




## MODERN SLAVERY STATEMENT

1 JULY 2023 - 30 JUNE 2024



An aerial photograph of a pristine beach. The ocean is a vibrant turquoise color, with white foam from the waves washing onto a wide, white sandy beach. A single person is walking along the water's edge. The beach curves along the coastline, with dense green vegetation visible on the right side. The sky is a pale blue, and the overall scene is peaceful and scenic.

**TAFE NSW acknowledges Aboriginal and Torres Strait Islander Peoples as the Traditional Custodians of the Land, Rivers and Sea. We acknowledge and pay our respects to the Elders; past, present and emerging of all Nations.**

Hyams Beach, Wandj Wandj Country,  
South Coast, NSW: traditional lands of the Jerrinja people.

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## INTRODUCTION

The New South Wales Technical and Further Education Commission (TAFE NSW) has developed this Modern Slavery Statement (Statement) in line with the Modern Slavery Act 2018 (NSW), Modern Slavery Act 2018 (Commonwealth), and the Office of the NSW Anti-Slavery Commissioner's inaugural Working together for real freedom - NSW Anti-slavery Commissioner's Strategic Plan 2023–2026.

The Statement outlines the action TAFE NSW has taken to identify and address modern slavery risks in the organisation's operations and supply chain during the reporting period 1 July 2023 to 30 June 2024, and the future steps proposed to strengthen our approach.

TAFE NSW does not own or control any other entities therefore the requirement to consult with other entities under our ownership or control does not apply.

## ABOUT TAFE NSW

TAFE NSW is Australia's largest provider of Vocational Education and Training (VET) and was established as a statutory agency by the Technical and Further Education Commission Act 1990 (NSW). With over 397,000 annual student enrolments, over 10,000 employees, and operating across 154 operational campuses, we aim to provide high-quality VET to build prosperity, sustainability, and innovation throughout NSW. We are passionate about developing our learners' skills and supporting them to achieve a successful future, which in turn will contribute to a strong and viable economy.

The supply chain at TAFE NSW is varied, diverse, and complex, delivering hundreds of courses across the state. TAFE NSW spends over \$650 million each year with more than 2,300 suppliers, located within Australia and overseas. It is important that TAFE NSW supports its teachers and learners by supplying ethical, sustainable and value-for-money goods and services.



## MESSAGE FROM THE MANAGING DIRECTOR

At TAFE NSW we are aware modern slavery is a serious human rights issue that affects millions of people around the world. We maintain a strong commitment to upholding human rights and promoting ethical business practices in all aspects of our operations, including our buying and contract management. We recognise the devastating impact of modern slavery on individuals, communities, and society, and are working towards preventing any form of slavery, forced labour, human trafficking, or exploitation in our supply chain.

Over the past 12 months we have increased our efforts to combat modern slavery by building upon our existing initiatives. This includes:

- **Procurement artifacts:** We have updated our procurement artifacts with changes to policy, procedure, and processes; all aimed to better address modern slavery.
- **Risk identification tool:** We leverage the NSW Anti-Slavery Commissioner's Inherent Risk Identification Tool as part of our procurement planning process.
- **Enterprise Risk Register:** We have integrated modern slavery risk into our risk governance framework at an organisational level.
- **Standard conditions:** TAFE NSW contracts include appropriate conditions that hold suppliers contractually accountable for addressing modern slavery.
- **Supply chain analysis:** We have identified categories of spend that are classified as high-risk for modern slavery and are progressively partnering with suppliers to address and manage the risks.
- **Training and awareness:** We have delivered a range of training and information sessions to our employees and have scheduled regular targeted training to buyers who purchase from high-risk categories.
- **Collaboration:** We are leveraging our unique relationships with NSW Government and industry experts to collaborate, share resources, and work together to address modern slavery.

TAFE NSW is working hard to implement the NSW Anti-Slavery Commissioner's reasonable steps to manage modern slavery risks in our operations and supply chains, but there is still progress to be made. Over the coming year, we will continue this work to ensure we establish and maintain a supply chain that is ethical and sustainable. I look forward to sharing our progress with you in 2025.

I approve this statement in my capacity as representative of the principal governing body of TAFE NSW and sole Managing Director.



