

Modern Slavery Statement 2023



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MELBOURNE POLYTECHNIC

MODERN SLAVERY STATEMENT 2023

ABOUT THIS STATEMENT

The *Modern Slavery Act 2018 (Cth) (Act)* came into force on 1 January 2019. It requires Australian entities with a minimum consolidated revenue of \$100 million to report on the risk of modern slavery in its operations and supply chain and the steps it is taking to respond to the risks identified.

This statement by Melbourne Polytechnic made pursuant to the Act sets out the actions we have taken to address modern slavery and human trafficking risks in our business, operations and supply chain in the reporting year 1 January 2023 to 31 December 2023.

MELBOURNE POLYTECHNIC'S APPROACH

Melbourne Polytechnic acknowledges that modern slavery practices are serious violations of human rights. We do not have and do not tolerate any form of modern slavery in any part of our business or supply chain.

OUR VALUES

Our Values are the enduring tenets of our organisation. They are a set of guiding principles that describe what we value and how we work:

- ▶ **Welcoming - We all belong.** We welcome and appreciate diverse ideas, and we embrace differences. We are open-minded, kind and compassionate so that everyone feels valued and respected. We create safe spaces for every person to come with their whole self and achieve their full potential. When everyone feels supported, our community is a better place.
- ▶ **Curious - We have a passion for learning.** Curiosity inspires us to be creative and find different ways of viewing the world. When we listen well and ask thoughtful questions, we learn more and adapt well to change. Our enthusiasm for learning and sharing knowledge drives us to improve. We are open to and respectful of everyone's experience and contribution. We seek out and are receptive to new skills and ideas. We find better ways of doing things that benefit our community.

- ▶ **Collaborative - We are better together.** We support and empower each other as we work towards our shared vision. We achieve more when we share our work, ideas and solutions respectfully. We make it easy to connect and collaborate with each other, our students, industry and the community.
- ▶ **Accountable - We all act with integrity.** We hold ourselves to a high standard and are responsible for our actions. We take our role seriously, and our vision informs every decision. In every interaction we are honest, respectful and fair. We deliver on our commitments to each other, our students, industry and community.



MELBOURNE POLYTECHNIC'S STRUCTURE AND OPERATIONS

GOVERNANCE AND STRUCTURE

Melbourne Polytechnic is a body corporate operating under Part 3.1 of the *Education and Training Reform Act 2006 (Vic)* and the *Constitution of Melbourne Polytechnic Order 2016*. It does not own or control any separate reporting entities.

Melbourne Polytechnic is governed by legislation that stipulates principles of accountability, governance and financial management. Specifically, the *Public Administration Act 2004 (Vic)* takes a comprehensive approach to supporting good public administration in Victoria by:

- ▶ defining the public sector and the public bodies that are within scope of the *Public Administration Act 2004 (Vic)*, which includes Melbourne Polytechnic;
- ▶ establishing a framework to ensure the effective governance of the whole of the Victorian public sector, to help government manage both the financial and non-financial risks associated with public entities carrying out functions on its behalf enshrining the core and enduring public sector values of responsiveness, integrity, impartiality, accountability, respect, support for human rights, and leadership, which represent the defining characteristics of the behaviour required of all public sector employees;
- ▶ the requirements of the *Financial Management Act 1994 (Vic)*;
- ▶ the Principles of Probity (integrity, fairness and honesty);
- ▶ the Codes of Conduct issued by the Victorian Public Sector Commission;
- ▶ the Supplier Code of Conduct issued by the Victorian Government Purchasing Board (VGPB); and
- ▶ our own internal business controls, policies and procedures, which include: Conflicts of Interest; Fraud and Corruption Control; Public Interest Disclosure; Gifts, Benefits and Hospitality; Confidential Information; Equal Opportunity, Discrimination and Sexual Harassment; Occupational Health and Safety; Protected disclosure, Accounting, Financial Reporting and Internal Controls.

The Melbourne Polytechnic Board is accountable to the Victorian Government for the overall strategy, governance and performance of Melbourne Polytechnic's functions.

The Board has appointed a Chief Executive, who is supported by six Functional Groups:

- ▶ Academic Operations
- ▶ People, Culture and Corporate Services
- ▶ Strategy, Performance and Governance
- ▶ Student Engagement, International and Community Partnerships
- ▶ Infrastructure, Sustainability and Precincts
- ▶ Curriculum Innovation and Teaching Excellence

