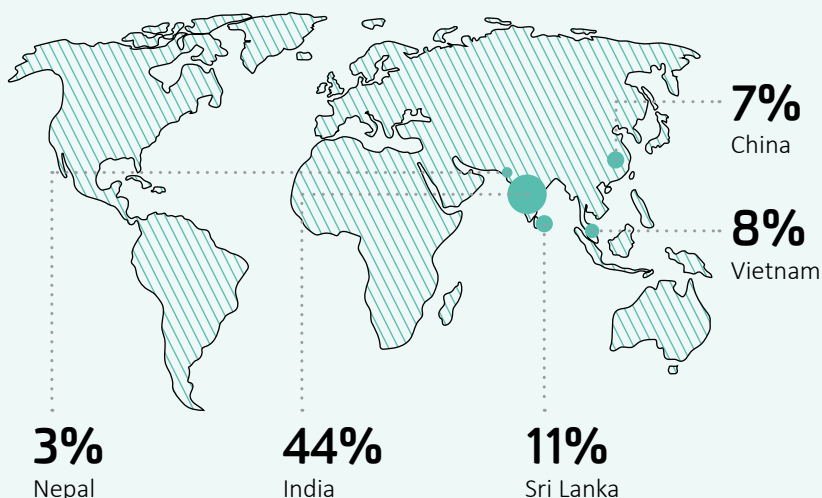
Deakin University is a public university established under the *Deakin University Act 2009* (Vic). Deakin University is governed by a Council, which has oversight of the University's strategy, risk management, and compliance obligations. The Vice-Chancellor is the Chief Executive Officer and is accountable to Council for the University's operations.

- **Council:** Oversight of modern slavery risk management and annual statement approval
- **Vice-Chancellor:** Ultimate accountability for modern slavery compliance
- **Chief Financial Officer:** Operational accountability for procurement and supply chain management



ENROLMENTS

International – top countries of origin



ENROLMENTS

Total enrolments

61,704

Equivalent full time student load (EFTSL)

43,023

Undergraduate

39,766

Postgraduate

18,954

Graduate researchers

2,253

Non-award

731

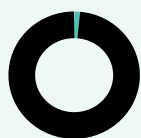
1. ShanghaiRanking Global Ranking of Sport Science Schools and Departments 2024
2. QILT Graduate Outcomes Survey 2024
3. ShanghaiRanking 2025 ARWU
4. Clarivate Highly Cited Researchers 2025
5. QILT 2024 Student Experience Survey; CWTS Leiden Ranking Open Edition 2025- Australian universities
6. QILT Graduate Outcomes Survey – Longitudinal 2024
7. QILT Graduate Outcomes Survey 2024
8. QS World University Rankings: Sustainability 2026
9. THE World University Rankings 2026

ENROLMENTS

Equity and inclusion



26.4%
First in family



1.1%
Aboriginal and Torres Strait Islander peoples



13.9%
People with disability



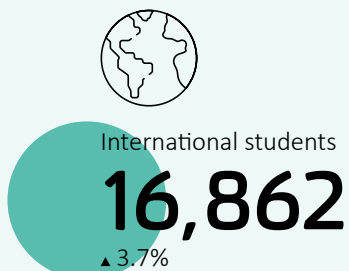
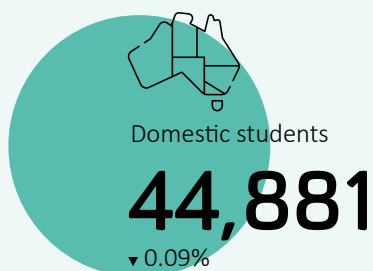
8.9%
Low socioeconomic status



