



# 2024 MODERN SLAVERY STATEMENT



CHRISTIAN  
EDUCATION  
MINISTRIES

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This Modern Slavery Statement (MMS) is submitted on behalf of Christian Education Ministries Ltd (ABN 65 124 826 722), under section 13 of the Modern Slavery Act 2018 (Cth)(MSA) to cover the reporting period of 1 January 2024 to 31 December 2024.

The MSS was approved by Christian Education Ministries Ltd's Board of Directors on 14 May 2025 on behalf of all entities covered by the MSA. The MSA is signed by the Chief Executive Officer as a duly authorised representative of Christian Education Ministries Ltd's Board.

**David Fyfe**

Chief Executive Officer

# CONTENTS

ABOUT US	1
STRUCTURE AND OPERATIONS	3
SUPPLY CHAINS	4
SUPPLY CHAIN RISKS	6
GEOGRAPHICAL RISK	8
SPECIFIC SUPPLIER RISK	9

# ABOUT US

Christian Education Ministries Ltd (CEM) is a not-for-profit, non-denominational, Christian organisation involved in various aspects of Christian Education, including the delivery of primary and secondary education, delivery of school support services, developing curriculum, operating early learning centres and helping home schoolers. The organisation manages ten distinct brands:

1. Our schools operate under the brands:

- Australian Christian College (ACC)
- Medowie Christian School
- Brightwaters Christian College
- River City Christian College
- Heritage Christian School
- Swan Hill Christian School
- Bairnsdale Christian College

2. Our early learning centres and out-of-school-hours (OOSH) centres operate under the Smartplay Early Learners brand (Smartplay)

3. Our support to families choosing to home-school their children is provided under the Australian Christian Home Schooling brand (ACHS)

Under each of these brands CEM is pursuing its mission to develop each and every student to be equipped spiritually, academically, socially and physically to flourish into their full potential, and be a positive influence on the world around them.

CEM has fourteen (14) wholly-owned operating subsidiaries, none of which is a reporting entity for purposes of the MSA. These are as follows:

## In New South Wales

- Australian Christian College – New South Wales Ltd (ABN 24 125 965 862), which operates a school in Marsden Park
- Australian Christian College – Singleton Ltd, now named ACC Singleton Ltd (ABN 57 126 319 953), which operates a school in Singleton\*

- Brightwaters Christian College Ltd, now named ACC Brightwaters Christian College Ltd (ABN 54 106 419 854), which operates a school in Brightwaters\*
- Medowie Christian School Ltd, now named ACC Medowie Christian School Ltd (ABN 69 085 148 965), which operates a school in Medowie\*
- Hastings Association for Christian Education Ltd (ABN 47 002 521 404), which operates a school in Port Macquarie

## In Western Australia

- Australian Christian College – Western Australia Ltd (ABN 45 121 476 024), which operates a school in Albany
- Australian Christian College – Darling Downs Ltd, now named ACC Darling Downs Ltd (ABN 83 126 319 622), which operates a school in Brookdale#

## In Queensland

- Australian Christian College – Queensland Ltd (ABN 86 125 183 637), which operates a school in Caboolture

## In Tasmania

- Australian Christian College – Tasmania Ltd (ABN 53 620 450 651), which operates schools in Hobart, Launceston and Burnie

## In Victoria

- Australian Christian College – Victoria Ltd (ABN 49 005 784 627), which operates schools in Benalla and Skye
- River City Christian College Inc. (ABN 30 078 204 989), which operates a school in Echuca^
- Bairnsdale Christian Community School Inc (ABN 76 447 460 787), which operates a school in Bairnsdale
- Son Centre Christian School Ltd (ABN 39 056 886 769), which operates a school in Swan Hill

\* Effective 1 January 2025, these schools were transferred to Australian Christian College - New South Wales Ltd, and the transferor entities became dormant.

# Effective 1 January 2025, this school was transferred to Australian Christian College - Western Australia Ltd, and the transferor entity became dormant.

^ Effective 16 January 2026, this school was transferred to Australian Christian College - Victoria Ltd, and the entity became dormant.