OPERATIONS

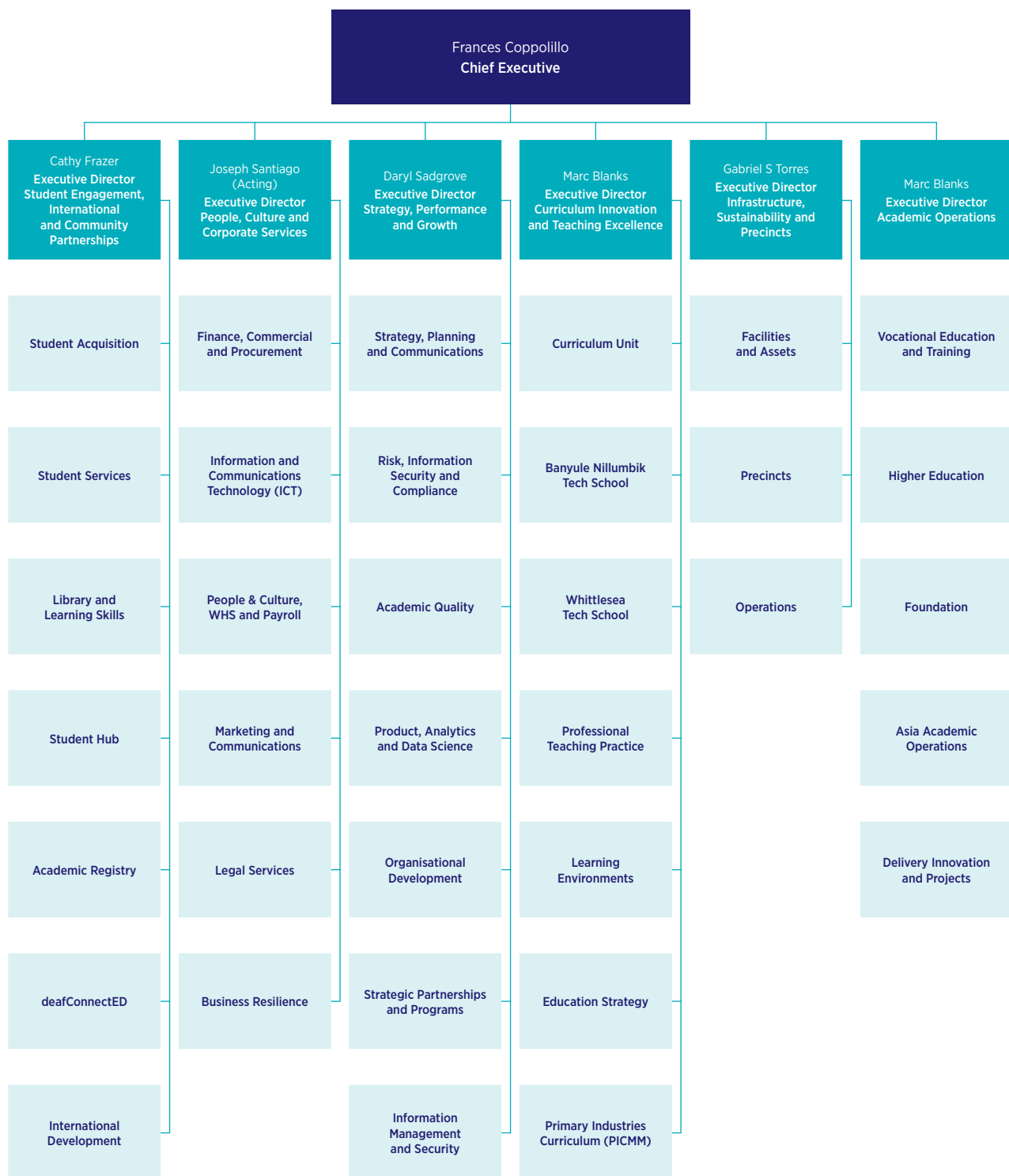
Melbourne Polytechnic has been delivering vocational training since 1912 and is one of the largest providers in Victoria. Offerings include a wide range of Vocational Education and Higher Education courses to provide students with skills and qualifications to prepare them for the workplace. These are delivered across seven campuses located at Preston, Collingwood, Epping, Fairfield, Heidelberg, Prahran, Greensborough, and at training sites at rural and regional locations in Victoria.

Melbourne Polytechnic operates a number of long-term international programs with more than fifteen partner institutions in China (including Hong Kong), Korea and Indonesia. Our international programs operate in line with Victorian and Australian Government strategic initiatives and strategies for regional engagement. They align with our organisational strategy and focus on the student experience, workforce development and priority industries.

Melbourne Polytechnic also provides a range of consulting and training services for industry, government, and educational sectors in the local community throughout Australia and internationally.

In 2023, Melbourne Polytechnic employed approximately 1397 staff (835 EFT), with 54% of our staff engaged as teachers.

MELBOURNE POLYTECHNIC SENIOR MANAGEMENT STRUCTURE AT 31 DECEMBER 2023



PROCUREMENT AND SUPPLY CHAINS

APPROACH TO PROCUREMENT

Melbourne Polytechnic's procurement activity is undertaken in a decentralised model and has a robust governance structure in place to ensure compliance with regulatory requirements.