15.6%
From regional or remote areas of Australia

ENROLMENTS

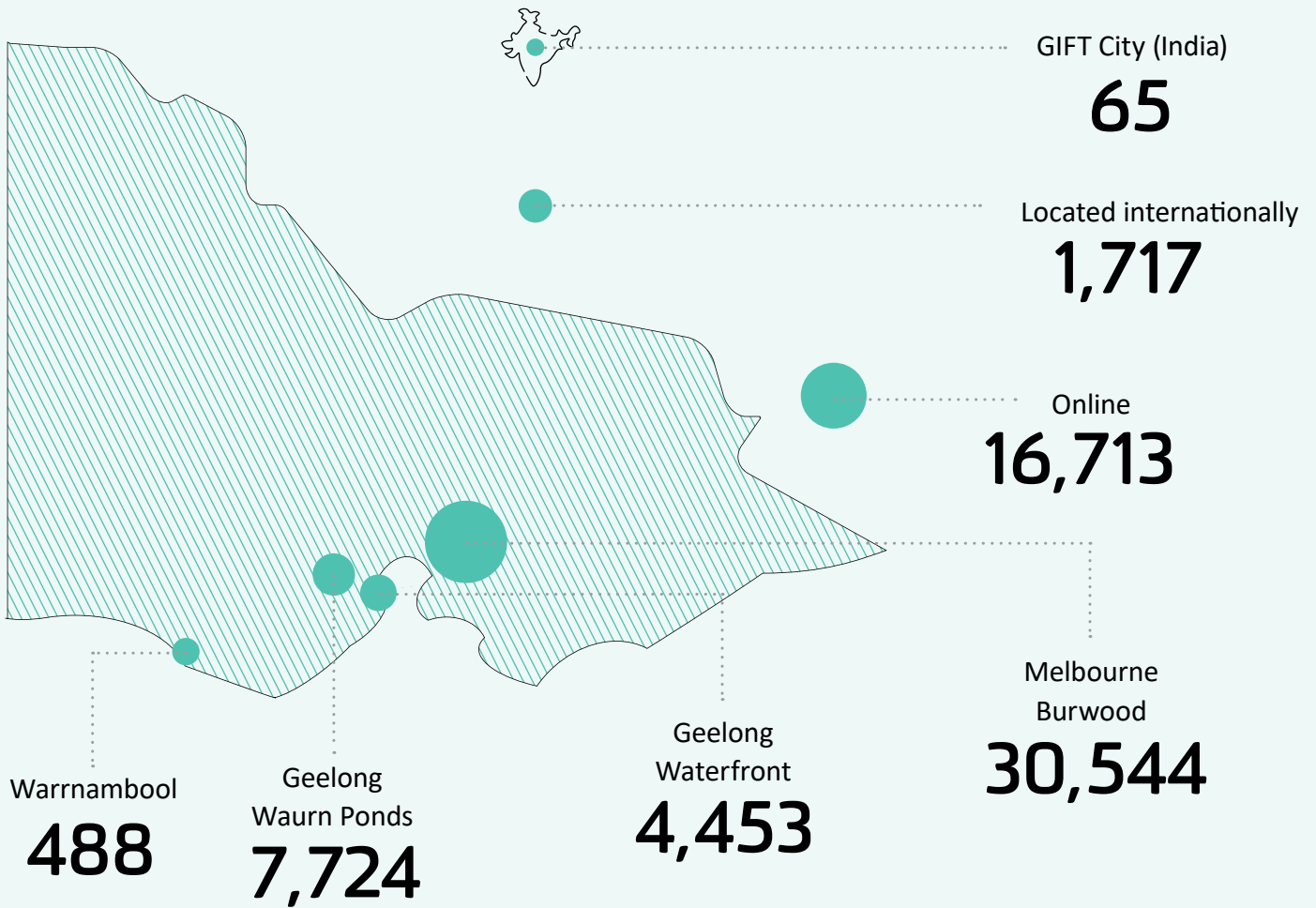
Domestic and international*



*Note: Due to students gaining residency during the year, a very small number of individuals appear in both categories, resulting in the sum slightly exceeding the total course enrolments figure.

ENROLMENTS

By campus / location



ENROLMENTS

By faculty

Arts and Education

14,155



Health

17,297



Business and Law

15,111



Other

634



Science, Engineering and Built Environment

14,507





Our operations

Education and research

- Teaching across four faculties and fourteen schools
- Research activities in applied Artificial Intelligence, Sustainable Bioproducts, Cyber Research and Innovation, Marine Science, Rural Health, Physical Activity and Nutrition, and Frontier Materials
- Student services and support
- Library and digital resources
- International partnerships and offshore delivery

Campus operations

- Facilities management across 450 hectares
- Student accommodation at all four Deakin campuses
- Food services and hospitality, retail operations, Deakin Estate: events and conferences, and sports and recreation facilities

Digital infrastructure

- IT systems and cloud services, educational technology platforms, telecommunications networks, data centres and cybersecurity

Corporate services

- Human resources and workforce management, Finance and Assurance, marketing and communications, estate and infrastructure management, and security and emergency management

Commercial activities

- Contract research and consulting, intellectual property commercialisation, and industry partnerships

Our supply chain

Financial overview

Total University expenses:	\$1.48 billion
Addressable Procurement:	\$403.1 million
Controlled entities:	\$10.5 million
GIFT City (India):	\$1.9 million
Deakin Lancaster Indonesia (DLI):	\$157,400

