

Modern Slavery Statement

Holmesglen Institute
1 January to 31 December 2021
ABN number 40096756729

This statement covers the activities of Holmesglen Institute (**Holmesglen**) and its controlled entities for the year ended 31 December 2021.

This statement sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains during the 2021 calendar year and establishes future actions we are committed to implementing to further mitigate these risks.

About Holmesglen and our structure

Holmesglen Institute is a technical and further education (**TAFE**) institute established under the *Education and Training Reform Act 2006* (Vic) (**ETR Act**). The ETR Act, together with our Constitution, defines our functions and duties, including:

- providing vocational education and training and higher education programs to benefit Victorian industry and communities
- undertaking applied research in partnership with learners, industry and communities
- providing facilities and services to support our learners and communities.

We are committed to delivering on our purpose, which is to:

- provide education and training to ensure our learners are work ready, life ready and world ready
- play an integral role in the community, supporting social inclusion and cohesion
- partner with businesses to develop their workforce for today and the future.

As a Victorian TAFE Institute, we are also subject to the *Public Administration Act 2004* (Vic) and the Standing Directions under the *Financial Management Act 2018* (Vic).

Our responsible Minister is the Minister for Training and Skills and Minister for Higher Education, the Hon. Gayle Tierney MP. We work closely with the Department of Education and Training as well as with Victorian industry and community-based organisations.

Holmesglen Institute controls three entities; Holmesglen International Training Services Pty Ltd ACN 077 692 472, Glenuc Pty Ltd ACN 128 404 722 and the Holmesglen Foundation ABN 85 116 873 292. Holmesglen International Training Services Pty Ltd did not operate during 2021.

The Holmesglen Foundation was established and operates under a trust deed between Glenuc Pty Ltd and the Institute. Glenuc Pty Ltd is the Foundation's trustee under the trust deed and employs 2 employees, one full time and one part time, to support the Glenuc Board in delivering on its commitments as outlined in the Trust Deed with the Institute.

At Holmesglen, we recognise the importance of respecting the human rights of those affected by our business activities. As a public education provider, our vision is to be a leading tertiary provider valued by local and international learners, the community and industry. We take seriously our responsibilities with regard to international labour and human rights standards in working towards that vision.

For more information, please refer to our corporate publications which are available on our website at www.holmesglen.edu.au.

Our operations

During 2021, over 26,000 learners undertook our certificates, diplomas, advanced diplomas, bachelor's degrees, graduate certificates and master's degrees. We also provided a number of micro-credentials and non-award programs to help learners develop foundational or specific work-related skills.

Our core operations are in Melbourne, Victoria with six campuses at various locations within the Melbourne metropolitan area and our rural learning centre located in Eildon, Victoria. We also partner with and deliver training solutions to international clients in Japan, Mongolia, South Korea and China.

Offshore partnerships and projects in 2021 included

- establishment of two new partnerships in South Korea to deliver vocational skills training and vocational English, with pathways to Holmesglen's on-campus programs
- commencement of a new partnership with Suzhou Vocational University in Jiangsu Province to deliver English language, technical teacher training, international children's services and some engineering
- development of micro-credentials for the international building industry
- continued delivery of our diploma programs in accounting and international business with partners Shandong Institute of Commerce and Technology and Zhejiang Business Technology Institute
- a one-year extension to our long-standing relationship with Oyu Tolgoi copper mine in Mongolia for delivery of electrotechnology and engineering programs.

In 2021, we engaged 1,094 employees, of which 496 were full-time employees, 215 were part-time employees, and 383 were fixed term and casual employees. All our staff are based in Australia.

Our supply chain

We source and engage our suppliers in accordance with our Procurement and Tendering Rule, Social Procurement Strategy, Modern Slavery Policy and related procedures. For procurement of construction works services, we also comply with the Ministerial Directions for Public Construction in Victoria.