Stephen Brady  
Managing Director, TAFE NSW  
30 October 2024

## OUR OPERATIONS

TAFE NSW spends over \$650 million per year across the following three portfolios:

- Corporate Goods and Services
- Information, Communication, Technology; and
- Property and Infrastructure Services.

At TAFE NSW, the procurement function is centralised under a team of accredited and skilled professionals who handle engagements exceeding \$250,000. For engagements below this threshold, business stakeholders have responsibility, backed by the support of the Procurement team's resources, processes, and technology. The TAFE NSW Procurement Framework is comprehensive and consists of the following key documents to drive buyer behaviour and decision making:

- TAFE NSW Procurement Policy
- Procurement Planning Procedure
- Procurement Sourcing Procedure
- Contract Management Procedure
- Simple Procurement less than \$250,000 Procedure
- TAFE NSW Code of Conduct
- TAFE NSW Delegation Manual
- Statement of Business Ethics

TAFE NSW has achieved the highest level of competency accreditation for Goods and Services and Construction Procurement from the NSW Procurement Board. This formal recognition confirms that TAFE NSW possesses the required capability and capacity to deliver value for money, efficiency, and effectiveness in government procurement, ensuring excellent service delivery. The procurement function at TAFE NSW complies with the [NSW Government Procurement Policy Framework](#) and is committed to meeting the goals and objectives that underpin the Framework.

## OUR SUPPLIERS

Due to the range of courses we deliver, our significant geographic footprint, and high spend across our three procurement categories, we engaged a total of 2,323 registered suppliers spread across 24 countries.

Of the suppliers engaged by TAFE NSW in the past 12 months:

- 97.07% are based in Australia
  - Australia is considered a low-risk location
- 2.93% are based in countries outside of Australia
  - 1.42% are high-risk locations
  - 0.17% are moderate-risk locations
  - 1.33% are low-risk locations

Most goods and services purchased on behalf of TAFE NSW originate from low-risk geographical locations such as Australia, the United States of America, and Great Britain. A small portion of suppliers are based in overseas countries such as China, Vietnam, Brazil, and India. These international suppliers are primarily involved in assisting TAFE NSW with the recruitment of international students who come to Australia to learn at TAFE NSW.

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"TAFE NSW has a complex supply chain, buying diverse goods and services to support teachers to deliver courses and training. It's critical that we take accountability and assess modern slavery risk in our procurement activities."

**Director, TAFE NSW Procurement**

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# TAFE NSW SUPPLY CHAIN

TAFE NSW has thoroughly examined the goods and services purchased within each portfolio and pinpointed specific categories that pose a high risk of modern slavery practices. To effectively mitigate these risks, we concentrate our efforts on these areas by raising awareness, fostering collaboration, and implementing rigorous due diligence measures.

Approximately half of TAFE NSW suppliers fall under ten distinct commodities, with facilities and building maintenance, construction, and ICT being the most significant, accounting for 70 percent of the total spend.

The map below highlights where TAFE NSW suppliers are based.

