

Modern Slavery Statement 2025



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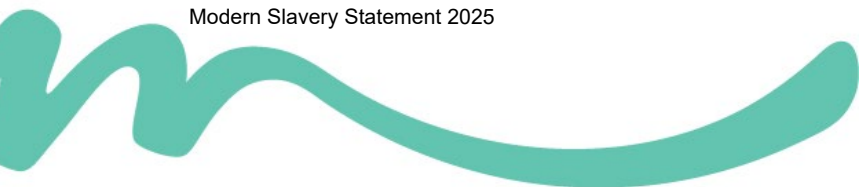
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Modern Slavery

'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 2025 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 24 June 2026.

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-2025)
<https://www.walkfree.org/global-slavery-index/findings/global-findings/Modern-Slavery-Statement-2025>

About Chisholm

As one of the largest vocational training providers in Victoria, we transform lives for the better through relevant and responsive quality education and training. At Chisholm, our goal is to educate and skill our communities and industries for generations to come.

In 2025, over 32,500 students studied at Chisholm, supported by a team of more than 1,700 dedicated employees. These students were enrolled in 226 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.

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 come together for the better.

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.

Chisholm is a Victorian Government-owned TAFE provider, established under the Education and Training Reform Act 2006. The responsible minister is the Hon Colin Brooks MP, Minister for Skills and TAFE.

This has been a milestone year for Chisholm Institute. The launch of our Strategic Plan 2025–2029 sets out an ambitious vision: Empowered local communities with global impact.

Our new direction, underpinned by the strong foundations created during the 2021–2024 Strategic Plan, will ensure we can meet the evolving needs of the communities we serve.

As one of Victoria's largest training providers, our community is richly diverse. Over 32,500 students come to Chisholm from more than 150 countries. For Chisholm, this is a source of strength and creates a learning environment that is vibrant, inclusive and globally connected.



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
- > Membership Committee
- > Remuneration 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.

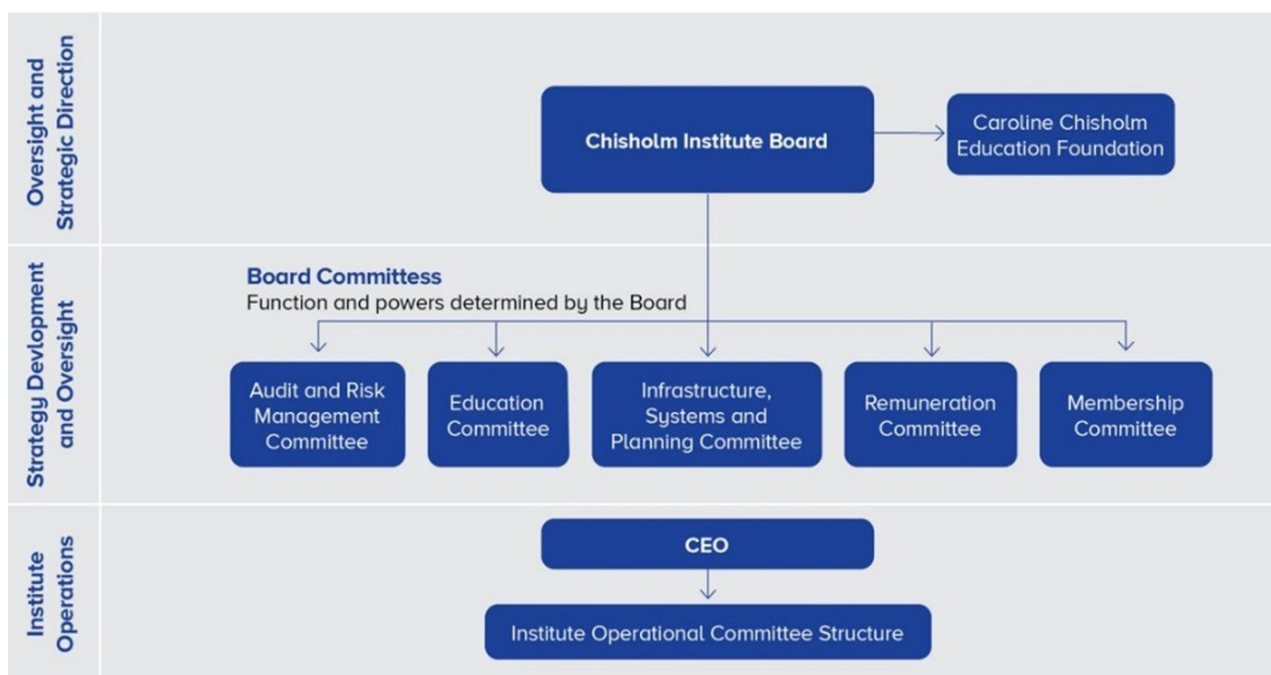
However, the powers of Chisholm are subject to and must be exercised in accordance with the functions, duties and obligations conferred or imposed on the organisation by:

- > 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	Empowered local communities with global impact.		
OUR ROLE	Working together to enrich lives through education.		
OUR VALUES	Collaboration, Accountability, Integrity, Respect.		
Strategic goals and objectives Our strategic goals and objectives describe the areas we will focus on to achieve our outcomes.	Goal 1: To lead an environment of educational excellence. Objective 1 We collaborate to deliver innovative teaching practice and pathways that empower learners. Objective 2 We empower our people with the environment and skills they need to succeed. Objective 3 We innovate to offer flexible learning for our students. Objective 4 As leaders in applied learning we share our expertise locally and globally.	Goal 2: To support our communities to be job-ready. Objective 5 We deliver on industry needs and provide innovative work-integrated learning. Objective 6 Our people and students are digitally ready and enabled by technology. Objective 7 We connect our local community with global skills research and innovation.	Goal 3: To exceed stakeholder expectations. Objective 8 We embed environmental sustainability in our culture, our curriculum and our facilities. Objective 9 We create a safe and inclusive experience for everyone. Objective 10 We exceed government expectations by making evidence-informed decisions together.
Outcomes	Our outcomes will drive excellence in teaching and teacher professional development, deliver outcomes for industry, as well as improve environmental sustainability and our collaborative culture.	1. Increased student positive perceptions of teaching. 2. Increased number of partners use the TAFE Professional Educator College for teacher professional development. 3. Increased number of students who achieved their main reason for learning including employment and further study. 4. Increased number of students and industry choose TAFE in Melbourne's south east. 5. Improved environmental impact. 6. Increased number of our people say we have worked together to achieve outcomes.	

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. Chisholm has incorporated Modern Slavery Risks into the procurement planning documents to prompt staff to consider the possible risks and implementation of risk mitigation strategies. We have also updated our market engagement documents to include modern slavery questions; this will allow us to assess modern slavery risks in supplier submissions. 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 2025, as part of the procurement and contracting policy reviews, updates were made to the key control mechanisms within the planning, market engagement and contracting documents. The changes were intended to enhance the identification of modern slavery risks in the procurement planning stage and enable a stronger analysis of bidder's modern slavery capabilities at the tender evaluation stage. This early assessment of capabilities will enable Chisholm to work with suppliers to enhance their Modern Slavery assessment and identification capabilities over the course of their engagement. Chisholm's contract documents were updated to reflect the revised supplier code of conduct. Chisholm has continued to develop the internal capabilities of procurement staff and ensured that procurement policies are reviewed and systematically updated to ensure that Chisholm's procurement practices remain up to date and Chisholm's contract clauses mitigate risks that may arise

