



## Modern Slavery Statement © 2021

Australia Financial year 2020 – 2021

This Modern Slavery Statement is provided under Sections 5(d) and 6 of the **Modern Slavery Act** (2018) Australia for the period from 1 July 2020 to 30 June 2021 for **Nolan School of Procurement** ABN 20 908 686 616.

### Our Business

We are a Queensland, Australia-based global online Procurement education provider, delivering unique Procurement-related skills training to organisations and individuals in 11 countries in Australasia, Africa, and the Middle East.

### Our Core Values

Our School has three Core Values:

1. **We transform people into Procurement Specialists through effective training.**

We have a particular focus on developing countries that have a deficit of capable skilled Procurement staff in both government and the private sector. Our training is designed to give our Students proficiency in both strategic and tactical capability. Creating Procurement job-readiness serves multiple purposes with direct Social Procurement benefits:

- Graduating capable Procurement officers to manage Government Procurement and Tender processes with confidence and probity;
- Mitigating organisational corruption through education surrounding proper separation of duties, fairness in Tender evaluation and transparent reporting;
- Eradicating opportunities for Modern Slavery to enter the Supply Chain by infusing all our education with procurement probity and ethics awareness;
- Empowering women to achieve financial independence and escape domestic violence;
- Breaking the cycle of poverty by providing the breadwinners in families with employable skills.



## 2. We believe every person is entitled to inexpensive education.

- Our membership and Program pricing is designed to be affordable for people who value Skills-based education and who want to learn.
- We have payment plans and our Certificates do not expire.
- We maintain a free graduation information service to ensure that prospective employers may verify the authenticity of our Students' Program qualifications.
- Our School is annually independently audited for data security and compliance with Australian Federal and Queensland State Procurement policies.

## 3. Our teaching promotes Social Justice to make the World fairer.

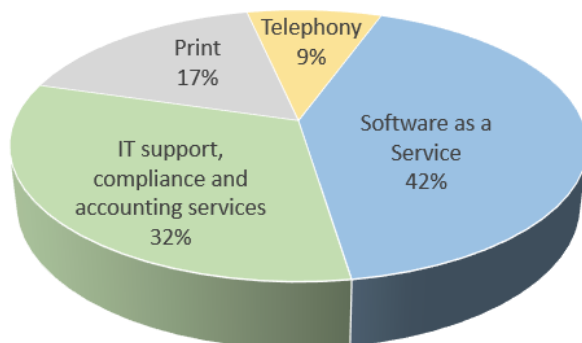
We teach our Students that kindness, competence and exceptional service is the strongest argument to attain Leadership adoption and visible practice of, Procurement policy and process. This includes promoting organisational culture that values compliance with policy requirements, Tendering probity, transparent reporting, diversification in the workplace and eradication of corruption and modern slavery practices.

### Our Supply Chain

As an online education provider, most of our expenditure is on ICT services. We procure goods and services as follows:

- Telephony hosting services from Telstra Corporation in Melbourne, Australia.
- Webinar as a Service from Zoom Video Communications in California, US.
- Audit compliance from a service provider based in Brisbane, Australia.
- Software as a Service from Microsoft Corporation in Washington, US.
- ICT support services from a service provider in Brisbane, Australia.
- ICT security compliance from Cybermetrix in Brisbane, Australia.
- Payment Gateways through PayPal and Western Union in US.
- Printing services through an SME in Melbourne, Australia.
- Platform as a Service from Wix.com in Tel Aviv, Israel.

### Our Category Spend



Our annual spend across all categories, expressed in percent.



## Our Risk Methodology

We identify our most significant risks relating to Modern Slavery in operating as a global education provider.

	Consequence			
Likelihood	Insignificant	Minor	Moderate	Major
Almost certain	Medium	Medium	High	High
Likely	Medium	Medium	High	High
Possible	Low	Medium	Medium	High
Unlikely	Low	Low	Medium	Medium

Our Risk Matrix to assign Risk ratings.

