

Modern Slavery Statement

Holmesglen Institute
1 January to 31 December 2020
ABN number 40096756729

This statement covers the activities of Holmesglen Institute (**Holmesglen**) and its controlled entities for the year ended 31 December 2020.

This is our first modern slavery statement under the *Modern Slavery Act 2018* (Cth) and sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains.

This statement has been approved by the Board of Holmesglen on 30 June 2021.

About Holmesglen

Holmesglen Institute is a technical and further education (**TAFE**) institute established under the *Education and Training Reform Act 2006* (Vic) (**ETR Act**). The ETR Act, together with our Constitution, defines our functions and duties, including:

- providing vocational education and training and higher education programs to benefit Victorian industry and communities
- undertaking applied research in partnership with learners, industry and communities
- providing facilities and services to support our learners and communities.

We are committed to delivering on our purpose, which is to:

- provide education and training to ensure our learners are work ready, life ready and world ready
- play an integral role in the community, supporting social inclusion and cohesion
- partner with businesses to develop their workforce for today and the future.

We are also subject to the *Public Administration Act 2004* (Vic) and the Standing Directions under the *Financial Management Act 2018* (Vic).

Our responsible Minister is the Minister for Training and Skills and Minister for Higher Education, the Hon. Gayle Tierney MP. We work closely with the Department of Education and Training as well as with Victorian industry and community-based organisations.

During 2020, over 23,000 learners undertook our certificates, diplomas, advanced diplomas, bachelor's degrees, graduate certificates and master's degrees. We also provided a number of micro-credentials and non-award programs to help learners develop foundational or specific work-related skills.

At Holmesglen, we recognise that respecting the human rights of those affected by our business activities is important. As a public education provider, our vision is to be a leading tertiary provider valued by local and international learners, the community and industry. We take seriously our responsibilities with regard to international labour and human rights standards in working towards that vision.

For more information, please refer to our 2020 Annual Report which is available on our website at www.holmesglen.edu.au.

Our structure and operations

Holmesglen controls three entities, Holmesglen International Training Services Pty Ltd ACN 077 692 472, Glenuc Pty Ltd ACN 128 404 722 and the Holmesglen Foundation ABN 85 116 873 292. Holmesglen International Training Services Pty Ltd did not operate during 2020.

The Holmesglen Foundation was established and operates under a trust deed between Glenuc Pty Ltd and the Institute. Glenuc Pty Ltd is the Foundation's trustee under the trust deed and employs 2 employees, one full time and one part time, to support the Glenuc Board in delivering on its commitments as outlined in the Trust Deed with the Institute.

Our core operations are in Melbourne, Victoria with seven campuses at various locations in and around the city, and we have one campus located in Eildon, Victoria. We continue to expand our Australian and overseas operations through commercial projects and educational partnerships. We partner with and deliver training solutions to international clients, particularly in Japan, Indonesia, Mongolia and China.

