



# MODERN SLAVERY STATEMENT

---

1 JULY 2024 - 30 JUNE 2025



An aerial photograph of a long, white sandy beach curving along a coastline. The water is a vibrant turquoise color, with white foam from waves washing onto the shore. A single person is walking on the beach, providing a sense of scale. The background shows a dense line of green vegetation along the coast.

**TAFE NSW acknowledges Aboriginal and Torres Strait Islander Peoples as the Traditional Custodians of the Land, Rivers and Sea. We acknowledge and pay our respects to the Elders; past, present and emerging of all Nations.**

Hyams Beach, Wandj Wandian Country,  
South Coast, NSW: traditional lands of the Jerrinja people.

# CONTENTS

<b>Introduction</b>	<b>4</b>
About TAFE NSW	4
Message from the Managing Director	5
Our Operations	6
Our Suppliers	6
TAFE NSW Supply Chain	7
Modern Slavery Factors	10
<b>Plan on a page</b>	<b>11</b>
Our Priorities, Objectives and Actions	11
<b>Initiatives</b>	<b>12</b>
<b>Summary</b>	<b>14</b>

## Address

TAFE NSW Procurement  
[ProcurementServices@tafensw.edu.au](mailto:ProcurementServices@tafensw.edu.au)  
Building A, Mary Ann Street,  
Ultimo NSW 2007



## INTRODUCTION

The New South Wales Technical and Further Education Commission (TAFE NSW) has developed this Modern Slavery Statement (Statement) in line with the Modern Slavery Act 2018 (NSW), Modern Slavery Act 2018 (Commonwealth), and the Office of the NSW Anti-Slavery Commissioner's inaugural Working together for real freedom - NSW Anti-slavery Commissioner's Strategic Plan 2023–2026.

The Statement outlines the actions TAFE NSW has taken to identify and address modern slavery risks in the organisation's operations and supply chain during the reporting period 1 July 2024 to 30 June 2025, and the future steps proposed to strengthen our approach.

TAFE NSW operates as a single service group. While it controls other entities, these entities do not have separate operations, procurement functions, or generate independent revenue. Consultation for the development of this modern slavery statement occurred through centralised management.

## ABOUT TAFE NSW

TAFE NSW is Australia's largest provider of Vocational Education and Training (VET) and was established as a statutory agency by the *Technical and Further Education Commission Act 1990* (NSW). With over 404,000 annual student enrolments, over 11,000 employees, and operating across 154 operational campuses, we aim to provide high-quality VET to build prosperity, sustainability, and innovation throughout NSW. We are passionate about developing our learners' skills and supporting them to achieve a successful future, which in turn will contribute to a strong and viable economy.

The supply chain at TAFE NSW is varied, diverse, and complex, delivering hundreds of courses across the State. TAFE NSW spends over \$560 million each year with more than 2,000 suppliers located within Australia and overseas. It is important that TAFE NSW supports its teachers and learners by supplying ethical, sustainable and value-for-money goods and services.



## MESSAGE FROM THE MANAGING DIRECTOR

At TAFE NSW we remain deeply committed to addressing modern slavery as a serious human rights issue that continues to affect millions of people around the world. We are dedicated to upholding human rights and promoting ethical business practices in all aspects of our operations, including our buying and contract management. We recognise the devastating impact of modern slavery on individuals, communities, and society, and are working towards preventing any form of slavery, forced labour, human trafficking, or exploitation in our supply chain.

