

## 1. PURPOSE

To outline Holmesglen's commitment to addressing modern slavery risks in our operations and supply chains and the actions the Institute will implement to address these risks and comply with the requirements of the *Modern Slavery Act 2018* (Cth), including the submission and publication of our annual Modern Slavery Statement.

## 2. SCOPE

Applies to:

- all employees involved in the procurement of goods and services
- suppliers and partners engaged to provide goods and services to the Institute and its controlled entities.

## 3. POLICY STATEMENT

Holmesglen acknowledges that modern slavery risks may be present in our operations. We have zero tolerance for all forms of modern slavery. Holmesglen recognises that respecting the human rights of all individuals is of high importance and we are committed to reducing the risks of modern slavery through our own activities, supply chains and investments.

## 4. PRINCIPLES

- 4.1. Holmesglen's approach to modern slavery is integrated into the Institute's governance framework and includes the following.
- (a) 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.
  - (b) Our Procurement and Tendering Governance 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.
  - (c) The Victorian Government's Supplier Code of Conduct 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.
  - (d) Our Procurement Complaints Procedure establishes our processes for receiving and managing complaints regarding our procurement processes.
  - (e) All our invitation to supply documents include requirements to comply with the Victorian Government's Supplier Code of Conduct including commitment to comply with modern slavery obligations.
  - (f) Our Grievance Resolution Procedure supports and encourages employees to raise concerns without fear that their future employment prospects will be adversely affected.
  - (g) 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) from detrimental action by officers, learners, employees and contractors of Holmesglen Institute and ensures that all other requirements of the act are met.
  - (h) 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.

- (i) Our Risk Management Framework includes our 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.
- 4.2. The Institute will identify and assess the modern slavery risks in its supply chains in accordance with its Risk Management Rule and Enterprise Risk Management Plan. Risk indicators to be considered to identify modern slavery risks include sector and industry, types of products and services, geographical locations and specific entity risks. All modern slavery risks will be included in the Institute’s enterprise operational risk register.
- 4.3. The Organisational Performance Review Committee (OPRC) will monitor the progress of current and future actions taken to address modern slavery risks and assess the effectiveness of these actions.
- 4.4. Holmesglen’s annual Modern Slavery Statement will be prepared in accordance with the *Modern Slavery Act 2018* and address the seven mandatory criteria as published by the Australian Border Force.
- 4.5. An extract of Holmesglen’s annual Modern Slavery Statement will be included in the Institute’s annual report.
- 4.6. Reports relating to modern slavery are to be made in accordance with our Public Interest Disclosures Policy.

The Institute may also make a report to Victoria Police, if we hold concerns for the immediate safety of an individual.

If a report also involves fraud and corruption, it will be reported in accordance with our Fraud and Corruption Rule and Fraud and Corruption Control Plan.

## 5. ACCOUNTABILITIES

Action	Accountability
Approve the annual Modern Slavery Statement.	Board
Review and endorse the Modern Slavery Statement. Report to the Board on identified significant modern slavery risks, actions taken to address those risks and the effectiveness of these actions.	Chief Executive
Prepare the annual Modern Slavery Statement for the preceding full calendar year and submit to the Chief Executive and Board for approval that describes: <ul style="list-style-type: none"> <li>▪ the reporting entity details</li> <li>▪ Holmesglen’s structure, operations and supply chains</li> <li>▪ the risks of modern slavery practices in Holmesglen’s operations and supply chains and its controlled entities</li> <li>▪ the actions taken by Holmesglen and its controlled entities to assess and address these risks, including due diligence and remediation processes</li> <li>▪ the assessment of the effectiveness of these actions</li> <li>▪ the process of consultation at Holmesglen and its controlled entities</li> <li>▪ any other relevant information.</li> </ul>	Chief Financial Officer

Action	Accountability
<p>Submit the approved and signed annual Modern Slavery Statement to the Modern Slavery Statement Public Register by no later than 30 June in the succeeding year.</p> <p>Engage appropriate resources to support implementation of current and future actions to address modern slavery risks.</p> <p>Provide reports to the Organisational Performance Review Committee on actions to address modern slavery including:</p> <ul style="list-style-type: none"> <li>▪ action plan for modern slavery compliance</li> <li>▪ detailed supply chain mapping of direct and indirect suppliers</li> <li>▪ responses to supplier questionnaire used to engage with suppliers and inform the risk assessment methodology</li> <li>▪ modern slavery risk assessment methodology and detailed risk management report</li> <li>▪ the number of suppliers that have committed to the Supplier Code of Conduct</li> <li>▪ relevant training and the number of employees that have completed training on modern slavery.</li> </ul>	
<p>Engage and consult with suppliers in accordance with the approved actions to address modern slavery risks.</p> <p>Lead the implementation of the modern slavery action plan and report on its progress.</p>	Manager Procurement

## 6. DEFINITIONS

Term	Meaning
Modern slavery	<p>Situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedom. Modern slavery is only used to describe serious exploitation. It does not include practices like substandard working conditions or underpayment of workers.</p> <p>The <i>Modern Slavery Act 2018</i> defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour mean situations where children are subjected to slavery or similar practices or engaged in hazardous work.<sup>1</sup></p>

## 7. CONTEXT AND/OR REFERENCED DOCUMENTS

### Internal

[Conduct Rule](#)

[Code of Conduct](#)

[Enterprise Risk Management Plan](#)

[Fraud and Corruption Control Rule](#)

[Grievance Resolution Procedure](#)

[Public Interest Disclosure Policy](#)

<sup>1</sup> Commonwealth Modern Slavery act 2018 – Guidance for reporting entities.

[Procurement and Tendering Governance Rule](#)  
[Procurement and Tendering Procedure](#)  
[Procurement Complaints Procedure](#)  
[Modern Slavery Statement](#)  
[Social Procurement Strategy](#)  
[Risk Management Rule](#)

**External**

[Modern Slavery Act 2018](#)  
[Modern Slavery Statement Public Register](#)  
[Commonwealth Modern Slavery act 2018 – Guidance for Reporting Entities](#)  
[Victorian Government’s Supplier Code of Conduct](#)

**8. REVIEW**

- 8.1 This policy must be reviewed no later than three years from the date of approval.
- 8.2 The policy will remain in force until such time as it has been reviewed and re-approved or rescinded. The policy may be withdrawn or amended as part of continuous improvement prior to the scheduled review date.

**9. VERSION HISTORY**

Version Number	Date	Summary of changes
1	July 2021	New policy to address the mandatory requirements of the <i>Modern Slavery Act 2018</i> (Cth).