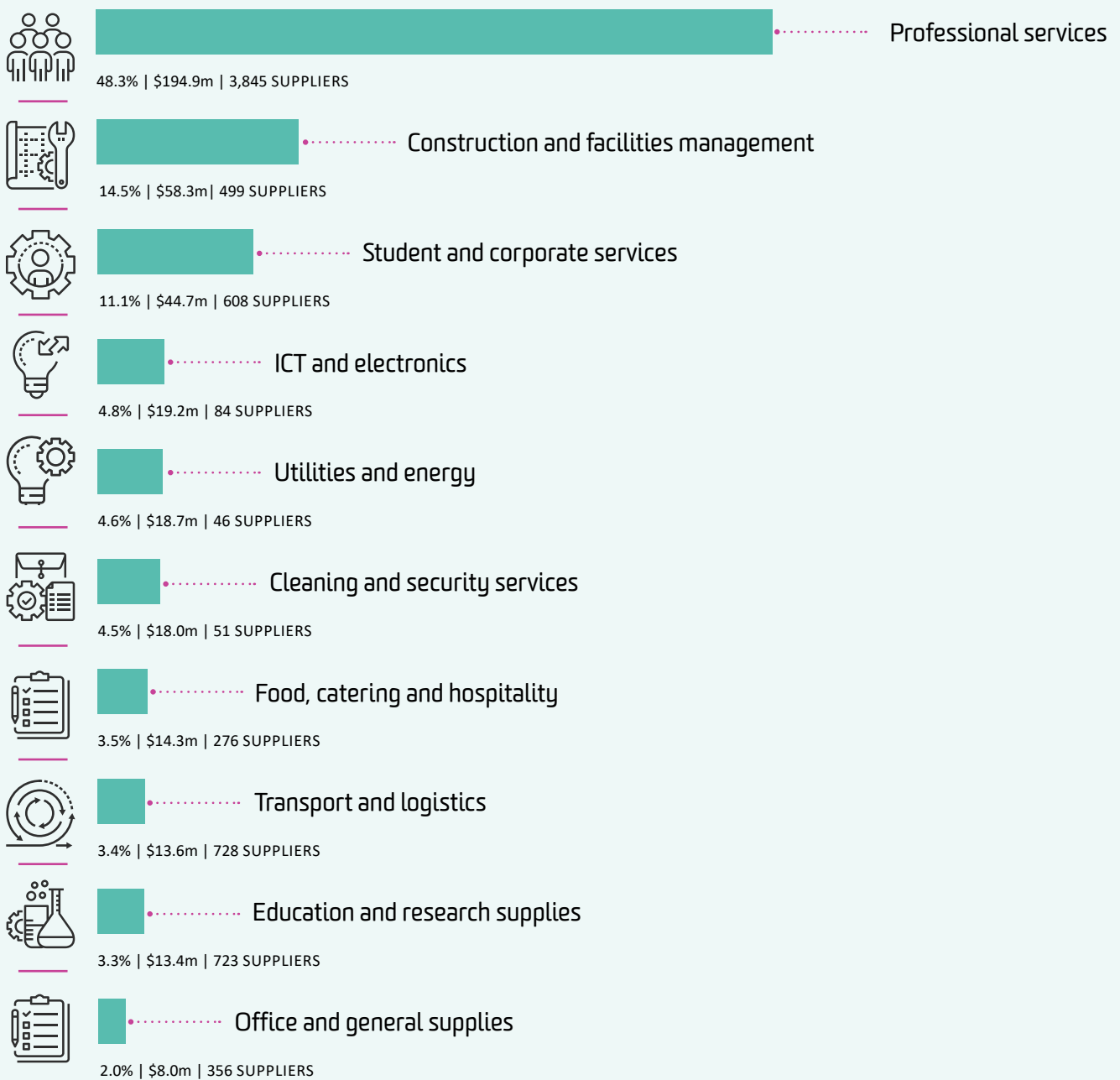
Supplier network

Active suppliers	5,532
New suppliers (2025)	941
Countries	72

Figure 2: Deakin University Addressable Spend

Total Spend: \$403.1m across 5,532 suppliers

Spend by category



Source: Deakin's Financial System Unifi (Workday) supply chain characteristics

Tier 1 suppliers (direct):

- Suppliers with whom we have direct contractual relationships
- Predominantly Australian-based businesses (81.4% by count)
- Mix of multinational corporations, national companies, small and medium enterprises (SMEs), and local businesses

Tier 2+ suppliers (indirect):

- Suppliers who supply goods and services to our Tier 1 Suppliers
- More geographically diverse, particularly for manufactured goods
- Less visibility

Key supply chain features:

