

About this Statement

This Modern Slavery Statement has been prepared by Chisholm Institute to meet the Modern Slavery Reporting Requirement of the *Commonwealth Modern Slavery Act 2018* and covers the financial year ending 31 December 2020.

This Statement covers all the entities within Chisholm Institute, and our approach to tackling modern slavery is applied across the whole of Chisholm Institute, including application of our policies, procedures, and systems relating to supply chain management, contracting, purchasing and human resources practices. All references to our, we, us, and Chisholm refer to Chisholm Institute (ABN: 65 335 795 326) and its controlled entities including Caroline Chisholm Education Foundation and TAFE Online Pty Ltd ABN 25 166 750 107 trading as Chisholm Online.

This is our first public Modern Slavery Statement. Chisholm is not required to report under modern slavery legislation in any other jurisdictions.

Chisholm's Board of Directors approved this Statement on 26 May 2021.

About Chisholm

We are a Victorian Government owned technical and further education (TAFE) provider established under the *Education and Training Reform Act 2006*. The responsible Minister is the Hon. Gayle Tierney MP, Minister for Training and Skills and Minister for Higher Education.

At Chisholm, we're leading the way for what a modern TAFE can and should be. We exist to inspire success and transform lives by providing quality education and training throughout Victoria, nationally and internationally through our strategic partnerships.

For more information about Chisholm please see our Annual Report for 2020 published on our website at www.chisholm.edu.au.

Chisholm's structure, operations and supply chains

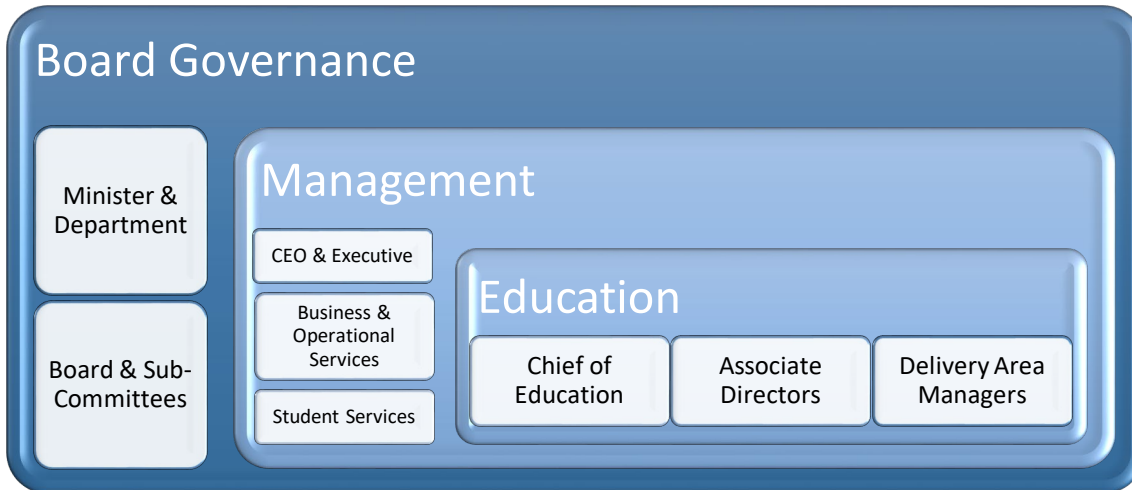
Governance and structure

Chisholm is established under the *Education and Training Reform Act 2006*. In accordance with the Act, the Minister and the governing body of Chisholm exercise specific powers in relation to governance. Chisholm is also subject to the *Public Administration Act 2004*.

Ministerial directions and guidelines may be issued by the Minister to clarify the management, reporting and other responsibilities of TAFE institute boards, and to give direction about employment of staff, the charging of fees, or other specific matters. Executive Memoranda may also be issued to support the Directions.

The Department of Education and Training oversees Ministerial director appointments to Chisholm's Board. Board appointments are published on the Public Board Appointments online register (see www.publicboards.vic.gov.au).

Chisholm is structured across three governance groups as follows:



Our business and operations.

In 2020, we employed more than 1700 staff and enrolled almost 34,000 students across our campus locations at Dandenong, Frankston, Berwick, Cranbourne, Rosebud, Springvale and Wonthaggi, including Chisholm Online, workplace training and offshore. Student numbers through Chisholm Online increased by more than 50 per cent on 2019 as students looked for more flexible study options to improve their employment opportunities.

With a range of qualifications including certificates, diplomas, degrees and postgraduate study, we deliver more than 300 courses designed to be accessible, flexible and relevant for students, employers, industry and our community. We are turning our focus to short industry-led credential courses, to ensure our training is relevant and reliable and provides the skills that employers are looking for.