This year, we have concentrated our efforts on the areas that pose the greatest risk to people, maximising the impact of our actions. In line with this approach, we have made steady progress against our initiatives to combat modern slavery within our supply chain. Key actions include:

- **Procurement artefacts:** We have updated our procurement planning templates to strengthen the assessment of modern slavery risks. Buyers are required to consult the Inherent Risk Identification Tool (IRIT) and incorporate the relevant procurement category risk rating into their assessments.
- **Supply chain analysis:** We are progressively partnering with suppliers to address and manage modern slavery risks, particularly in categories of spend that are classified as high-risk.
- **New whole-of-government (WoG) cleaning contract model:** TAFE NSW has committed to participating in the reform of cleaning services, consisting of insourcing and outsourcing reform models. One of the key drivers is to reduce modern slavery risks and improve better working conditions for cleaners.
- **Training and awareness:** We have continued to deliver a range of training and information sessions to our employees, including targeted training to buyers who purchase from high-risk categories such as ICT and Facilities Management.
- **Newsletters to buyers:** We regularly feature updates on modern slavery initiatives and promote training sessions and resources in our quarterly Procurement newsletter, circulated to ~4,000

buyers and financial delegates.

- **Response to Anti-Slavery reporting requirements:** We have cooperated with the Office of the Anti-Slavery Commissioner to respond to requests for information and specific approaches to emerging high-risk categories, such as electronic vehicles (EV) and EV infrastructure purchases.
- **Collaboration:** We are actively leveraging our strategic relationships with the NSW Government and industry experts to foster meaningful collaboration in addressing modern slavery. In parallel, we are working closely with internal teams, such as Procurement, Legal and Systems Group (ICT) to embed modern slavery considerations into core policies and decision-making processes. This whole-of-organisation approach ensures that ethical and sustainable practices are not only encouraged but systematically integrated across TAFE NSW.

Over the past year, TAFE NSW has made a number of advancements in implementing the NSW Anti-Slavery Commissioner's recommended actions to address modern slavery risks across our supply chain and procurement operations. While we acknowledge that this journey is ongoing, we are proud of the meaningful progress we've made in embedding ethical, transparent, and sustainable practices.

Looking ahead, we remain committed to building on the strong foundations we've laid and continue to lead by example. We look forward to sharing further progress in 2026 as we work towards a future free from exploitation.

I approve this statement in my capacity as representative of the principal governing body of TAFE NSW and sole Managing Director of TAFE NSW.



Chloe Read  
Managing Director, TAFE NSW  
30 October 2025

## OUR OPERATIONS

TAFE NSW spends over \$560 million per year across the following three portfolios:

- Corporate Goods and Services
- Information, Communication, Technology; and
- Property and Infrastructure Services.

At TAFE NSW, the procurement function is centralised under a team of accredited and skilled professionals who handle engagements exceeding \$250,000. For engagements below this threshold, business stakeholders have responsibility, backed by the support of the Procurement team's resources, processes, and technology. The TAFE NSW Procurement Framework is comprehensive and consists of the following key documents to drive buyer behaviour and decision-making:

- TAFE NSW Procurement Policy
- Procurement Planning Procedure
- Procurement Sourcing Procedure
- Contract Management Procedure
- Simple Procurement less than \$250,000 Procedure
- TAFE NSW Code of Conduct
- TAFE NSW Delegation Manual
- Statement of Business Ethics

TAFE NSW has achieved the highest level of competency accreditation for Goods and Services and Construction Procurement from the NSW Procurement Board. This formal recognition confirms that TAFE NSW possesses the required capability and capacity to deliver value-for-money, efficiency, and effectiveness in government procurement, ensuring excellent service delivery. The procurement function at TAFE NSW complies with the [NSW Government Procurement Policy Framework](#) and is committed to meeting the goals and objectives that underpin effective procurement in NSW.

## OUR SUPPLIERS

Due to the range of courses we deliver, our significant geographic footprint, and high spend across our three procurement portfolios, we engaged a total of 2,072 registered suppliers that were spread across 23 countries.

Of the suppliers engaged by TAFE NSW in the past 12 months:

- 96.62% are based in Australia
  - While Australia is considered a low-risk location, there remains a prevalence of modern slavery across high-risk categories.
- 3.38% are based in countries outside of Australia
  - 0.10% are high-risk locations
  - 2.32% are moderate-risk locations
  - 0.97% are low-risk locations

Most goods and services purchased on behalf of TAFE NSW originate from low-risk geographical locations such as Australia, the United States of America, and Great Britain. A small portion of suppliers are based in overseas countries such as China, Vietnam, Brazil, and India. These international suppliers are primarily involved in assisting TAFE NSW with the recruitment of international students who come to Australia to learn at TAFE NSW.

