



MODERN SLAVERY STATEMENT

Box Hill Institute

2022

Box Hill Institute
465 Elgar Road, Box Hill Victoria

INTRODUCTION

This is the current Modern Slavery Statement for Box Hill Institute (BHI), as required by the *Modern Slavery Act 2018 (Cth)* (“the Act”). This statement relates to the 2022 calendar year.

The purpose of this statement is to outline the actions 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 must cover the seven mandatory criteria:

1. Identify the reporting entity
2. Describe the reporting entity’s structure, operations and supply chains
3. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls
4. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes
5. Describe how the reporting entity assesses the effectiveness of these actions
6. Describe the process of consultation with any entities the reporting entity owns or controls
7. Any other relevant information.

The Modern Slavery Statement has been reviewed and approved by the Board of BHI.

ABOUT BOX HILL INSTITUTE

Criterion 1 and 2

Box Hill Institute (“BHI”) is a leading provider of secondary, 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.

BHI 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 the community.

Our Purpose

To support community prosperity and industry growth by delivering learning experiences that meet society’s current and 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 wide 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 2022 financial year supplies and services procured was approximately \$40 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 2022, BHI continued to align its procurement practices with the policies of the Victorian Government Purchasing Board (VGPB). VGPB policies are mandated under the *Financial Management Act 1994* (Vic) and are 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.

State government procurement policies adhered to by BHI include the Fair Jobs Code, the Local Jobs First policy, the Social Procurement Framework and the Supplier Code of Conduct.

As part of its alignment with state government procurement policies in 2022 and into the present year, BHI:

- has undertaken a detailed review of its existing suppliers to understand the risks of modern slavery associated with those suppliers and the sectors they operate in;
- is ensuring all suppliers it engages comply with the Fair Jobs Code, the Local Jobs First policy, the Social Procurement Framework and the Supplier Code of Conduct wherever relevant and applicable; and
- is 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 risks.

As part of its evolving commitment to managing modern slavery risk, BHI has formed a cross-functional team to identify risks and implement mitigations.

As noted above, BHI is also undertaking a detailed review of its existing suppliers with a view toward obtaining an understanding of risks of modern slavery associated with those suppliers and the sectors they operate in. To do this, BHI will engage a specialist risk consultancy firm and develop a risk assessment methodology that allows BHI to identify suppliers who are likely to be high risk in terms of modern slavery practices existing in their business practices and supply chains (expected to be completed in April 2023).

BHI will utilise this tool to identify high risk suppliers and implement appropriate due diligence practices with respect to those suppliers at the approach to market stage of the procurement process.

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	Alignment with the Victorian Government Purchasing Board and adopt State Purchase Contract arrangements where available.	BHI is continuing to align its procurement practices with those of the VGPB, thus enabling BHI to engage with suppliers with confidence in the integrity of the supply chain of those suppliers. In addition to this, BHI will continue to utilise Victorian Government State Purchasing Contracts wherever it can.
Update policies & templates	Review and update relevant policies and procedures. Insert modern slavery clauses into all BHI contract templates. Develop a modern slavery questionnaire to insert into tender documentation.	BHI has reviewed its procurement policies, procedures and practices. BHI is also continuing to work with specialist consultants to embed procurement practices that appropriately address modern slavery risks. 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.
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. The 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 2023.
Staff Communication	Communicate modern slavery information to staff where appropriate and ensure a shared understanding in managing our social	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

PLANNED ACTION	DETAIL	MITIGATING EFFECT
	responsibilities with respect to modern slavery.	understanding of BHI's values and expectations in relation to modern slavery.

METHODS TO ASSESS EFFECTIVENESS OF ACTIONS

Criterion 5

For the actions planned to be undertaken in 2023, 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 compliance with the Fair Jobs Code, the Local Jobs First policy, the Social Procurement Framework and the Supplier Code of Conduct wherever relevant and appropriate	Require compliance with the Fair Jobs Code, the Local Jobs First policy, the Social Procurement Framework and the Supplier Code of Conduct wherever relevant and appropriate as part of an enhanced contract management approach. Track and report progress.
Update policies & templates	Use of a modern slavery questionnaire where appropriate 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	Ensure that relevant staff engage with BHI's Procurement team to ensure modern slavery risks are assessed and appropriately addressed in the procurement process.

CONSULTATION WITH ENTITIES

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 25 May 2023 and has been signed by the Chief Executive Officer on behalf of the Board.



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Grant Radford
Chief Executive Officer and Managing Director
Box Hill Institute

7 June 2023

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Date