



# **2023 MODERN SLAVERY STATEMENT**

**NextEd Group Limited**

**ABN 75 105 012 066**

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# 1. Our commitment

This Modern Slavery Statement outlines NextEd Group Limited's activities to support its commitment to zero tolerance of modern slavery and human trafficking.

NextEd is committed to acting ethically and with integrity in all aspects of its operations, business dealings and supplier relationships. We seek to implement and maintain effective systems and controls to ensure that modern slavery and human trafficking are not occurring anywhere within our own businesses or in our supply chains.

NextEd is committed to ensuring there is transparency in our approach to addressing modern slavery throughout our business and supply chains, in a manner consistent with our disclosure obligations under the Modern Slavery Act 2018 (*Cth*) (the **Modern Slavery Act**).

NextEd understands that prevention, detection and reporting of any modern slavery or human trafficking activities in any part of the organisation is the responsibility of its people. Employees and contractors are encouraged to report any concerns about possible breaches within the organisation or our supply chain to the Group Quality, Accreditation & Compliance Manager (email [eve.ollerenshaw@nexted.com.au](mailto:eve.ollerenshaw@nexted.com.au) or telephone +61 424 141 279) or to a member of the NextEd Senior Executive Team.

## 2. What is modern slavery?

Modern slavery describes situations where offenders use coercion, threats, or deception to exploit victims and undermine their freedom.<sup>1</sup>

Modern slavery is a criminal offence<sup>2</sup> and is defined in the Modern Slavery Act as including:

- trafficking of persons;
- slavery;
- servitude;
- forced marriage;
- forced labour;
- debt bondage;
- deceptive recruiting for labour or services; or
- child labour in situations where children are subjected to slavery or similar practices or are engaged in hazardous work.

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<sup>1</sup> Attorney General's Dept [www.ag.gov.au/crime/modernslavery](http://www.ag.gov.au/crime/modernslavery).

<sup>2</sup> Divisions 270 and 271 of the Commonwealth Criminal Code.

### *3. The “Reporting Entity”*

NextEd Group Limited (the **Reporting Entity**), is an ASX listed company (ASX:NXD). This 2023 Modern Slavery Statement covers NextEd Group Limited and its controlled entities, as described in section 4.1 below and listed in the Appendix for the reporting period 1 July 2022 to 30 June 2023 (**Reporting Period** or **FY23**). Throughout this statement, we refer to the Reporting Entity and its controlled entities collectively as **NextEd**.

In the Reporting Period, NextEd had an annual turnover of \$102.2 million, just in excess of the minimum statutory reporting threshold under the Modern Slavery Act for the first time.

Accordingly, this is NextEd’s first Modern Slavery Statement. While NextEd has comprehensive and robust governance and compliance frameworks in place, it is in still in the early stages of formalising programmes for identifying, assessing and addressing potential modern slavery risks.

NextEd is committed to a culture of continuous improvement and, as we expand and enhances our frameworks, policies, procedures and actions, directed towards the detection and mitigation of modern slavery and human trafficking risks in our operations and supply chain, that progress will be reported in future Modern Slavery Statements.

## *4. Our structure, operations and supply chain*

### **4.1. Our structure**

NextEd includes the entities listed in the Appendix.

The NextEd businesses presently operate in 4 main divisions:

- Technology & Design;
- Domestic Vocational;
- International Vocational (including English language); and
- Go Study Australia.

### **4.2. Our operations**

NextEd is one of Australia’s largest listed private education organisations, delivering education and services to more than 25,000 students annually at its 9 campuses around Australia, online, and at its 16 overseas located student recruitment offices. The organisation delivers quality courses across the English Language, Vocational and Higher Education sectors, to both domestic and international student, as described in more detail below.

## Our Businesses

### Technology & Design



Founded in 1999, Academy of Interactive Technology (**AIT**) has trained over 5,000 students to be leaders of the future in the digital and creative industries. Our programs and philosophy transform creative minds into the industry's most sought-after graduates.

AIT specialises in delivering Higher Education Diplomas and Bachelor Degrees with specialisations including Mobile App Development, 2D Animation, 3D Design, Games Design, and Filmmaking. We also delivers Vocational Diploma qualifications in IT and Graphic Design.

Our students having access to some of the country's best technologies, creative sector educators and industry practitioners. AIT's long-standing relationships with industry experts, associations and companies gives our graduates a competitive edge.



Launched in 2015, Coder Academy Australia (**CA**) delivers accelerated-learning higher education accredited Bootcamps to help people transform careers at pace. CA is the original Australian-owned coding Bootcamp, offering a range of courses in tech sector skills development which are designed to be intense; delivering accredited qualifications that traditionally take up to 2 years or more into shorter periods of 6 or 10 months without compromising learning outcomes.