---

“TAFE NSW is uniquely positioned to lead by example in making ethical choices that reflect our core values. We are committed to building capability across our organisation and strengthening our supply chain by taking accountability and proactively assessing modern slavery risks in our procurement activities.”

**Director, Procurement Capability and Governance**

## TAFE NSW SUPPLY CHAIN

TAFE NSW has thoroughly examined the goods and services purchased within each portfolio and pinpointed specific categories that pose a high risk of modern slavery practices. To effectively mitigate these risks, we concentrate our efforts on these areas by raising awareness, fostering collaboration, and implementing rigorous due diligence measures.

Approximately half of TAFE NSW suppliers fall under 10 distinct procurement categories, with facilities and building maintenance, construction, and ICT being the most significant, accounting for 70 percent of the total spend.

The map below highlights where TAFE NSW suppliers are based.

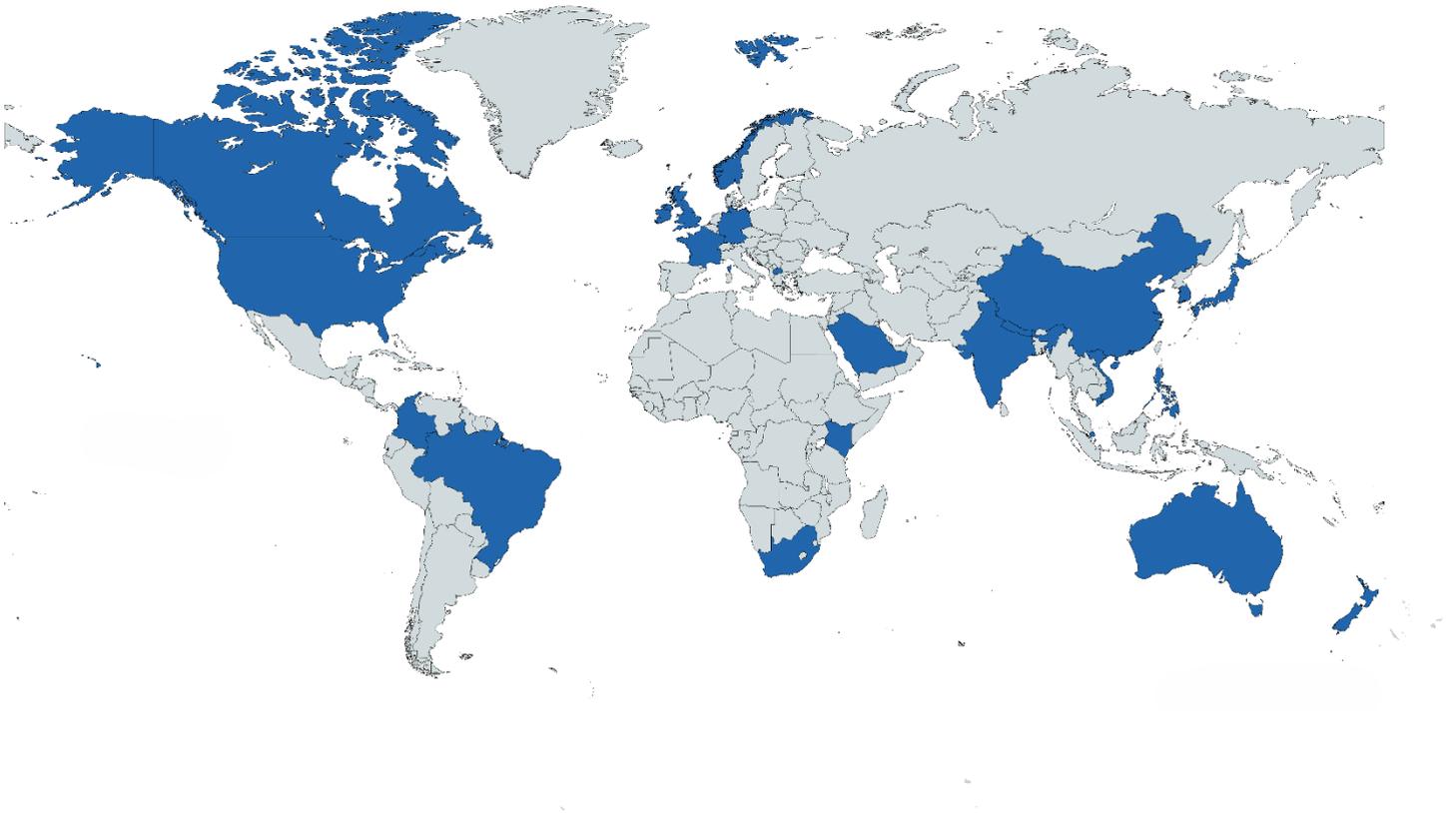


Figure 1 - Geographical locations of TAFE NSW suppliers

## TAFE NSW SUPPLY CHAIN

TAFE NSW has established partnerships with suppliers for frequently purchased goods and services, and incorporated model contract clauses to combat modern slavery. Additionally, ad hoc engagements that occur with suppliers for low-value and low-risk needs are subject to the TAFE NSW Purchase Order terms and conditions, which include modern slavery clauses.

This chart provides an overview of the annual spend per category.



Figure 2 - 2024/2025 spend with suppliers per category

### Top 10 procurement categories by spend FY25

Building Construction
Cleaning
Contingent Labour
Educational Resources
End-user Computing and Peripherals
ICT Professional Services - excluding Managed and Maintenance Services
ICT Software
Infrastructure Professional Services
Specialty Building Maintenance and Repairs
Utilities