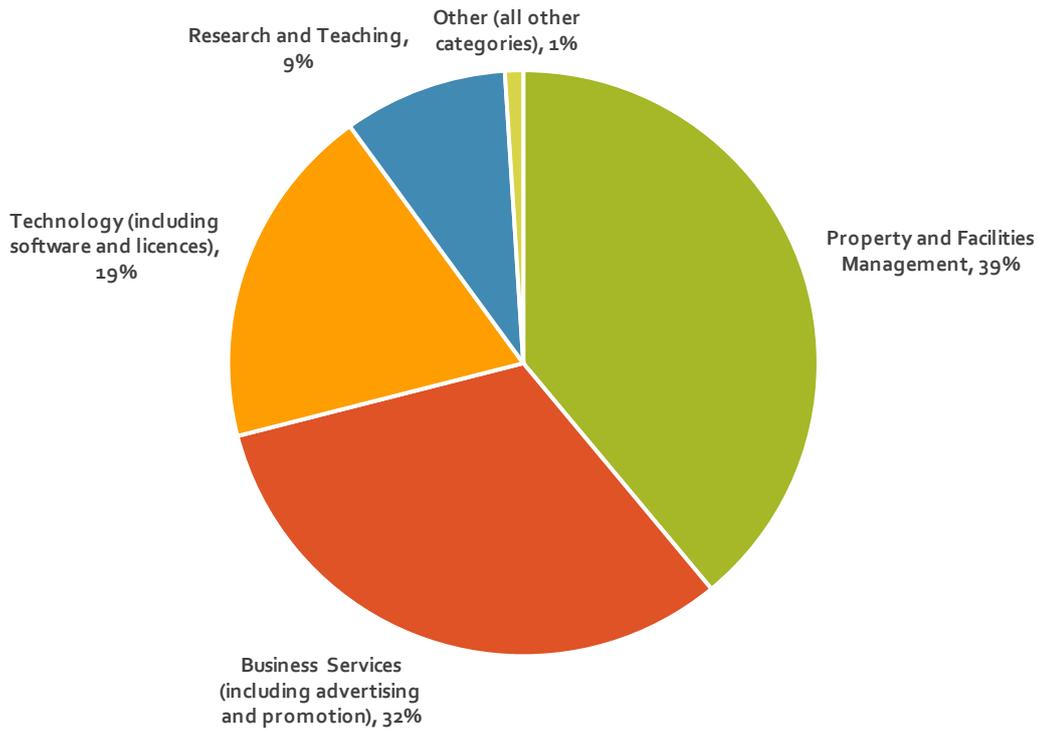
From the 1st July 2021, Holmesglen commenced transition to the Victorian Government Purchasing Board supply policies, which include mandatory usage of certain state purchase contracts.

During 2021, we engaged approximately 1,320 suppliers with an average spend per supplier of \$31,000. The majority of our suppliers are primarily located in Australia, accounting for 96% of total suppliers. A high level break down of procurement % spend by level 1 category (based on the Australian University Procurement Network (AUPN) taxonomy) is provided in figure 1.

The main types of goods and services that we procure directly are:

- **Property and facilities management:** This category includes goods and services used to maintain training spaces, administration offices and related facilities, maintenance and repairs, utilities, renewables, cleaning and security.
- **Research and Teaching:** This category includes stationery, books and other print materials, lecturer and teaching expenses, teaching and student consumables, student placements and other student related services, research equipment and laboratory supplies.
- **Technology:** This category includes computer hardware and software, printers, audio visual equipment and services, IT professional services, and telecommunications equipment.
- **Business services:** This category includes consultancies and related services, advertising and media, catering, travel and logistical services.

Figure 1: Indicative spend by category snapshot



Procurement contract terms are dependent on the nature of the services provided and may be short, medium or long-term depending on the goods or services to be procured. For example, a public construction project engagement will be based on the estimated term of project completion, whilst a contract for delivery of services such as cleaning will generally be a longer term of 3 to 5 years.

Modern slavery risks

During 2021 we undertook an assessment of the modern slavery risks in our procurement practices and supply chains including a broader review of our Procurement Strategy and social procurement objectives.

The assessment of our modern slavery risks included a desktop spend analysis with spend data assessed against the following factors based on the Global Slavery Index

- Supplier association with countries with heightened prevalence or vulnerability to modern slavery
- Supplier association with supply categories (industries/products/services) with heightened vulnerability to modern slavery
- Business criticality based on total supplier spend

Suppliers were then assigned a modern slavery risk level ranging from low to very high. There were 69 suppliers identified to have an initial risk assessment rating of high to very high, and with an annual spend of \$10,000 or more, who were contacted and invited to respond to a Supplier Self - Assessment Questionnaire (SAQ), with responses to be submitted by the end of January 2022. The SAQ sought information from our tier 1 suppliers to understand potential modern slavery risks and identify opportunities to mitigate those potential risks within our immediate supply chains.

