

Chisholm

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Modern slavery statement 2023

TAFE VICTORIA



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Wominjeka, Welcome to Chisholm

Chisholm acknowledges the Bunurong people of the Kulin Nation as the Traditional Custodians of the Country on which our campuses are located.

We recognise their continuing connection to land and waters and thank them for protecting the Country and its ecosystems that we enjoy today.

We pay our respects to Elders, past and present, and extend that respect to all First Nations people.

Chisholm is committed to supporting and empowering our Aboriginal and Torres Strait Islander workforce, students and their communities by providing quality teaching and learning opportunities.



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 were in forced marriage. Women and girls are vastly over-represented, making up 71 per cent of victims. Modern slavery is most prevalent in Africa, followed by 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 2023 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 Pty Ltd (trading as Chisholm Online, which ceased trading on 30 June 2023 and was deregistered on 3 January 2024) 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 approved this Statement on the 29th of May 2024

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



About Chisholm

As one of the largest vocational training providers in the state, we transform lives for the better through relevant and responsive quality education and training.

We believe that the small moments of impact are just as important as the life-changing ones, and strive to deliver exceptional experiences for our students, partners and our people. Our goal is to educate and skill our communities and industries for generations to come.

More than 31,000 students studied with Chisholm in 2023 in over 250 courses across a broad range of study areas on campus at Bass Coast, Berwick, Cranbourne, Dandenong, Frankston or Mornington Peninsula, or via online, workplace or offshore delivery. These students are supported by a team of over 1,600 dedicated staff.

We are proud of our vibrant and diverse student mix and are committed to celebrating culture and community, embracing differences in gender, age, ethnicity, race, cultural background, disability, religion and sexual orientation.



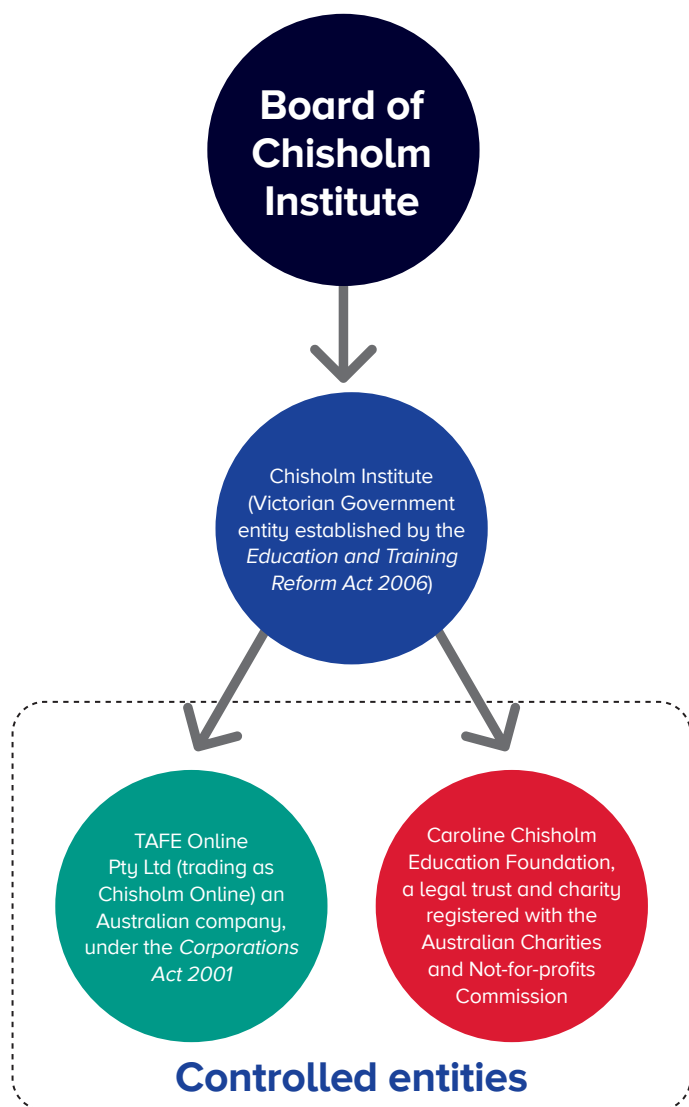
Our business and operation

At Chisholm, we believe that education journeys can be as individual as each student and offer qualifications from short courses to certificates, diplomas, degrees and postgraduate studies.