What makes CA unique is the bringing together of industry experience and expertise in education, with industry leaders designing courses to directly fill skills gaps. Our internship program is well-respected throughout the tech sector, with graduates going on to work for companies such as Dropbox, Commonwealth Bank, Gorilla Stack, Code Nation and Lexicon Digital, to name a few.



The International School of Colour and Design (**iscd**) offers industry driven and vocational interior design and styling courses that incorporate the fundamentals of design. Courses are delivered both face-to-face and online.

The strength of iscd's reputation and its long history in this sector has resulted in many graduates going on to become some of Australia's most respected interior designers.

## Domestic Vocational



Celtic Training (**Celtic**) has built its reputation on 16 years of empowering students to discover their pathways. Celtic provides nationally recognised vocational qualifications through virtual and in-person training across Queensland and South Australia. It currently specialises in healthcare and business qualifications.

Since its founding in 2005, Celtic has created a community of students, trainers, and employers. As a result, students who study with Celtic are given the best work connections, expert resume support and a network of friendly, like-minded workers who want to see them succeed.



SERO Institute (**Sero**) is an Australian registered vocational education and training provider for domestic students. Sero delivers vocational qualifications in cookery, hospitality, community services, and sport & Fitness. Under the slogan 'create your tomorrow today', Sero is passionate about providing industry-ready skills for today's fast-paced world.

Since launching in 2014, Sero has been dedicated to creating world-class study experiences for every student by using the latest industry equipment, specialist trainers, and quality campus resources.



Capital Training Institute (**CTI**) is a national vocational education training organisation delivering construction and business courses in New South Wales, Queensland and South Australia.

CTI is one of the few RTO's in Australia accredited to deliver accelerated construction training to enter the in-demand construction workforce.

## International Vocational



Greenwich College (**Greenwich**) is one of the largest and most respected private tertiary education colleges delivering courses to international students in Australia.

Greenwich operates campuses in Sydney, Melbourne, Brisbane, Adelaide, Gold Coast and Perth. It delivers courses to more than 15,000 English language students each year, and to more than 8,000 vocational students undertaking courses in business, marketing, leadership and management, project management, cookery, hospitality, and healthcare.

Greenwich College is recognised as an innovative leader within the international tertiary education industry and has been presented with a series of awards to recognise the excellent quality of the services and products it offers to its international students.

## Go Study



Go Study Australia (**Go Study**) is one of Australia's largest student recruitment agencies, providing education advice, enrolment support, visa administration and lifestyle support for students looking to live, work and study in Australia.

Go Study has recruitment and marketing agreements with more than 300 universities and colleges located across Australia, Canada, USA and the UK and supports the enrolment of more than 5,000 international students each year.

Go Study has 16 offices located in Europe (France, Italy and Spain), Latin America (Chile, Columbia and Mexico) and around Australia.

## ***Our NextEd Vision***

*We share a vision to unleash potential through inspiring learning and experiences, ensuring graduates are equipped with the skills to fulfil their personal and career ambitions.*

### ***Unleashing potential***



We are helping people succeed through education. We are breaking down barriers and we operate with high energy and high engagement. We promote strength within our students and across the organisation. Most of all, we empower our students to achieve personal growth.

### ***Inspiring***



We aim to be uplifting, visionary and creative in order to make engaging and relevant courses that promote out of the box thinking and building connections.

### ***Learning and experiences***



Education is more than just what happens in the classroom. The entire experience of learning, community and industry mentorship should be our focus to ensure our students achieve positive outcomes.



# Our NextEd Values



## Be Bold

Courageous and forward-thinking people who are inspired to deliver and support impactful innovation and growth strategies.



## Be Inclusive

Diverse and engaged teams who are agile, connected and aligned to putting collective success before individual achievements.



## Be Respectful

Honest and considerate people who show gratitude for the efforts of others and take responsibility for their actions.



## Be Excellent

Passionate and results driven people who are renowned for delivering great student experiences and outcomes.

