

Modern Slavery Statement 2024

Chisholm Institute



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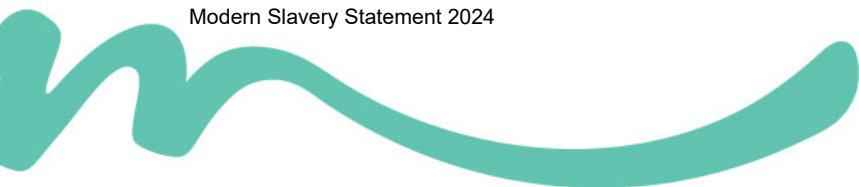
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Modern Slavery

'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.

The most vulnerable — women, children, and migrants — remain disproportionately affected. More than 12 million of all people in modern slavery are children, and women and girls account for over half of them (54 per cent). Migrant workers were three times more likely to be in forced labour than non-migrant workers¹

About this Statement

Chisholm's Modern Slavery Statement

reports the activities of Chisholm Institute for the calendar year ending 31 December 2024 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, 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 entity 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 28 May 2025.

Womin Djeka, 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 through providing quality teaching and learning opportunities.



¹ [Global findings | Walk Free](https://www.walkfree.org/global-slavery-index/findings/global-findings/Modern-Slavery-Statement-2024)
<https://www.walkfree.org/global-slavery-index/findings/global-findings/Modern-Slavery-Statement-2024>

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.

In 2024, more than 33,000 students studied at Chisholm, supported by a team of more than 1,600 dedicated staff. These students were enrolled in more than 250 courses across a broad range of study areas on campus, online, in the workplace and overseas.

At Chisholm, 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.

Equitable access for all is important to us, which is why we provide personalised support services to students, so they can successfully achieve their goals. 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, ability, religion and sexual orientation.

Our business and operation

We understand that education journeys can be as individual as each student. To cater to the diverse needs of our student population, we offer a broad range of qualifications, from short courses and certificates to diplomas, degrees and postgraduate studies.

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

Chisholm's 2025–2029 Strategic Plan sets an ambitious vision: Empowered local communities with global impact. This plan, developed through a comprehensive engagement process, reflects the voices and insights of more than 700 employees, as well as students, key industry, community, and government stakeholders.

It outlines Chisholm's strategic focus on achieving excellence in teaching and professional development, delivering meaningful outcomes for industry, improving environmental sustainability, and fostering a culture of collaboration within Chisholm and across the TAFE Network.



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 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

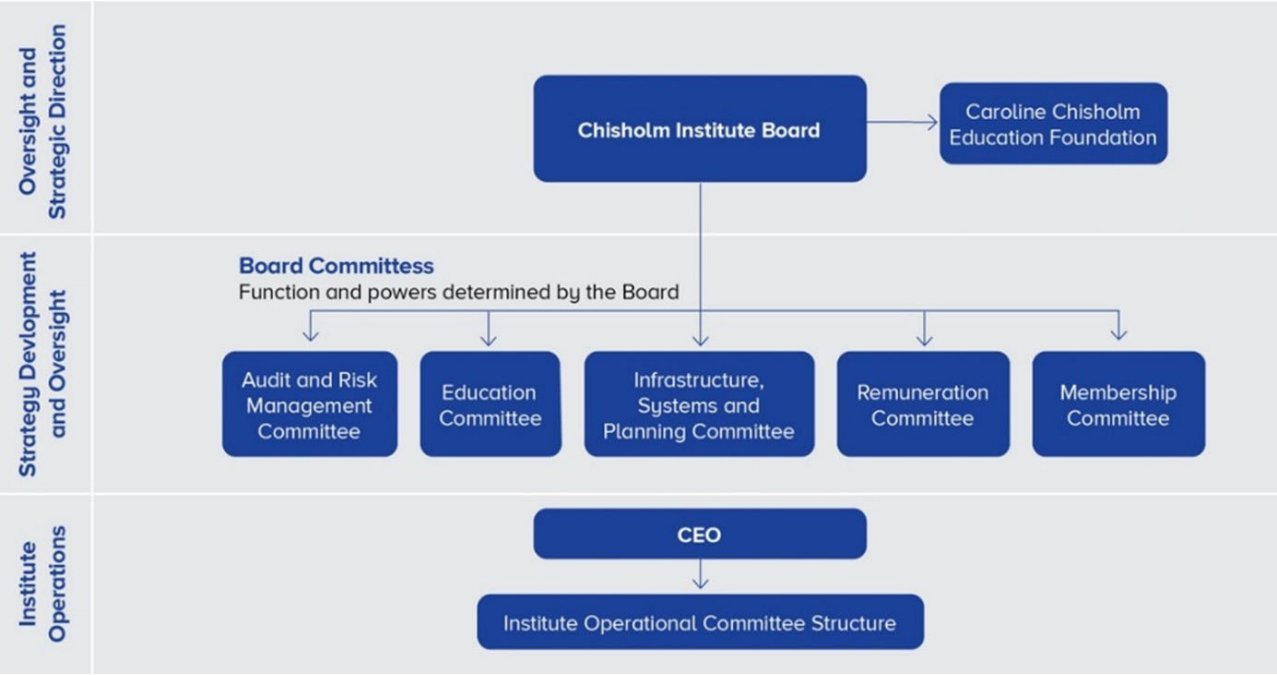
its objectives or performing its functions. However, the powers of Chisholm are subject to and must be exercised in accordance with the functions, duties and obligations conferred or imposed on the organisation by:

- > 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

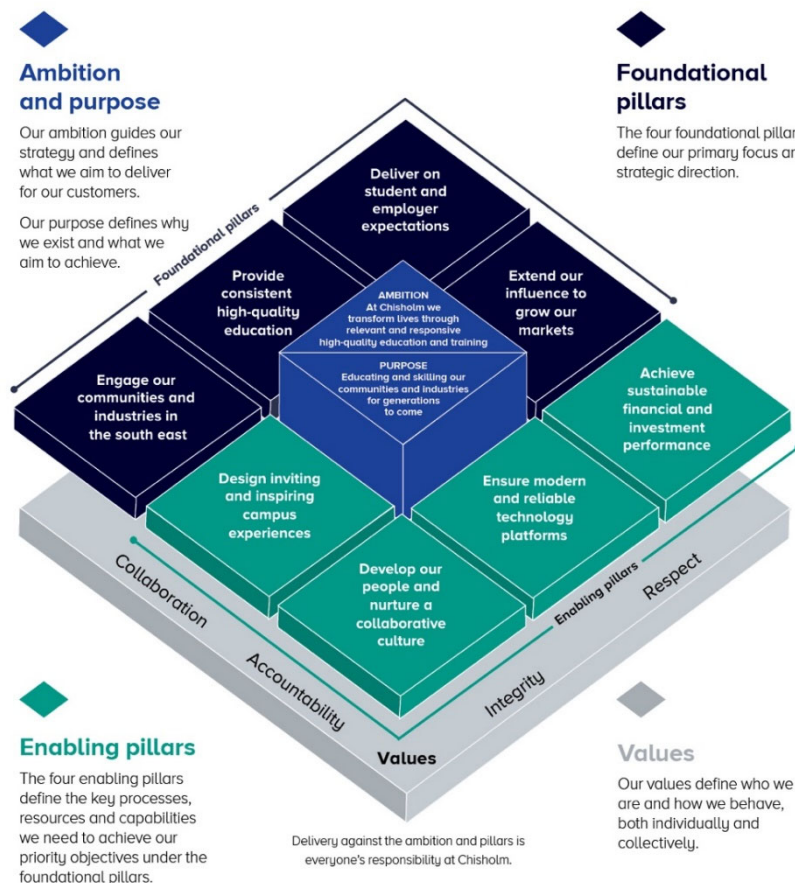
We respect our organisation, its people and its guiding principles in all our interactions.

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.