TAFE NSW conducts modern slavery due diligence as part of its procurement and contract management activities, particularly within the high-risk procurement categories. This due diligence is aligned to the Office of the Anti-Slavery Commissioner (OASC) Guidance on Reasonable Steps (GRS) and includes analysis of high-risk categories, training and awareness, and embeds modern slavery risk management into our procurement framework. The table below categorises the types of goods and services we purchase in each of the portfolios, and details areas that typically have a higher probability of modern slavery occurring.

Portfolio	Categories	High modern slavery impact areas
<b>Corporate Goods &amp; Services</b>	<ul style="list-style-type: none"> <li>• Course delivery resources</li> <li>• Travel</li> <li>• Fleet services</li> <li>• Marketing</li> <li>• Recruitment</li> </ul>	<ul style="list-style-type: none"> <li>• Office consumables and promotional merchandise</li> <li>• Garments</li> <li>• Call centre services and business process outsourcing</li> <li>• Hospitality and catering services and consumables</li> <li>• Recruitment and contractor services</li> </ul>
<b>Information &amp; Communication Technology</b>	<ul style="list-style-type: none"> <li>• Technology and data</li> <li>• Telecommunications</li> </ul>	<ul style="list-style-type: none"> <li>• Software and cloud services</li> <li>• Desktop and Audio-Visual Hardware (computers, projectors, smart screens, phones)</li> <li>• ICT Professional services</li> <li>• WAN, LAN and Mobile hardware</li> <li>• Artificial intelligence products</li> </ul>
<b>Property &amp; Construction</b>	<ul style="list-style-type: none"> <li>• Construction</li> <li>• Facilities maintenance</li> </ul>	<ul style="list-style-type: none"> <li>• Construction services and supplies</li> <li>• Landscaping and maintenance requirements, utilities, contractors</li> <li>• Cleaning and waste management services</li> <li>• Furniture</li> <li>• Security services</li> </ul>

Figure 3 - TAFE NSW Categories with a high risk of modern slavery

---

“I used to focus mainly on price and delivery timelines. Now, I ask questions like ‘where does this product come from? Who made it? Under what conditions? I am considering human rights as being part of every buying decision I make.”