In accordance with the *Education and Training Reform Act 2006*, Melbourne Polytechnic's Board is responsible for establishing and approving procurement policies.

The Chief Executive, under delegation from the Board, is responsible for establishing the governance framework for procurement at Melbourne Polytechnic, and is accountable for implementation of procurement procedures. The Chief Executive is also responsible for ensuring that the institute has the appropriate capability to manage its procurement activity.

A Procurement Committee supports the Chief Executive in ensuring compliance with regulatory requirements, and embedding good procurement practice at Melbourne Polytechnic to support achieving its business objectives. The Procurement Committee monitors procurement activity during the planning stage, prior to award of a contract, during the delivery of services under a contract and reports to the Chief Executive on procurement initiatives.

Specialist procurement support is available to the business to provide guidance and support in both specification development and contract management activity.

ABOUT OUR SUPPLY CHAIN

To support the achievement of its business objectives, Melbourne Polytechnic buys a range of goods and services. Categories of goods and services bought include:

- ▶ Facilities Services including maintenance and upgrade services, security and cleaning and waste management
- ▶ Corporate Services including office supplies and professional services
- ▶ Information Technology products including hardware and software
- ▶ Educational supplies, and
- ▶ Human resource services.

MANAGEMENT OF RISKS RELATING TO MODERN SLAVERY PRACTICES

MELBOURNE POLYTECHNIC'S APPROACH TO RISK MANAGEMENT

Melbourne Polytechnic implements a number of measures to ensure effective risk management and compliance with our obligations, including the risks associated with modern slavery practices.

Melbourne Polytechnic embeds risk and compliance management practices in its governance, management, planning and decision making, consistent with national and international standards and practices including *AS/NZS ISO 31000: 2018 Australian/New Zealand Standard: Risk management – Principles and Guidelines*, *ISO 19600:2015 Compliance management systems – Guidelines*, the *Victorian Government Risk Management Framework*, and the *Victorian Minister of Finance's Standing Directions*.

This enables Melbourne Polytechnic to achieve its strategic objectives in a risk aware environment and ensure operations are conducted in a risk-based manner.

The Melbourne Polytechnic Board oversees and monitors the assessment and management of risk across the Polytechnic.

The Finance, Audit and Risk Committee reports to the Board on:

- a. all risk assessment and risk controls to ensure that an appropriate program of risk management is maintained;
- b. the adequacy of Melbourne Polytechnic's compliance management; and
- c. the review and oversight of the risk culture.

The Chief Executive and the Executive Leadership Committee provide leadership and demonstrate commitment to Melbourne Polytechnic's risk and compliance management programs, and are responsible for setting, owning, instilling and overseeing a positive risk culture.

RISKS OF MODERN SLAVERY PRACTICES INHERENT IN THE OPERATIONS AND SUPPLY CHAINS OF MELBOURNE POLYTECHNIC

Melbourne Polytechnic's operations and supply chains contain a number of risks relevant to ensuring that modern slavery practices are prevented and addressed, including the risks that relating to:

- ▶ Direct employment of staff;
- ▶ Employment of staff via labour hire service providers;
- ▶ Engagement of contractors who employ staff;
- ▶ Purchase of goods and services, including software services and information communication technology hardware; and
- ▶ Students who may be subjected to risks relating to trafficking in persons, slavery and slavery-like practices, debt bondage, forced servitude, deceptive recruiting practices and child labour.

Melbourne Polytechnic takes a strategic approach to managing its supply chain risks. Risks of modern slavery are identified at a category level in the first instance and then at the procurement activity level.

Melbourne Polytechnic has robust policies and procedures in place to support the business to identify modern slavery risks and to include provisions to mitigate those risks.

Processes are in place during the planning stage, in the specification design, in evaluating and undertaking due diligence before engaging suppliers, awarding the supply arrangement and during contract management. These processes apply to all contracts, from operational supply contracts to major partnerships with international educational suppliers. Market analysis is also undertaken on a continuous basis to monitor risks in the supply market and to ensure that Melbourne Polytechnic's suppliers continually meet their legal obligations in relation to employment conditions.

MANAGEMENT OF RISKS RELATING TO MODERN SLAVERY PRACTICES cont.

