

Modern Slavery Statement

2021

Modern Slavery

'Modern Slavery' is used to describe all human trafficking, slavery and slavery-like offences in Divisions 270 and 271 of the Criminal Code Act 1995 (Cth) (Criminal Code). These offences include trafficking in persons, slavery, and servitude, forced labour, deceptive recruiting for labour or services, debt bondage, and forced marriage. Modern slavery is also used to describe the worst forms of child labour, including the commercial sexual exploitation of children and the exploitation of children for illegal activities such as drug trafficking.

Every person has the right to be free from slavery. This is enshrined in international law, which recognises freedom from slavery as a fundamental right that applies without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. Nevertheless, modern slavery practices persist and are serious crimes and grave violations of human rights.

An estimated 40.3 million men, women, and children were victims of modern slavery on any given day in 2016. Of these, 24.9 million people were in forced labour and 15.4 million people were living in a forced marriage. Women and girls are vastly over-represented, making up 71 percent of victims. Modern slavery is most prevalent in Africa, followed by the Asia and the Pacific region.¹

About this Statement

Chisholm's Modern Slavery Statement reports the activities of Chisholm Institute for the calendar year ending 31 December 2021 and has been prepared in accordance with the *Modern Slavery Act 2018* (Cth).

This Statement covers all the entities within Chisholm Institute, including Chisholm Institute, TAFE ONLINE (trading as Chisholm Online) and the Caroline Chisholm Education Foundation. All references to our, we, us, and Chisholm refer to Chisholm Institute (ABN 65 335 795 326) and its controlled entities including TAFE Online Pty Ltd (ABN 25 166 750 107) trading as Chisholm Online and Caroline Chisholm Education Foundation (ABN 43 912 374 223).

Our approach to ensuring we carry out all activities and comply with the modern slavery reporting is to implement across the whole of Chisholm, policies, procedures, and systems that guide our staff through understanding and developing appropriate and best practice supply chain management, contracting, purchasing and people, culture and safety practices.

Chisholm is not required to report under modern slavery legislation in any other jurisdictions.

The Chisholm Board of Directors approved this Statement on 25 May 2022.

¹ Australian Border Force Website – Addressing Modern Slavery in Government Supply Chains and e-learning modules
<https://modernslaveryregister.gov.au>

Table of Contents

Modern Slavery2

Modern Slavery2

About this Statement2

Table of Contents3

.....3

About Chisholm4

Our business and operations.....5

Chisholm’s structure, operations and supply chains.....5

 Powers and structure5

 Governance framework.....5

Our approach to modern slavery risks7

 Procurement strategy.....7

 Industry and labour markets we operate in7

How we identify, assess and address modern slavery8

 Assess modern slavery risks in our supply chains8

 Modern slavery risk with people and human rights.....9

Consultation with controlled entities.....9

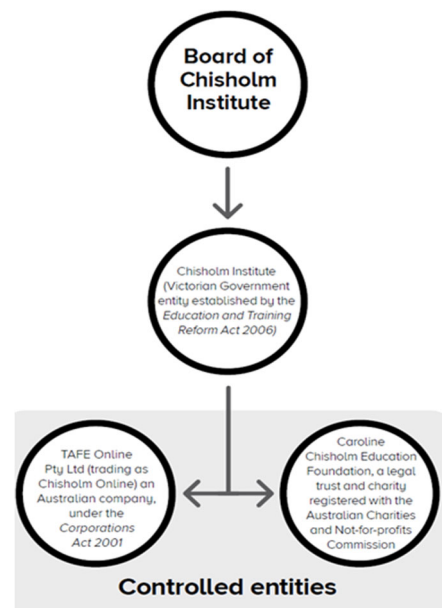
Board approval9



About Chisholm

Chisholm is a Victorian Government owned Technical and Further Education (TAFE) provider established under the Education and Training Reform Act 2006 (Vic). The responsible Minister is the Hon. Gayle Tierney MP, Minister for Training and Skills and Minister for Higher Education. In 2021, we employed more than 1,600 staff and enrolled almost 38,000 students across our campus locations at Dandenong, Frankston, Berwick, Cranbourne, Mornington Peninsula, Springvale and Bass Coast, including Chisholm Online, workplace training and offshore. We provide quality education and training programs, creating opportunities now and for the future.

For more information about Chisholm, please see our Annual Report for 2021 published on our website at www.chisholm.edu.au.



Our business and operations

We are one of the largest training providers in Victoria, committed to supporting and enhancing culturally diverse communities in Melbourne's fast-growing southeast region.