## Operating nationally

- Smartplay Early Learners Pty Ltd (ABN 92 633 199 934), which operates early learning and/or OOSH centres in Caboolture, Medowie and Marsden Park

This statement describes the supply chains and operations of CEM and its above-named subsidiaries. CEM operates a central services model across its subsidiaries, with financial management and procurement largely managed from CEM. As a result, procurement processes and actions designed to mitigate modern slavery risks are consistently implemented across all entities.

All of the individual entities described above have been consulted in relation to the preparation and contents of this statement, and in relation to CEM's modern slavery response generally.

CEM is committed to operating responsibly and establishing and adhering to Christian principles and values, which at their core seek to recognise the value of, and seek to extend God's love and grace to, all people.



# STRUCTURE AND OPERATIONS

Through its subsidiaries CEM owns and operates independent Christian schools, early learning centres and OOSH centres throughout Australia. CEM provides governance and strategic leadership support, and a range of central professional services to its subsidiaries. None of these subsidiaries individually meets the reporting threshold under the MSA.

CEM and all subsidiary companies are registered as charities with the Australian Charities and Not-for-Profits Commission, and are governed by a board of directors at each individual company's level. The Principal of each school is responsible for the day-to-day management

and operations of the School, reporting to their respective Boards and the Chief Executive Officer.

The principal activity of each School is provision of primary and secondary education. Smartplay Early Learners Pty Ltd provides early learning and OOSH centres as described above.



# SUPPLY CHAINS

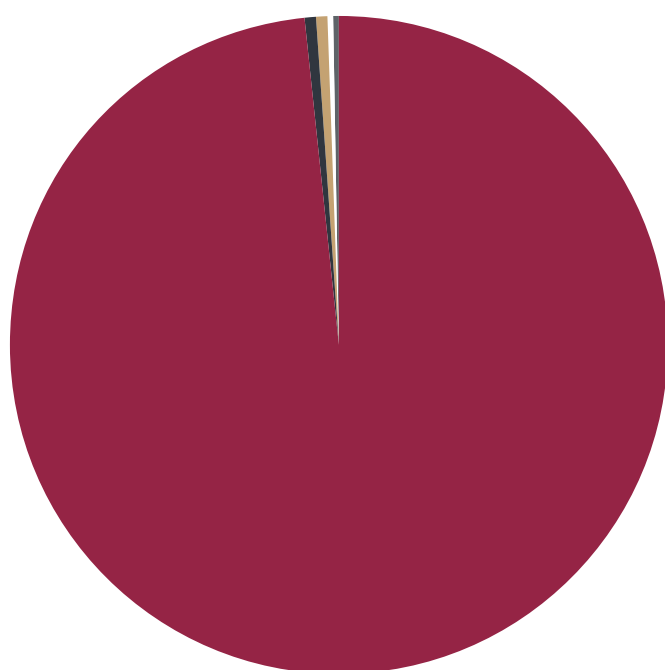
Approximately 72% of CEM's operational cost base is represented by employment-related costs (all staff are employed within Australia and the significant majority of staff are employed pursuant to industrial Awards and other approved industrial agreements), with a further 9% represented by depreciation, interest, financing and other non-cash expenses.

The remaining 19%, plus CEM's capital expenditure, (hereafter "the supply chain") has been subjected to supply chain risk analysis where the expenditure with the individual supplier exceeds \$20,000. This represents 213 suppliers who collectively represent 91% of CEM's supply chain. CEM's total Tier 1 supply chain represents 1,919 suppliers such that the suppliers not subjected to supply chain analysis represent 1,706 suppliers with an average annual expenditure of approximately \$2,750, of which 98% are Australian suppliers.

CEM and its subsidiaries employed 737 full-time equivalent staff for the reporting period. Our employees filled roles primarily in primary and secondary school teaching (62%), school administration and support (35%), and early learning centres (3%).

During the 2024 reporting period, CEM engaged with industry experts, Fair Supply Analytics, to undertake extensive supply chain mapping based on CEM's supply chains for the year. This process has enabled a high degree of visibility over our supply chain reaching down multiple tiers, and a robust assessment of our supply chain risk.

The vast majority of CEM's Tier 1 supply chain is located in Australia, as represented in the pie chart below. This localised supply chain provides CEM with a greater level of influence over the practices of its suppliers, which will be a factor in our future actions to address modern slavery risks.



