

Bendigo Kangan Institute

Modern Slavery Act Statement

2025



Modern Slavery Statement

Bendigo Kangan Institute – ABN 74 802 942 886

Bendigo Kangan Institute (BKI) is proud to present its fifth modern slavery statement, as required by the Modern Slavery Act 2018 (Cth). This statement reflects our ongoing commitment to combatting modern slavery, and outlines the progress made since our last update in 2024.

Within this statement, we evaluate our modern slavery risk across our operations and supply chain landscape. The statement will further outline how we combat modern slavery using our risk management program, controls, and business practices. We continue to use an externally procured Modern Slavery Assessment Tool which enhances our understanding of modern slavery risks within our supply chain, allowing us to target specific suppliers or business processes that may be at higher risk.

BKI's Board of Directors approved this statement on 29 May 2025.

About Bendigo Kangan Institute

BKI was established under the Education and Training Reform Act 2006 (Vic) to provide vocational education training services to the community. We are an integrated skills provider that brings together education, assessment, and learning. BKI has distinct functions to:

- provide communities and industries with efficient and effective education and skills assessment programs and services;
- provide programs and services that are responsive to the community and industry needs; and
- provide online solutions and e-learning systems for organisations and education providers.

BKI is one of Victoria's largest and most trusted vocational education and training providers with a proud history dating back to the 1850s. We provide modern specialist training facilities offering 200 courses across a diverse range of study areas.

Bendigo Kangan Institute consists of Bendigo TAFE, Kangan Institute, VETASSESS and eWorks under ABN 74 802 942 886. We have provided this statement on behalf of the four brands comprising BKI. We do not own any entities and therefore we have not consulted with other entities under criterion 6 of section 16 of the Modern Slavery Act 2018 because it does not apply to us.

The functions of BKI are supported by the Bendigo Kangan Institute Constitution. BKI train and educate students at nine campuses and ten correctional facilities across regional Victoria and metropolitan Melbourne. Our footprint stretches from Cremorne to Echuca and also includes Docklands, Essendon, Broadmeadows, Castlemaine and Bendigo.

VETASSESS, Australia's leading assessment provider, offers skills assessments for migration purposes delivered across a range of trade and general professional occupations to the Federal Government's Department of Employment and Workplace Relations (DEWR) and Department of Home Affairs. VETASSESS provides educational research and consultation on assessment standards and curriculum and is located in Melbourne, maintaining an overseas presence through contracts with partners in India and China.

eWorks, an online brand of BKI, is one of Australia's leading e-learning delivery and consultancy specialists, offering a range of customised products and services to help organisations maximise the benefits of online education.

Acknowledgment of Country

Bendigo TAFE and Kangan Institute acknowledge that their campuses are located on the ancestral lands of the Wurundjeri Peoples of the Kulin Nations, the Djaara people of Dja Dja Wurrung, Yorta Yorta Nations and the Gunaikurnai people.