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 2024, Chisholm continued to focus on training staff and developing procurement champions throughout the institute. A focus was placed on continuing the developing of the procurement capabilities within the institute and maturing the procurement processes to ensure the best outcomes are achieved. Chisholm's governance structure ensures compliance with regulatory requirements and the systematic review of the procurement policies and contracts ensures that Chisholm's procurement practices are up to date and Chisholm's contract clauses mitigate risks that may arise.

Chisholm is an agency of the Victorian State Government and as such the 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.

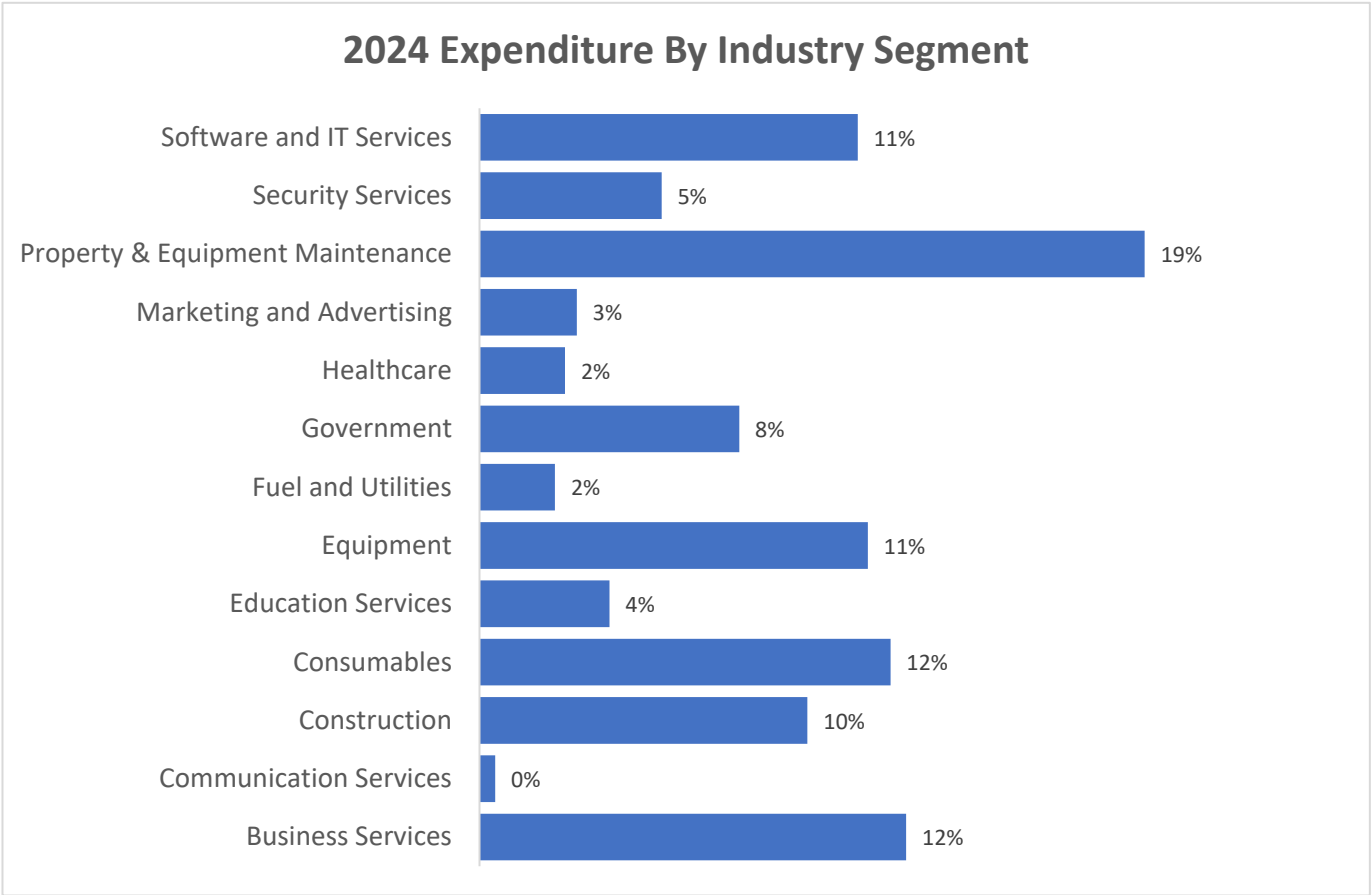
Chisholm's Procurement and Legal team have completed the Australian Border Force (ABF) e-Learning modules on Modern Slavery procurement, identification, and risks. The procurement and legal team at Chisholm guide staff through the procurement process and ensure suppliers meet the compliance criteria