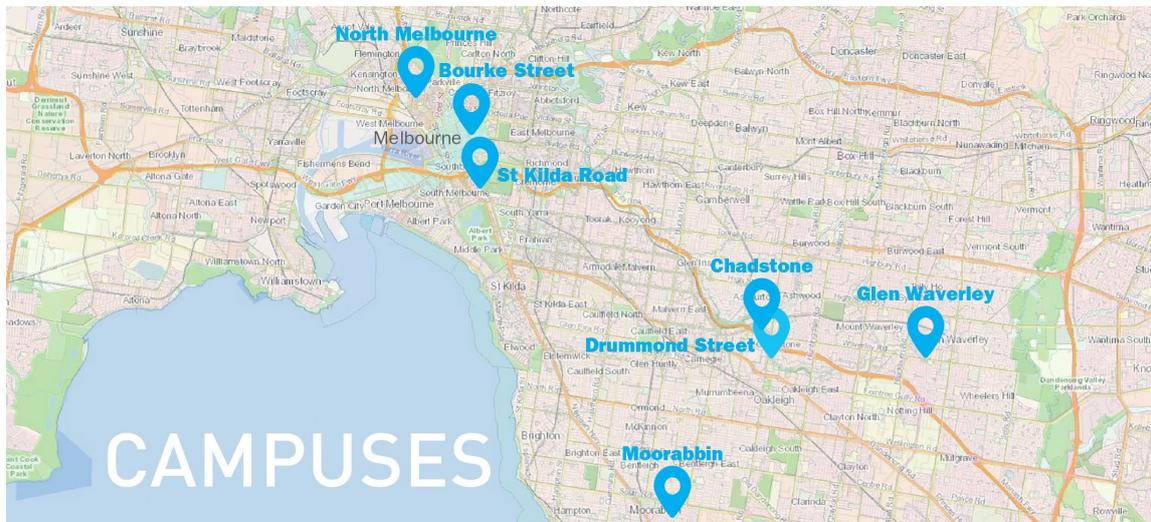


Figure 1: Holmesglen's campus locations

Offshore partnerships and projects in 2020 included:

- online delivery of our diploma programs in accounting and international business with partners Shandong Institute of Commerce and Technology and Zhejiang Business Technology Institute
- establishment of a new partnership in China with Suzhou Vocational University to deliver online English programs
- online delivery of construction training to our partner Wuhan Polytechnic
- online website security training to the Indonesian Ministry for Education and Culture
- delivery of project management training to Victorian Government employees working in Indonesia
- delivery of electrotechnology programs to Indonesian-Australian company PT ODG - an electrical, instrumentation, mechanical and fire services contractor based in Jakarta
- delivery of online English training to our long-term partner Kamori Kanko and a new client Kyushu Technical Institute – a Japanese national university.

We engage approximately 1,312 employees, of which 527 are full-time employees, 257 are part-time employees, and 528 are fixed term and casual employees. All our staff are based in Australia.

We also have managed investments with the Victorian Funds Management Corporation (**VFMC**). The VFMC has in place a Modern Slavery Policy that sets out its expectations and commitment to identify, assess and address modern slavery risks.

Our supply chain

We source and engage our suppliers in accordance with our Procurement and Tendering Rule, Social Procurement Strategy and related procedures. For procurement of construction works services, we also comply with the Ministerial Directions for Public Construction in Victoria. From the 1st July 2021, Holmesglen is also required to follow the Victorian Government Purchasing Board supply policies, which includes mandatory usage of certain state purchase contracts.

We engage approximately 2000 suppliers annually with an average spend per supplier of \$24,000. The majority of our suppliers are primarily located in Australia, accounting for 98% of total suppliers. A high level break down of procurement % spend by category is provided in figure 2.