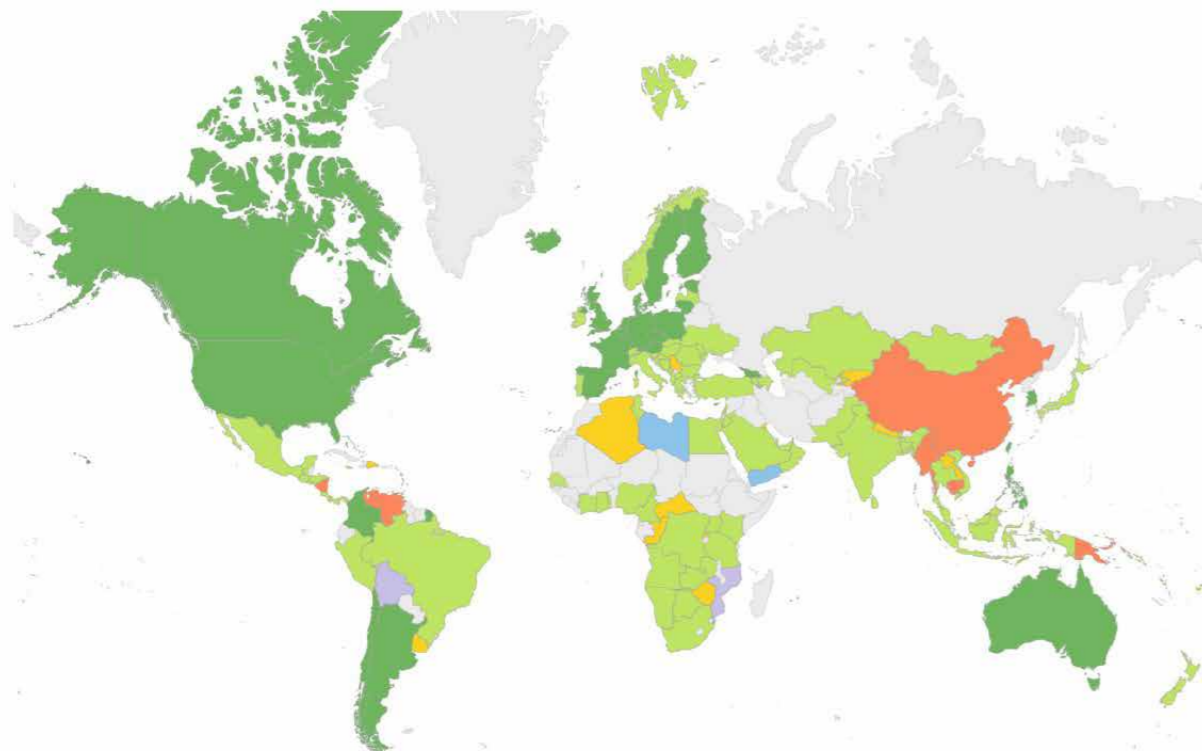
The Institutes respect their Elders past present and emerging and cultural heritage and we recognise their continuing connection to land, waters and culture.

Modern Slavery Statement

The BKI 2025-2030 “Growth for Impact” Strategic Plan highlights our commitment to growth as an integrated skills provider and links to United Nations Sustainable Development Goals (UNSDG). BKI places the utmost importance on safeguarding the wellbeing and rights of its people and everyone else who engages with our services. We firmly believe that the protection of every person is integral to our mission. This commitment extends beyond our domestic operations and into our offshore partnerships and relationships, including our migration skills

assessment program (VETASSESS). We commit to upholding the same level of integrity, and protection for individuals internationally as we do locally.

The below graphic represents the geographical regions of our operations. For the context of modern slavery, this map, and the supply chain maps that follow, have been overlaid with the colour tier system of the adopted Trafficking-in Persons Report¹.



¹ Trafficking in Persons Report 2024

Our Role in Fighting Modern Slavery

Every individual deserves dignity, freedom, and fair treatment. At BKI, we uphold the principle that no one should suffer exploitation or deprivation of their fundamental rights.

Modern slavery refers to various forms of exploitation and coercive practices that deprive individuals of their freedom, rights, and dignity. It encompasses situations where individuals are forced or coerced into labour, servitude, or human trafficking. Modern slavery can take different forms, including forced labour, debt bondage, forced marriage, human trafficking, and child labour.

The International Labour Organisation (ILO) estimates that over 40 million people around the world are victims of modern slavery. In recent years, supply chain transparency is a key policy strategy used by governments to identify and prevent business practices that lead to modern slavery.

BKI is committed to ensuring that modern slavery practices are not engaged in any part of our service provision, which includes ensuring robust supplier procurement through to raising all staff members’ awareness on the risks and impact of modern slavery practices.

Our Governance and Public Sector Obligations

As a public sector entity and vocational education provider established under the *Education and Training Reform Act (2006)*, BKI abides by public sector obligations that operate alongside the Modern Slavery Act to advance civil rights and protections. Consistent with our previous statements, these include but are not limited to:

- The *Public Administration Act 2004* (Vic), which reflects the key public sector values of integrity, impartiality, responsiveness, respect for human rights, accountability and leadership. BKI has adopted these values into its own organisational policies, including its Employee Code of Conduct;

- The *Financial Management Act 1994* (Vic), which requires BKI to adopt governance practices to support compliance with the Victorian Government Risk Management Framework; Gifts, Benefits and Hospitality Accountabilities, Sponsorship, Asset Management, Public Construction and financial practices and controls;
- The *Public Interest Disclosure Act 2012* (Vic), which operates as the framework for encouraging and investigating reports of public sector improper and corrupt conduct; and
- *Charter of Human Rights and Responsibilities Act 2006* (Vic) which incorporates international human rights principles into Victorian law. Under the Charter, public authorities are required to act in a way that is compatible with human rights. BKI has adopted a Human Rights Policy to ensure decision making is consistent with these principles.

