

# Modern Slavery Statement

Holmesglen Institute  
1 January to 32 December 2022  
ABN number 40096756729

This statement covers the activities of Holmesglen Institute (**Holmesglen**) and its controlled entities for the year ended 31 December 2022.

This statement sets out the actions we have taken to assess and address modern slavery risks in our operations and supply chains during the 2022 calendar year and establishes future actions we are committed to implementing to further mitigate these risks.

## About Holmesglen and our structure

Holmesglen Institute is a technical and further education (**TAFE**) institute established under the *Education and Training Reform Act 2006* (Vic) (**ETR Act**). The ETR Act, together with our Constitution, defines our functions and duties, including:

- providing vocational education and training and higher education programs to benefit Victorian industry and communities
- undertaking applied research in partnership with learners, industry and communities
- providing facilities and services to support our learners and communities.

As a Victorian TAFE Institute, we are also subject to the *Public Administration Act 2004* (Vic) and the Standing Directions under the *Financial Management Act 2018* (Vic).

Our responsible Minister is the Minister for Training and Skills and Minister for Higher Education, the Hon. Gayle Tierney MP. We work closely with the Department of Education and Training as well as with Victorian industry and community-based organisations.

Holmesglen Institute controls three entities; Holmesglen International Training Services Pty Ltd ACN 077 692 472, Glenuc Pty Ltd ACN 128 404 722 and the Holmesglen Foundation ABN 85 116 873 292. Holmesglen International Training Services Pty Ltd did not operate during 2022.

The Holmesglen Foundation was established and operates under a trust deed between Glenuc Pty Ltd and the Institute. Glenuc Pty Ltd is the Foundation's trustee under the trust deed and employs one full time employee to support the Glenuc Board in delivering on its commitments as outlined in the Trust Deed with the Institute.

At Holmesglen, we recognise the importance of respecting the human rights of those affected by our business activities. As a public education provider, our vision is to be a leading tertiary provider valued by local and international learners, the community and industry. We take seriously our responsibilities with regard to international labour and human rights standards in working towards that vision.

For more information, please refer to our corporate publications which are available on our website at [www.holmesglen.edu.au](http://www.holmesglen.edu.au).

## Our operations

During 2022, we employed approximately 1,000 staff and over 18,000 learners undertook our senior-secondary certificate, vocational programs and higher education degrees. We also enrolled over 7,000 learners in our skill sets and non-award programs to help them develop foundational or specific work-related skills.

Our core operations are in Melbourne, Victoria with six campuses at various locations within the Melbourne metropolitan area and our rural learning centre located in Eildon, Victoria.

All of our staff are based in Australia.

Our mission is to provide education and training to enable our learners to be work ready, life ready and world ready. We have an integral role in the community supporting social inclusion and cohesion. We work with businesses to develop the workforce of today and tomorrow

We are committed to delivering on our 2030 Vision and our aspiration to be:

- an inspirational and inclusive place of learning
- physical, digital and experiential
- focussed on excellence in performance
- connected to industry and community partners
- differentiated
- globally connected
- resilient, sustainable and adaptive

## Our supply chain

We source and engage our suppliers in accordance with our Procurement and Tendering Rule, Social Procurement Strategy, Modern Slavery Policy and related procedures. For procurement of construction works services, we also comply with the Ministerial Directions for Public Construction in Victoria.

The Institute is also required to comply with the Victorian Government Purchasing Board supply policies, which includes mandatory usage of relevant state purchase contracts.

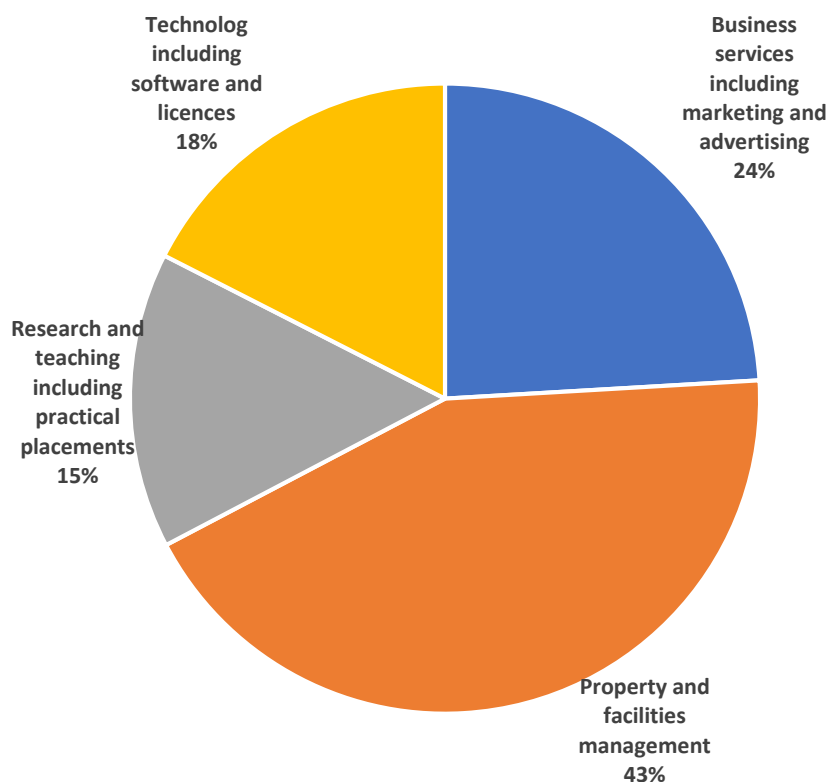
During 2022, we engaged 1,427 suppliers with an average spend per supplier of \$28,000. 96% of our suppliers are located in Australia.

