

Chisholm

chisholm.edu.au

On campus | Online
Workplace | International

Modern Slavery Statement 2022



Table of Contents

- Modern Slavery 2
- About this Statement 2
- Womin Djeka, welcome to Chisholm 2
- About Chisholm 3
- Our business and operation 3
- Chisholm’s structure, operations and supply chains 4
 - Powers and structure 4
 - Governance framework..... 4
- Our vision, purpose and values 5
 - Our values 5
 - Our ambition 5
 - Our purpose 5
- Our approach to modern slavery risks 6
- Procurement strategy 6
- Industry and labour markets we operate in 7
- How we identify, assess, and address modern slavery 8
- Assess modern slavery risks in our supply chains 9
- Key Survey Results 10
- Engaging with our key suppliers on modern slavery risks 11
- Modern slavery risk with people and human rights 11
- Consultation with controlled entities 12
- Board approval 12



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 2022 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) 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 31st May 2023.

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

About Chisholm

We are a Victorian Government-owned TAFE provider established under the *Education and Training Reform Act 2006*. The responsible Minister is the Hon. Gayle Tierney MP, Minister for Training and Skills and Higher Education.

In 2022, we employed more than 1200 people and enrolled almost 36,000 students across our campus locations at Dandenong, Frankston, Berwick, Cranbourne, Mornington Peninsula and Bass Coast, and through Chisholm Online, workplace training and offshore delivery.

We are driven by our purpose to educate and skill our communities and industries for generations to come and deliver a range of qualifications – including certificates, diplomas, degrees and postgraduate study.

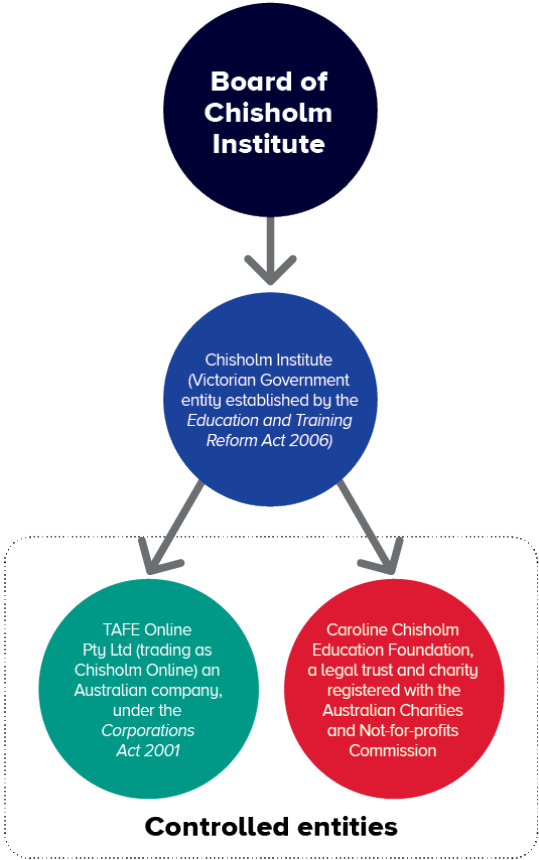
For more information about Chisholm, please see our Annual Report for 2022 published on our website at chisholm.edu.au.

Our business and operation

At Chisholm, we transform lives through relevant and responsive quality education and training across Victoria, nationally and internationally, collaborating with our strategic partners.

We offer more than 300 courses that have been designed to be accessible, flexible and relevant for students, employers, industry and our community, and place people at the centre of everything we do.

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 is accountable to The Hon. Gayle Tierney MP, Minister for Training and Skills and Higher Education.