BKI are committed to the above obligations which form the foundation of our operations. We continue to work toward integrating protective measures throughout all facets of our activities to ensure compliance with our public sector obligations.

Furthermore, our dedication to advancing the protection of individuals is demonstrated through various policies and controls. These encompass areas such as conflicts of interest, fraud and corruption prevention, public interest disclosures, improper conduct, acceptance of gifts and benefits, discrimination, workplace behaviour, gender equality, occupational health and safety as well as stringent financial practices and procedures.

Our Procurement Practices

At BKI, we prioritise integrity and uphold ethical standards in all aspects of our operations. Our commitment to responsible practice extends to our procurement processes, where we set clear expectations for our contractors and supply partners. We emphasise the importance of engaging with people ethically and have implemented measures to combat modern slavery from our supply chains.

We hold our suppliers accountable, demanding workplaces that uphold fairness, respect human rights, and actively address the risk of modern slavery. Our *Supplier Code of Conduct* reflects our dedication to combating modern slavery and is integrated into our procurement policies and procedures. These policies align with government strategies including the *Victorian Government's Supplier Code of Conduct*.

Aligned with the requirements set by the *Victorian Government Purchasing Board* (VGPB) and Ministerial Directions and Instructions for Public Construction Procurement, our *Procurement Strategy* serves as a guiding framework. The *Procurement Strategy* complements our other controls including the contractor prequalification processes, insurance verification protocols, and the *Supplier Code of Conduct*, to which all our suppliers must agree and comply in the provision of goods and services.

In line with our commitment to social and sustainable outcomes, our *Social Procurement Strategy* (SPC) demonstrates our dedication to driving positive change within our supply chain environment. The strategy covers various segments, such as Building and Construction, Fleet and Transport, Finance Services, Information Technology, and Professional Services. It incorporates weighted criteria to assess social value and ensures that our procurement decisions align with our social goals and commitments.

VETASSESS provides skills assessments for both migration and national skills recognition and has a considerably more global operating environment. In recognition of this unique operating context, VETASSESS procurement continues to implement anti-modern slavery practices to address risks that are specific to their business, including:

- Inclusion of a modern slavery clause in contracts, which require annual reports on modern slavery based on a provided template;
- Holding regular meetings between VETASSESS country heads of overseas offices to promote familiarity with BKI's Modern Slavery Statement; and
- Embedding a recruitment policy for overseas offices to align hiring practices with the requirements of the modern slavery clause.

Our efforts to enhance procurement practices illustrate our capability to incorporate a modern slavery perspective into our go-to-market and contract management strategies. With improved due diligence processes and a comprehensive system of checks and balances, our procurement team is now better positioned this year and, in the future, to identify and address instances of modern slavery.

Our Risk and Audit Program

BKI adopts effective risk management, with modern slavery identified as a priority. Our *Risk Framework* ensures thorough identification, assessment and mitigation of risks including modern slavery.

BKI's *Risk Appetite Statement* (RAS) specifies the amount of risk it is willing to accept in pursuit of its strategic objectives and delivery of its operational plans as approved by the BKI Board. As outlined in our RAS, we have no tolerance for non-compliance to legislative obligations such as modern slavery. As part of our expected behaviour against our risk appetite, we are committed to allocating sufficient resources to ensure ongoing compliance, monitor changes in our environment, and actively respond (local and global).

Monitoring modern slavery risk is covered in our enterprise risk register within our Governance, Risk and Compliance system. This system facilitates risk management by implementing appropriate controls and treatments, with regular reporting updates on the risk status. Reports are shared with BKI's Board of Directors and its Finance Risk and Audit Committee (FRAC), ensuring informed decision making and actions addressing modern slavery risks as they evolve.