**TAFE NSW Buyer**

---

## MODERN SLAVERY FACTORS

Having carefully considered the various factors contributing to modern slavery, TAFE NSW has identified those more likely to be prevalent within our supply chain. We have prioritised our focus on these areas of concern by evaluating the perceived risk to people and considering their vulnerability.

To combat modern slavery effectively, we are enhancing awareness, fostering collaboration, and implementing appropriate due diligence practices. By taking these measures, we are committed to building a modern slavery-free supply chain that upholds ethical standards and safeguarding human rights.

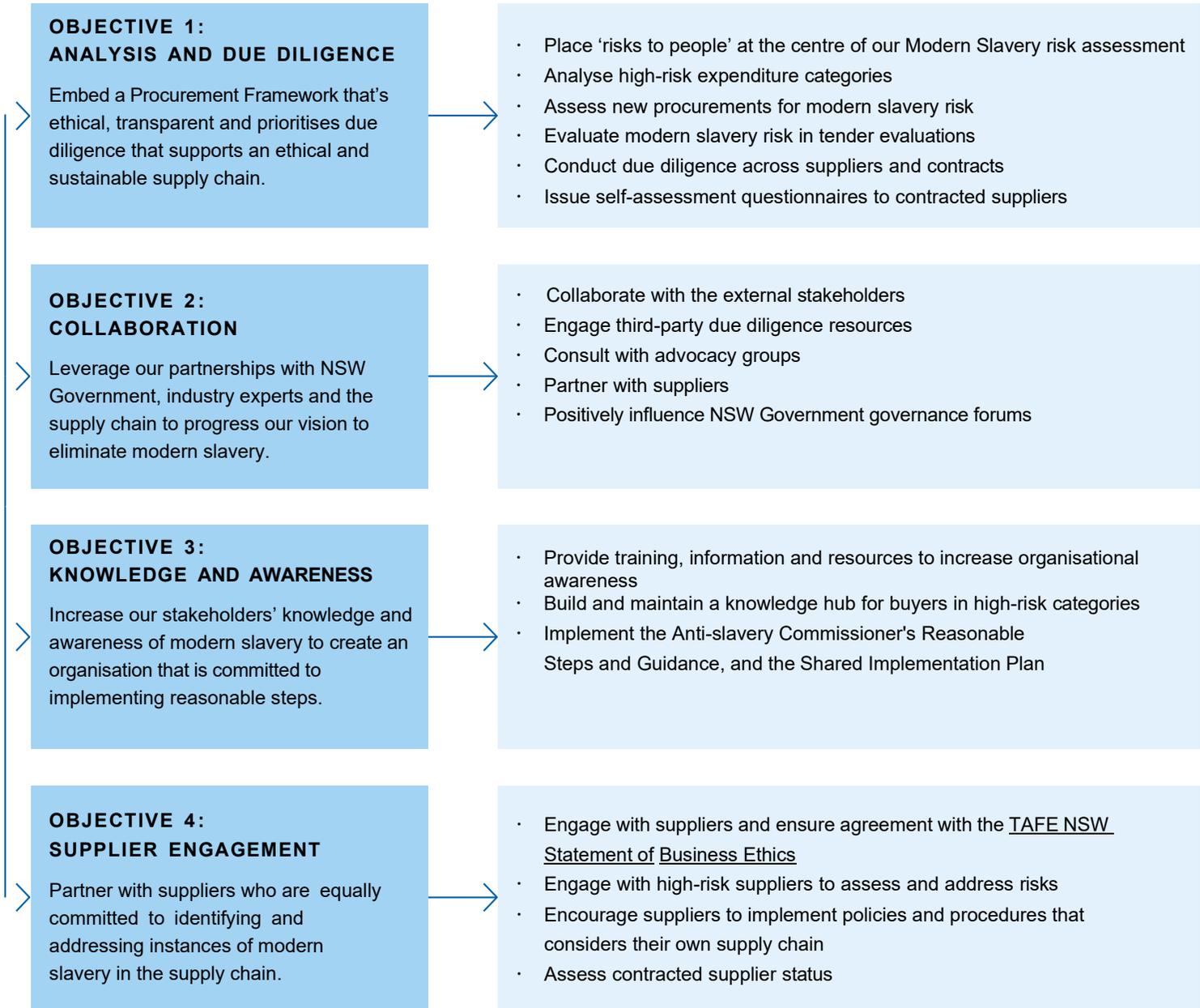
**Recruitment:** Recruitment practices carry inherent risks of modern slavery, including exploitative actions such as recruiters charging high fees, withholding workers' passports, and using false promises to trap vulnerable workers. A vulnerability exists where TAFE NSW works with international agents who oversee engagement with international students. TAFE NSW is ensuring that internal stakeholders involved in the procurement of international agents are trained to be aware of the potential high risks of modern slavery prevalent when they engage with these overseas suppliers.