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

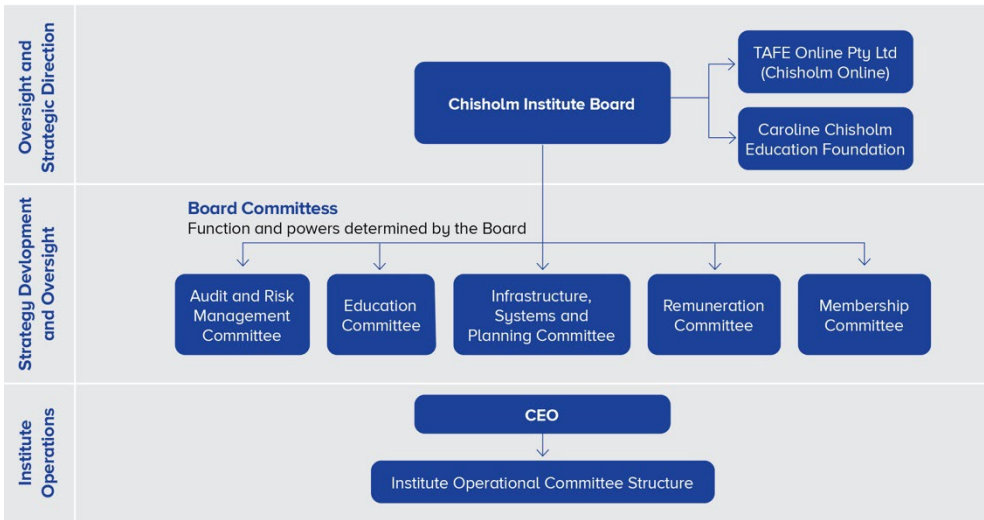
its objectives or performing its functions. However, the powers of Chisholm are subject to and must be exercised in accordance with the functions, duties and obligations conferred or imposed on the organisation by:

- > 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

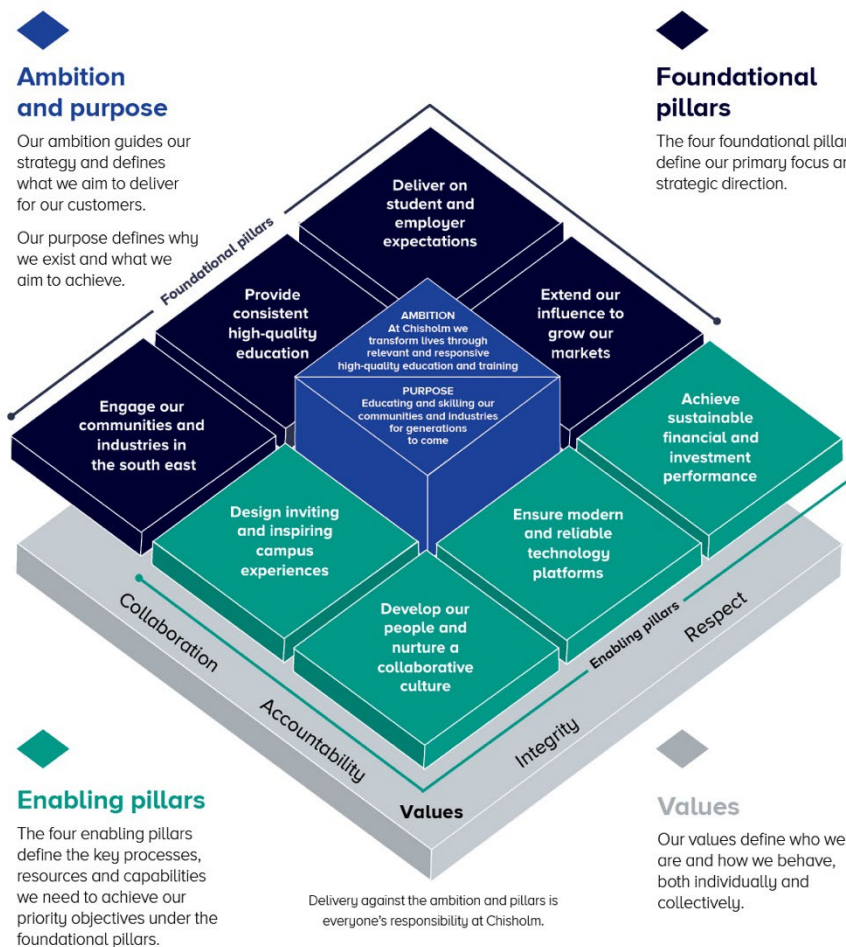
We respect our organisation, its people and its guiding principles in all our interactions.

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

During 2022, Chisholm had a strong focus on maturing and developing our procurement process. 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 guides staff through the procurement process and ensure suppliers meet the compliance criteria. Chisholm plans on implementing formal procurement training for staff throughout 2023, the training will include a modern slavery module.