Executive leadership holds responsibility for managing these risks, overseeing strategy implementation and progress monitoring. BKI's Strategic Internal Audit Plan program plays a vital role, coupled with organisation wide audits, which include fraud and integrity audits in our overseas offices, encompassing modern slavery in their scope. These audits evaluate effectiveness of our approach, identify vulnerabilities and drive improvements in due diligence, supplier vetting and contractual obligations.

To ensure audit program effectiveness and independence, BKI's FRAC review audit findings, recommendations, and oversee progress in implementing actions, including those addressing modern slavery concerns.

Modern Slavery Desktop Audits

One of the commitments in our last *Modern Slavery Statement* was to establish the desktop audit approach as part of our *Contract Management Plan*. The requested information includes:

- evidence of employment contracts;
- payslips for selected employees;
- contractor recruitment policy/procedure;
- contractor grievance mechanisms;
- policies; and
- training and awareness initiatives that address modern slavery, human rights, and work rights issues.

BKI utilised the VGPB contract templates for all contracted goods and services. These contracts include references to unethical behaviour and the *Victorian Government Supplier Code of Conduct*. The *Supplier Code of Conduct Commitment Letter* is required to be signed by suppliers during the go-to-market process. Part D of the Victorian Governments Supplier

Code of Conduct covers labour and human rights. By signing this letter, the supplier agrees to the *Victorian Government Supplier Code of Conduct*.

These contracts provide us with authority to conduct desktop modern slavery audits on suppliers. These audits will therefore be implemented on targeted suppliers going forwards.

iPRO Modern Slavery Assessment

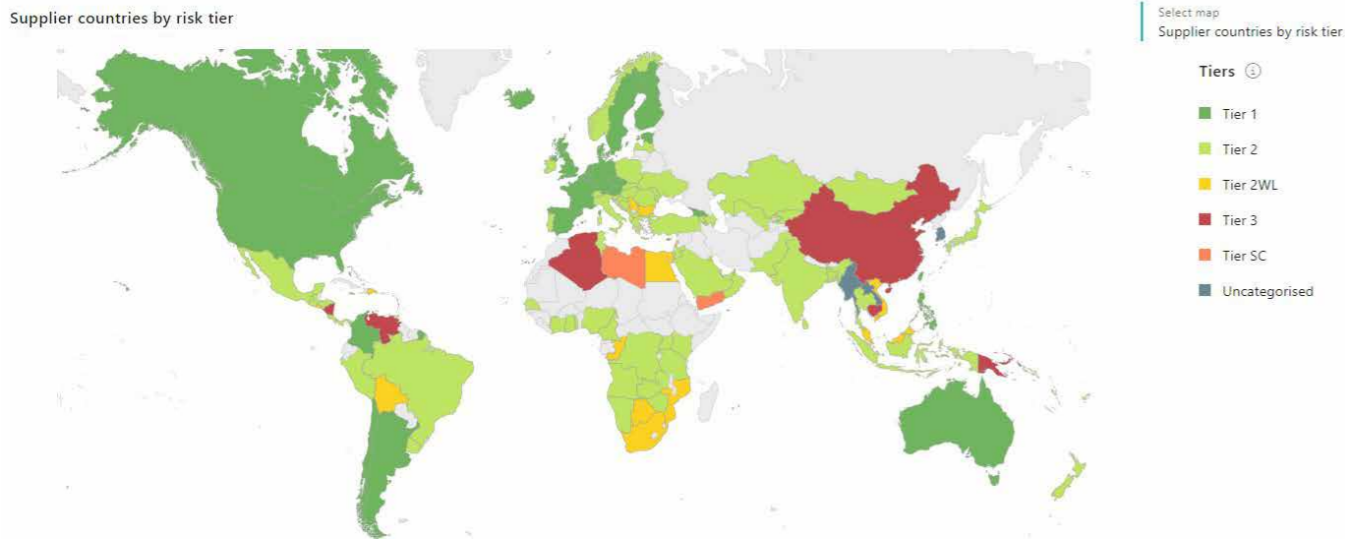
As part of our continuous improvements to ensure we have taken a robust approach to anti-modern slavery, we have again engaged iPRO (a third-party provider), who have undertaken a Modern Slavery Assessment on BKI's supply chain based on responses provided by 299 of our identified highest risk suppliers. This year we are pleased to report an additional 101 responses compared to last year.