### 4.3. Our supply chain

Our supply chain comprises:

- Education agents – providers of advice and support to international students about choices of study destinations, colleges, courses, and visa requirements. Agents help students with visa and enrolment documentation as part of the process of recruiting them into courses and receive a percentage of the tuition that the student pays to a college for the services they perform. NextEd works with approximately 450 education agent companies from over 80 different source countries.
- Professional service providers – includes audit, accountancy, legal services, insurance, consultancy, and regulatory compliance experts.
- Labour hire and recruitment companies – providers of casual staff and permanent staff recruitment services across all organisational functions.
- IT suppliers - supply IT hardware and software solutions to the organisation, which in some cases includes external data hosting and storage services.
- Construction workers and project managers – are engaged by NextEd to work on campus and office fit-out projects, and maintaining and upgrading of premises.
- Property leasing, licensing, and hire – NextEd does not own the properties it operates from, and instead leases or licenses premises from third party landlords. In addition, NextEd will occasionally hold social or working events at external premises.
- Cleaning and maintenance companies – provide cleaning services to NextEd offices and campuses.
- Stationery and printing suppliers – provide office stationery, learning resources, marketing collateral and other general office equipment.
- Course textbook and learning kit suppliers – provide textbooks and custom learning kits for NextEd students to use when undertaking their courses.
- Clothing and merchandise suppliers – provide NextEd with branded products and clothing.
- Travel and accommodation providers – Some NextEd employees undertake work-related travel to perform their roles. The organisation works with travel booking companies, airlines and hotel accommodation groups both domestically and overseas.

## *5. Identifying our Modern Slavery Risks*

### **5.1. Risks in our operations**

NextEd employs over 900 full-time, part-time, sessional, and casual employees across its operations in Australia and overseas. We understand that the education industry is not considered to be a high-risk industry for modern slavery due to the high levels of regulatory oversight and the fact that many of our employees are skilled and hold tertiary qualifications relevant to their roles. We believe that this, combined with NextEd's employment and corporate governance policies and practices, reduce the risk of modern slavery within our employed workforce.

We recognise that the risk of modern slavery varies by geography, and are influenced by local laws, customs and practices. NextEd operates in 7 countries, 2 of which (Colombia & Mexico) are considered to have a higher risk of modern slavery, as measured by the Global Slavery Index 2022. We therefore are alert that there may be a higher risk that our staff and contractors in those countries may be exposed to modern slavery practices.

### **5.2. Risk in our supply chain**

#### ***Education agents***

NextEd considers that the education agent relationships present the greatest risk of possible modern slavery in its supply chain. Many of the agents who refer students to NextEd are located in countries in Southeast Asia, South Asia, Latin America and Europe, some of which are considered to present a higher risk of modern slavery.

Whilst some Australian legislation (including Australian Consumer Laws) provide a framework for education agent operations, there is a likelihood that some agents may knowingly or unwittingly provide incomplete or inaccurate information to international students during the recruitment process, or have payment practices for their employees (especially those located overseas) which may be considered as modern slavery.

#### ***Goods and services***

NextEd purchases a variety of goods and services to operate its businesses as outlined above and we recognise that there is potential for NextEd to contribute to or be directly linked to modern slavery practices through the procurement of goods and services used in our operations.

Higher risk areas are likely to be where goods are sourced from overseas manufacturing facilities, or where services are delivered by overseas located employees.

NextEd has identified the following higher risk product or service categories that are relevant to our operations:

- Purchase of electronic equipment which is manufactured overseas;
- Purchase of branded promotional goods and clothing which is manufactured overseas; and
- Sourcing of furniture for fit out of new campuses from overseas manufacturers.

NextEd intends to prioritise the assessment of these possible higher risk areas, and mitigation where appropriate, in FY24.

### **5.3. Reporting mechanisms**

NextEd understands that prevention, detection and reporting of any modern slavery and human trafficking in any part of the organisation is the responsibility of its people. Employees and contractors are encouraged to report any concerns about likely breaches within the organisation or its supply chain to the Group Quality, Accreditation & Compliance Manager (email [eve.ollerenshaw@nexted.com.au](mailto:eve.ollerenshaw@nexted.com.au) or telephone +61 424 141 279) or to a member of the NextEd Senior Executive Team.

## *6. Actions: how we address modern slavery*

### **6.1. Our approach**

NextEd acknowledges that addressing modern slavery requires a whole of organisation response that addresses each of the following areas:

- Our organisation's operations and culture;
- Collaboration with suppliers and other stakeholders;
- Systems and processes;
- People and management;
- Governance and oversight; and
- Reporting, review and remediation as required.

As this is NextEd's first Modern Slavery Statement, we are in the early stages of formalising programmes for identifying, assessing and addressing modern slavery risks across the organisation and our supply chain.

### **6.2. NextEd's embedded governance and compliance frameworks**

NextEd has in place robust governance and compliance frameworks, policies and procedures including (among other things):

1. Whistleblower Policy;
2. Annual Corporate Governance Statement;

3. Discrimination, Bullying and Harassment Policy;
4. Fraud and Corruption Policy; and
5. Employee Code of Conduct.

NextEd also has a comprehensive Agent Management Framework to provide guidance to its staff and agents in relation to compliance and best practice.