- **Migrant Workers:** Migrant workers brought into a country without proper documentation, limited language skills, and those who are isolated from their families and communities are at greater risk of being exploited. A vulnerability exists in high-risk categories such as construction, cleaning and security where many employees are migrants. In these industry sectors, workers may face unstable job conditions, inadequate pay, excessive workloads and lack of job security, making them susceptible to modern slavery. TAFE NSW is working side by side with the Department of Education to transition to a new WoG hybrid inhouse and outsource cleaning contract model to enhance working conditions, wages, and workforce stability. This aims to ensure fair treatment and attract skilled workers, reduce exploitation, and alleviate the risk of cleaners being subjected to modern slavery.
- **Subcontracting:** Subcontracting within the supply chain can also introduce risks with delayed payment to workers, leading to financial hardships. TAFE NSW is working to minimise subcontracting across major facility maintenance contracts, such as cleaning and security, and we comply with the *Building and Construction Industry Security of Payment Act 1999 (NSW)* to ensure prompt cash

flow to subcontractors.

- **Lack of transparency:** Immature, weak or non-existent company due diligence processes can contribute to obscuring supply chain transparency, making it challenging to identify and address modern slavery risks. However, at TAFE NSW, modern slavery is assessed during the planning, sourcing and management phases of all significant procurements valued at more than \$250,000.
- **Minimal Action:** A lack of education, awareness, and capability can negatively impact on an organisation and an individual's ability to be accountable and effectively address modern slavery. TAFE NSW is committed to increasing awareness of modern slavery through various initiatives, including collaboration with suppliers, as well as education and training for our staff. In FY25 an additional 80 staff attended modern slavery awareness training sessions, and on-demand training resources were made available to all staff via our Intranet and circulated to approximately 4,000 buyers
- **Discrimination:** Discrimination based on race, gender, or other factors can create conditions that make individuals more vulnerable to exploitation. The TAFE NSW Code of Conduct provides a framework for all employees to use when facing legal and/or ethical questions about what is and isn't discrimination in the workplace. Supplier expectations are also outlined in the TAFE NSW Statement of Business Ethics, including the need to maintain a sustainable and ethical supply chain that is free of slavery and exploitation.

**MODERN SLAVERY VISION**  
 We will proactively identify and eliminate modern slavery in our supply chain and procurement operations.



## INITIATIVES

The initiatives listed below have been established for implementation and ongoing progression. These initiatives will guide TAFE NSW to achieve its vision of eliminating modern slavery.