The iPRO Modern Slavery Assessment Tool highlights modern slavery risks in our supply chain. Each supplier who completed the assessment was analysed and assigned a

risk category based on their responses. The Assessment Tool allows us to view suppliers risk profiles to see their risk categorisation, risk scores, sectors of operation, countries of operation, and recommended risk mitigation actions, which in turn will allow us to make any adjustments necessary to strengthen our anti-modern slavery approach.

A summary of BKI supplier risk categories and supplier countries by risk tier is set out below. Compared to last reporting period², the percentage of suppliers assigned low risk has modestly increased this year, but our overall risk profile is largely unchanged.

Risk categories	% of suppliers per risk category	# of suppliers per risk category
Low-Risk (No inherent risk)	38.3%	115
Low-Risk (Adequate risk control)	16.3%	49
Medium-Risk (Partial risk control)	37%	111
High-Risk (Inadequate risk control)	8.3%	25
High-Risk (High levels of inherent risk)	0%	0



² iPRO 2024 Modern Slavery Insights Report for Bendigo Kangan Institute (generated April 2024)

The Assessment Tool provides suppliers with an action plan for how they can reduce their risk profile. After completing the 2024-2025 assessment for BKI, seven suppliers enrolled their workers in annual modern slavery, human trafficking, and child labour risk awareness training. Three suppliers issued a modern slavery risk compliance policy to their suppliers and three suppliers will be issuing continual modern slavery risk identification and assessment processes to their businesses operations.

Modern Slavery Response Protocol

At BKI, we recognise the importance of maintaining an effective response mechanism to promptly address any instances of modern slavery within our supply chain. We are committed to taking swift and appropriate action upon identifying such cases and conducting thorough investigations.

Our Speak Up program, feedback channels, and risk assessment program are vital components in helping us identify instances of modern slavery. Through these mechanisms, BKI provides a secure and confidential platform for individuals, both within and outside its operations, to raise concerns and report any suspicions related to modern slavery. We encourage all stakeholders, including staff, students, contractors, and suppliers, to utilise these channels to help us identify fraud, corruption, and instances of modern slavery within our supply chain.

While we have not detected active cases of modern slavery through these channels, our investigation response plan would be activated if necessary. BKI's investigation response entails gathering relevant information, conducting interviews, and collaborating with our legal team or relevant authorities and external organisations where necessary.

Our response is guided by the principles of justice, fairness, and respect for human rights, with the aim of providing redress for affected individuals and preventing recurrence.

Modern Slavery Response Mechanism in Practice

One of the commitments of our Modern Slavery Statement is to undertake desktop audits as part of our Contract Management Plan.

The requested information includes evidence of employment contracts and payslips for selected employees. Contractor recruitment policy/ procedure, contractor grievance mechanisms, policies and training and awareness initiatives that address modern slavery, human rights, and work rights issues. These audits ensure we are actively keeping high risk suppliers accountable.

Our Modern Slavery Risk Environment

BKI is committed to ensuring that modern slavery practices are not engaged in any part of our service provision, which includes ensuring robust supplier procurement through to raising all staff members’ awareness on the risks and impact of modern slavery practices.

Modern slavery practices include human trafficking, slavery, forced marriage, forced labour, debt bondage, deceptive recruiting, physical abuse, restrictions on the freedom of movement, confiscation of passports and identity records, wage theft and child labour. Any form of these practices are serious breaches of human rights.

BKI does not tolerate any form of breach of human rights in any part of its operations or supply chain.

Our Supply Chain Environment

Our suppliers operate, produce, and source across several different sectors. Some of these sectors can be described as high-risk³.

As we transition into the 2025–2026 period, our commitment to confronting modern slavery risks remains unwavering. Our revised risk assessment focusses on pinpointing specific areas requiring attention, recognising that our most significant vulnerabilities often extend beyond our direct influence.