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. Higher risk of modern slavery practices may occur as a result 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

The following Industry segments with the highest spend in 2024 include:

- Property & Equipment Maintenance (19%)
- Business Services (12%)
- Consumables (12%)
- Equipment (11%)
- Software and IT services (11%)



For the calendar year 2024

- > Roughly 988 Suppliers
- > Total Spend for Construction and Goods & services was over \$79 Million
- > Approached the market using a formal procurement tender process 19 times

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 continued to provide procurement training to staff to build the institute's capabilities, empowering staff to make the best decision when engaging new suppliers.

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:

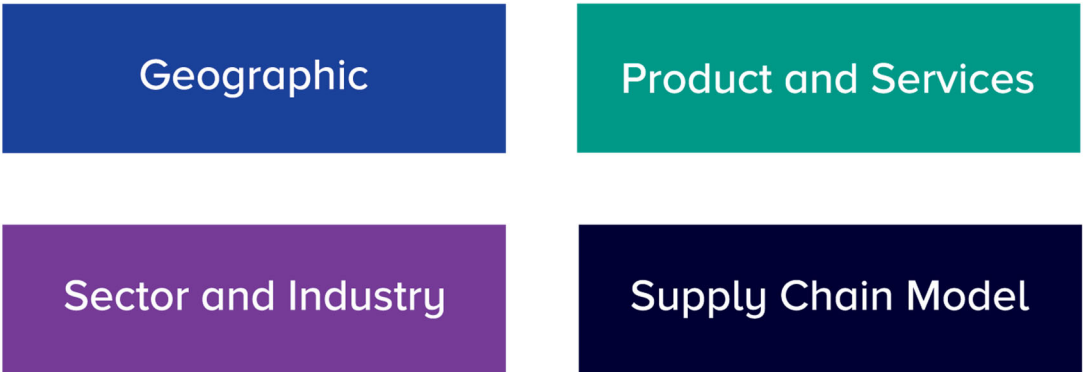
- > Supplier Code of Conduct
- > Supplier Engagement Plan
- > Employee Code of Conduct
- > Procurement Framework
- > Protected Disclosure (Whistle-blowers)
- > Workplace Health and Safety
- > People Plan (supporting diversity)
- > Flexible Work Policy - Professional and General Employees and Chisholm 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

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.



Country of origin risk

- Products and services made in or sourced from suppliers based in any of the following countries:
- > India, China, Pakistan, Bangladesh, North Korea, Thailand, Myanmar, Cambodia, or the Philippines
 - > Africa (in particular, Eritrea, Uganda, Kenya, Ethiopia, Sudan, Congo, Mauritania and Nigeria)
 - > Eastern Europe (Russia, Uzbekistan, Ukraine)
 - > Middle East / Northern Africa (Saudi Arabia, Turkiye, Iran, Iraq, Yemen, Syria, UAE, Afghanistan, Kuwait)
 - > South America (Venezuela, Mexico, Colombia, Peru)
 - > Pacific Islands (Fiji, PNG, Solomon Islands)

Category Risk

- 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 For more information see https://modernslaveryregister.gov.au/resources/Modern_Slavery_Toolkit_of_Resources.PDF and The Global Slavery Index (<https://www.globalslaveryindex.org/>) Modern Slavery Statement 2024

Engaging with our key suppliers on modern slavery risks

Chisholm requested suppliers identified as high-risk and suppliers with spend values of more than \$100,000 to complete a Modern Slavery Survey (based on Australian Government model slavery and trafficking supplier questionnaire³). This was requested to provide a deeper understanding of Chisholm supply chain and to identify any possible modern slavery risks by providing Chisholm with an overview of what actions key suppliers are taking to improve their own supply chains to reduce shared modern slavery risks