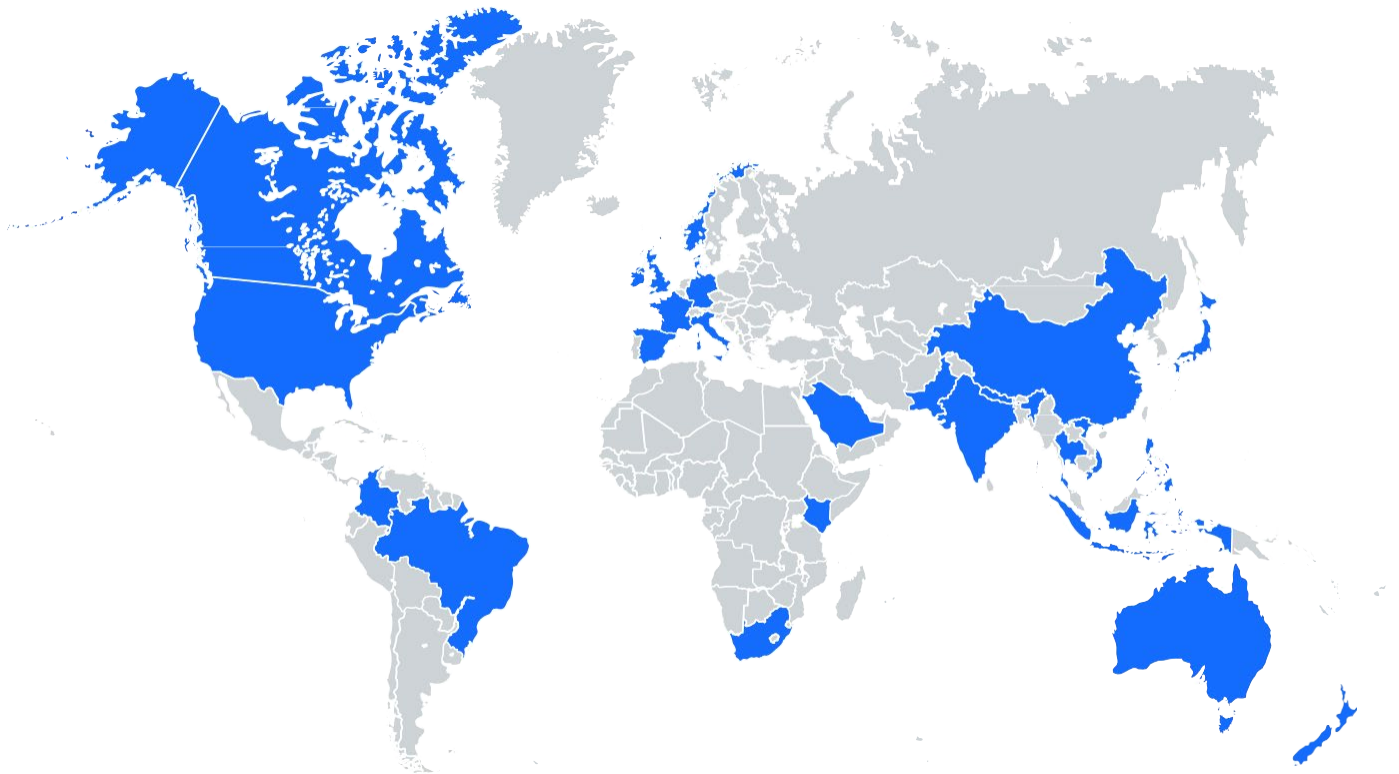


Figure 1 - Geographical locations of TAFE NSW suppliers

TAFE NSW SUPPLY CHAIN

TAFE NSW has established partnerships with suppliers for frequently purchased goods and services and incorporated model contract clauses to combat modern slavery. Additionally, ad hoc engagements that occur with suppliers for low-value and low-risk needs are subject to the TAFE NSW purchase order terms and conditions which include modern slavery clauses.

This chart provides an overview of the annual spend per category.

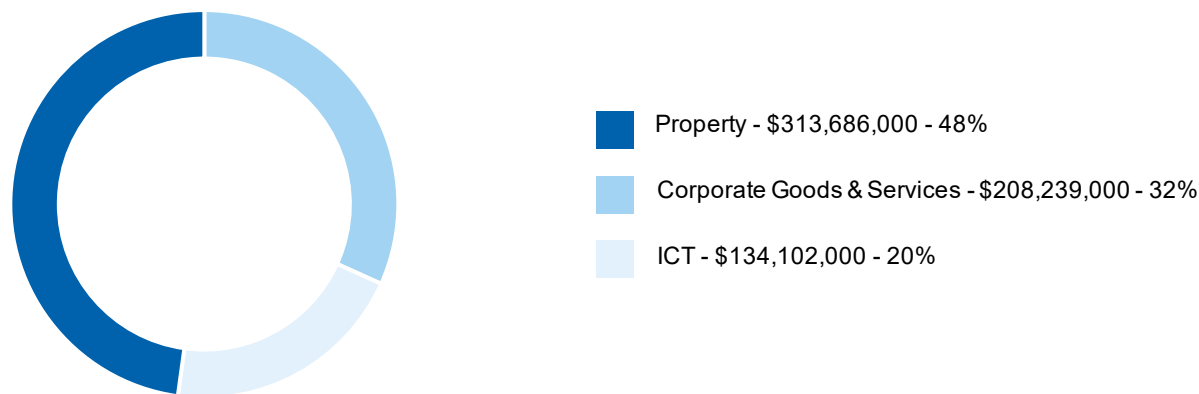


Figure 2 - 2023/2024 spend with suppliers per category

Top 10 procurement categories by spend FY24

Facilities and Buildings Management
Construction
ICT
Childcare Services and Contingent Labour
Education and Training Services
Management, Business and Administrative Services
Furniture, Office Supplies and Services
Marketing, Advertising, Communications and Engagement
Fleet Management
Freight, Couriers, and Postage