Despite our zero-tolerance approach to modern slavery, we acknowledge the challenges associated with identifying instances of such practices. We have therefore conducted scenario modelling and reviewed current scenarios to pinpoint potential vulnerabilities within our risk environment.

Our suppliers operate in the following sectors, including but not limited to:
















- Accommodation and Food Services;
- Agriculture, forestries and fishing;
- Construction;
- Domestic work;
- Education;
- Electricity, gas, steam and A/C supply;
- Finance and insurance;
- Government administration, defence and social security;
- Health and social work;
- Information and communication;
- Maintenance and repair of motor vehicles;
- Manufacturing;
- Mining and quarrying;
- Professional and scientific services;
- Real estate;
- Retail;
- Transportation and storage;
- Water supply, sewerage and waste management; and
- Wholesale.

³ High-risk sectors are those in which human trafficking activities are known to occur and were identified in the Global Estimates of Modern Slavery and child labour exploitation that were separately identified in Child Labour: Global Estimates 2020 Trends and the Road Forward (ILO and UNICEF, 2021).

High-risk Sectors of Operation

Table 1 below describes our supply chain environment indicating that out of a total out of 299 suppliers, 103 (34%) high-risk sectors of operation were identified in responses. Top three sectors are Construction, Manufacturing and Wholesale.

Table 1 – Supplier by Sector by Operation
















 <div> Accommodation and Food Service Activities 12 </div>	 <div> Agriculture, Forestries, and Fishing 5 </div>
 <div> Building services contractor 8 </div>	 <div> Cleaning 4 </div>
 <div> Construction 19 </div>	 <div> Domestic work 5 </div>
 <div> Labour hire 6 </div>	 <div> Maintenance and Repair of motor vehicles 6 </div>
 <div> Manufacturing 24 </div>	 <div> Mining and Quarrying 6 </div>
 <div> Personal services 5 </div>	 <div> Retail 14 </div>
 <div> Security services 1 </div>	 <div> Transportation and Storage 7 </div>
 <div> Wholesale 12 </div>	

Production of goods in High-risk Sectors

Table 2 below describes our supply chain environment indicating that a total out of 299 suppliers, 70 (23%) high-risk sectors of operations in production of goods were identified in responses. Top sectors for production of goods are Manufacturing and Construction.

The below insights reveal that approximately a quarter of our suppliers operate in high-risk sectors, and the highest-risk sector overall is in Construction.

Table 2 – Supplier by Sector by Production of Goods

 Accommodation and Food Service Activities 13	 Agriculture, Forestry, and Fishing 7
 Building services contractor 7	 Cleaning 2
 Construction 33	 Domestic work 4
 Labour hire 4	 Maintenance and Repair of motor vehicles 6
 Manufacturing 24	 Mining and Quarrying 7
 Personal services 5	 Retail 18
 Security services 4	 Transportation and Storage 13
 Wholesale 15	

SCENARIO MODELLING

The below scenario modelling is based on iPRO reporting insights and describe various hypotheticals and our controls/response to address.

Supply Chain Exploitation:

Hypothetical Scenario: As part of our activities, staff and contractors across our campuses are supplied with personal protective equipment (PPE), including gloves, safety boots, and high-visibility garments. These products are sourced through Australian-based suppliers; however, the manufacturing of PPE frequently occurs in countries such as Malaysia, China, and India, where modern slavery risks are elevated.

There are growing concerns about forced labour practices in the global PPE supply chain, particularly in the production of rubber gloves and textiles. Documented risks include the exploitation of low-paid migrant workers, recruitment through deceptive practices, excessive overtime, unsafe working conditions, debt bondage, and limited enforcement of labour protections. Subcontracting to unregulated factories further obscures supply chain transparency and increases the potential for human rights violations.

Risk Mitigation: Consistent with Victorian Government departments and agency rules, BKI buy uniforms and personal protective equipment manufactured locally and ethically, whenever possible, for Victorian Government employees.

VETASSESS Skills Assessments

Hypothetical Scenario: VETASSESS, as a skills assessment authority authorised by the Australian Government, allows applicants to engage overseas agents to represent them during the skills assessment process. However, it is discovered that one of these overseas agents engaged in predatory practices such as charging excessive fees, confiscating identity documents such as passports, and/or exploiting vulnerable applicants.