With a range of qualifications including certificates, diplomas, degrees and postgraduate study, we deliver more than 400 courses designed to be accessible, flexible and relevant for students, employers, industry and our community. We also provide short industry-led credential courses, to ensure our training is relevant and reliable and provides the skills that employers are looking for.

Most of our staff live and work in Melbourne. Some of our staff are based or spend a significant amount of their time working at teaching and education facilities overseas. During 2021, we paused travel and most of our staff and students switched to working and studying remotely.

Chisholm's structure, operations and supply chains

Powers and structure

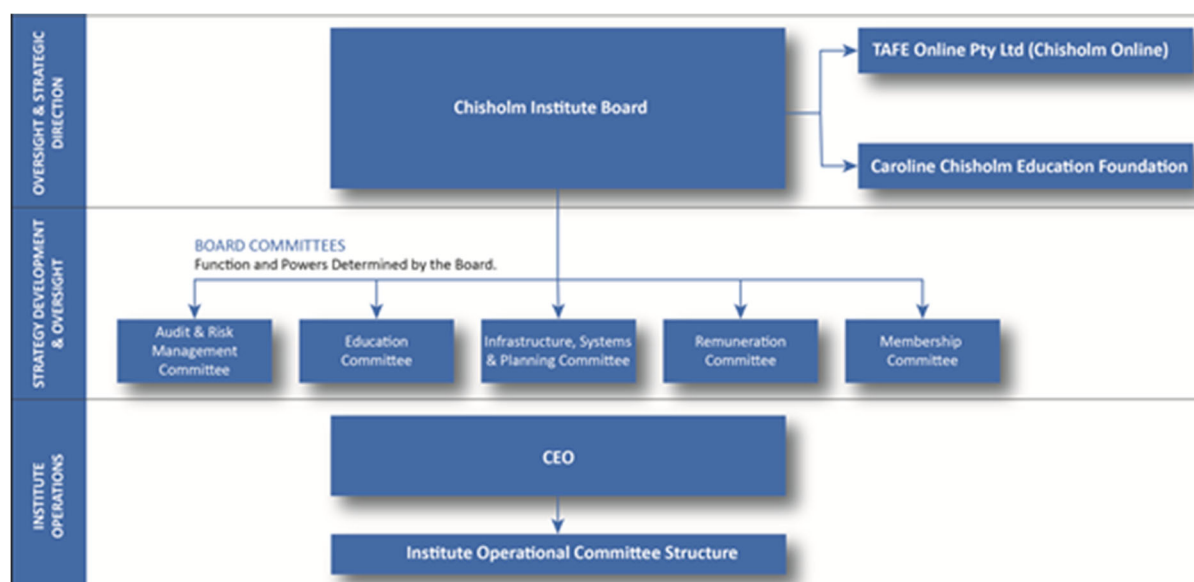
Chisholm is established and regulated under the Education and Training Reform Act 2006 (Vic) (the Act). The Minister and the governing body of Chisholm, exercise specific powers in relation to governance as per the Act. Chisholm is also subject to the Public Administration Act 2004 (Vic).

Ministerial directions and guidelines may be issued by the Minister to clarify the management, reporting and other responsibilities of TAFE Institute boards, and to give direction about employment of staff, the charging of fees, or other specific matters. Executive Memoranda may also be issued to support the directions.

The Department of Education and Training oversees Ministerial director appointments to Chisholm's Board. Board appointments are available on the Public Board Appointments online register (see www.publicboards.vic.gov.au).

Governance framework

Our governance framework provides assurances that the right people, receive the right information, at the right time. The framework enables management to make the best decisions that are considered with the appropriate level of scrutiny, and ensure the ongoing viability, reputation and, quality of our organisation.



Our VISION, PURPOSE and VALUES

Our vision

Leading the way in education and training to inspire success and transform lives

Our purpose

Chisholm Institute excels in education and training and is respected and valued for enhancing the social and economic futures of individuals, industry and communities.