- Domestic vs. International: 83.9% of spend with Australian-based suppliers; 16.1% with international suppliers directly; additional international exposure through Tier 2+ suppliers
- Service vs. Goods: 86.4% services (cleaning, security, professional, ICT support); 13.6% goods (equipment, consumables, materials)
- Worker-dependent: High proportion of the use of human worker dependant services (cleaning, security, catering, facilities management) presents an elevated risk in modern slavery
- Supply Chain Complexity: Simple (professional services) to highly complex (electronics, textiles, food)
- Offshore Campuses: Procurement conducted locally in India and Indonesia through partnership arrangements, meeting the regulatory requirements of multiple countries




Geographic distribution

Table 1: Top 10 Countries by Spend FY2025

Rank	Country	Spend	% of Total Spend	GSI risk	No. of Suppliers	Categories
1	Australia	\$317.1 million	83.9%		4,504	All categories
2	India	\$16.1 million	4.3%		105	Professional services, Contract and Agency Labour
3	United States of America	\$11.7 million	3.1%		220	Building and Facilities Maintenance, Printing and Paper products, Contract and Agency Labour
4	United Kingdom	\$7.3 million	1.9%		135	Printing and Paper Products, Professional Services, Building Facilities Maintenance
5	Ireland	\$5.5 million	1.5%		12	Promotional Merchandise, Building and Facilities Maintenance, Professional Services, Printing and paper Products
6	Sri Lanka	\$3.9 million	1.0%		34	Professional Services, Contract and Agency Labour, Promotional Merchandise
7	Netherlands	\$1.8 million	0.5%		16	Printing and Paper Products, Building and Facilities Maintenance, Professional Services, Lab and Medical equipment, Electronics and Appliances, Contract and Agency Labour
8	China	\$1.6 million	0.4%		60	Professional Services, Lab and Medical Consumables, Contract and Agency Labour, Electronics and Appliance, Lab and Medical Equipment
9	Canada	\$1.5 million	0.4%		31	Professional Services, Building Construction and Facilities Maintenance, Lab and Medical Equipment, Electronics and Appliances
10	Indonesia	\$1.3 million	0.3%		29	Professional Services, Contract and Agency Labour, Event Management, Promotional Merchandise

Source: Deakin UniFi

 Low
 Medium

Modern slavery risks in our operations and supply chain

Supply Chain Risk

Risk assessment methodology




Our approach to assessing risk:

We use a systematic, risk-based approach to identify where modern slavery might occur in our supply chain. This approach follows the UN Guiding Principles on Business and Human Rights (UNGPs) and Australian Government guidance.

Our three-step process:

1. Identify inherent risk – we assess how risky each category of goods or services is (for example, cleaning services vs. software licences)
2. Adjust for additional factors – we consider:
 - Which country the supplier operates in
 - How workers are employed (direct employees vs. labour hire)
 - Whether vulnerable groups of workers are involved
3. Determine our response – we decide what checks and actions are appropriate based on the level of risk

Table 2: Spend by Inherent Sector Risk

Sector Risk Level	FY2025 Spend	% of Total	Supplier Count	Key Sectors
	\$109.73 million	27.2%	833	Construction, ICT hardware, cleaning, security, catering, textiles, lab consumables
	\$98.43 million	24.4%	3,845	Office supplies, printing, furniture, general equipment, hospitality
	\$194.94 million	48.4%	1,759	Professional services, software, utilities, subscriptions

Source: Deakin UniFi and Global Slavery Index 2023.

Note: Counts by category; totals include suppliers across multiple categories. Actual unique suppliers: 5,532.

Our progress:

- 2025: We built our risk assessment method and tools
- 2026 onwards: We will scale up our supply chain checks, verification processes, and responses.

Step 1: Identifying inherent sector risk

What is inherent sector risk?:

This is the level of modern slavery risk that naturally exists in a particular type of product or service, regardless of where it's purchased from.

Our spend by inherent sector risk

This table shows how our total spending is distributed across different risk levels, based on the type of goods and services we purchase.

What this tells us:

- Nearly half our spend (48.4%) is on low-risk professional services, software and utilities
- Over one quarter (27.2%) is on high-risk categories requiring enhanced monitoring
- The remaining quarter is medium-risk, requiring standard due diligence

While high-risk spending represents only 27.2% of our total, it involves 833 suppliers that require closer attention and stronger controls.

How we assess it:

Based on recognised information sources, including Walk Free Foundation's Global Slavery Index, International Labour Organization (ILO) guidance, UN Guiding Principles on Business and Human Rights (UNGPs), Responsible Business Alliance (RBA) standards, we grouped Deakin's 250+ spending categories into:

- 10 major sectors
- 25 detailed risk categories.

We rated each category as HIGH, MEDIUM or LOW risk based on four factors:

- Labour exposure: Vulnerable worker populations, labour intensity, employment models
- Supply chain complexity: Number of tiers, traceability, raw material sourcing
- Documented exploitation: Historical modern slavery cases in the sector
- Regulatory oversight: Strength of protections and enforcement.