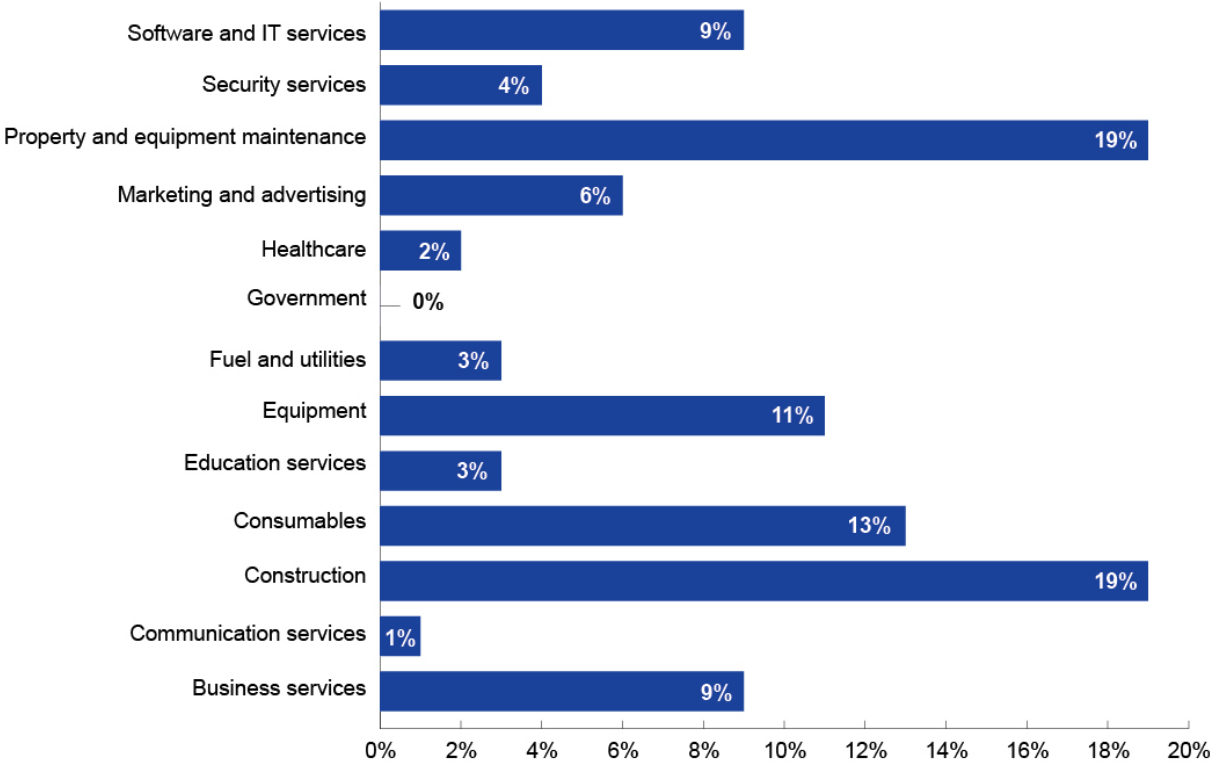
Industry and labour markets we operate in

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.

Industry segments that we purchased goods and services from in 2022 include:

- > Construction Services (19%)
- > Property and Equipment Maintenance Services (19%)
- > Consumables (13%)
- > Equipment (11%)
- > Business Services (9%).

2022 Expenditure by Industry Segment



For the calendar year 2022

- > More than 1,000 Suppliers
- > Approached the market using a formal procurement tender process 15 times
- > Total Spend for Construction and Goods and services was over \$63 Million.

How we identify, assess, and address modern slavery

Over this reporting period, we have made significant progress in implementing policies and actions to assist in addressing modern slavery risks. Chisholm has taken 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;
- > Implemented a questionnaire via a third party and adopted a systemised method 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;
- > Refreshed its procurement policies and procedures to incorporate ongoing risk assessments and due diligence steps. Chisholm systematically screens suppliers prior to engaging and identifies 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;
- > Sought additional information and set expectations with suppliers throughout tender processes, from evaluation through to contract management;
- > Formed an ongoing cross-functional working group with other Victorian TAFEs to look at further ways Chisholm can meaningfully contribute to addressing and eliminating modern slavery practices in its supply chain and operations; and
- > In 2023 Chisholm will be rolling out formal procurement training to staff, which will include a modern slavery module.