#	Focus Area	Key Initiative	Framework area	Activities	Responsible Officer	Status
1	<b>Analysis and Due Diligence</b>	Analyse high-risk expenditure categories	<b>Data analysis</b>	Analyse high-risk expenditure categories to determine if the risk profile suggests they are vulnerable to modern slavery, including a centralised review of property and construction procurements.	Director of Procurement Capability & Governance	Ongoing
2	<b>Analysis and Due Diligence</b>	Assess new procurement activities for modern slavery risk	<b>Sourcing</b>	During the planning stage, assess new procurement activities for modern slavery risk and include strengthened steps for buyers across the plan, source, and manage stages.	Directors, Procurement	Ongoing
3	<b>Analysis and Due Diligence</b>	Conduct due diligence at a Vendor Master level	<b>Supplier management</b>	Conduct due diligence at a Vendor Master level using the Identification Risk Identification toolkit (IRIT) and engage with third-party due diligence analytical firms to provide an independent risk review of our suppliers in the cleaning industry.	Director of Procurement Capability & Governance	Completed FY25
4	<b>Analysis and Due Diligence</b>	Develop and issue self-assessment questionnaire to contract suppliers	<b>Contract management</b>	Develop a self-assessment questionnaire with a core set of questions covering a combination of risk identification factors and mitigation systems. Issue the questionnaire to a pilot group of contracted suppliers to monitor progress in managing modern slavery risks through regular contract performance meetings.	Director of Procurement Capability & Governance	Ongoing
5	<b>Analysis and Due Diligence</b>	Evaluate suppliers involved in new sourcing activities	<b>Sourcing</b>	During the source stage, evaluate suppliers involved in new sourcing activities to determine if they have the governance, stakeholder engagement, risk identification and management, monitoring, and remedies to control modern slavery risks.	Directors, Procurement	Ongoing
6	<b>Analysis and Due Diligence</b>	Incorporate modern slavery into the Enterprise Risk Register	<b>Policy</b>	Add modern slavery risk to the Enterprise Risk Register in ServiceNow at the organisational level.	Director of Procurement Capability & Governance	Completed FY25
7	<b>Analysis and Due Diligence</b>	Update the sourcing library with the recommended questions	<b>Sourcing</b>	Update template sourcing documentation with the Guidance on Reasonable Steps (GRS) Model Tender Clauses (heightened version for high-risk and streamlined version for low/moderate risk procurement contexts).	Director of Procurement Capability & Governance	Completed FY25

## INITIATIVES

#	Focus Area	Key Initiative	Framework area	Activities	Responsible Officer	Status
8	<b>Analysis and Due Diligence</b>	Update contracts to include new and recommended modern slavery clauses	<b>Sourcing</b>	Update standard contract templates to include the GRS Model Contract Clauses (heightened version for high-risk and streamlined version for low/moderate risk procurement contexts).	Director of Procurement Capability & Governance	Completed FY25
9	<b>Analysis and Due Diligence</b>	Conduct feedback and review for TAFE NSW performance 360 degree	<b>Capability</b>	Complete an annual TAFE NSW modern slavery performance review. Learnings to be reflected through improvements to the Policy and Risk Management Plan.	Director of Procurement Capability & Governance	Ongoing
10	<b>Enhance Collaboration</b>	Engage third-party due diligence suppliers and resources	<b>Due diligence</b>	Engage third-party diligence suppliers and resources to assist supplier review when warranted by risk assessment, including the use of AI tools.	Director of Procurement Capability & Governance	Ongoing
11	<b>Enhance Collaboration</b>	Consult with advocacy groups and collaborate with external stakeholders	<b>Networking</b>	Consult with advocacy groups as nominated by the Office of the Anti-Slavery Commissioner (OASC) and continue to collaborate with external stakeholders (e.g. OASC, NSW Treasury, and the Chartered Institute of Purchasing and Supply).	Director of Procurement Capability & Governance	Ongoing
12	<b>Enhance Collaboration</b>	Engage with broader TAFE NSW business areas to act responsibly	<b>Networking</b>	Establish a grievance mechanism for modern slavery.	Deputy Chief Operating Officer	FY26 Q2
13	<b>Build capability and awareness</b>	Provide refresher training and raise awareness among staff	<b>Capability</b>	Raise awareness, provide refresher training, and include modern slavery awareness in the suite of mandatory staff training.	Director of Procurement Capability & Governance	Ongoing
14	<b>Build capability and awareness</b>	Build a knowledge hub for buyers in high-risk categories.	<b>Capability</b>	Build a knowledge hub for buyers in high-risk categories under a dedicated MS Teams' channel.	Director of Procurement Capability & Governance	Ongoing
15	<b>Build capability and awareness</b>	Implement the Anti-slavery Commissioner's Guidelines	<b>Policy</b>	Implement the Anti-slavery Commissioner's Guidelines.	Director of Procurement Capability & Governance	Ongoing
16	<b>Engage and partner with suppliers</b>	Update Statement of Business Ethics	<b>Policy</b>	Update the TAFE NSW Statement of Business Ethics to include a revised statement aligned to the NSW Government Suppliers' Code of Conduct.	Director of Procurement Capability & Governance	Completed FY25
17	<b>Engage and partner with suppliers</b>	Engage suppliers to raise awareness and encourage the implementation of policies and procedures	<b>Contract management</b>	Engage with suppliers who provide products or services deemed high-risk to raise awareness and manage ongoing modern slavery risk. Apply targeted engagement and contract management to encourage suppliers to implement policies and procedures.	Director of Procurement Capability & Governance	Ongoing
19	<b>Analysis and Due Diligence</b>	Government Reforms	<b>Sourcing</b>	Implement government reforms due for release in FY26. Apply selection criteria for modern slavery as required in related procurements.	Director of Procurement Capability & Governance	FY26 Q4