Step 2: Adjusting for geographic risk






What is geographic risk?

This is the level of modern slavery risk in the country where a supplier operates or sources their products.

How we classify countries:

Using the Global Slavery Index 2023, which measures how many people per 1,000 population are affected by modern slavery in each country, we group countries into four risk tiers: Tier A (LOW), Tier B (MEDIUM), Tier C (HIGH), and Tier D (CRITICAL).

Table 3: Our Spend by Geographic Risk

Risk Tier	Definition	FY2025 Spend	% of Total	Number of Suppliers	Characteristics
 Tier A (LOW)	Fewer than 5 per 1,000; strong protections	\$353.4 million	87.7%	5,221	Strong rule of law and labour protections
 Tier B (MEDIUM)	5.0-9.9 per 1,000; inconsistent enforcement	\$24.0 million	6.0%	220	Labour protections exist but inconsistently enforced; documented concerns
 Tier C (HIGH)	10-30 per 1,000; weak protections, documented exploitation	\$0.7 million	0.2%	39	Weak enforcement; documented exploitation cases
 Tier D (CRITICAL)	Over 30 per 1,000; systemic exploitation	\$0	0%	0	Systemic exploitation; very weak protections
 Unclassified	Country information unavailable	\$24.98 million	6.2%	Unknown	

Note: Due to limitations in our systems, we were unable to identify the country of origin for \$24.98 million (6.2%) of total spend. As a result, geographic risk could not be assessed for this portion of the supply chain during the reporting period. Deakin will continue to address these limitations and to improve data completeness. Source: Deakin's Financial System Unifi (Workday) and Global Slavery Index 2023

Step 3: Determining final risk and our response

How we calculate final risk:

We combine sector risk (Step 1) and geographic risk (Step 2) to determine the final risk level for each supplier relationship.

What this determines:

The final risk level determines the level of scrutiny required and the nature of due diligence and monitoring activities applied to each supplier:

- **VERY HIGH risk** → Enhanced due diligence, alternative sourcing, supplier audits, regular monitoring
- **HIGH risk** → Enhanced due diligence, supplier audits, regular monitoring
- **MEDIUM risk** → Standard due diligence, periodic reviews
- **LOW risk** → Basic compliance checks.

This risk-based approach ensures we focus our resources where modern slavery risks are greatest.

Modern slavery risk profile

Priority risk categories

How we identify priorities:

We combine both sector risk and geographic risk to identify where modern slavery is most likely to occur in our supply chain. Our top 10 priority categories represent suppliers that are:

- Operating in high-risk sectors (like labour hire or manufacturing), and
- Based in countries with elevated modern slavery risks.

These 10 categories represent \$9.4 million in annual spend and are our highest priority for enhanced due diligence, audits, and monitoring.

Table 4: Top 10 Priority Risk Categories

Priority	Category	Inherent Sector Risk	Geographic Tier Mix	Final Risk Level	Number of Suppliers	Why This is a High Priority
1	Contract and Agency Labour, including Student Recruitment	H	Tier B and C	V	92	Labour-hire models, vulnerable workers
2	Promotional Merchandise	H	Tier B and C	V	22	Mixed goods (textiles, electronics, plastics), vulnerable workers
3	Building and Facilities Maintenance	H	Mixed Tier A and B	H	5	Trades labour, subcontracting, vulnerable workers
4	ICT Hardware - Computing	H	Tier B	H	4	Electronics manufacturing, forced labour, conflict minerals, cobalt
5	ICT Hardware- Network and AV	H	Tier B	H	2	Semiconductors, firmware security, supply chain concentration, counterfeits
6	Event Management	MH	Tier B	MH	15	Vulnerable workers, subcontracting, casual labour, equipment supply chain
7	Catering and Food Services	H	Tier B	H	9	Food supply chains, hospitality labour, casual workers
8	Lab and Medical Consumables	H	Mixed Tier A and B	MH H	6	Gloves, plastics, reagents (rubber, chemicals), complex supply chain, vulnerable workers
9	Lab and Medical Equipment	MH	Mixed Tier A and B	MH H	4	Precision equipment, electronics components, complex supply chain
10	Electronics and Appliances	H	Tier B	H	1	Metals extraction, hazardous chemicals, labour practices, product safety
TOTAL					160	

Note: Total supplier figure presented in this report is based on the unique count of suppliers, rather than the total number of supplier records. This approach removes duplication where the same supplier may appear multiple times across different systems, categories, business units or spend lines. Source: Deakin UniFi and Global Slavery Index 2023.