Our courses are intrinsically linked to community and industry needs and we have a wide range of local, national and international partners who support our training. This gives us the unique ability to showcase how communities and industry, metro and regional, come together for the better.

We believe in equitable access for all and offer personalised support services to students so they can successfully achieve their goals.

As one of Victoria's largest training organisations, we are committed to supporting and enhancing culturally diverse communities in Melbourne's fast-growing South-East region through the provision of outstanding education and training programs and positive student and employer experiences.



Chisholm's structure, operations and supply chains

Powers and structure

Chisholm Institute and the governing Board of Chisholm Institute are established by the *Education and Training Reform Act 2006 (Vic)*.

Chisholm is governed by a Board representative of the Victorian Government, industry and community. The Board's governance structure includes several committees that support the work of the Board in executing its governance responsibilities:

- > Audit and Risk Management Committee
- > Education Committee
- > Infrastructure, Systems and Planning Committee
- > Remuneration Committee
- > Membership Committee.

The Board is ultimately responsible to the Victorian Government for the governance and management of Chisholm and its controlled entity Chisholm Online (TAFE Online Pty Ltd, which ceased trading on 30 June 2023 and will be deregistered on 3 January 2024) and is accountable to the Minister for Skills and TAFE.

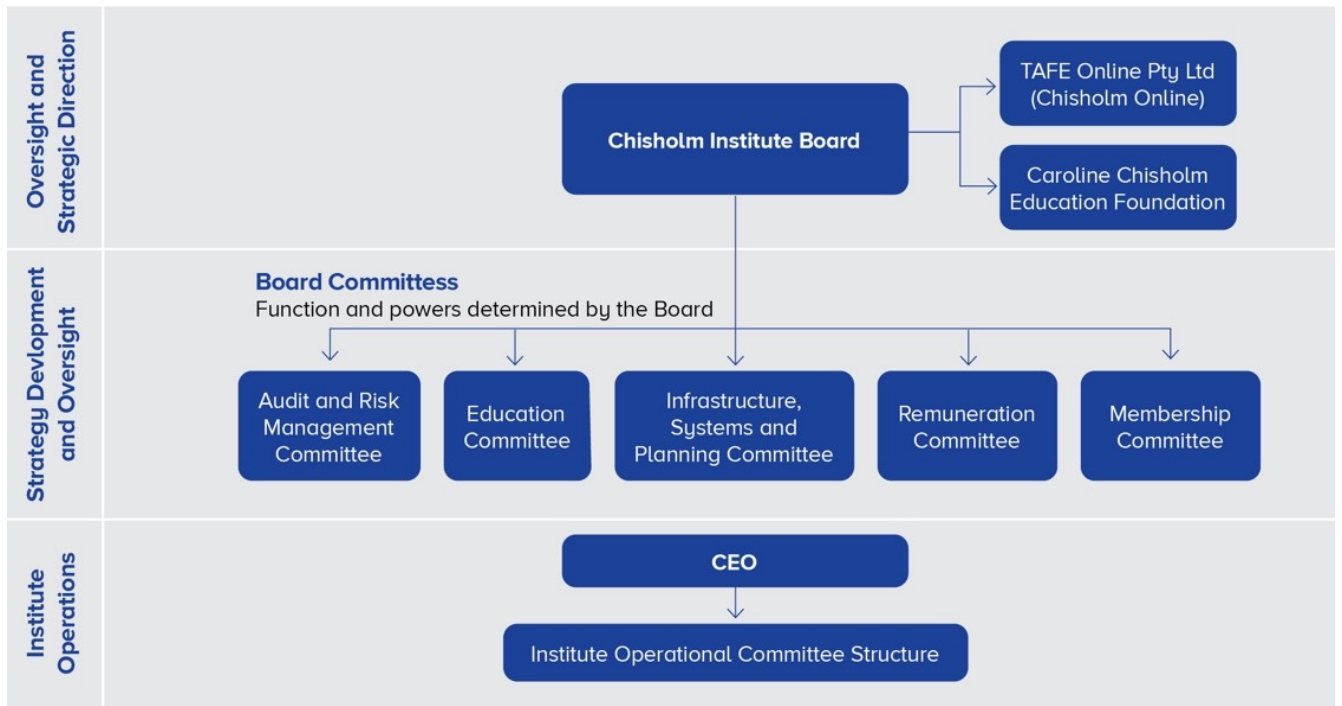
Chisholm has the power to do all things that are necessary or convenient to be done for or in connection with, or as incidental to, meeting its objectives or performing its functions. However, the powers of Chisholm are subject to and must be exercised in accordance with the functions, duties and obligations conferred or imposed on the organisation by:

- > the Act and other laws
- > the Constitution
- > Ministerial and government directions and guidelines under the Act and other legislation, laws and conventions
- > the general administrative, social and economic directives and policies established by the Victorian Government from time to time.

The Chisholm Institute Board must take all reasonable steps for the advancement of the objectives of the organisation, while operating in accordance with the economic and social objectives and public sector policy established from time to time by the Minister. While meeting its objectives, the Board is also required to comply with the Chisholm Institute Constitution and provide all assistance and information to the Minister or the Minister's delegates.

Governance framework

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



Our vision, purpose and values

Our values



Collaboration

We are one united team, working together with each other and our partners to meet the needs of our students, customers and government.



Accountability

We take responsibility for our work, focusing on the best outcomes for the student, customer, Chisholm and its people.



Integrity

We always do the right thing, guided by our Values and ethical principles even when faced with difficult decisions.



Respect

We respect our organisation, its people and its guiding principles in all our interactions.

Our ambition

At Chisholm, we transform lives through relevant and responsive high-quality education and training.

Our purpose

Educating and skilling our communities and industries for generations to come.



Ambition and purpose

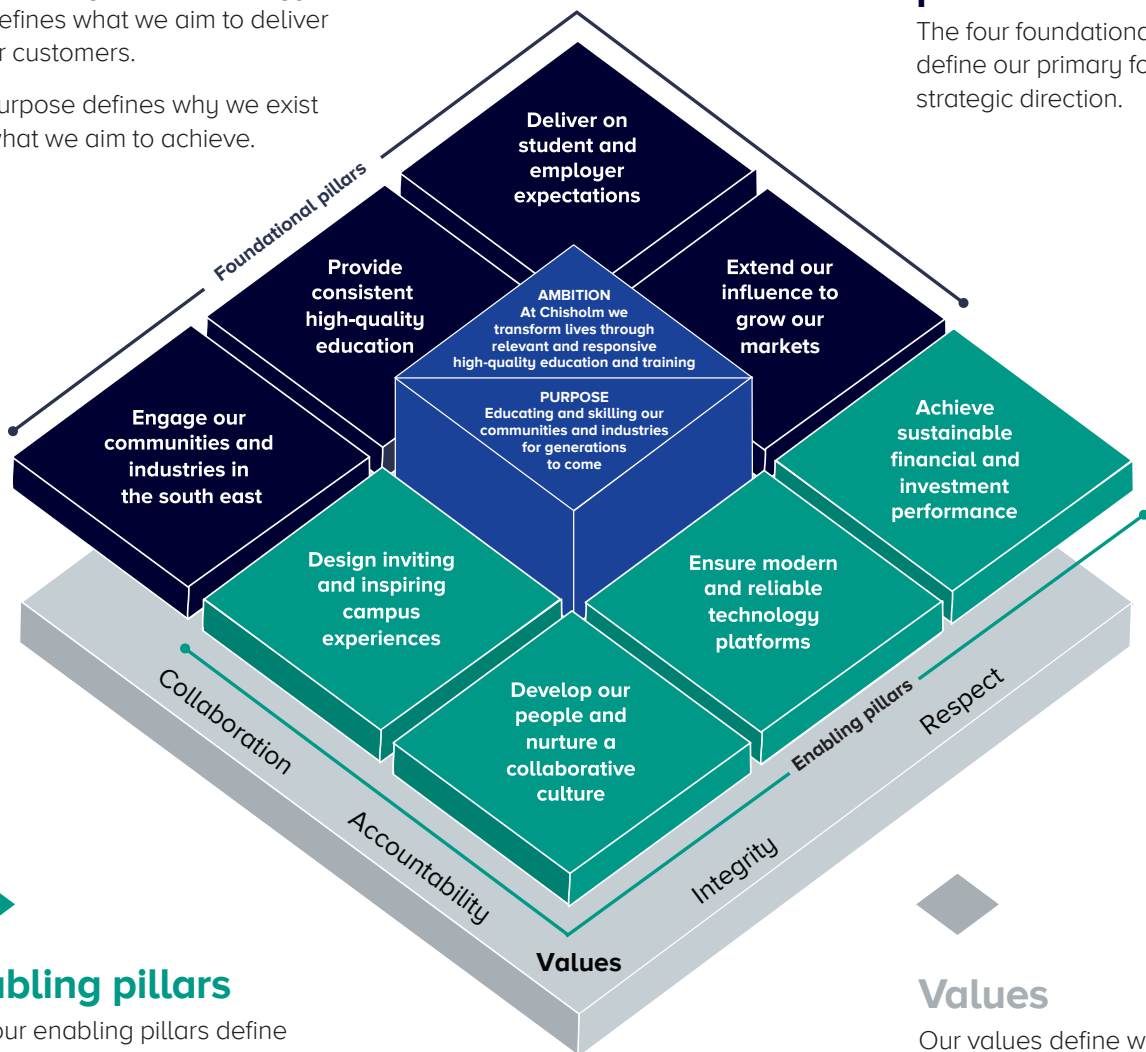
Our ambition guides our strategy and defines what we aim to deliver for our customers.