The risk assessment during 2021 confirms that our operations and supply chains have a medium potential for modern slavery risks, largely based on our categories of spend. Our broader risk profile is summarised in the table below.

Risk	Description
Sector / Industry	<p>The education sector within which we operate is not considered a high-risk sector for modern slavery practices. As our teaching staff are highly skilled and employed by us in Australia under appropriate employment contracts and the sector is highly regulated, our operations present a low potential for modern slavery risks.</p>
Products and Services	<p>We understand that modern slavery risks are present in our supply chain from products and services we procure.</p> <p>Products</p> <p>We understand that there are modern slavery risks in our supply chains because of the way products are produced, provided or used such as high-risk raw materials used as inputs or the use of exploited labour.</p> <p>Products identified as being of higher modern slavery risk include:</p> <ul style="list-style-type: none"> • workwear and protective clothing • MDFS and desktop printers • teaching equipment IT software <p>Services</p> <p>We understand that some types of services may have a higher prevalence of modern slavery practices because of their characteristics, products and processes, including building, cleaning and security services and catering services and related supplies. These services are often provided by migrant workers, low skill workers or labour hire contractors.</p> <p>We assessed our supplier’s product and services category risk based on the Australian University Procurement Network Risk rating which categorises these risks based on the products and services delivered.</p> <p>Our 2021 assessment has identified that of our 1,320 suppliers, 1,041 (79%) provided products or services assessed as low risk, 210 (16%) were assessed as medium risk, 61 (5%) assessed as high risk and 8 (1%) were assessed as very high risk. We have commenced further engagement with our suppliers identified as high or very high risk through a self-assessment questionnaire that will assist us to identify further mitigation opportunities for implementation.</p> <p>Investments</p> <p>We also have managed investments with the Victorian Funds Management Corporation (VFMC). The VFMC has in place a Modern Slavery Policy that sets out its expectations and commitment to identify, assess and address modern slavery risks.</p>
Geographic	<p>The specific country, or countries, a supplier is based in and / or operates within is a strong indicator of the likelihood for modern slavery to exist.</p> <p>The Global Slavery Index (GSI), which was used for this assessment, provides a modern slavery risk rating for each country. The GSI rating is based on several metrics including the levels of governance issues, nourishment and access, inequality, disenfranchised groups and the effects of conflict. Further information on the GSI can be found at the following link https://www.globallslaveryindex.org/2018/findings/global-findings/</p> <p>We based our assessment of a supplier’s country of operation on the supplier’s address and the Australian Business Number (ABN) recorded on our systems. As the majority of our suppliers are based in Australia and the majority of our</p>

Risk	Description
	<p>goods and services are procured locally in Australia, we have assessed the geographic risk as low potential for modern slavery risks.</p> <p>For suppliers with an overall risk rating of high to very high, we have undertaken further engagement as part of the supplier self-assessment questionnaire process to identify whether they conduct their operations from other countries where the supplying entity has a facility, site, factory or other operations.</p> <p>We will further engage with suppliers who have responded to the questionnaire to implement appropriate risk mitigation strategies as required.</p>

Actions to assess and address risk

During this reporting period, Holmesglen developed and implemented a Modern Slavery Policy which outlines our broader commitment to addressing modern slavery risks across our operations and supply chain. It also summarises the relevant governance framework and establishes accountabilities to support this commitment.

Additional activities that we have undertaken to address risks to modern slavery include:

- implementation of regular progress reports to the Organisational Performance Review Committee
- updated our website to include a dedicated page to [Procurement and Tendering at Holmesglen](#). This page provides a summary of our Procurement Framework, including our Modern Slavery Policy and published statements
- acquisition of an e-learning module on Modern Slavery to enable training and raise awareness of modern slavery risks to relevant staff from 2022.