V Very High MH Medium High
H High M Medium

Key 2025 insights from our risk assessment

- 1. Geographic concentration:** 87.7% of our spending is with suppliers in low-risk countries (primarily Australia), but we still must remain vigilant as exploitation can occur anywhere.
- 2. Service-dominated:** Most of our spending is on services rather than manufactured goods, but labour-intensive services (cleaning, security) carry significant risks.
- 3. Priority focus needed:** While \$9.4 million represents only 2.3% of our addressable spend, these 160 suppliers in 10 categories require disproportionate attention and resources.
- 4. Data gaps:** We cannot assess risk for 6.2% of spending due to incomplete country data; improving data quality is a priority.
- 5. International operations:** Our campuses and partnerships in India and Indonesia require locally appropriate approaches to due diligence.

Operational risk assessment

Overview

In 2025, Deakin's modern slavery efforts primarily focused on supply chain risk assessment. While we have not yet conducted systematic modern slavery risk assessments across all operational functions, the University maintains robust controls that mitigate modern slavery risks in our direct operations.

This section summarises operational controls operating during 2025 and our commitment to more systematic operational risk assessment in 2026.

Direct employment:

Deakin directly employed approximately 5,654 staff during 2025 under Australian employment law across four Victorian campuses and supporting online operations.

Regulatory environment:

Australian employment operates within highly protective regulatory frameworks including the *Fair Work Act 2009*, which prohibits sham contracting and establishes minimum employment standards. Australia's Global Slavery Index prevalence rate is 0.6 per 1,000 population (very low risk).

Controls operating in 2025

Why this is low risk:

- Australia's Global Slavery Index: 0.6 per 1,000 (very low risk)
- Strong protections: *Fair Work Act 2009*, enterprise agreements, union oversight, independent enforcement by Fair Work Ombudsman

Key controls:

- Right-to-work verification and visa monitoring
- Enterprise agreements and Modern Award coverage
- Regular payroll auditing
- Multiple reporting channels (HR, whistleblower hotline, union, Safer Community Unit)

2025 outcome: No modern slavery incidents reported through grievance, whistleblower, or union channels.

International branch campuses (IBC) and partnerships

Deakin operates two international campuses in medium-risk countries:

GIFT City, India (Global Slavery Index: 8.0 per 1,000)

- Staff employed directly by Deakin

DLI, Bandung, Indonesia (Global Slavery Index: 6.7 per 1,000)

- Partnership with Lancaster University. Navitas Pty Limited operates the campus
- Academic staff employed by Yayasan

Why IBCs present elevated risk

Country-specific risks:

- India: Bonded labour, caste-based discrimination, construction exploitation, migrant worker vulnerability
- Indonesia: Forced labour, domestic servitude, informal employment

Operational risks:

Local procurement of high-risk services (facilities, cleaning, security, catering, ICT)

- Student recruitment agents and sub-agents
- Limited visibility into subcontractors
- Language barriers to reporting

Controls operating in 2025:

- IBC Oversight Committee with modern slavery risk reporting
- Modern slavery included in institutional risk register
- Partnership agreements include labour standards requirements
- Procurement Policy updated in December to explicitly incorporate IBC operations
- Compliance with local safeguarding laws (India's POSH Act; Indonesia sexual harm prevention)
- Commenced mapping operational models and high-risk suppliers
- Strategic Procurement oversight of major IBC procurement

Acknowledged limitations:

Fair Futures 2024 recommendations for IBC operations were not comprehensively implemented in 2025. Systematic supplier due diligence, worker verification, local staff training, and adapted grievance mechanisms remain development priorities.

Student placements and Work-Integrated Learning (WIL)

Students undertake placements with external organisations, particularly in health, education, and professional disciplines.

Controls operating in 2025:

- Student Placement Procedure (reviewed August 2025)
- Placement agreements with host organisations
- Pre-placement checks and student briefings
- Health WIL Team oversight with regular check-ins
- Multiple complaint channels

2025 outcome: No material modern slavery concerns escalated.

Student recruitment

Deakin University is committed to ethical recruitment practices that protect prospective international students from exploitation and modern slavery risks throughout the recruitment process.

Why student recruitment presents modern slavery risk:

While the National Code of Practice for Providers of Education and Training to Overseas Students 2018 protects students, it does not comprehensively address worker conditions in the recruitment supply chain.

Modern slavery risks exist in:

- Commission structures incentivising excessive working hours for agents
- Debt bondage where agents pay fees to secure territories
- Exploitation of casual event and marketing staff
- Sub-agent networks with limited visibility
- Operations in medium-risk countries (India, Sri Lanka, Indonesia, Malaysia, Philippines, Pakistan) with inconsistent labour law enforcement.