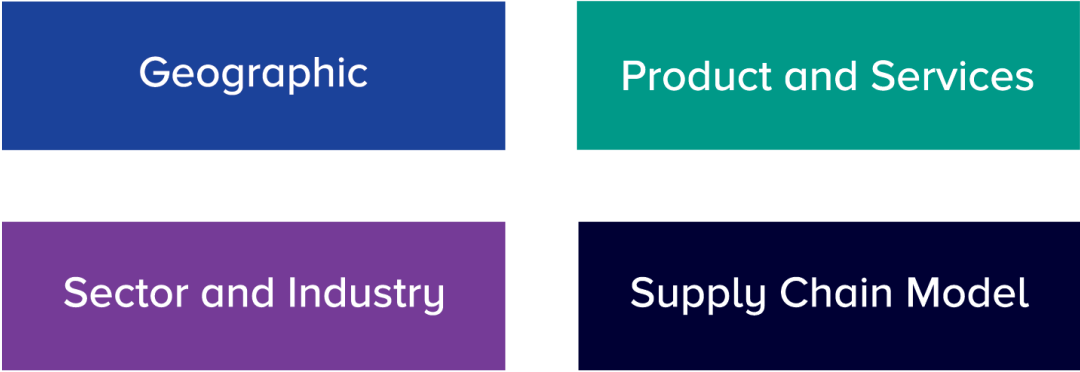


Assess modern slavery risks in our supply chains

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	Category Risk
Products and services made in or sourced from suppliers based in any of the following countries:	Electronic goods such as laptops, computers, and mobile phones
> India, China, Pakistan, Bangladesh, North Korea, Thailand, Myanmar, Cambodia, or the Philippines	Clothing and garments
> Africa (in particular, Uganda, Kenya, Ethiopia, Sudan, Congo, and Nigeria)	Cleaning and building services
> Eastern Europe (Russia, Uzbekistan, Ukraine)	Hospitality and food services
> Middle East / Northern Africa (Egypt, Iran, Iraq, Yemen, Syria, Morocco)	Building materials such as bricks, timber, carpets
> South America (Venezuela, Mexico, Colombia, Peru)	Outsourced IT such as support desks and managed services
> Pacific Islands (Fiji, PNG, Solomon Islands)	

² For more information see https://modernslaveryregister.gov.au/resources/Modern_Slavery_Toolkit_of_Resources.PDF and The Global Slavery Index 2018 (<https://www.globalslaveryindex.org/>)

Key Survey Results

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

- > 3% – North America
- > 3% – Western Europe & UK
- > 93% – Australia and NZ

In which countries do your critical trade suppliers predominantly operate?

- > 5% – North Asia
- > 5% – South Asia
- > 5% – North America
- > 8% – West Europe
- > 10% – South East Asia
- > 67% – Australia and 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? Please briefly describe these reports and concerns and when they occurred.

- > 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? Please briefly describe these reports and concerns and when they occur.

- > 100% – No

Is the entity obliged to make or publish statements on the risks of modern slavery under modern slavery laws? If yes, please attach a copy for the last reporting period.

- > 18% – Yes
- > 82% – No

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

- > 50% – Never
- > 29% – at least once every two years
- > 21% – at least once a year

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

- > 52% – Yes
- > 48% – No

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

- > 36% – High
- > 36% Moderate
- > 29% – Developing

Does the entity provide training for its workers on modern slavery?

- > 43% – Yes
- > 57% – No

Does the entity have a person or team responsible for overseeing modern slavery risks that arise in the goods or services you deliver?

- > 64% – Yes
- > 36% – No

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

- > 36% – All
- > 11% – 75% or more but not all
- > 7% – up to 25%
- > 46% – None

Does the entity provide long-term housing or accommodation for any workers including contractors (excluding rental as part of a salary package)?

- > 100% – No

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

- > 43% – All
- > 46% – 75% or more but not all
- > 4% – Between 50% and 75%
- > 7% – between 25% and 50%

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

- > 11% – Up to 25%
- > 89% – None

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

- > 14% – up to 25%
 - > 86% – None
-

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 that most of our key suppliers primarily operate in Australia and New Zealand. In 2022 there were no complaints regarding modern slavery in any of our suppliers or their supply chain. Our suppliers consider they have high-moderate visibility across their supply chain. Almost 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, most 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 are developing an understanding of their own supply chain while also building their staff capability in regard to addressing modern slavery concerns.

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

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

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 31st May 2023. 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

31st May 2023

Chisholm

2797_0523 CRICOS No 00881F RTO No 0260 TEQSA PRV12123.
Training to eligible students is delivered with Victorian and Commonwealth Government funding.