## Our Risk Mitigation Strategy

Inherent Risk	Risk Rating	Mitigation and Residual Risk	Residual Risk Rating
Our Suppliers discover Modern Slavery practices within their supply chains and do not promptly remedy these practices.	L: Possible x C: Major =  High	Mitigation: <ul style="list-style-type: none"> <li>We conduct a basic check on all our Suppliers for Modern slavery practices.</li> <li>We use the 8 checks in the <i>Australian Government Supplier Questionnaire – Identifying modern slavery risks</i> as our template for conducting due diligence on our suppliers.</li> <li>We advertise on our website that we maintain vigilance for Modern slavery practices within our suppliers' supply chains.</li> <li>If we discover Modern Slavery practices in our suppliers' organisations, we will send them a query and consider their response. In some cases, we will terminate our engagement with suppliers.</li> </ul>	L: Possible x C: Moderate =  Medium
Covid-19-related lockdowns disrupt our business process, causing us financial loss which results in our staff becoming unemployed.	L: Possible x C: Major =  High	Mitigation: <ul style="list-style-type: none"> <li>Our Workplace Health and Safety Policy affirms that our organisational priority is the safety, health and</li> </ul>	L: Possible x C: Moderate =  Medium



		<p>wellbeing of our Staff and Students. We comply strictly with Australian Government minimum safety and health directives.</p> <ul style="list-style-type: none"> <li>As an online education provider, our infrastructure allows us to operate virtually and conduct classes from home.</li> </ul>	
<p>Our staff outside Australia inadvertently engages services (e.g., an office cleaning service company) that pays its staff wages that constitutes a Modern Slavery practice.</p>	<p>L: Possible x C: Moderate =  Medium</p>	<p>Mitigation:</p> <ul style="list-style-type: none"> <li>All professional services appointments are engaged directly with the Principal in Australia. We conduct a basic check on all our Suppliers for Modern slavery practices.</li> <li>All wages and rates are reviewed annually for lawful compliance regionally prior to engagement.</li> <li>During induction and annually, our staff undergo Modern Slavery awareness training.</li> </ul>	<p>L: Unlikely x C: Insig =  Low</p>
<p>Our staff outside Australia inadvertently does not comply with our minimum Workplace Health and Safety standards.</p>	<p>L: Unlikely x C: Major =  Medium</p>	<p>Mitigation:</p> <ul style="list-style-type: none"> <li>During induction and annually, our staff undertakes Workplace Health and Safety training, including but not limited to workplace safety responsibility, identification of hazards, evacuation, mental health awareness, bullying and harassment in the workplace, discrimination, and reporting of incidents.</li> </ul>	<p>L: Unlikely x C: Minor =  Low</p>
<p>We inadvertently charge Students fees that cause financial stress or hardship to themselves and their families.</p>	<p>L: Unlikely x C: Moderate =  Medium</p>	<p>Mitigation:</p> <ul style="list-style-type: none"> <li>Our education and administration fees, including our payment plans, are reviewed</li> </ul>	<p>L: Unlikely x C: Insig. =  Low</p>



		annually for both competitiveness and affordability. We do not charge interest on late fees.	
We inadvertently host mandatory attendance paid Program webinars on days and at times that may disadvantage people who are at risk of losing their jobs through non-attendance at certain hours.	L: Unlikely x C: Minor =  Low	Mitigation: <ul style="list-style-type: none"> <li>• Our Program Conditions identify that we do not hold classes and examinations on specific major international holidays.</li> <li>• Our School plans our core classes and examinations a year in advance. All new classes and other events are checked for conflicting holiday dates.</li> </ul>	L: Unlikely x C: Insig. =  Low

**Inherent Risk** is the current risk level with no controls in place to mitigate a risk.

**Residual Risk** is the remaining risk level after an Inherent Risk is mitigated.

Risk is calculated as Likelihood (L) x Consequence (C).

Relevant documents (updated annually and earlier as required)

- Procurement Policy including Modern Slavery Policy
- Workplace Health and Safety Policy
- Modern Slavery Statement
- IT Security Policy



This Modern Slavery Statement is a correct depiction of our supply chain in Australia and overseas. Our Statement is updated annually and following significant changes in our supply situation.

Yours Sincerely

*N Menachemson*

Nolan Menachemson

Principal

Nolan School of Procurement

Brisbane, Australia

25 July 2021