



MODERN SLAVERY STATEMENT

Box Hill Institute

2021

Box Hill Institute
465 Elgar Road, Box Hill Victoria

INTRODUCTION

This is the second Modern Slavery Statement for Box Hill Institute, as required by the *Modern Slavery Act 2018 (Cth)* (“the Act”). This statement relates to the 2021 calendar year.

The purpose of this statement is to outline the actions to be taken by Box Hill Institute in 2022 to identify and minimise the risk of modern slavery in BHI’s business and supply chain.

The Modern Slavery Statement has been reviewed and approved by the Board of Box Hill Institute.

ABOUT BOX HILL INSTITUTE

Criterion 1 and 2

Box Hill Institute (“BHI”) is a leading provider of vocational and higher education in Victoria.

BHI’s functions, powers and duties are detailed in the *Education and Training Reform Act 2006* (Vic) and the Constitution of Box Hill Institute.

Beginning in 1924 with just 65 local students, the Institute now operates in 10 countries and offers a wide range of globally recognised courses to more than 40,000 students.

Box Hill Institute is proud to serve communities through the education, training and lifelong learning that it offers. BHI works with a broad range of stakeholders across the communities it serves to provide meaningful skills, education and employment outcomes.

Our Vision

To help students grow into proud and successful learners who are valued by industry and community.

Our Purpose

To support community prosperity and industry growth by delivering learning experiences that meet society’s future needs.

Our Values

- We deliver outstanding experiences

We put our students and customers at the centre of everything we do. We solve problems, take ownership and create experiences that make a difference.

- We are in it together

As one team, we care about our people, and foster a generosity of spirit for our community. By valuing our differences we ensure everyone belongs in the BHI community.

- We make great ideas happen

We empower each other to inspire new ideas and challenge the status quo. We are adaptable, equitable and agile in responding to opportunities

Overview of Supply Chain

As a TAFE, Box Hill Institute sources a vast range of goods and services ranging from educational resources, third party program delivery, building repairs and maintenance, ICT goods and services and marketing and promotional activities. During the 2021 financial year supplies and services procured was approximately \$28.25 million. BHI’s supply chain

is limited to Australia, except in a few circumstances where BHI delivers international education through strategic cooperation and global partnerships.

ASSESSMENT OF MODERN SLAVERY RISKS

Criterion 3

In 2021, BHI moved to align with the policies of the Victorian Government Purchasing Board (VGPB). VGPB policies are mandated under the *Financial Management Act 1994* (Vic) and subject to Standing Directions issued by the Victorian Minister for Finance from time to time. VGPB's supply policies cover:

- Governance
- Complexity and Capability Assessment
- Market Analysis and Review
- Market Approach; and
- Contract Management and Disclosure.

Additional VGPB policies exist in relation to International Agreements, Local Jobs First, Social Procurement Framework, Supplier Code of Conduct and Uniforms and Personal Protective Equipment.

The Supplier Code of Conduct has the purpose of ensuring ethical, sustainable and socially responsible procurement. In 2021 BHI has been introducing increasing numbers of its suppliers to the Supplier Code of Conduct, many for the first time. BHI will continue to work closely with its suppliers to embed the Supplier Code of Conduct.

As part of VGPB alignment in 2021 and into the present year, BHI is:

- actively undertaking a detailed review of its procurement processes;
- ensuring all suppliers are compliant with the VGPB Supplier Code of Conduct; and
- adopting a number of State Purchase Contract arrangements where available and appropriate.

The impact of these changes is to focus on providing a strong framework around supplier engagement which substantially improves BHI's confidence in the integrity of such appointments including, but not limited to, its ability to assess modern slavery risk.

BHI's purchasing activities predominantly involve local businesses based in Australia and BHI has assessed that there is minimal risk of modern slavery exposure. As part of its evolving commitment to managing modern slavery risk, BHI has formed a cross-functional team to identify risks and implement mitigations. This team is BHI's Modern Slavery Working Group.

BHI understands the important role it plays within its commercial eco-system to be not only compliant with its obligations under the *Modern Slavery Act 2018* (Cth) but to engage the commitment of its suppliers and those businesses supplying to BHI's suppliers. In managing its suppliers, BHI has begun the process of implementing practices to mitigate the risk of modern slavery occurring within its suppliers' supply chains.