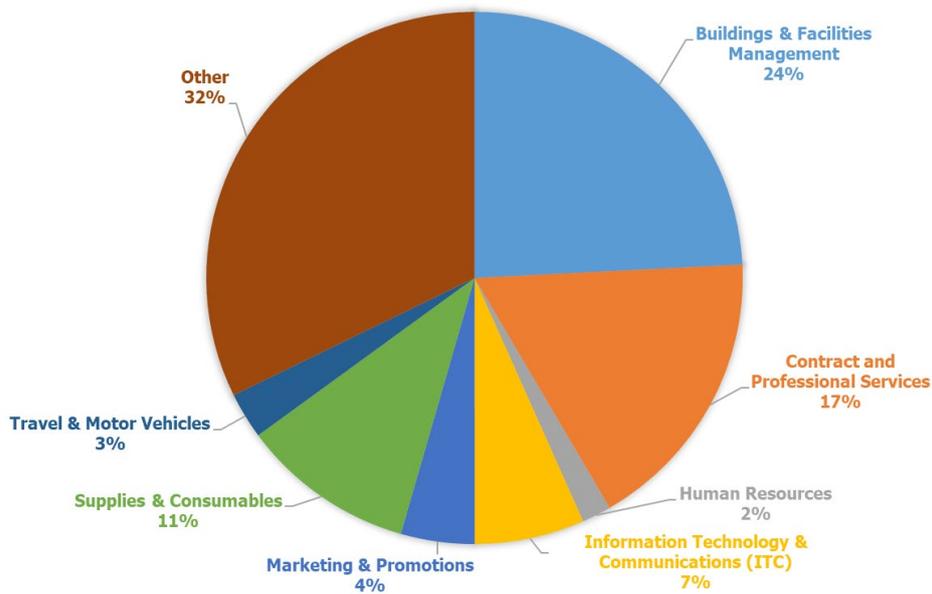


Figure 2: Indicative spend by category snapshot

The main types of goods and services that we procure directly are:

- **Contract and professional services:** This includes financial services, taxation, legal counsel, insurance, consulting and professional and personal development.
- **Building and facilities management services:** This includes services used to maintain offices and facilities, including campus maintenance services, utilities, cleaning services, security services and construction works and services for campus buildings.
- **Supplies and consumables:** This includes stationery, books and other print materials, amenities and kitchen consumables, food and beverages and related consumable, educational aids and supplies for teaching programs such as food and equipment for cookery and hospitality courses and uniforms, safety glasses, laboratory coats, hard hats, hi-vis vests, gloves, and academic dress for graduations.
- **Information technology and communications:** This includes computer hardware and software, printers, audio/visual equipment, data room services, desk phones and mobile phones used by our employees.
- **Marketing and promotions:** This includes advertising, promotions and social media.
- **Travel and motor vehicles:** This includes motor vehicle operating expenses and overseas and national travel.
- **Other:** This includes catering, leasing expenses, staff development and communication expenses.

Procurement contract terms are dependent on the nature of the services provided and may be short, medium or long term depending on the goods or services to be procured. For example, a public construction project engagement will be based on the estimated term of project completion, whilst a contract for delivery of services such as cleaning will generally be a longer term of 3 to 5 years.

Modern slavery risks

Due to the impact of the COVID-19 pandemic on our operations, we had reduced capacity in 2020 to be able to undertake a detailed assessment of our modern slavery risks. We recognise the importance of this activity and a key priority for the 2021 calendar year reporting period is to conduct this assessment to further inform our approach to mitigating and reducing modern slavery risks.

In the interim and in order to understand our key risk areas, we have undertaken a high-level desk-top risk assessment which considers a number of indicators of modern slavery risks including sector and industry, the type of products and services, geographical location and specific entity risk. The risk factors we have identified are based on information published by the Walk Free Foundation (Global Slavery Index 2018). During 2021 and 2022 we will review other sources of risk indicators as part of our more detailed assessment of our modern slavery risks.

Our initial risk assessment has indicated that our operations and supply chain have a medium potential for modern slavery risks. Our risk profile is summarised in the table below.

Risk	Description
Sector / Industry	Based on the information we have reviewed, education as a sector is not considered a high-risk sector for modern slavery practices. As all our teaching staff are highly skilled and employed by us in Australia and the sector is highly regulated, our operations present a low potential for modern slavery risks.
Product / Service	<p>We understand that modern slavery risks are present in our supply chain from products and services we procure.</p> <p>Products</p> <p>We understand that there are modern slavery risks in our supply chains because of the way products are produced, provided or used such as high-risk raw materials used as inputs or the use of exploited labour.</p> <p>Products identified as being of higher modern slavery risk include:</p> <ul style="list-style-type: none"> • fabric and clothing • electronics including laptops, computers and mobile phones • construction materials including timber and bricks • hospitality produce including fish and rice. <p>Services</p> <p>We understand that some types of services may have a higher prevalence of modern slavery practices because of their characteristics, products and processes, including building, cleaning and security services which are often provided by migrant works, low skill workers or labour hire contractors.</p> <p>During 2020 Holmesglen entered into new service agreements for cleaning and security services following an extensive public tender process, and in accordance with our Procurement and Tendering rule. As part of this process all prospective tenderers were required to commit to the Victorian Government's Supplier Code of Conduct, which includes a requirement for all suppliers to proactively expected to proactively identify, address and report, where relevant, on risks of modern slavery practices in their business operations and supply chains.</p> <p>In addition to the requirement to commit to the Supplier Code of Conduct, prospective tenderers were required to commit to our social procurement outcomes, including the requirement to ensure compliance with industrial relation laws and promoting secure employment, and detailed due diligence and probity processes were followed prior to the appointment of the successful service providers. Accordingly, for these current contracts, our assessment is that they present with a low to medium modern slavery risk.</p> <p>In relation to building services, the Institute complies with the Ministerial Directions for Public Construction, and during 2020 all construction works and</p>