Controls operating in 2025:

- Agent vetting including background checks and performance monitoring
- Contractual agreements prohibiting excessive fees, misrepresentation, or coercion
- Agent training on modern slavery indicators
- Regular audits and student feedback review
- Transparent fee structures
- Reporting channels through Student Central and Safer Community Unit

Our commitment extends beyond regulatory compliance to fostering a recruitment environment that respects human rights and protects vulnerable international students from all forms of exploitation.

Research participants and clinical trials

Deakin researchers conduct studies involving human participants across health, psychology, education, and social sciences. Ethical research conduct is fundamental to the University's research integrity framework.

Controls operating in 2025:

- Mandatory Deakin University Human Research Ethics Committee (DUHREC) approval under National Statement on Ethical Conduct in Human Research
- Rigorous consent processes with enhanced protections for vulnerable populations
- Prohibition on coercion or undue inducement
- Right to withdraw without penalty

2025 outcome: No modern slavery-related concerns identified.

Recognition and commitment

Deakin maintains robust operational controls that mitigate modern slavery risks. However, these controls have not yet been systematically assessed through a dedicated modern slavery lens or integrated into a comprehensive operational modern slavery risk management framework.

Actions taken to assess and address risks

What we achieved:

- Established a Strategic Procurement team providing dedicated capability for ethical procurement and modern slavery compliance including management of the University's modern slavery program of work.
- Published updated Procurement Policy and Procedure embedding modern slavery requirements across all international campuses and controlled entities.
- Strengthened contractual terms in high risk contracts, requiring suppliers to comply with the *Modern Slavery Act 2018* (Cth), declare the absence of modern slavery-related convictions, and adhere to Deakin's Supplier Code of Conduct.
- Implemented supplier risk screening and pilot due diligence programs, including work on assessing our existing supplier base.
- Developed modern slavery guidance on our staff intranet covering definitions, risk indicators, warning signs, and how to escalate concerns.

Risk assessment and identification

Electronics watch monitoring:

We participated in Electronics Watch's independent monitoring of ICT hardware supply chains, covering laptops, desktop computers, monitors, and networking equipment from major suppliers.

Findings: 38 monitoring reports covering 20 factories in East Asia and Southeast Asia identified excessive working hours, forced labour indicators, occupational health and safety concerns, discrimination, recruitment fee problems, violence and harassment, environmental issues, child labour risks, and restrictions on freedom of association.

What this revealed: Worker-centred monitoring identified real exploitation in our supply chains. However, we lacked clear protocols to respond quickly and effectively—a gap we're addressing in 2026.

Proxima risk assessment tool:

We began using the Proxima platform (through our AUPN partnership) to screen suppliers based on country risk, industry risk, spending levels, and supply chain complexity.

Specific risk identified: Proxima flagged concerns about glove manufacturing in Malaysia by a major multinational glove supplier, where the sector has documented modern slavery risks including migrant worker exploitation, recruitment fees, passport retention, and poor dormitory conditions. Deakin purchases small quantities of two glove products through Australian distributors for research, health, and education purposes. The manufacturer was a tier 3 supplier within Deakin's supply chain.

Targeted assessments

We integrated modern slavery considerations into specific high-stakes procurement, including carbon offset purchases, assessing supplier labour practices, community consultation, Indigenous rights protections, and worker grievance mechanisms.

Collaboration and sector engagement

Deakin actively participated in the Australasian Universities Procurement Network (AUPN) Modern Slavery Program throughout 2025. This sector-wide initiative involves 41 universities across Australia and New Zealand, leveraging collective spending of \$14 billion and shared expertise.

Key AUPN activities in 2025:

- **Risk data:** Collectively reviewed 180,000+ suppliers to identify high-risk categories
- **Capability development:** Nine national forums, survivor advocate sessions, and ACRATH training adopted by 32 universities. Deakin attended the International Student Risk Roundtable
- **Supplier engagement:** Sector-wide questionnaires across laboratory and medical consumables; 22 universities participated in Electronics Watch pilot monitoring 27 factories
- **Industry collaboration:** Joint initiatives including temporary migrant survey and student vulnerability roundtable
- **Third-party support:** Partnerships with Electronics Watch and ACRATH








Assessing the effectiveness of our actions

2025 Performance summary

We established foundations in 2025—our team, policies, and tools are in place. Our risk identification activities (Electronics Watch, Proxima) identified real concerns in our supply chains.

Our current maturity reflects the reality of a foundation-building year. We have invested in the structural prerequisites—governance, policies, and tools—that enable systematic due diligence. Scaling these capabilities to deliver measurable improvements will be a multi-year journey.