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, externally 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 while also requiring that suppliers complete a due diligence questionnaire prior to being added to our database.

Procurement strategy

In 2023, Chisholm continued to focus on maturing and developing out procurement capabilities. Our governance structure ensures compliance with regulatory requirements and the systematic review of our policies and contracts ensures that our procurement practices are up to date and our contract clauses mitigate risks that may arise. 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 guide staff through the procurement process and ensure suppliers meet the compliance criteria.

Industry and labour markets we operate in

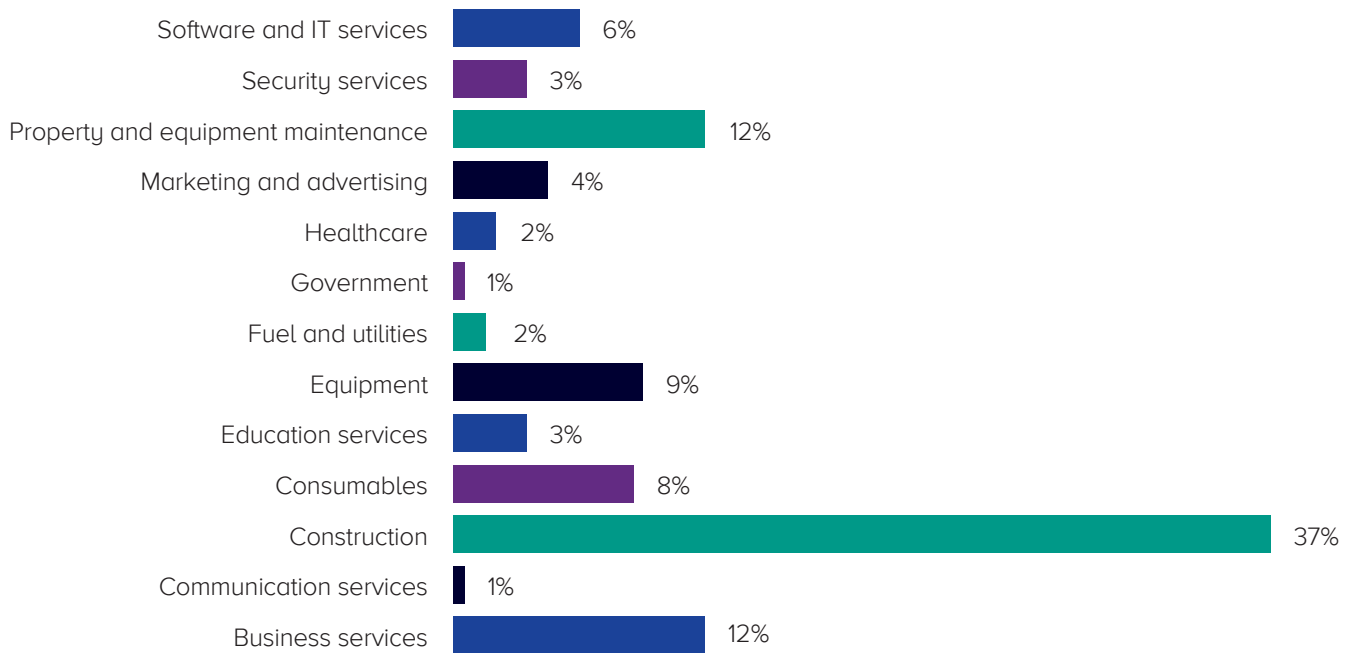
To support our students and teachers and ensure we deliver great teaching and learning experiences, we buy a wide range of goods and services. The following categories of goods and services may have a higher risk of modern slavery practices because of the type of goods and services, country of origin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