Country	Sum of Spend
Australia	\$45,207,801
Ireland	\$304,430
United States	\$233,351
United Kingdom	\$175,347
New Zealand	\$28,310
<b>Grand Total</b>	<b>\$45,949,239</b>



Figure 1: CEM's Tier 1 Supply Chain





CEM, through engagement with Fair Supply Analytics, has further mapped its supply chain up to 10 tiers and identified those which occur in higher risk countries and industries, which is discussed further in later sections.

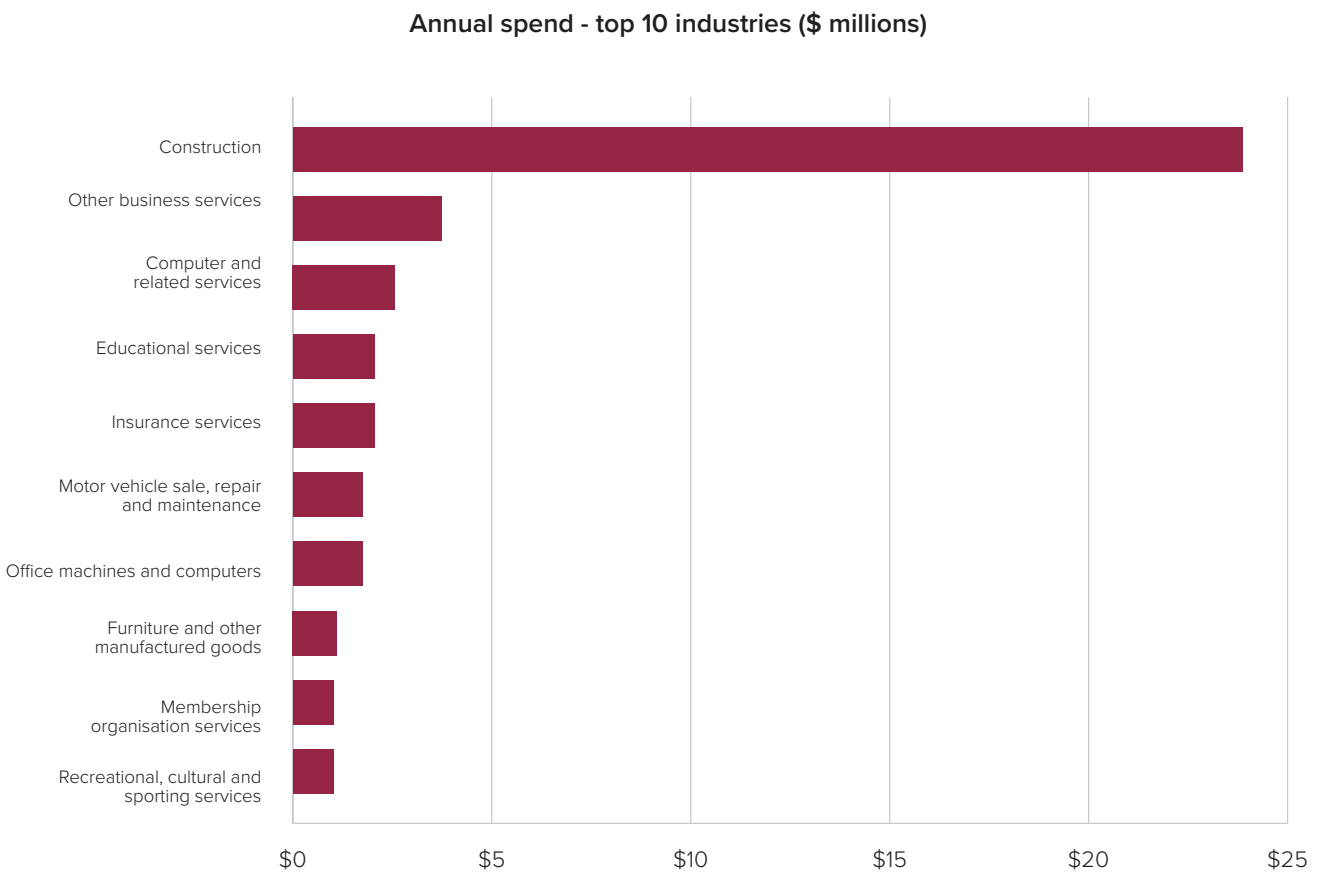


Figure 2: Annual Spend



# SUPPLY CHAIN RISKS

Through the risk analysis conducted by Fair Supply Analytics, CEM has gained a deeper understanding of its supply chain risks across a range of metrics, including by supplier, supply chain tier, industry, and country. Supply chain risk is represented in the 'theoretical slavery footprint' (TSF) which indicates the theoretical number of people in conditions of modern slavery within the supply chain.