Risk Mitigation: While VETASSESS cannot maintain direct oversight of agents chosen by applicants, VETASSESS commits to responding promptly to any reports or evidence of modern slavery practices. In scenarios where applicants may contact VETASSESS regarding any concerns about misconduct of the appointed agent, VETASSESS would direct them to the legislative authority over registered migration agents, or to Department of Home Affairs and to Border Watch.

Business Development:

Hypothetical Scenario: During business development activities within our China and India and markets, it becomes clear that some of our partners are outsourcing their administrative and support services to third-party providers. By doing so, there could be issues with bonded or forced labour, particularly among marginalised communities. Additionally, recruitment practices for teaching and administrative staff in these regions may be susceptible to exploitation, with migrant workers facing deceptive recruitment fees, passport confiscation, and restricted freedom of movement.

Risk Mitigation: While VETASSESS cannot maintain direct oversight of agents chosen by applicants, VETASSESS commits to responding promptly to any reports or evidence of modern slavery practices. In scenarios where applicants may contact VETASSESS regarding any concerns about misconduct of the appointed agent, VETASSESS would direct them to the legislative authority over registered migration agents, or to Department of Home Affairs and to Border Watch.

Our Anti-Modern Slavery Actions:

A Year in Review

Our previous modern slavery risk assessments have provided us with valuable insights, enabling us to adopt a more coordinated approach to reducing the likelihood of slavery occurring within our operations. Through continued assessments, we are able to identify clear actions and are pleased that we were able to achieve most of our planned commitments.

In 2024 - 2025 we:

- Consolidated our use of iPRO – a third-party Modern Slavery Assessment Tool to assess modern slavery risks in our operations and supply chain;
- Undertook a Modern Slavery desktop audit of one of our highest risk suppliers (cleaning supplier);
- Developed a Modern Slavery Fact Sheet as part of iPRO survey sent to all suppliers to help clarify their modern slavery obligations;
- Reviewed our anti-modern slavery processes within our approach to Environmental and Social Governance (ESG) including modern slavery elements in our ESG Strategy; and
- Undertook quarterly risk reviews of modern slavery risks which includes evaluation of effective controls and progression of key treatments reported to Executive and to FRAC.

Our Future Commitments and Actions – Addressing our Modern Slavery Risks

In the coming year, BKI commits to advancing its anti-modern slavery initiatives through the following actions:

- Expand our modern slavery audit schedule to include further contractor audits of our highest risk suppliers;
- Continue to work closely with suppliers identified at highest risk based on insights gathered using the iPRO Modern Slavery Assessment Tool and monitor progress against agreed anti-modern slavery initiatives;
- Further develop intelligence exchange with our TAFE Community of Practice Partners to manage modern slavery as a shared risk; and
- Roll out learning modules on modern slavery for all BKI staff leveraging resources from iPRO.

Approved by Bendigo Kangan Institute's Board of Directors on 29 May 2025.

Sharan Burrow
BKI Board Chair
Bendigo Kangan Institute

Kangan Institute campuses

Broadmeadows
 Pearcedale Parade
 Broadmeadows VIC 3047

Docklands
 1 Batmans Hill Drive
 Docklands VIC 3008

Essendon
 38 Buckley Street
 Essendon VIC 3040

Cremorne
 85 Cremorne Street
 Cremorne VIC 3121

Hume Global Learning Centre in Sunbury
 44 Macedon Street
 Sunbury VIC 3429

Bendigo TAFE campuses

Bendigo City
 154 Hargreaves Street
 Bendigo VIC 3550

Bendigo Charleston Road
 62-104 Charleston Road
 Bendigo VIC 3550

Echuca
 Corner Hare and Darling Streets
 Echuca VIC 3564

Castlemaine
 Castlemaine campuses
 - 65 Templeton Street
 - Castlemaine Community and Learning Hub:
 142 Cornish Street
 - The Mill: 1/9 Walker Street

VETASSESS and eWorks

85 Cremorne Street
 Cremorne VIC 3121