A high level break down of procurement % spend by level 1 category (based on the Australian University Procurement Network (AUPN) taxonomy) is provided in figure 1.

The main types of goods and services that we procure directly are:

- **Property and facilities management:** This category includes goods and services used to maintain training spaces, administration offices and related facilities, maintenance and repairs, utilities, renewables, cleaning and security.
- **Research and Teaching:** This category includes stationery, books and other print materials, lecturer and teaching expenses, teaching and student consumables, student placements and other student related services, research equipment and laboratory supplies.
- **Technology:** This category includes computer hardware and software, printers, audio visual equipment and services, IT professional services, and telecommunications equipment.
- **Business services:** This category includes consultancies and related services, international student recruitment, advertising and media, catering, travel and logistical services.

**Figure 1: Indicative spend by category snapshot**



Procurement contract terms are dependent on the nature of the services provided and may be short, medium or long-term depending on the goods or services to be procured. For example, a public construction project engagement will be based on the estimated term of project completion, whilst a contract for delivery of services such as cleaning will generally be a longer term of 3 to 5 years.

### **Modern slavery risks**

Holmesglen acknowledges that modern slavery risks may be present in our operations and we are committed to reducing the risks through our own activities, supply chains and investments.

We have in place a Modern Slavery Policy which underscores this commitment and sets out the principles that support the Institute's approach to addressing modern slavery in our supply chain.

In line with our policy, we undertake an annual review of all of our active suppliers and assess the modern slavery risks in accordance with our Risk Management Rule and Enterprise Risk Management Plan.

In assessing our modern slavery risks we consider the following factors

- Geographic risk which takes into consideration the supplier association with countries with heightened prevalence or vulnerability to modern slavery as determined by the Global Slavery Index 2018 criteria
- Supply category risk which considers sector and industries and products and services with heightened vulnerability to modern slavery
- Complexity and business criticality risk based on the criticality of the supplier's goods and services to the operations of the Institute, and
- Overall entity risk which is considered following review and consideration of whether higher risk suppliers have the policies and procedures in place to manage exposure to modern slavery risks within their supply chains.

Our broader modern slavery risk profile is summarised in the table below.

Risk Category	Description
<b>Geographic</b>	<p>The specific country, or countries a supplier is based in and / or operates within is a strong indicator of the likelihood for modern slavery to exist.</p> <p>We base our assessment of a supplier's country of operation on the supplier's address and the Australian Business Number (ABN) recorded on our systems.</p> <p>As the majority of our suppliers are based in Australia and the majority of our goods and services are procured locally in Australia, the modern slavery geographic risk for the majority of our suppliers is low.</p>
<b>Sector / Industry</b>	<p>The education sector within which we operate is not considered a high-risk sector for modern slavery practices. As our teaching staff are highly skilled and employed by us in Australia under appropriate employment contracts and the sector is highly regulated, our operations present a <b>low</b> potential for modern slavery risks.</p>
<b>Products and Services</b>	<p>We understand that there are modern slavery risks in our supply chains because of the way products are produced, provided or used such as high-risk raw materials used as inputs or the use of exploited labour.</p> <p>Products and services that we procure that are of potentially higher modern slavery risk include:</p> <ul style="list-style-type: none"> <li>• workwear and protective clothing</li> <li>• laptops, computers and mobile phones</li> <li>• catering and food supplies</li> <li>• maintenance, security and cleaning services.</li> </ul> <p>Suppliers that provide high risk products and services are required to complete a modern slavery supplier questionnaire which supports us in determining further mitigation strategies.</p>
<b>Complexity and business criticality</b>	<p>The complexity and business criticality of the supply chain or products and services procured may increase the likelihood or impact of modern slavery risks.</p> <p>In addition sub-contracting and recruitment activities may also increase the risk of modern slavery.</p> <p>The Institute's annual review of its Procurement Strategy includes a high level complexity assessment across the key procurement categories, with the majority of procurements identified as being of low value and low complexity and therefore also presenting as low risk of modern slavery when assessed against this risk category.</p>

Our supplier assessment process includes the following:

- All active suppliers are assessed against each of the modern slavery risk categories outlined above to determine an initial risk rating and inform further action required.
- Suppliers that are initially assessed as of medium, high and very high modern slavery risk are required to complete the Institute's supplier self-assessment questionnaire
- Suppliers are further assessed based on their self-assessment questionnaire responses to determine a current risk rating and
- Further actions are determined for implementation where the current risk rating remains at high or very high following this further assessment.