### **6.3. Awareness raising and training**

After the end of the current reporting period and prior to approval of this 2023 Modern Slavery Statement, all members of the NextEd Senior Leadership Team have completed training about modern slavery, our legislative obligations and best practice. This was in the form of a comprehensive online module with detailed content, Q&A and a mandatory test. This is in the process of being extended to all direct reports to the Senior Leadership Team and other key functional and operational managers.

### **6.4. Our outlook**

NextEd's focus during the balance of the next reporting period (FY24) will be on creating and embedding an appropriate Modern Slavery governance framework and supporting procedures across the organisation.

Since the end of the current Reporting Period, NextEd has established a Modern Slavery Steering Committee comprising:

- CEO;
- CFO;
- Exec GM Quality, Accreditation & Compliance;
- Head of Strategy; and
- Company Secretary

The Committee will report to the Audit & Risk Management Committee of the Board of Directors of NextEd at least twice annually. The Committee will be supported by a working group including appropriate representatives from support function and business units as appropriate from time to time.

Other future actions intended to be undertaken include:

- Completing the develop and implementation of policies and processes to support the identification, management, and remediation of modern slavery risks;
- Continuing to roll out modern slavery training to employees;
- Undertake a risk review and analysis of areas considered to be possible higher risk areas in our supply chain, including education agents who operate in higher

risk countries and suppliers of goods sourced from higher risk countries, with mitigation where appropriate;

- Review education agent and supplier agreements for the inclusion of appropriate modern slavery provisions; and
- Review NextEd policies, manuals and training materials for the inclusion of appropriate modern slavery information.

## *7. Assessing effectiveness & consultation*

### **7.1. Assessing effectiveness**

Being the first time that NextEd has been required to prepare a Modern Slavery Statement, we are unable to adequately determine the impact and effectiveness of measures taken to date.

We note that to date there have been no reports relating to possible modern slavery or human trafficking submitted under our Whistleblower Policy, Code of Conduct, or otherwise.

### **7.2. Consultation**

In preparing this Modern Slavery Statement, NextEd consulted with its directors and members and the NextEd Senior Leadership Team as well as other key functional and operational managers.

As noted in section 6.3 above, since the completion of the current Reporting Period, but prior to approval of this Modern Slavery Statement, all members of the NextEd Senior Leadership Team have undertaken comprehensive Modern Slavery Awareness training, which, at the date of this Statement is also in the process of being completed on a mandatory basis by all direct reports to the Senior Leadership Team, and other key functional and operational managers.

## *8. Approval*

In accordance with section 13 of the Modern Slavery Act 2018 (Cth) this statement was approved by the Board of Directors of NextEd Group Limited on 1 February 2024.

Signed on behalf of NextEd Group Limited



Glenn Elith

Chief Executive Officer



## Appendix – NextEd entities

Name	Principal Activity	Place of incorporation and operation	Ownership interest	
			2023	2022
RedHill Education Ltd	Educational Services	Australia	100%	100%
Go Study Australia Pty Ltd <sup>1</sup>	Student Recruitment	Australia	100%	100%
Academy of Interactive Technology Pty Ltd <sup>1</sup>	Educational Services	Australia	100%	100%
International School of Colour and Design Pty Ltd <sup>1</sup>	Educational Services	Australia	100%	100%
Greenwich College Pty Ltd <sup>1</sup>	Educational Services	Australia	100%	100%
Go Study Australia Intercambio Cultural Ltda <sup>2</sup>	Student Recruitment	Brazil	100%	100%
Go Study Australia S.A.C. <sup>2</sup>	Student Recruitment	Peru	100%	100%
Go Study Australia Sociedad Limitada <sup>3</sup>	Student Recruitment	Spain	100%	100%
Go Study Colombia SAS <sup>5</sup>	Student Recruitment	Colombia	100%	-
iCollege International Pty Ltd	Educational Services	Australia	100%	100%
Management Institute of Australia Pty Ltd <sup>4</sup>	Educational Services	Australia	100%	100%
Management Institute of Australia No.1 Pty Ltd <sup>4</sup>	Educational Services	Australia	100%	100%
Management Institute of Australia No.2 Pty Ltd <sup>4</sup>	Educational Services	Australia	100%	100%
Celtic Training & Consultancy Pty Ltd	Educational Services	Australia	100%	100%
Brisbane Career College Pty Ltd	Educational Services	Australia	100%	100%
Capital Training Institute Pty Ltd	Educational Services	Australia	100%	100%

1. 100% owned by Redhill Education Ltd

2. 75% owned by Go Study Australia Pty Ltd and 25% owned by RedHill Education Ltd

3. 100% owned by Go Study Australia Pty Ltd

4. Companies were all acquired at the same time and are now in liquidation waiting deregistration

5. Go Study Colombia SAS was incorporated on December 6, 2022