In 2023 Chisholm experienced a significant increase in construction spend as we undertook stage 2 of the Frankston redevelopment project.

Industry segments that we purchased goods and services from in 2023 include:

- > Construction (37%)
- > Business services (12%)
- > Property and equipment maintenance (12%)
- > Equipment (9%)
- > Consumables (8%).

2023 Expenditure by industry segment



For the calendar year 2023

- > Roughly 1,030 Suppliers
- > Approached the market using a formal procurement tender process 9 times
- > Total Spend for Construction and Goods & services was over \$97 Million.

How we identify, assess, and address modern slavery

Over this reporting period, we have continued to implement and embed policies and actions to assist in addressing modern slavery risks. Chisholm takes 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
- > Sending a questionnaire via a third party to our "at-risk" suppliers and undertake a systemised approach to assist Chisholm in conducting supply chain questionnaires for Chisholm's suppliers. Chisholm undertakes an analysis of this data and it is used to further identify, assess and, where appropriate, address modern slavery risks
- > Chisholm regularly reviews and updates our procurement and contracting policies and procedures to incorporate ongoing risk assessments and due diligence steps
- > Chisholm systematically screens suppliers via due diligence questionnaires prior to engaging in an effort to identify 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
- > Seeking additional information and set expectations with suppliers throughout the tender processes, from evaluation through to contract management;
- > Enable the right to audit our suppliers through standard contract clauses
- > Formed an ongoing cross-functional working group with other Victorian TAFEs which is chaired by Chisholm Institute to look at further ways Chisholm can meaningfully contribute to addressing and eliminating modern slavery practices in its supply chain and operations; and
- > Chisholm has rolled out procurement training to staff to build the institutes capabilities with the goal of empowering staff to make the best decision when engaging new suppliers.

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 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. Our Agreements also contain relevant obligations on our suppliers.

We review our usage of suppliers and perform analysis to map sectors and industries, products and services, and geographic locations and determine the supply chain risk.

Geographic

Product and services

Sector and industry

Supply chain model

Country of origin risk	Category risk
Products and services made in or sourced from suppliers based in any of the following countries: <ul style="list-style-type: none"> > India, China, Pakistan, Bangladesh, North Korea, Thailand, Myanmar, Cambodia, or the Philippines > Africa (in particular, Uganda, Kenya, Ethiopia, Sudan, Congo, and Nigeria) > Eastern Europe (Russia, Uzbekistan, Ukraine) > Middle East / Northern Africa (Egypt, Iran, Iraq, Yemen, Syria, Morocco) > South America (Venezuela, Mexico, Colombia, Peru) > Pacific Islands (Fiji, PNG, Solomon Islands). 	Electronic goods such as laptops, computers, and mobile phones
	Clothing and garments
	Cleaning and building services
	Hospitality and food services
	Building materials such as bricks, timber, carpets
	Outsourced IT such as support desks and managed services

² Australian Border Force Website – Addressing Modern Slavery in Government Supply Chains and e-learning modules <https://modernslaveryregister.gov.au>

Engaging with our key suppliers on modern slavery risks

To help Chisholm further understand and identify modern slavery risks in its supply chain, Chisholm requested its suppliers with spend value of more \$100,000 across the high-risk categories of goods and services to complete a Modern Slavery Survey (based on Australian Government model slavery and trafficking supplier questionnaire³). The survey's were completed to gauge what actions key suppliers are taking to improve their own supply chains to reduce shared modern slavery risks.