Holmesglen continues to review and improve our internal strategies, processes and procedures which support us in identifying and reducing the risks of modern slavery in our operations and supply chains, including:

Addressing operational risk	Addressing supply chain risks
Our Complaint Resolution Procedure supports and encourages employees to raise concerns without fear that their future employment prospects will be adversely affected.	Our Social Procurement Strategy supports safe and fair workplaces by purchasing from suppliers that comply with industrial relations laws and promote secure employment. This strategy enables us to adopt a strategic, organisation-wide approach to how we will deliver social and sustainable outcomes through our procurement activities.
Our Public Interest Disclosures Policy establishes a system for the protection of persons who make a public interest disclosure or complaint under the Public Interest Disclosures Act 2012 (Vic) (PID Act) from detrimental action by officers, learners, employees and contractors of Holmesglen Institute in accordance with section 58(5) of the PID Act and ensures that all other requirements of the PID Act are met.	Our Procurement and Tendering Rule establishes how we implement and maintain an effective procurement and tendering framework including ensuring that all goods, services, assets and construction procurement risks, including modern slavery, are managed appropriately.
Our Conduct Rule and Code of Conduct defines the standard of behaviours expected of all members of the Holmesglen community including the requirement to demonstrate the Victorian public sector values of responsiveness, integrity, impartiality, accountability, respect, leadership and human rights.	Our Procurement Complaints Procedure establishes our processes for receiving and managing complaints regarding our procurement processes.

Addressing operational risk	Addressing supply chain risks
<p>Our Risk Management Framework which includes Risk Management Rule, Enterprise Risk Management plan and strategic and operational risk registers. Our Risk Management Framework outlines our approach and commitment to risk management and establishes the processes for identifying, evaluating and managing our risks including modern slavery risks.</p>	<p>Our standard purchase order terms and conditions and approach to market templates include requirements to comply with the Victorian Government’s Supplier Code of Conduct, and address our Social Procurement outcomes, as relevant to the particular tender or quotation. The Victorian Government’s Supplier Code of Conduct that sets out the minimum expectations for our suppliers and third-party labour providers related to ethical practices including addressing modern slavery risks in their business.</p>

The outcome of the broader supply chain assessment identified a number of key actions and opportunities to further mitigate our risk to modern slavery. This includes, but is not limited to, reviewing the above policies, strategies and frameworks, and considering modern slavery risk management where possible. This will be our focus for the 2022 reporting period.

Assessing our effectiveness

At present, we assess the effectiveness of our actions by monitoring and closing out the activities that we have already committed to as part of our procurement strategies and frameworks.

We acknowledge that we are still in the early maturity phase of our modern slavery activities and as such plan to focus on developing and monitoring metrics for assessing effectiveness in this upcoming reporting period.

These metrics will include, but may not be limited to:

- Number of staff who undertake the modern slavery e-learning module
- Number of suppliers responding to annual modern slavery surveys
- Number of audits undertaken of suppliers to determine if mitigation actions are actioned
- Increased engagement with high-risk suppliers, including risk assessment and education/awareness
- Increased level of awareness among staff through targeted education and training.

During 2022 we will identify additional metrics to support the monitoring and reporting of the effectiveness of our actions. See our future actions commitment below.

Consultation

This statement was prepared by the Chief Financial Officer and key internal stakeholders have been consulted with as relevant.

Holmesglen Institute controls Holmesglen International Training Services Pty Ltd, Glenuc Pty Ltd and the Holmesglen Foundation. None of these entities are reporting entities under the Modern Slavery Act 2018 (Cth). As controlled entities of Holmesglen Institute, the Institute manages all of their procurement, risk management and tendering activities and their operations and supply chains are included in this Modern Slavery Statement, and proposed action plan. Therefore wider consultation has been assessed as not being required.

Future actions

In our next reporting period we will continue our focus on the following actions:

- review actions identified following the supplier self-assessment questionnaire and further engage with suppliers to identify risks and implement risk mitigation strategies;
- begin review of policies, processes and contract terms and conditions to identify where modern slavery considerations can be included;
- full implementation of our Modern Slavery e-learning module to all relevant staff and monitor completion;
- a review of our modern slavery risk assessment methodology to further identify and evaluate our modern slavery risks, including implementing metrics to monitor the effectiveness of our actions;
- complete transition to the Victorian Government Purchasing Board mandatory supply policy requirements including development and approval of our new Procurement Strategy. This strategy will incorporate our approach to addressing Modern Slavery risks and our current Social Procurement Strategy.

The Board of Holmesglen Institute is the principal governing body for the purposes of approving this statement. This statement was approved by the Board of Holmesglen Institute on 10th May 2022. The Board has authorised Mary Faraone to sign this statement in her capacity as the Chief Executive and Director of Holmesglen Institute.



Mary Faraone
Chief Executive and Director
Date: 11th May 2022