We're one of the largest training providers in Victoria, committed to supporting and enhancing culturally diverse communities in Melbourne's fast-growing south east region.

We're providing outstanding education and training programs, creating opportunities now and for the future.

Most of our staff live and work in Melbourne. Some of our staff are based or spend a significant amount of their time working at teaching and education facilities overseas.

During 2020, like many other education bodies around the world, we paused travel and most of our staff and students switched to working and studying remotely.

Our supply chains.

To support our students and teachers and ensure we deliver great teaching and learning experiences we buy a wide range of goods and services.

Categories of goods and services we routinely purchase include:

- construction services and supplies to maintain or upgrade our campus facilities
- furniture and stationery
- electronics (computers, audio visual equipment, phones etc.)
- information technology products, solutions and services to support teaching and learning
- food and catering supplies
- travel services

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- vocational course supplies (small and large equipment, chemicals, automotive tools and consumables, healthcare equipment and supplies, make-up, haircare and cosmetic supplies etc.)
- books and printing and waste management services.

As a Victorian Government owned entity we comply with public procurement laws and we align with Victorian Government Purchasing Board (VGPB) supply policies.¹ An increasing proportion of our spend is through Victorian Government purchasing contracts and frameworks established by VGPB.

Our total procurement spend for calendar year 2020 was more than \$40 million with more than 235 suppliers. We awarded 9 contracts via formal public procurement tender processes for a value of \$7 million. We placed 4 blanket orders with suppliers appointed under Victorian Government purchasing contract arrangements established by VGPB.

Steps taken by Chisholm to identify, assess and address modern slavery risks in our supply chain

Chisholm has taken the following steps to identify, assess and address modern slavery risks across its supply chain and operations

- Undertook a review of its current suppliers, to identify suppliers that supply 'at-risk' products / services and/or operate from 'at-risk' geographic areas.
- Requested 'at risk' suppliers to complete a modern slavery questionnaire, so Chisholm can further identify, assess and, where appropriate, address modern slavery risks
- Refreshed its procurement policies and procedures to incorporate ongoing risk assessments and due diligence steps, to assist Chisholm to systematically screen suppliers prior to engaging them and identify and address modern slavery risks in its supply chain, on an ongoing basis.
- Incorporated suitable contract clauses in its standard contracts, which require suppliers to cooperate with Chisholm to identify and address modern slavery risks
- Formed an ongoing cross-functional working group to look at further ways Chisholm can meaningfully contribute to addressing and eliminating modern slavery practices in its supply chain and operations – including awareness training for leaders, staff and students.

¹ For more information on VGPB and VGPB supply policies please refer to www.buyingfor.vic.gov.au.

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Review of current suppliers to assess modern slavery risks in our supply chains

We understand that there are risks of modern slavery in our supply chains. Using the risk screening tool included in Australian Government Modern Slavery Toolkit² and information published by the Walk Free Foundation, the following categories of goods and services within our supply chains may have a higher risk of modern slavery practices because 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.

Country of origin risk	Category risk
Products and services made in or sourced from suppliers based in any of the following countries: <ul style="list-style-type: none"> • India, China, Pakistan, Bangladesh, North Korea, Thailand, Myanmar, Cambodia or Philippines • Africa (in particular, Uganda, Kenya, Ethiopia, Sudan, Congo, Nigeria) • Eastern Europe (Russia, Uzbekistan, Ukraine) • Middle East / Northern Africa (Egypt, Iran, Iraq, Yemen, Syria, Morocco) • South America (Venezuela, Mexico, Colombia, Peru) • Pacific Islands (Fiji, PNG, Solomon Islands) 	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

Engaging with our key suppliers on modern slavery risks

To help Chisholm further understand and identify modern slavery risks in its supply chain, Chisholm requested its suppliers with spend value of more \$100,000 across the high-risk categories of goods and services to complete a Modern Slavery Survey (based on Australian Government model slavery and trafficking supplier questionnaire³). This was done to gauge what actions these key suppliers are taking to improve their own supply chains to reduce shared modern slavery risks.

We received more than 30 responses to the survey from our key suppliers. The responses demonstrated that most of our key suppliers consider they have high-moderate visibility across their supply chain. Almost half of the suppliers surveyed have policies in place to deal with modern slavery risks and have a team or person in place to oversee modern slavery risks.

Of those suppliers where no formal policy is in place most reported that they do have general procurement processes in place to evaluate suppliers including in respect of labour practices prior to engaging them.