Risk	Description
	services were sourced from the Victorian Government's public construction register. These directions are highly regulated, and it is our assessment that they present a low to medium risk potential for modern slavery.
Geographic	<p>The Global Slavery Index lists the 10 countries with the highest prevalence of modern slavery risk. The list can be found at the following link https://www.globalslaveryindex.org/2018/findings/global-findings/</p> <p>As we purchase the majority of our goods and services from Australia there is relatively low potential for modern slavery. However, we do recognise that components of some of the products we purchase in Australia may be sourced from countries with a high prevalence of modern slavery. Our future actions include further detailed risk assessments across all our key procurement categories. However, as a large majority of our goods and services are procured locally in Australia, there is a low potential for modern slavery risks.</p>
COVID-19 risks	<p>Holmesglen recognises that the COVID-19 pandemic has brought further challenges to modern slavery and highlighted social and economic inequalities worldwide.</p> <p>Our enterprise risk register includes the business and safety impacts of COVID-19 on the Institute's operations and we will include in our register an assessment of the impact of COVID-19 on our supply chain.</p>

Actions to assess and address risk

Holmesglen acknowledges that modern slavery may be present in our business and we endeavour to take responsibility for reducing the risks of modern slavery in our operations and supply chains.

Holmesglen has in our existing governance framework (which was used throughout the 2020 reporting period) a number of strategies, rules and procedures to ensure we have strong frameworks to assist us to assess and address modern slavery risks, including:

- Our Social Procurement Strategy that supports, relevantly, safe and fair workplaces by purchasing from suppliers that comply with industrial relations laws and promote secure employment. This strategy enables Holmesglen to adopt a strategic, agency-wide approach to how we will deliver social and sustainable outcomes through our procurement in accordance with the Framework and beyond. The strategy outlines:
 - identified social procurement opportunities
 - priority social and sustainable procurement objectives
 - key roles and responsibilities for social procurement
 - our approach to developing social procurement capability
 - our social procurement measurement and reporting approach.

Our Organisational Performance Review Committee monitors our progress in implementing our Social Procurement Strategy, and the achievement of our social procurement outcomes.

- Our Procurement and Tendering Rule sets our requirements for implementing and maintaining an effective procurement and tendering framework including our commitment to ensure that all purchases of goods, services, assets and construction:
 - are conducted in accordance with relevant legislation, standards, government guidelines and funding arrangements
 - will be efficient, effective and economical
 - achieve value for money taking into account the total benefits and costs over the life
 - of the goods, services, assets or works procured
 - will be within Board approved budgets