DUE DILIGENCE AND MITIGATION PROCESSES

Criterion 4

Box Hill Institute is undertaking the following steps to assess and mitigate modern slavery risks in its supply chains:

PLANNED ACTION	DETAIL	MITIGATING EFFECT
VGPB alignment	Align with the Victorian Government Purchasing Board and adopt State Purchase Contract arrangements where available.	BHI has taken significant steps to align its procurement practices with the VGPB, thus enabling BHI to engage with suppliers with confidence in the integrity of the supply chain of those suppliers.
Update policies & templates	Review and update relevant policies and procedures. Insert modern slavery clauses into all BHI contract templates. Develop modern slavery questionnaire to insert into tender documentation.	<p>BHI is actively reviewing its procurement policies, procedures and practices. BHI is also in the process of approaching consultants to (a) undertake a review of its supplier data base and its supplier list for suppliers with “red flags” regarding modern slavery risks, and (b) identify suppliers from countries where modern slavery risks are known or thought to be significantly higher than in Australia.</p> <p>BHI has completed a review of all of its procurement contract templates to ensure that they include appropriate modern slavery clauses and are aligned with VGPB standards.</p> <p>In addition to this, BHI has started utilising Victorian Government State Purchasing Contracts, so far in relation to eServices, banking, legal and other professional advisory services. BHI will continue to utilise Victorian Government State Purchasing Contracts in other areas wherever it can.</p> <p>BHI has also developed a modern slavery questionnaire to accompany purchase requisitions, RFQs and other approach-to-market documents which prospective suppliers will be required to</p>

		complete as part of their tenders. BHI will implement this practice starting 1 June 2022.
Working Group	Establish a modern slavery working group within BHI, to coordinate BHI's modern slavery response and continued monitoring and management against policies and procedures.	BHI has established its Modern Slavery Working Group, which has been facilitating BHI's response to modern slavery risks by drawing upon the expertise of in-house counsel and its risk management, procurement and finance functions. This Working Group will continue to oversee and coordinate all of the activities BHI undertakes in relation to complying with its obligations under the <i>Modern Slavery Act 2018 (Cth)</i> throughout 2022.
Staff Communication	Communicate modern slavery information to staff and ensure a shared understanding in managing our social responsibilities with respect to modern slavery.	BHI's Modern Slavery Working Group is in the process of developing plans for raising awareness among relevant BHI personnel of modern slavery risks to enable those personnel to undertake procurement actions with an understanding of BHI's values and expectations in relation to modern slavery. Proposed activities include: <ul style="list-style-type: none"> • presentations to personnel by BHI's in-house counsel and procurement function; • the establishment of a modern slavery information page on BHI's staff intranet or the issuing of staff alerts on new or emerging modern slavery risks and issues.

METHODS TO ASSESS EFFECTIVENESS OF ACTIONS

Criterion 5

For the actions planned to be undertaken in 2022, BHI will assess the effectiveness of those actions as follows:

PLANNED ACTION	ASSESSMENT MECHANISM
VGPB alignment	Track number of State Purchasing Contracts utilised. Implement Supplier Code of Conduct commitment by suppliers.
Require commitment to the Supplier Code of Conduct	Implement a mandatory commitment to the Supplier Code of Conduct as part of an enhanced contract management approach. Track and report progress.
Update policies & templates	Use of a modern slavery questionnaire in approach-to-market documentation. Number of policies updated. Number of template contracts updated to include modern slavery clauses.
Working Group	Enhanced management of modern slavery risk through the identification and implementation of cross-functional initiatives.
Staff Communication	Establishment of modern slavery information page on staff intranet or issuing staff alerts on new or emerging modern slavery risks and issues. Number of presentations given to personnel and/or any other initiatives implemented.


CONSULTATION

Criterion 6

Not required as BHI does not have any reporting entities.

SIGNING

This statement was approved by the Board of Box Hill Institute on 26 May 2022 and has been signed by the Interim Chief Executive Officer on behalf of the Board.


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Laura Macpherson
Interim Chief Executive Officer and Managing Director
Box Hill Institute

...6/6/2022.....
Date