Overall, from the survey results we see that our suppliers are most likely on the same journey as we are in regard to better understanding their own supply chains to identify modern slavery risks and plan steps going forward

² For more information see https://modernslaveryregister.gov.au/resources/Modern_Slavery_Toolkit_of_Resources.PDF and The Global Slavery Index 2018 (<https://www.globalslaveryindex.org/>) and the International Labour Organisation Report: Global Estimates of Modern Slavery





(https://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms_575479.pdf).

³https://modernslaveryregister.gov.au/resources/Supplier_Questionnaire_-_Modern_Slavery_Procurement_Toolkit.docx

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that are appropriate for them to take to address identified risks and then carry out deeper dive risk assessments and mitigation strategies to embed modern slavery risk management.

Key survey results:

How much visibility does your organisation have over its supply chain?	Does your organisation have a policy or policies in place to deal with modern slavery?
 <p>33% High (mapped the full supply chain for key products and services used and identified key suppliers at all levels)</p> <p>45% Moderate (identified major suppliers and partially or fully mapped supply chains for key products and services)</p> <p>22% Developing (identified major suppliers. But have very limited or no visibility of your supply chains below that level)</p>	 <p>48% Yes</p> <p>52% No</p>
Does your organisation perform screening of all prospective suppliers to assess the modern slavery risks that may occur in its operations and supply chains?	Does your organisation have a person/team responsible for overseeing modern slavery risks that arise in relation to the goods or services that you deliver?
 <p>52% Yes</p> <p>48% No</p>	 <p>52% Yes</p> <p>48% No</p>

Refresh of our procurement policies and processes

Chisholm recognises that through our spend we have an opportunity to facilitate and promote social and sustainable outcomes.

As a Victorian Government owned entity, Chisholm aligns itself with the Victorian Government’s Social Procurement Framework. Chisholm’s Social Procurement Strategy was approved by the Victorian Department for Treasury and Finance in July 2020.

Chisholm’s Social Procurement Strategy commits Chisholm to using our buying power to general social value across the following key focus areas:

- Women’s equality and safety – looking for opportunities to partner with suppliers who offer family violence leave and demonstrate gender equitable employment practices
- Opportunities for disadvantaged Victorians – looking at opportunities to purchase from Victorian social enterprises and/or suppliers that demonstrate employment practices which offer opportunities to disadvantaged Victorians

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- Supporting safe and fair workplaces – looking for opportunities to purchase from suppliers that create good industrial climates for their workforce including security employment.

With effect from 1 July 2021 Chisholm is required to align with the VGPB supply policies. Full alignment is required by 30 June 2022.

Over the past 12 months Chisholm has been reviewing and refreshing its procurement policies and processes to:

- better embed social procurement practices into its overall approach to procurement and managing its supply chain;
- align with VGPB supply policies; and
- establish a consistent and coordinated approach with our suppliers to identifying, assessing and addressing modern slavery risks in our shared supply chains.

As a result Chisholm has refreshed its procurement management framework, supporting policies, procedures, templates and tools to enable an integrated approach to ethical, sustainable and socially responsible procurement across Chisholm which aligns with the Victorian Government's commitment.

A key aspect of our refreshed procurement management framework is enabling the making of procurement decisions based on an evaluation of social and sustainable outcomes as well as price, quality and risk.

Our refreshed framework includes the requirement suppliers as part of Chisholm's market engagement documentation to complete a supplier due diligence questionnaire which includes questions on modern slavery risks and fair work practices. This will assist Chisholm to identify and assess modern slavery risks and work through strategies to address identified risks.

A substantial proportion of Victorian Government procurement is undertaken under State Purchase Contracts and through pre-qualification registers. Over time as Chisholm aligned with VGPB supply policies more and more of Chisholm's purchasing will be carried out through State Purchase Contracts and using pre-qualification registers and in turn, the State Purchase Contracts and pre-qualification registers will be adapted to further embed the social procurement framework objectives including working with suppliers on better social and sustainability outcomes.

Update of our contracts

Alongside the refresh of our procurement management framework Chisholm has also updated its set of contracting templates to include appropriate contract clauses to ensure suppliers work with Chisholm to identify, assess and address modern slavery risks. Where applicable Chisholm's contract templates are per the standard contracts and model clauses published by VGPB, which include model clauses for modern slavery and incorporate the Victorian Government's Supplier Code of Conduct.

Modern slavery risks in our operations

Our people plan and approach

Our employment policies set out workplace rights at Chisholm in accordance with the *Public Administration Act 2004 (Vic)*, the Ministerial Directions to TAFE Institutes on the employment of staff and all other requirements imposed on Chisholm under relevant employment and industrial relations legislation or at common law.