TAFE NSW conducts rigorous modern slavery due diligence as part of contract management activities, particularly within the high-risk procurement categories. The below table categorises the types of goods and services we purchase in each of the portfolios, and details areas that typically have a higher probability of modern slavery occurring.

Portfolio	Categories	High modern slavery impact areas
<b>Corporate Goods &amp; Services</b>	<ul style="list-style-type: none"> <li>• Course delivery resources</li> <li>• Travel</li> <li>• Fleet services</li> <li>• Marketing</li> <li>• Recruitment</li> </ul>	<ul style="list-style-type: none"> <li>• Office consumables and promotional merchandise</li> <li>• Garments</li> <li>• Call centre services and business process outsourcing</li> <li>• Hospitality and catering services and consumables</li> <li>• Recruitment and contractor services</li> </ul>
<b>Information &amp; Communication Technology</b>	<ul style="list-style-type: none"> <li>• Technology and data</li> <li>• Telecommunications</li> </ul>	<ul style="list-style-type: none"> <li>• Software and cloud services</li> <li>• Desktop and Audio-Visual Hardware (computers, projectors, smart screens, phones)</li> <li>• ICT Professional services</li> <li>• WAN, LAN and Mobile hardware</li> </ul>
<b>Property &amp; Construction</b>	<ul style="list-style-type: none"> <li>• Construction</li> <li>• Facilities maintenance</li> </ul>	<ul style="list-style-type: none"> <li>• Construction services and supplies</li> <li>• Landscaping and maintenance requirements, utilities, contractors</li> <li>• Cleaning and waste management services</li> <li>• Furniture</li> <li>• Security services</li> </ul>