Of the 1,427 active suppliers during 2022, 1,331 have a current risk rating of low risk, 88 have a current risk rating of medium and 8 remain as high risk.

We continue to review our modern slavery risk profile, risk assessment methodologies and tools and supplier questionnaires as part of our commitment to continuous improvement and addressing the risks within our supply chains.

## Actions to assess and address risk

Holmesglen’s Modern Slavery Policy outlines our commitment to addressing modern slavery risks across our operations and supply chain. It also summarises the relevant governance framework and establishes accountabilities to support this commitment.

In addition to the Institute’s Modern Slavery Policy, Holmesglen has in place a number of other internal strategies, rules, policies and procedures which support us in identifying and reducing the risks of modern slavery in our operations and supply chains. These strategies, rules, policies and procedures are continuously reviewed, updated and communicated to all relevant staff throughout the Institute include but are not limited to the following:

Addressing operational risk	Addressing supply chain risks
<p>Our Complaint Resolution Procedure supports and encourages employees to raise concerns without fear that their future employment prospects will be adversely affected.</p>	<p>Our Social Procurement Strategy supports safe and fair workplaces by purchasing from suppliers that comply with industrial relations laws and promote secure employment. This strategy enables us to adopt a strategic, organisation-wide approach to how we will deliver social and sustainable outcomes through our procurement activities.</p>
<p>Our Public Interest Disclosures Policy establishes a system for the protection of persons who make a public interest disclosure or complaint under the Public Interest Disclosures Act 2012 (Vic) (PID Act) from detrimental action by officers, learners, employees and contractors of Holmesglen Institute in accordance with section 58(5) of the PID Act and ensures that all other requirements of the PID Act are met.</p>	<p>Our Procurement and Tendering Rule establishes how we implement and maintain an effective procurement and tendering framework including ensuring that all goods, services, assets and construction procurement risks, including modern slavery, are managed appropriately.</p>
<p>Our Conduct Rule and Code of Conduct defines the standard of behaviours expected of all members of the Holmesglen community including the requirement to demonstrate the Victorian public sector values of responsiveness, integrity, impartiality, accountability, respect, leadership and human rights.</p>	<p>Our Procurement Complaints Procedure establishes our processes for receiving and managing complaints regarding our procurement processes.</p>
<p>Our Risk Management Framework which includes Risk Management Rule, Enterprise Risk Management plan and strategic and operational risk registers. Our Risk Management Framework outlines our approach and commitment to risk management and establishes the processes for identifying, evaluating and managing our risks including modern slavery risks.</p>	<p>Our standard purchase order terms and conditions and approach to market templates include requirements to comply with the Victorian Government’s Supplier Code of Conduct, support our Modern Slavery risk mitigation obligations and address our Social Procurement outcomes, as relevant to the particular tender or quotation.</p> <p>The Victorian Government’s Supplier Code of Conduct that sets out the minimum expectations for our suppliers and third-party labour providers related to ethical practices including addressing modern slavery risks in their business.</p> <p>During 2022 we also reviewed all of our standard market approach documents to include a requirement to support the Institute’s Modern Slavery mitigation commitment with the inclusion of a supplier modern slavery response section.</p>

All our rules, policies and procedures are reviewed regularly within scheduled timeframes and updated as required for any relevant amendments required.

## Assessing our effectiveness

We assess the effectiveness of our actions by

- monitoring and closing out the activities that we have committed to as part of our procurement strategies and frameworks
- monitoring the number of suppliers assessed as medium, high or very high risk and the strategies implemented to address these risks and continue to engage with these suppliers to address modern slavery risks
- monitoring and reporting Modern Slavery risk to the relevant Committees as part of our risk management framework
- monitoring the number of staff who have undertaken relevant e-learning modules including modules relating to modern slavery, procurement essentials and contract management. All of these modules have specific references to identifying and mitigating modern slavery risks.

## Consultation

Holmesglen Institute controls Holmesglen International Training Services Pty Ltd, Glenuc Pty Ltd and the Holmesglen Foundation. None of these entities are reporting entities under the Modern Slavery Act 2018 (Cth). As controlled entities of Holmesglen Institute, the Institute manages all of their procurement, risk management and tendering activities and their operations and supply chains are included in this Modern Slavery Statement, and proposed action plan. Therefore wider consultation has been assessed as not being required.

## Future actions

In our next reporting period we will continue our focus on the following:

- review actions identified for individual supplier self-assessment questionnaires and further engage with suppliers to identify and implement risk mitigation strategies
- finalise the review of all of our standard Institute agreements and contracts to include contractual modern slavery clauses
- conduct an annual review of all active suppliers during the year utilising the Institute's modern slavery risk assessment methodology and tool.

## Board approval

The Board of Holmesglen Institute is the principal governing body for the purposes of approving this statement. This statement was approved by the Board of Holmesglen Institute on the 15<sup>th</sup> March 2023. The Board has authorised Mary Faraone to sign this statement in her capacity as the Chief Executive and Director of Holmesglen Institute.



**Mary Faraone**  
**Chief Executive and Director**  
**Date: 15<sup>th</sup> March 2023**