We are rigorous in checking that all new recruits have the right to work in Australia. Where it is necessary to hire agency workers or contractors, our staff are directed to specified, reliable agencies that have been vetted through Chisholm's procurement procedures and meet our imposed selection criteria regarding their

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employment policies and practices. Agencies are asked to identify any sub-contractors used and to promote fair work practices as appropriate.

Our people plan

A cornerstone principle behind Chisholm's operational People Plan 2019-2021 is the need to vehemently uphold fair employment practices which avoid discrimination or exploitation.

Our approach is aligned to the *Human Rights and Responsibilities Act 2006* and we actively educate our workforce in merit based recruitment practices and transparent processes. Our People Plan includes a range of initiatives which seek to foster an accessible, inclusive, diverse and positive work environment for all.

Chisholm has designed a Respectful Workplace Behaviours program which addresses the expectations of all employees to adhere to significant policies (for example, Code of Conduct) and legislative requirements, and what to do if they experience or observe anything of concern in the workplace. In addition, a Speaking up Awareness program will be progressively implemented for all employees to be aware of the avenues for providing feedback, seeking support, speaking up, and where appropriate, making a referral or formal complaint about anything that concerns them.

Reporting of concerns

Chisholm has in place a Protected Disclosure (Whistleblowers) Policy⁴ to encourage staff and contractors to raise concerns about potential corruption, fraud and other unlawful practices within Chisholm. If a case of modern slavery were to be suspected, this would be fully investigated and appropriate action would be taken.

Ongoing steps we are taking

2021 plan

Chisholm is taking a multi-faceted approach to social responsibility in its supply chain aligned with the Victorian Government's – whole of government - social and sustainable procurement framework.

Over the next 12 months as part of rolling out and embedding Chisholm's refreshed procurement management framework and aligning with VGPB supply policies Chisholm will look at ways to raise organisational awareness about modern slavery such as:

1. Including modern slavery awareness as an areas of focus in procurement training for staff with purchasing responsibilities
2. Embedding supply chain risk reporting via carrying out an annual supplier survey – similar to the initial targeted supplier survey carried out by Chisholm earlier this year. This will provide Chisholm with a year on year reporting mechanism to track baseline improvements in supplier approaches to better manage modern slavery risks.
3. Further segmenting suppliers into different categories and identifying the second tier of current Chisholm suppliers to extend the supplier survey.
4. Establishing an ongoing working group to:
 - Identify further opportunities for raising awareness of modern slavery risks, for example in relation to our international activities especially when located in high-risk countries

⁴ See <https://qms.chisholm.edu.au/Document/DownloadContentByDocumentId/c946aa77-5dc8-e411-80c0-005056b47701>

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- Address identified risks across Chisholm’s supply chains and its operations including appropriate remediation processes as applicable.

Measuring effectiveness

In this first 2020 reporting period, we have identified and assessed the risks of modern slavery across a segment of our supply chain where a higher prevalence of modern slavery practices was more likely because 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. This has helped us establish a foundation for our anti-modern slavery program.

As our program develops, in future reporting periods we will be in a position to introduce appropriate measures of its effectiveness relevant to the activities we undertake. For example we may:

- Measure effectiveness of our training and awareness activities by surveying our staff who engage in procurement activities to measure changes in their understanding of modern slavery risks.
- When running the extended supplier surveys and measure engagement with suppliers via percentage of suppliers that respond to our surveys.

Consultation process

Chisholm wholly owns TAFE Online Pty Ltd, which operates as Chisholm Online. Chisholm manages the procurement activities and day to day business operations of the Caroline Chisholm Education Foundation. As both Chisholm Online and the Caroline Chisholm Education Foundation are integrally connected to Chisholm business, their operations and supply chains have been included in our modern slavery response plan. Any references in this Statement to Chisholm’s operations and supply chain include the operations and supply chain of Chisholm Online and the Caroline Chisholm Education Foundation.

For the avoidance of doubt, this Statement is a single modern slavery statement by Chisholm, and not a joint statement. Neither Chisholm Online nor the Caroline Chisholm Education Foundation is a reporting entity for the purposes of the Modern Slavery Act. Given Chisholm Online and the Caroline Chisholm Education Foundation are integrally connected to Chisholm, including sharing the same key staff across procurement and shared governance and risk assessment structure, it was not necessary to have a formal consultation process.

Approval by the Board

In accordance with Section 13(2) of the *Modern Slavery Act 2018*, this Statement was approved by the Board of Chisholm Institute (ABN 65 335 795 326) on 26 May 2021.

The Board is the principal governing body of Chisholm, for the purposes of approving this Statement. This Board has authorised Mr Stephen Marks, Chairman of the Board to sign this Statement.



Stephen Marks, Board Chair

26 May 2021