Table 5: Performance Summary

Dimension	2025 evidence	Future focus
Governance and Structure	 Established functional responsibility within the Strategic Procurement team; Policy and procedure published; Supplier Code of Conduct in place; High-risk contract clauses updated.	Uplift Supplier Code of Conduct; strengthen governance processes
Risk Identification	 Proxima screening commenced; Electronics Watch monitoring operational; specific risks identified (factory findings, glove manufacturing)	Improve risk data quality; expand screening coverage; develop response protocols
Training and Capability	 Formal training not yet delivered; team building foundational knowledge	Deliver ACRATH training to procurement team; develop stakeholder awareness materials
Supplier Engagement	 Pilot activities completed; systematic due diligence not yet scaled	Begin targeted engagement with highest-risk suppliers; develop engagement templates
Response and Remediation	 Response protocols under development	Implement formal response protocol; commence remediation planning
Worker Impact	 Measurable worker outcomes not yet demonstrable	Continue building capability for future worker engagement programs
Overall Assessment	 Foundation infrastructure complete; building capability for systematic implementation	Focus on training, risk identification, and highest-risk supplier engagement

Strategic insights from 2025

Our foundation year generated valuable insights that inform our implementation strategy:

1. Infrastructure Enables Action

Strong governance frameworks, policies, and team structures are essential prerequisites for effectiveness. The 2025 investment in these foundational elements provides the platform for systematic supplier engagement as capability matures.

2026 application: Continue strengthening foundational infrastructure through Supplier Code of Conduct uplift and improved governance processes.

2. Risk Identification Requires Response Capability

Tools like Proxima and Electronics Watch successfully identify risks in our supply chains. However, identifying risks without clear response protocols creates implementation gaps. The delay between receiving Electronics Watch findings and structured supplier engagement highlighted this need.

2026 application: Develop supplier risk response protocol with defined escalation pathways and decision criteria; improve data quality to enable better risk prioritisation.

3. Training Builds Confident Implementation

Effective modern slavery due diligence requires specialised knowledge of exploitation indicators, risk assessment methods, and supplier engagement strategies. Building this capability through formal training is essential before scaling implementation activities.

2026 application: Prioritise ACRATH training for procurement team; develop awareness materials for key stakeholders; build internal expertise progressively.

4. Context-Specific Approaches Take Time

Modern slavery risks, regulatory environments, and labour markets vary significantly across jurisdictions. Developing locally adapted approaches for our international campuses requires dedicated resources, consultation, and careful implementation planning.

2026 application: Continue mapping IBC risks and operational contexts; commence planning for localised frameworks as a multi-year development priority.

5. Measurement Systems Enable Accountability

Systematic tracking of activities, issues identified, and actions taken enables accountability and supports continuous improvement. These systems must be developed before they can demonstrate progress.

2026 application: Develop basic tracking systems for training completion, supplier assessments conducted, and response actions taken.

6. Worker outcomes are the ultimate measure

While governance structures and compliance processes are necessary foundations, demonstrable improvements in worker conditions require sustained, systematic engagement over time. This is a long-term objective requiring progressive capability building.

2026 application: Focus on building the capability and systems required for future worker engagement; maintain worker outcomes as the long-term objective while acknowledging the pathway to achieve this.

Consultation

This Statement was prepared through consultation with: People and Culture, Deakin Research Ethics, Work-Integrated Learning teams, Chief Financial Officer (executive accountability for procurement), Strategic Procurement team (2025 activities and implementation challenges), Legal Services (contract clauses and compliance advice), Risk and Compliance (risk profiling), Deakin International (IBC operations), Finance (spend data analysis), and Sustainability (ESG integration).

Controlled Entities: This Statement covers Deakin University (ABN 56 721 584 203) and its controlled entities: Deakin Residential Services Pty Ltd (ABN 46 072 532 784), Institute for Regional Security Ltd (ABN 48 110 456 856), Unilink Pty Ltd (ABN 72 005 382 954), and Universal Motion Simulator Pty Ltd (ABN 58 622 763 240). Supply chains are largely aligned with Deakin University operations; no material additional modern slavery risks have been identified in controlled entity activities.

International Branch Campuses: GIFT City Campus (India) and DLI Bandung Campus (Indonesia, partnership with Lancaster University). Modern slavery risks and 2025-2026 activities at international campuses are addressed in International branch campuses (IBC) and partnerships, page 18.



Approval

This Statement was approved by the Deakin University Council on 28 May 2026
It has been signed by:
Deakin University



Claire Higgins
Chancellor



Professor Iain Martin
Vice-Chancellor

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This statement is available at: deakin.edu.au/about-deakin/values-and-culture/modern-slavery-statement

Previous statements:

- [2024 Modern Slavery Statement](#)

Related documents:


- [Deakin University Supplier Code of Conduct](#)
- [Procurement Policy](#)
- [Procurement Procedure](#)



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