Risks relevant to modern slavery and human trafficking across Melbourne Polytechnic's business, operations and supply chain are also addressed in a number of key Melbourne Polytechnic policies and procedures, including:

Policy	Principles
Child Safety Policy Child Safety Procedure	Sets out Melbourne Polytechnic's commitment to provide a safe environment which ensures the care, safety and wellbeing of all children and young people, and that protects them from all forms of harm and abuse.
Code of Conduct Policy	Sets out acceptable standards of behaviour within Melbourne Polytechnic.
Contracts Management policy Contracts Management procedure	Governs the negotiation, execution and management of contracts.
Fraud and Corruption Prevention Policy	Reflects Melbourne Polytechnic's commitment to effective fraud risk management and outlines Melbourne Polytechnic's approach to preventing and investigating fraud, corruption and other unacceptable practices.
Integrity Framework Policy	Consolidates the key standards of conduct and accountabilities for all Melbourne Polytechnic Board members, employees, external committee members and associates.
International Program Agreement	Establishes the relationship with international partners, including requirements in relation to human rights, and provisions to prevent engagement in all forms of trafficking in persons, slavery and slavery-like practices and child labour.
Protected Disclosure Policy	Establishes a system for ensuring the protection of persons who make "whistleblower" disclosures.
Risk Management Framework Risk and Compliance Management Policy Risk Management Procedure	Sets out Melbourne Polytechnic's approach to risk management and establishes staff responsibilities in identifying and managing risks

EMPLOYMENT AND PEOPLE MANAGEMENT

Melbourne Polytechnic's employment policies are in accordance with the Public Administration Act 2004 (Vic), the Ministerial Directions to TAFE Institutes on the employment of staff and all other requirements imposed on Melbourne Polytechnic under relevant employment and industrial relations legislation or at common law.

All Melbourne Polytechnic staff with the exception of employees on Executive contracts are covered by the Victorian TAFE Teaching Staff Agreement 2018 or the Melbourne Polytechnic Academic and Professional Staff Agreement 2022 and relevant underpinning Awards.

Melbourne Polytechnic ensures that all new employees have the right to work in Australia. Where it is necessary to hire agency workers or contractors, our staff are directed to specified, reliable agencies that have been vetted through Melbourne Polytechnic's procurement procedures and meet our imposed selection criteria regarding their employment policies and practices. Agencies are asked to identify any sub-contractors used and to promote fair work practices as appropriate.

PROCUREMENT AND SUPPLY CHAIN ASSURANCE

Melbourne Polytechnic has robust procurement policies and procedures in place underpinned by the regulatory framework applicable including but not limited to requirements of the Victorian Government Purchasing Board Supply Policies for goods and services, the Ministerial Directions for Public Construction and the Victorian Government's Supplier Code of Conduct that describes minimum expectations that suppliers should aspire to meet in specific areas including labour and human rights.

Melbourne Polytechnic's procurement methodologies help identify, manage and mitigate risk within the supply chain. Proactive contract management and robust due diligence processes assist with identifying risks, non-compliance with contractual commitments and ensuring benefits are realised.

All supplier agreements contain enforceable legal obligations which require suppliers and contractors to comply with the Act and to notify Melbourne Polytechnic of any actual or suspected breaches.

HUMAN TRAFFICKING

Melbourne Polytechnic engages with Government agents, such as Global Victoria, Austrade, and local embassies, and appoints local agents in overseas jurisdictions as part of its due diligence process to assess and select off-shore partners. Melbourne Polytechnic's International Program Agreement contains enforceable legal obligations prohibiting our off-shore partners from engaging in conduct constituting modern slavery, including all forms of trafficking in persons, slavery and slavery-like practices and the worst forms of child labour. These off-shore partners are subject to ongoing audit requirements to ensure compliance with the International Program Agreement.

Melbourne Polytechnic students who might be at risk of modern slavery or trafficking have access to a range of counselling and support services.

ASSESSING THE EFFECTIVENESS OF ACTIONS TAKEN TO MITIGATE THE RISKS OF MODERN SLAVERY PRACTICES

Melbourne Polytechnic assesses the effectiveness of actions taken to mitigate the risks of modern slavery practices by:

- ▶ Communicating to suppliers of our expectations and minimum standards for all supply arrangements;
- ▶ Requesting suppliers to articulate their understanding of modern slavery matters prior to engagement;
- ▶ Undertaking due diligence of suppliers during the evaluation and contract management stage of the procurement process;
- ▶ Working in a collaborative environment with clear pathways for reporting to identify and manage risks; and
- ▶ Regularly reviewing and updating procurement policies and procedures to ensure compliance with relevant regulatory requirements.

IMPROVEMENTS TO PROCUREMENT CAPABILITY

Over the 2023 financial year, Melbourne Polytechnic has continued to strengthen its procurement capability including enhancing its supply chain assurance framework at both a category and procurement activity level to help ensure suppliers comply with all requirements, including mitigating the risks related to modern slavery in the supply chain.

A Procurement Capability Plan was implemented which incorporated training on the requirements of the Supplier Code of Conduct and the Modern Slavery Act.

APPROVAL

This Statement was approved by the Melbourne Polytechnic Board on 17 June 2024.



Helen Clarke
Board Chair
Melbourne Polytechnic



Information correct at June 2024 © MELBOURNE POLYTECHNIC



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