Figure 3 - TAFE NSW Categories with a high risk of modern slavery

## MODERN SLAVERY FACTORS

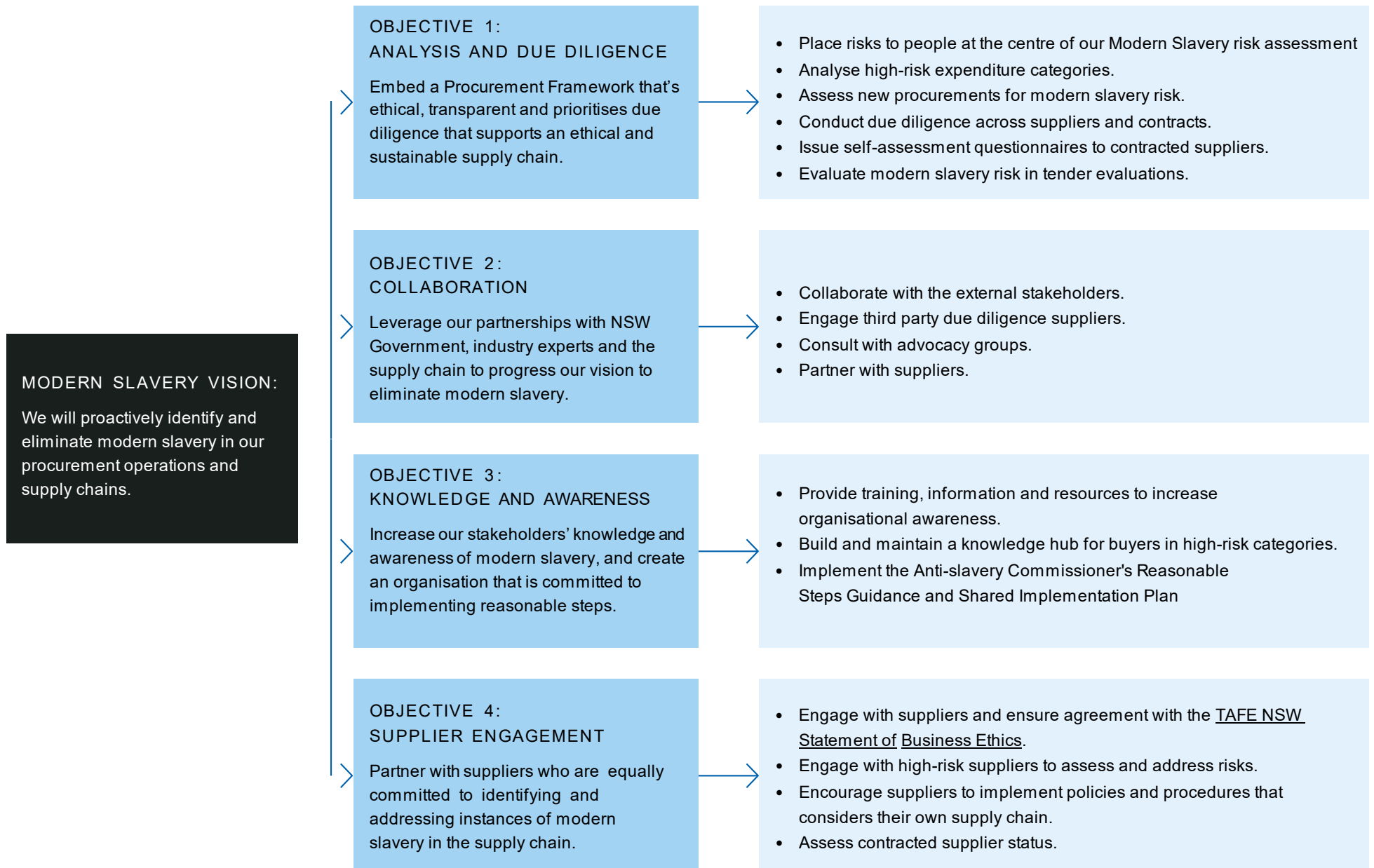
Having carefully considered the various factors contributing to modern slavery, TAFE NSW has identified those more likely to be prevalent within our supply chain. We have prioritised our focus on these areas of concern by evaluating the perceived risk to people and considering their vulnerability.

To combat modern slavery effectively, we are enhancing awareness, fostering collaboration, and implementing robust due diligence practices. By taking these measures, we are committed to building a modern slavery-free supply chain that upholds ethical standards and safeguards human rights.

- **Recruitment:** Recruitment practices carry inherent risks of modern slavery, including exploitative actions such as recruiters charging high fees, withholding workers' passports, and using false promises to trap vulnerable workers. A vulnerability exists where TAFE NSW works with international agents who oversee engagement with international students. TAFE NSW is ensuring that internal stakeholders are aware of the potential risks by addressing these with the agents.
- **Migrant Workers:** Migrant workers brought into a country without proper documentation, limited language skills, and isolated from their families and communities are at greater risk of being exploited. A vulnerability exists in high-risk categories such as cleaning and security, where employees may be on minimum wages. TAFE NSW conducted third-party due diligence reporting, as part of the NSWG Modern Slavery Risk Pilot working group, which allowed us to better understand and address the risks for applicable contracts.
- **Subcontracting:** Subcontracting within the supply chain can introduce risks with delayed payment to workers leading to financial strain. TAFE NSW seeks to minimise subcontracting across major facility maintenance contracts. TAFE NSW complies with the *Building and Construction Industry Security of Payment Act 1999 (NSW)* to ensure prompt cash flow to subcontractors.
- **Lack of transparency:** Immature, weak or non-existent company processes can contribute to obscuring supply chain transparency, making it challenging to identify and address modern slavery risks. However, at TAFE NSW, modern

slavery is assessed during the planning, sourcing and managing phases of all significant procurements valued at more than \$250,000.