CEM's TSF for the year was 0.6911. While it is currently difficult to benchmark this figure we consider this to be a relatively low level of risk.

CEM's top 15 risk industries represent 77% of the supply chain spend, and are entirely Australian-based. One (1) industry is rated moderate risk, three (3) moderate/low risk, and the remaining eleven (11) are rated low risk in terms of theoretical slaves/\$M of spend. When applied to the actual spend with the relevant industry suppliers, the top 15 risk industries account for 82% of CEM's TSF. Said differently, the majority of CEM's supply chain is spent in relatively low-risk industries.

**Theoretical Slaves per \$1 million of Spend**

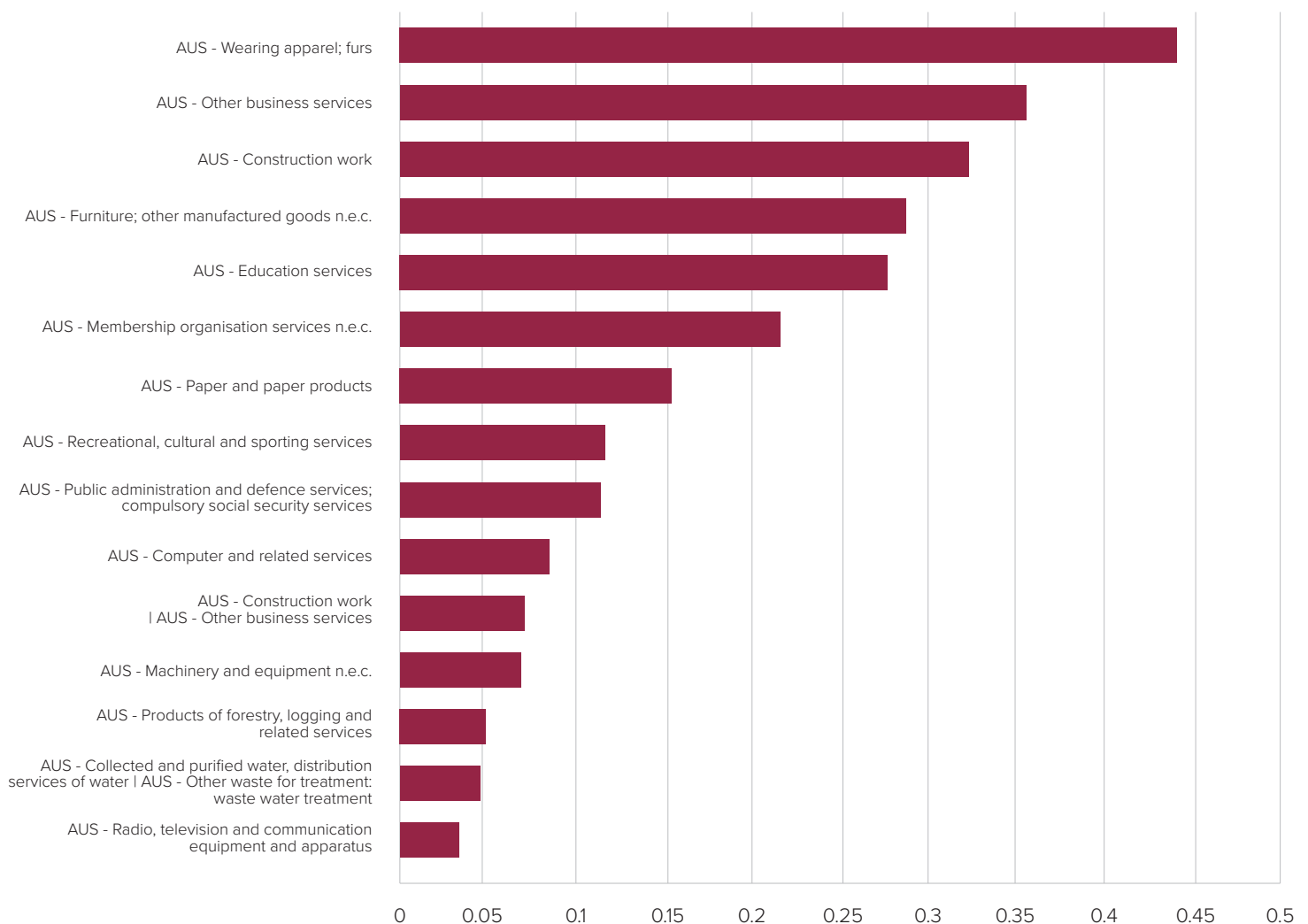


Figure 3: Risk Industries

The three industries with the highest modern slavery risk are:

- Australian Other Business Services (low risk): CEM acquires professional services largely in the nature of consulting (management, architectural, engineering services). CEM's total value of expenditure within this industry is approximately \$3.6 million.
- Australian Construction Services (low risk): CEM acquires a significant amount of construction services from suppliers within this industry. CEM's total value of expenditure within this industry is approximately \$22.4 million
- Australian Wearing Apparel (moderate risk): CEM acquires a small amount of uniforms and other apparel from suppliers within this industry. CEM's total value of expenditure within this industry is approximately \$290,000.



# GEOGRAPHICAL RISK

The table to the right lists CEM's TSF by geographical location, with the Top 10 countries specifically identified.

Australia ranks highly, predominantly due to the concentration of CEM's Tier 1 supply chain in Australia, and therefore spend. The fact that Australia (being an inherently lower risk country) is at the highest risk level for CEM is a further indication that our relative risk level is low.

We have noted the number of Tier 1 (direct) suppliers within CEM's supply chain (subjected to risk assessment) that are located within each geography. Where there are no Tier 1 suppliers within CEM's supply chain, this indicates that the modern slavery risk arises solely from the upstream supply chain of CEM's Tier 1 suppliers.