Our values

Our drive for commercial success is underpinned by our core values:

- > Collaboration
- > Accountability
- > Integrity
- > Respect



Ambition and purpose

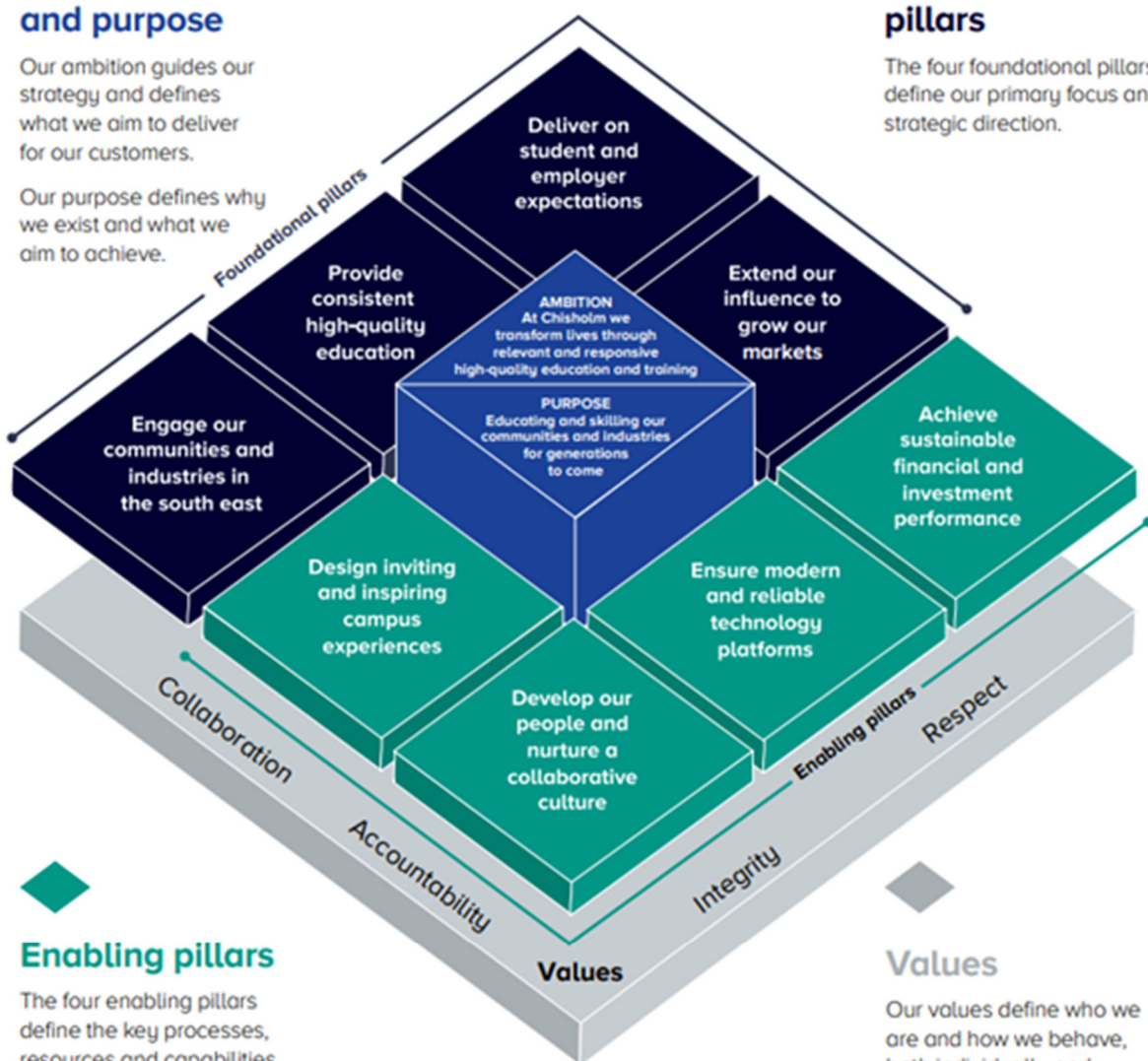
Our ambition guides our strategy and defines what we aim to deliver for our customers.

Our purpose defines why we exist and what we aim to achieve.



Foundational pillars

The four foundational pillars define our primary focus and strategic direction.



Enabling pillars

The four enabling pillars define the key processes, resources and capabilities we need to achieve our priority objectives under the foundational pillars.



Values

Our values define who we are and how we behave, both individually and collectively.

Delivery against the ambition and pillars is everyone's responsibility at Chisholm.

Our approach to modern slavery risks

We have adopted a risk-based approach to managing potential modern slavery vulnerabilities within our business operations and our supply chain. Whilst we consider the risk of modern slavery within our direct business operations to be low, we recognise that through our supply chain, and our client engagements, we may be exposed to modern slavery and human trafficking. We have used available internal resources, external published sources and feedback from organisations, such as the International Labour Organisation (ILO), the International Organization for Migration (IOM), and the Walk Free Human Rights group, to inform our risk assessment approach. In addition, we have invested in a third-party technology provider to manage our annual supplier questionnaires.