- take into account environmental, social and economic factors
 - encourage open and fair competition
 - support probity through the application of integrity, ethical behaviour, fairness
 - accountability and transparency in the conduct of the procurement processes
 - will be sourced from reputable suppliers for which bona fides have been verified
 - have appropriate processes and capability in place to cover the acquisition lifecycle
 - will ensure that risks are managed appropriately.
- The Victorian Government's Supplier Code of Conduct that sets out the minimum expectations for our suppliers and third party labour providers related to ethical practices including addressing modern slavery risks in their business.
 - Our Procurement and Tendering Procedure includes processes for receiving and managing supplier complaints.
 - We have implemented standard approach to market templates which include requirements to comply with the Victorian Government's Supplier Code of Conduct, and address our Social Procurement outcomes, as relevant to the particular tender or quotation.
 - Our Grievance Resolution Procedure supports and encourages employees to raise concerns without fear that their future employment prospects will be adversely affected.
 - Our Public Interest Disclosures Policy establishes a system for the protection of persons who make a public interest disclosure or complaint under the Public Interest Disclosures Act 2012 (Vic) (PID Act) from detrimental action by officers, learners, employees and contractors of Holmesglen Institute in accordance with section 58(5) of the PID Act and ensures that all other requirements of the PID Act are met.
 - Our Conduct Rule and Code of Conduct that defines the standard of behaviours expected of all members of the Holmesglen community including the requirement to demonstrate the Victorian public sector values of responsiveness, integrity, impartiality, accountability, respect, leadership and human rights.
 - Our Risk Management Framework which includes Risk Management Rule, Enterprise Risk Management plan and strategic and operational risk registers. Our Risk Management Framework outlines our approach and commitment to risk management and establishes the processes for identifying, evaluating and managing our risks including modern slavery risks.

We are committed to implementing specific actions during our future reporting periods in order to more fully assess and address our modern slavery risks, which we have set out in the 'Future actions' section below.

Assessing our effectiveness

As this is our inaugural statement, we acknowledge that we are still developing our approach to addressing modern slavery risks. We are committed to reviewing the effectiveness of our actions we have planned to undertake in the next reporting period as set out in the future actions section below.

Consultation

Prior to being put to the Board of Holmesglen for review and approval, this statement was reviewed by the Chief Executive, the Chief Financial Officer, the Internal Audit Manager and the Procurement Manager.

Holmesglen Institute controls Holmesglen International Training Services Pty Ltd, Glenuc Pty Ltd and the Holmesglen Foundation. Holmesglen International Training Services did not operate during 2020 and neither Glenuc Pty Ltd and the Holmesglen Foundation are reporting entities under the *Modern Slavery Act 2018* (Cth).

The Holmesglen Institute manages all procurement, risk management and tendering activities for Glenuc Pty Ltd and the Holmesglen Foundation through the Holmesglen Institute's procurement and risk management business units and these entities' operations and supply chains are included in this Modern Slavery Statement, and proposed action plan.

Future actions

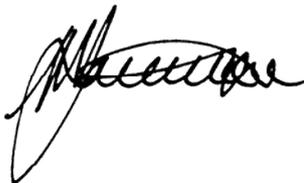
In our next reporting period we will focus on the following actions:

- develop an action plan for modern slavery compliance and risk to focus and prioritise our actions in each reporting period
- undertake detailed supply chain mapping (direct and indirect suppliers) to better understand our supply chain and operations
- develop a supplier questionnaire to engage with our suppliers and develop our risk assessment procedures
- develop a risk assessment methodology to undertake a full risk assessment to identify modern slavery risks that exist within our operations and supply chains, focusing on suppliers that we have identified as high or medium risk
- provide training to relevant staff in our procurement, compliance, legal and risk teams to raise awareness of modern slavery risks and how they may arise in our business.

To assess the effectiveness of our actions to address modern slavery risks for future reporting periods, we will:

- monitor the implementation of our action plan and provide implementation progress reports to the Organisational Performance Review Committee
- regularly review our modern slavery risk assessment methodology to consider whether we are appropriately identifying and evaluating our modern slavery risks
- monitor the number of our suppliers who have committed to our Supplier Code of Conduct
- monitor the number of employees who have completed training on modern slavery.

The Board of Holmesglen Institute is the principal governing body for the purposes of approving this statement. This statement was approved by the Board of Holmesglen Institute on 30 June 2021. The Board has authorised Mary Faraone to sign this statement in her capacity as the Chief Executive and Director of Holmesglen Institute.



Mary Faraone
Chief Executive and Director
30 June 2021