The responses demonstrated a diversification of our suppliers operations, this is due to the engagement and introduction of new software providers. In 2023 there were no complaints regarding modern slavery against any of our suppliers or their supply chain. We have seen an increase in our suppliers visibility of their supply chain and the frequency of our supplier's assessment of their own supply chains. Our suppliers have expressed that they have high to moderate visibility across their supply chain. We have also seen an increase in our suppliers proving Modern Slavery training to their staff. Just over half of the suppliers surveyed have policies in place to deal with modern slavery risks and have a team or person in place to oversee modern slavery risks, those who do not have policies in place have assured Chisholm of their work practices through the due diligence questioner.

Of those suppliers where no formal policy is in place, our suppliers reported that they do have general procurement processes in place to evaluate suppliers including in respect of labour practices prior to engaging them. We also assessed that our suppliers primarily rely on permanent or long-term employees. Overall, from the survey results we conclude that our suppliers have further developed their understand of the Modern Slavery risks in their supply chain, they are also working on building their staff capability in regard to identifying and addressing modern slavery concerns.

³ https://modernslaveryregister.gov.au/resources/Supplier_Questionnaire_-_Modern_Slavery_Procurement_Toolkit.docx

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 well-being 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-blowers)
- > 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.

2023 key survey results

Where are the entity's operations (including sales offices and representative offices) located?

- > 2% – North Asia
- > 10% – South East Asia
- > 4% – South Asia
- > 2% – Middle East
- > 2% – Africa
- > 7% – North America
- > 2% – South America
- > 7% – Western Europe & UK
- > 4% – Eastern Europe & Russia
- > 60% – Australia & NZ

In which countries do your critical trade suppliers predominantly operate?

- > 2% – North Asia
- > 12% – South East Asia
- > 3% – South Asia
- > 13% – North America
- > 2% – Central America
- > 12% – Western Europe & UK
- > 54% – Australia & NZ
- > 2% – Oceania (Other than Aus & NZ)

Have any reports or concerns been publicly or privately raised (including by the Minister, regulators, media and NGOs) regarding modern slavery reporting by the entity?

- > 100% – No

Have any reports or concerns been publicly or privately raised (including by regulators, media and NGOs) regarding modern slavery practices in your operations and/or supply chains?

- > 100% – No

Is the entity obliged to make or publish statements on the risks of modern slavery under modern slavery laws?

- > 21% – Yes
- > 79% – No

Do you monitor and assess your supply chain's compliance with modern slavery policies and procedures? If so, how often.

- > 35% – Never
- > 18% – At least once every two years
- > 47% – At least once a year

Does the entity have a written policy for workers that covers modern slavery?

- > 53% – Yes
- > 47% – No

How much visibility does the entity have over your supply chain?

- > 38% – High
 - > 44% – Moderate
 - > 18% – Developing
-

Approximately what percentage of the entity's workers receive training on modern slavery?

- > 32% – All
- > 12% – 75% or more but not all
- > 3% – 50% or More but less than 75%
- > 3% – 25% or more but less than 50%
- > 12% – Up to 25%
- > 38% – None

What percentage of workers of the entity are low-skilled seasonal, migrant or expatriate workers?

- > 3% – 25% or more but less than 50%
- > 12% – Up to 25%
- > 85% – None

What percentage of workers of the entity are on permanent or long-term employment contracts?

- > 41% – All
- > 56% – 75% or more but not all
- > 3% – 50% or more but less than 75%

What percentage of workers of the entity are contracted via labour hire agencies?

- > 3% – All
- > 18% – Up to 25%
- > 79% – None

Does the entity provide long-term housing or accommodation for any workers including contractors?

- > 100% – No

Does the entity have a tender, procurement and/or onboarding process that specifically assesses risk of modern slavery practices in suppliers?

- > 50% – Yes
 - > 50% – No
-

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* (Cth), the Chisholm Institute Board approved this Statement on 29/05/2024. The Board is the principal governing body of Chisholm Institute (ABN 65 335 795 326) for the purposes of approving this Statement. This Board has authorised Prue Digby to sign this Statement.



Prue Digby, Board Chair
29th May 2024



Chisholm