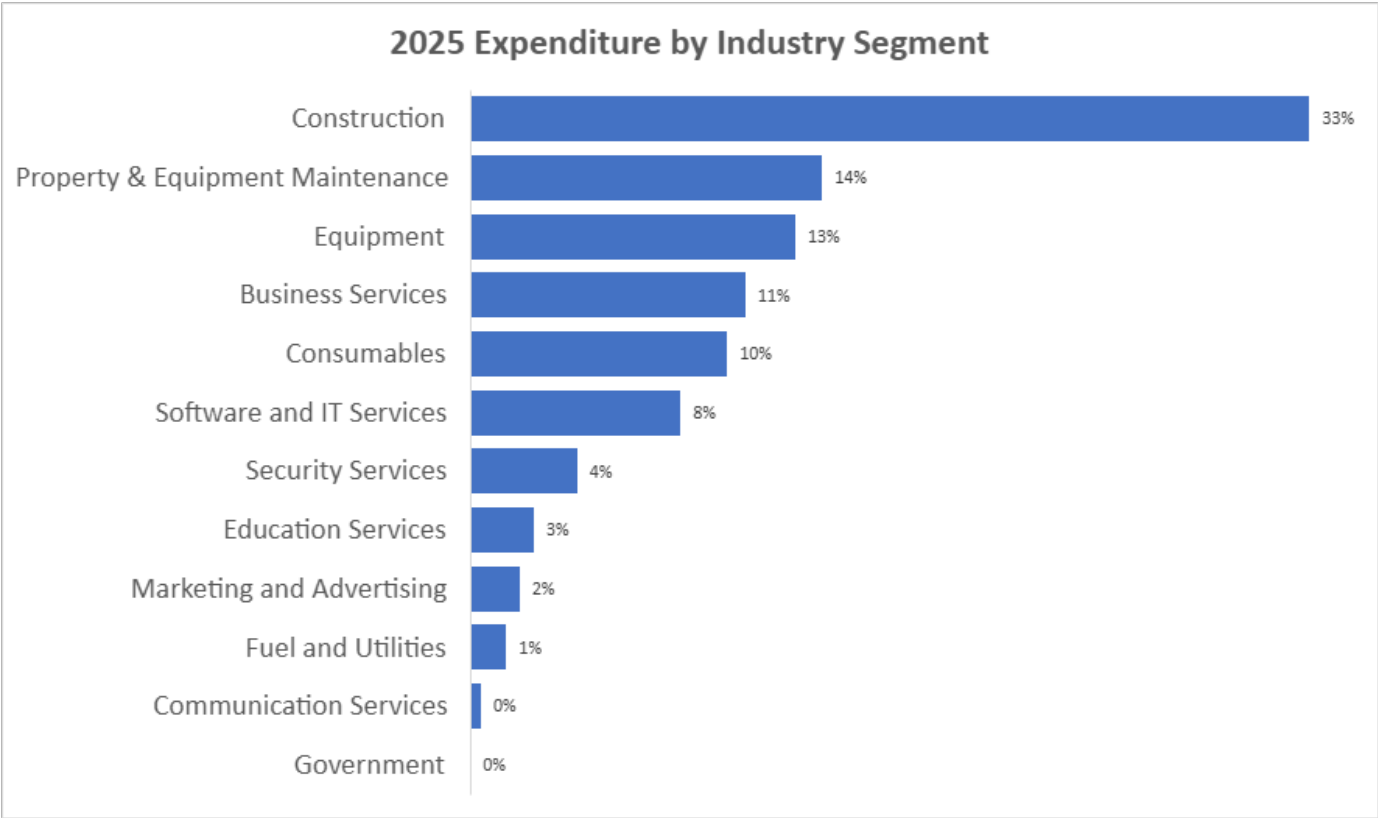
Chisholm is an agency of the Victorian State Government and as such the strategic procurement systems and processes, are required to meet the standards of the State Government supply policies. As part of the Victorian Government Procurement Board (VGPB) (The functions of which have been transferred to the Minister for Government Services) 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



For the calendar year 2025

- > 987 Suppliers
- > Total Spend for Construction and Goods & services was over \$87 million
- > Approached the market using a formal procurement tender process 22 times

How we identify, assess, and address modern slavery

Over this reporting period, we have strengthened our assessment of Modern Slavery risks and implement processes to assist suppliers in enhancing their capabilities. Chisholm takes the following steps across its supply chain and operations:

- > Identify Modern Slavery risks in the Procurement Planning Stage
- > 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 or assist suppliers in enhancing their internal capabilities;
- > 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;
- > Chisholm has increased our use of State Purchasing Contracts and register, which contain preferred contracting provisions such as general compliance with the law and auditing rights, which enable us to respond to any concerns or compliance matters
- > 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.
- > If a concern or compliance was raised, we would consider as appropriate supplier engagement, corrective action plans, and escalation protocols.