In 2024 there were no complaints regarding modern slavery against any of Chisholm's suppliers or with in their supply chain. Chisholm has seen the biggest increase in the number of suppliers providing modern slavery training for all of their staff. Chisholm has also seen an increase in the number of suppliers that are obliged to report on modern slavery. Suppliers have maintained a high to moderate visibility across their supply chain. 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

Of those suppliers where no formal policy is in place, some have reported that they do have general procurement processes in place to evaluate suppliers however we have seen a decrease in suppliers having a procurement process that specifically assesses the risk of modern slavery. We have seen that suppliers have maintained a heavy reliance on permanent staff and with very few engaging seasonal or low-skilled workers.

The survey has shown that suppliers have continued to invest in training their staff and develop their capabilities regarding identifying and addressing modern slavery concerns.



³ https://modernslaveryregister.gov.au/resources/Supplier_Questionnaire_-_Modern_Slavery_Procurement_Toolkit.docx
Modern Slavery Statement 2024

2024 Key Survey Results

| | |
|--|---|
| Where are the entity's operations (including sales offices and representative offices) located? | In which countries do your critical trade suppliers predominantly operate? |
| <ul style="list-style-type: none"> > 10% – North Asia > 10% – South East Asia > 10% – South Asia > 5% – Middle East > 5% – Africa > 5% – North America > 5% – South America > 10% – Western Europe & UK > 5% – Eastern Europe & Russia > 30% – Australia & NZ > 5% – Oceania (Other than Aus & NZ) | <ul style="list-style-type: none"> > 14% – South East Asia > 7% – South Asia > 7% – Middle East > 7% – North America > 14% – Western Europe & UK > 50% – Australia & 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? | 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? |
| <ul style="list-style-type: none"> > 100% – No | <ul style="list-style-type: none"> > 100% – No |
| Is the entity obliged to make or publish statements on the risks of modern slavery under modern slavery laws? | Do you monitor and assess your supply chain's compliance with modern slavery policies and procedures? If so, how often. |
| <ul style="list-style-type: none"> > 43% – Yes > 57% – No | <ul style="list-style-type: none"> > 42% – Never > 29% – At least once every two years > 29% – At least once a year |
| Does the entity have a written policy for workers that covers modern slavery? | How much visibility does the entity have over your supply chain? |
| <ul style="list-style-type: none"> > 57% Yes > 43% No | <ul style="list-style-type: none"> > 43% – High > 43% – Moderate > 14% – Developing |
| Does the entity provide training for its workers on modern slavery? | Does the entity have a person or team responsible for overseeing modern slavery risks that arise in the goods or services you deliver? |
| <ul style="list-style-type: none"> > 57% Yes > 43% No | <ul style="list-style-type: none"> > 57% – Yes > 43% – No |
| Approximately what percentage of the entity's workers receive training on modern slavery? | What percentage of workers of the entity are low-skilled seasonal, migrant or expatriate workers? |
| <ul style="list-style-type: none"> > 57% – All > 43% – None | <ul style="list-style-type: none"> > 15% – Up to 25% > 85% – None |
| What percentage of workers of the entity are on permanent or long-term employment contracts? | What percentage of workers of the entity are contracted via labour hire agencies? |
| <ul style="list-style-type: none"> > 15% – All > 85% – 75% or more but not all | <ul style="list-style-type: none"> > 28% – Up to 25% > 72% – None |
| Does the entity provide long-term housing or accommodation for any workers including contractors? | Does the entity have a tender, procurement and/or onboarding process that specifically assesses risk of modern slavery practices in suppliers? |
| <ul style="list-style-type: none"> > 100% – No | <ul style="list-style-type: none"> > 28% – Yes > 72% – 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 28 May 2025. 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 Gillian Miles, Board Chair, to sign this Statement.



Gillian Miles
Board Chair
Chisholm Institute

28 May 2025