- **Minimal Action:** A lack of education, awareness, and capability can negatively impact an organisation and an individual's ability to be accountable and effectively address modern slavery. TAFE NSW is committed to increasing awareness of modern slavery through various initiatives, including collaboration with suppliers, as well as education and training for TAFE NSW staff. In FY24 over 100 staff attended modern slavery awareness training sessions, and on-demand training resources were made available to all staff via our intranet.
- **Discrimination:** Discrimination based on race, gender, or other factors can create conditions that make individuals more vulnerable to exploitation. The TAFE NSW Code of Conduct provides a framework for all employees to use when facing legal and/or ethical questions about what is and isn't discrimination in the workplace. Supplier expectations are also outlined in the TAFE NSW Statement of Business Ethics, including the need to maintain a sustainable and ethical supply chain which is free of slavery and exploitation.



## INITIATIVES

The initiatives listed below have been established for implementation and ongoing progression throughout FY24 and FY25. These initiatives will guide TAFE NSW to achieve its vision of eliminating modern slavery.

#	Focus Area	Key Initiative	Framework area	Activities	Responsible Officer	Status
1	<b>Analysis and Due Diligence</b>	Analyse high-risk expenditure categories	<b>Data analysis</b>	Analyse high-risk expenditure categories to determine if the risk profile suggests they are vulnerable to modern slavery.	Director of Procurement Capability & Governance	Completed
2	<b>Analysis and Due Diligence</b>	Assess new procurement activities for modern slavery risk	<b>Sourcing</b>	During the plan stage, assess new procurement activities for modern slavery risk and include strengthened steps for buyers across the plan, source, and manage stages.	Directors, Procurement	Ongoing
3	<b>Analysis and Due Diligence</b>	Conduct due diligence at a Vendor Master level	<b>Supplier management</b>	Conduct due diligence at a Vendor Master level using the Inherent Risk Identification Tool, and engage with third-party due diligence analytical firms to provide an independent risk review of our suppliers in the cleaning industry.	Director of Procurement Capability & Governance	Completed
4	<b>Analysis and Due Diligence</b>	Develop and issue self-assessment questionnaire to contract suppliers	<b>Contract management</b>	Develop a self-assessment questionnaire with a core set of questions covering a combination of risk identification factors and mitigation systems. Issue the questionnaire to a pilot group of contracted suppliers to monitor progress in managing modern slavery risks through regular contract performance meetings.	Director of Procurement Capability & Governance	Completed
5	<b>Analysis and Due Diligence</b>	Evaluate suppliers involved in new sourcing activities	<b>Sourcing</b>	During the source stage, evaluate suppliers involved in new sourcing activities to determine if they have the governance, stakeholder engagement, risk identification and management, monitoring, and remedies to control modern slavery risks.	Directors, Procurement	Ongoing
6	<b>Analysis and Due Diligence</b>	Incorporate modern slavery into the Enterprise Risk Register	<b>Policy</b>	Add modern slavery risk to the Enterprise Risk Register in ServiceNow at the organisational level	Director of Procurement Capability & Governance	Completed
7	<b>Analysis and Due Diligence</b>	Update the sourcing library with the recommended questions	<b>Sourcing</b>	Update template sourcing documentation with the GRS Model Tender Clauses (heightened version for high risk and streamlined version for low/moderate risk procurement contexts).	Director of Procurement Capability & Governance	Completed