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.

Geographic

Product and Services

Sector and Industry

Supply Chain Model

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, the Philippines
- > Africa (in particular, Eritrea, Uganda, Kenya, Ethiopia, Sudan, DR 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, Colombia, Peru)
- > North America (Mexico)
- > 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>)
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Engaging with our key suppliers on modern slavery risks

On an annual basis, Chisholm requests suppliers identified as high-risk, as well as suppliers with an annual spend exceeding \$100,000, to complete a Modern Slavery Survey based on the Australian Government's Modern Slavery and Human Trafficking Supplier Questionnaire. This process enables Chisholm to gain a deeper understanding of its supply chain and identify potential modern slavery risks. The survey also provides insight into the actions key suppliers are taking to strengthen their own supply chains and reduce shared modern slavery risks.

The analysis demonstrates that Chisholm's suppliers operate across a broad geographic footprint, primarily within Australia and New Zealand. Most suppliers have a dedicated team or designated individual responsible for overseeing modern slavery risks and exhibit a strong understanding of their own supply chains. The majority report moderate to high visibility of their supply chains and undertake regular monitoring and risk assessments. These practices enable suppliers to actively implement measures to reduce modern slavery risks. To date, no modern slavery complaints have been made against either Chisholm or the suppliers surveyed.

While not all suppliers are required to publish a Modern Slavery Statement, many have established written policies and provide modern slavery training to staff. Further analysis of suppliers that do not provide formal training indicates that these organisations still have responsible personnel overseeing modern slavery risks and have policies in place to identify and manage risks during tendering and onboarding processes.

Chisholm's supply chain demonstrates a strong reliance on permanent employment arrangements, with very few suppliers engaging low-skilled or seasonal workers. In addition, none of the surveyed suppliers provide long-term housing or accommodation for their workers.

Chisholm will continue to work collaboratively with suppliers to strengthen awareness and capability in identifying and mitigating modern slavery risks. Suppliers identified as having areas for improvement will be supported through access to the Modern Slavery Register e-Learning modules to further build their knowledge and practices.



2025 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?
65% – Australia & NZ 8% – Western Europe & UK 6% – Oceania (Other than Aus & NZ) 4% – Southeast Asia 5% – North America 5% – South Asia 2% – North Asia 1% – Middle East 1% – Africa 1% – South America 1% – Central America 1% – Eastern Europe & Russia	52% – Australia & NZ 13% – Southeast Asia 11% – Western Europe & UK 8% – North America 6% – South Asia 3% – North Asia 2% – Eastern Europe & Russia 2% – Oceania (Other than Aus & NZ) 1% – Middle East 1% – South America 1% – Central America
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?
100% – No	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.
49% – Yes 51% – No	18% – Never 33% – At least once every two years 46% – At least once a year 3% – More than 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?
75% – Yes 25% – No	41% – High 38% – Moderate 21% – 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?
68% – Yes 32% – No	87% – Yes 13% – 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?
33% – All 18% – 75% or more but not all 11% – 50% or more but less than 75% 6% – 25% or more but less than 50% 6% – up to 25% 26% – None	2% – 25% or more but less than 50% 7% – up to 25% 91% – 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?
38% – All 54% – 75% or more but not all 5% – 50% or more but less than 75% 2% – up to 25% 1% – None	2% – 25% or more but less than 75% 21% – Up to 25% 77% – 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?
100% – No	77% – Yes 23% – No

Consultation with controlled entities

Chisholm Institute provides corporate support for its controlled entities, including provision of staffing and procurement services. Our controlled entities are included in the modern slavery risk analysis and have been consulted in the preparation of the Modern Slavery Statement.

Board approval

In accordance with section 13(2) of the *Modern Slavery Act 2018* (Cth), the Chisholm Institute Board approved this Statement on 24 June 2026. 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.

A handwritten signature in black ink, appearing to be 'G. Miles', written in a cursive style.

Dr Gillian Miles AM
Board Chair
Chisholm Institute