Procurement strategy

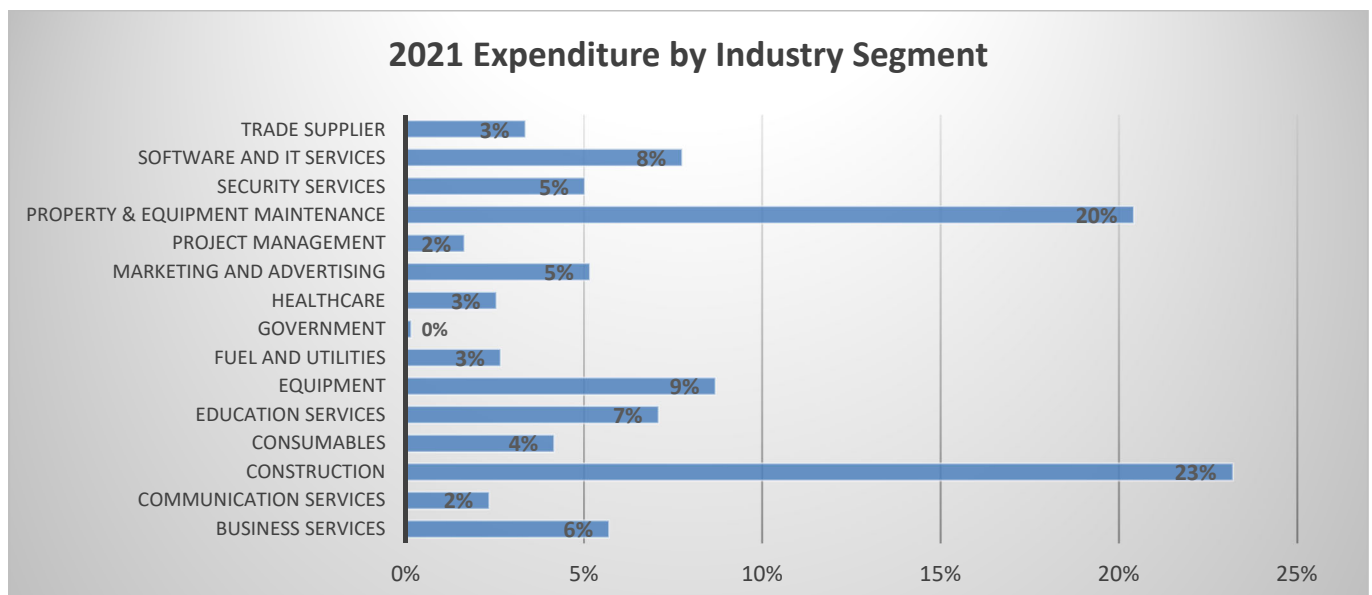
During 2021, Chisholm made significant changes in its approach to procurement. Chisholm is an agency of the Victorian State Government and our strategic procurement systems and processes are required to meet the standards of the State Government supply policies. As part of the Victorian Government Procurement Board (VGPB) expansion program, from 1 July 2021, when possible Chisholm has sourced suppliers, using the State Purchasing Contracts and State supplier registers. Our Procurement and Legal team have completed the Australian Border Force (ABF) e-Learning modules on Modern Slavery procurement, identification and risks. The procurement and legal team at Chisholm guides staff through the procurement process and ensure suppliers meet the compliance criteria.

Industry and labour markets we operate in

To support our students and teachers and ensure we deliver great teaching and learning experiences, we buy a wide range of goods and services. The following categories of goods and services may have a higher risk of modern slavery practices because of the type of goods and services, country of origin or other characteristics relevant to the supplier entity or nature of the supplier's industry.

Industry segments that we purchase goods and services include:

- Construction services (23%)
- Property and equipment maintenance services (20%)
- Equipment (9%)
- Software and IT services (8%)
- Education services (7%)



For the calendar year 2021

- Total spend for construction and goods and services was more than \$57 million
- More than 1,000 suppliers
- Approached the market using a formal public procurement tender process 10 times

In the 2020 reporting year we identified Modern Slavery actions being taken by suppliers:

- 50% had policies in place to deal with modern slavery
- 45% had moderate visibility of its supply chain
- 50% performed screening to assess modern slavery risks
- 50% have a person/team responsible for overseeing modern slavery risks

How we identify, assess and address modern slavery

Over this reporting period, we have made significant progress in implementing policies and actions to assist in addressing the modern slavery risks. Chisholm has taken the following steps across its supply chain and operations:

- Undertaken a review of current suppliers, to identify suppliers that supply 'at-risk' products / services and/or operate from 'at-risk' geographic areas;
- Engaged a third party and adopted a systemised method to assist Chisholm in conducting supply chain questionnaires for Chisholm's suppliers. Chisholm undertakes analysis of this data and it is used to further identify, assess and, where appropriate, address modern slavery risks;
- Refreshed its procurement policies and procedures to incorporate ongoing risk assessments and due diligence steps. Chisholm systematically screens suppliers prior to engaging and identifies potential modern slavery risks in its supply chain;
- Addressed any modern slavery concerns in our standard contract with suitable clauses which require suppliers to cooperate with Chisholm to identify and address modern slavery risks;
- In relation to tenders and, if required, sought additional information and set expectations with suppliers throughout the tender process, from evaluation through to contract management; and
- Formed an ongoing cross-functional working group to look at further ways Chisholm can meaningfully contribute to addressing and eliminating modern slavery practices in its supply chain and operations

Assess modern slavery risks in our supply chains

We understand that there are risks of modern slavery in our supply chains. Chisholm applies the risk tool supplied in the Australian Government Modern Slavery Toolkit² and data published by the Walk Free Foundation. We have identified the main risks of modern slavery practices within the market segments, product categories and the geographic regions of our operations.

For outsourced areas such as construction, cleaning, catering, security, IT services and project management, and for complex and high-risk contracts, we undertake formal procurement processes, that require extensive planning and probity activities. We review our usage of suppliers and perform analysis to map sectors and industries, products and services, geographic locations and determine the supply chain risk.



² For more information see https://modernslaveryregister.gov.au/resources/Modern_Slavery_Toolkit_of_Resources.PDF and The Global Slavery Index 2018 (<https://www.globalslaveryindex.org/>)

Modern slavery risk with people and human rights

In general, we take a targeted and risk based approach to managing modern slavery risks. We ensure that procedures, policies and practices are consistent with prudent commercial practice and endeavour to maximise our contribution to the economy and wellbeing of the communities and industries served by Chisholm and the State as a whole. The policies and procedures are regularly reviewed, updated, communicated to staff and implemented organisation wide, including the following:

- Supplier Code of Conduct
- Supplier Engagement Plan
- Employee Code of Conduct
- Procurement Framework
- Protected Disclosure (Whistle-blower's)
- Workplace Health and Safety
- People Plan (supporting diversity)
- Flexible Work Policy - Professional and General Employees and Chisholm Leadership Group
- Family Violence Workplace Support Plan for a Victim/Survivor of Family Violence
- Risk Framework

We provide ongoing training to our people who are responsible for sourcing and placing candidates, and to those in People, Culture and Safety related roles as well as our corporate teams who are responsible for sourcing.

- We endeavour to comply with all our legal obligations relating to the recruitment and on-boarding process
- We provide a range of employment and supplier engagement methods. In all cases, individuals are free to apply for work, free to turn down an offer of work and free to resign work at any time.
- We do not charge any fees to individuals for the sourcing of the employment opportunities they are offered.
- Our employment conditions adhere to the employment principles and standards in which we operate
- Employment decisions are based on merit
- Employees are treated fairly and reasonably
- Equal employment opportunity is provided
- Human rights as set out in the Charter of Human Rights and Responsibilities Act 2006 (Vic) are upheld
- Employees have a reasonable avenue of redress against unfair or unreasonable treatment
- The development of a career public service is fostered

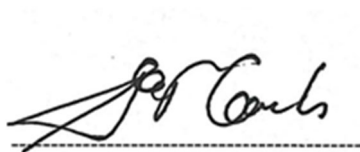
Consultation with controlled entities

Chisholm Institute provides corporate support for its controlled entities and this includes providing staffing and procurement services. Our controlled entities are included in the modern slavery risk analysis and are provided a brief on the modern slavery analysis and their obligations and risks within their business.

Board approval

In accordance with Section 13(2) of the Modern Slavery Act 2018, the Chisholm Board approved this Statement on 25 May 2022.

The Board is the principal governing body of Chisholm (ABN 65 335 795 326), for the purposes of approving this Statement. This Board has authorised Mr Stephen Marks, Chair of the Board to sign this Statement.



Stephen Marks, Board Chair
25 May 2022



Chisholm

CRICOS No 00881F RTO No 0260 TEQSA PRV12123.
Training to eligible students is delivered with
Victorian and Commonwealth funding.