## INITIATIVES

#	Focus Area	Key Initiative	Framework area	Activities	Responsible Officer	Status
8	<b>Analysis and Due Diligence</b>	Update contracts to include new and recommended Modern Slavery clauses	<b>Sourcing</b>	Update standard contract templates to include the GRS Model Contract Clauses (heightened version for high-risk and streamlined version for low/moderate risk procurement contexts).	Director of Procurement Capability & Governance	Completed
9	<b>Analysis and Due Diligence</b>	Conduct feedback and review for TAFE NSW performance 360 degree	<b>Capability</b>	Complete an annual TAFE NSW modern slavery performance review. Learnings to be reflected through improvements to the Policy and Risk Management Plan.	Director of Procurement Capability & Governance	Ongoing
10	<b>Enhance Collaboration</b>	Engage third-party due diligence suppliers	<b>Due diligence</b>	Engage third-party diligence suppliers to assist supplier review when warranted by risk assessment.	Director of Procurement Capability & Governance	Ongoing
11	<b>Enhance Collaboration</b>	Consult with advocacy groups and collaborate with external stakeholders	<b>Networking</b>	Consult with advocacy groups as nominated by the Office of the Anti-Slavery Commissioner (OASC), and continue to collaborate with external stakeholders (e.g. OASC, NSW Treasury, Chartered Institute of Purchasing and Supply, etc.) in working groups and pilot activities.	Director of Procurement Capability & Governance	Ongoing
12	<b>Enhance Collaboration</b>	Engage with broader TAFE NSW business areas to act responsibly	<b>Networking</b>	Establish a grievance mechanism for modern slavery	Deputy Chief Operating Officer	FY25 Q4
13	<b>Build capability and awareness</b>	Provide refresher training and raise awareness among staff	<b>Capability</b>	Raise awareness, provide refresher training, and develop a TAFE NSW Moodle for ongoing staff training.	Director of Procurement Capability & Governance	Completed
14	<b>Build capability and awareness</b>	Build a knowledge hub for buyers in high-risk categories	<b>Capability</b>	Build a knowledge hub for buyers in high-risk categories under a dedicated MS Teams channel.	Director of Procurement Capability & Governance	FY25 Q2
15	<b>Build capability and awareness</b>	Implement the Anti-slavery Commissioner's Guidelines	<b>Policy</b>	Implement the Anti-slavery Commissioner's Guidelines.	Director of Procurement Capability & Governance	Ongoing
16	<b>Engage and partner with suppliers</b>	Update Statement of Business Ethics	<b>Policy</b>	Update the TAFE NSW Statement of Business Ethics to include a revised statement aligned to the NSW Government Suppliers' Code of Conduct.	Director of Procurement Capability & Governance	Completed
17	<b>Engage and partner with suppliers</b>	Engage suppliers to raise awareness, and encourage the implementation of policies and procedures	<b>Contract management</b>	Engage with suppliers who provide products or services deemed high-risk to raise awareness and manage ongoing modern slavery risk. Apply targeted engagement and contract management to encourage suppliers to implement policies and procedures.	Director of Procurement Capability & Governance	Ongoing

## SUMMARY

TAFE NSW is the largest vocational education and training provider in NSW, and boasts a vast geographical reach across the state. This extensive network allows us to collaborate with many suppliers, both domestically and internationally.

In line with our dedication to ethical business practices, TAFE NSW upholds a strong commitment to promoting ethical conduct in all aspects of our operations, including procurement. As part of this commitment, we have taken decisive steps to implement processes and procedures aimed at identifying, addressing, and eliminating any instances of modern slavery within our supply chain and operations. By actively combating modern slavery, TAFE NSW strives to create a socially responsible, and ethically sound, environment in which everyone can thrive.

In the last twelve months, TAFE NSW has taken significant measures to tackle modern slavery. These steps include updating our procurement artifacts to complement the modern slavery updates from the previous year, analysing current buying behaviours, patterns, and spend, identifying high-risk categories and suppliers, and uplifting our organisational awareness and understanding of modern slavery and its associated risks and impacts.

We know our work is not done.

In the coming year, we remain committed to advancing our efforts by further embedding a framework and culture that supports the eradication of modern slavery. This involves working towards the implementation of a Modern Slavery Policy and Modern Slavery Risk Management Framework under the guidance of the Anti-Slavery Commissioner. We are monitoring the effectiveness of our processes and procedures to combat modern slavery and will continue to develop our processes and technology to make it easy to support ethical procurement practices.

Risk assessments will remain an important part of our approach to address modern slavery risk and will be conducted at every stage of the procurement process. We will continue to provide training and resources to equip our employees with the necessary skills to confidently assess modern slavery risks.

We will continually assess the effectiveness of our actions in identifying and managing modern slavery risk by tracking the progress of our initiatives, collaborating with suppliers and thought leaders across the NSW Government, and embedding the Anti-Slavery Commissioner's Shared Implementation Plan by June 2025. By building capability and awareness, our buyers will have the necessary knowledge to make good business decisions. Finally, we will engage directly with our high-risk suppliers, and both challenge and work with them to develop a shared approach to managing risk.

At TAFE NSW, we will proactively identify and work to eliminate modern slavery in our procurement operations and supply chains.

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"I had no idea modern slavery was such a big issue in our own country. I'll be thinking of this when I buy my classroom supplies. Thanks for providing such helpful information."

**TAFE NSW Buyer**

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**TAFE NSW Procurement**

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