## SUMMARY

TAFE NSW is the largest vocational education and training provider in NSW and boasts a vast geographical reach across the state. This extensive network allows us to collaborate with many suppliers, both domestically and internationally.

In line with our dedication to ethical business practices, TAFE NSW upholds a strong commitment to promoting ethical conduct in all aspects of our operations, including procurement. As part of this commitment, we have taken decisive steps to implement processes and procedures aimed at identifying, addressing, and eliminating any instances of modern slavery within our supply chain and procurement operations. By actively combating modern slavery, TAFE NSW strives to create a socially responsible, and ethically-sound, environment in which everyone can thrive.

In the last twelve months, TAFE NSW has advanced its measures to tackle modern slavery. These steps include participation in the WoG cleaning contract reform, updating our procurement strategy templates to incorporate the IRIT into our risk assessments, centralising risk assessments for property and construction, identifying high-risk categories and suppliers, and uplifting our organisational awareness and understanding of modern slavery and its associated risks and impacts.

In the coming year, we remain committed to advancing our efforts by working towards full conformance with the Anti-Slavery Commissioner's Guidance on Reasonable Steps by January 2026. We are actively monitoring the effectiveness of our processes and procedures to combat modern slavery and will continue to develop our processes and technology to make it easy to support ethical procurement practices. We are also recruiting a dedicated resource to tackle social procurement, including modern slavery within our supply chain and procurement operations.

Risk assessments will remain an important part of our approach to address modern slavery risk and will be conducted at every stage of the procurement process. We will continue to provide training and resources to equip our employees with the skills and confidence to assess modern slavery risks effectively, including the implementation of mandatory training modules.

We will continually assess the effectiveness of our actions in identifying and managing modern slavery risk by tracking the progress of our initiatives, collaborating with suppliers and thought leaders across the NSW Government, and embedding the Anti-Slavery Commissioner's Shared Implementation Plan. By building capability and awareness, our buyers will have the necessary knowledge to make good business decisions. Finally, we will continue to engage directly with our high-risk suppliers, and both challenge and work with them to develop a shared approach to managing risk.

At TAFE NSW, we will proactively identify and work to eliminate modern slavery in our supply chain and procurement operations.

---

**“Working with TAFE NSW has prompted us to take a closer look at our own supply chain. Their leadership in ethical sourcing has encouraged us to apply greater due diligence and strengthen our practices to ensure we’re buying responsibly and aligning with government priorities.”**

**TAFE NSW Supplier**

---



**TAFE NSW Procurement**

Building A, Mary Ann Street,  
Ultimo NSW 2007

[tafensw.edu.au](http://tafensw.edu.au)

131 601