Rank	Country	TSF%	Tier 1
1	Australia	48.5%	206
2	India	11.8%	-
3	China	10.1%	-
4	Indonesia	3.9%	-
5	United States	1.7%	4
6	Bangladesh	1.7%	-
7	Thailand	1.6%	-
8	Vietnam	1.6%	-
9	Malaysia	1.5%	-
10	Saudi Arabia	1.2%	-
		<b>83.6%</b>	<b>210</b>
Rest of the world		16.4%	3
<b>Total</b>		<b>100.00%</b>	<b>213</b>

This is illustrated by the cumulative TSF across Tier 1 (CEM's direct suppliers), Tier 2 (suppliers and contractors to CEM's Tier 1 suppliers), and so on through to Tier 10.

Tier	TSF
1	27.3%
2	23.9%
3	18.3%
4	12.5%
5	7.8%
6	4.7%
7	2.7%
8	1.5%
9	0.8%
10	0.5%
<b>100.0%</b>	

# SPECIFIC SUPPLIER RISK

Using the risk analysis, CEM has ranked each of its suppliers with a total annual spend greater than \$20,000 by risk level. This enables greater due diligence and engagement with higher risk suppliers to ensure that CEM is able to influence anti-modern slavery practices in the highest impact areas of its supplier base through supplier agreements and other direct engagement.

Further information about CEM's future measures is provided in later sections.

## Operational risks

CEM provides (either directly or through a subsidiary):

- Early Learning, for children aged 3-4 in Australia
- Schooling for international and local children aged 5-18 in Australia
- Out-of-school-hours care for children aged 5-18 in Australia

We acknowledge potential risks that CEM's operations present through:

- the engagement of Tier 1 suppliers within Australia which might contain a higher risk of modern slavery (e.g. security and cleaning services, building and construction services), appreciating that the 2023 Global Slavery Index estimates that Australia had 1.6 people per thousand in modern slavery; and/or
- the supply chain of CEM's suppliers where those supply chains are conducted in countries, or involve upstream suppliers, with greater modern slavery risks (e.g. in the manufacture of computer and other electronics, solar panels, and garments manufactured offshore for use within CEM's operations).

CEM has detailed below the actions taken in order to address those potential risks.

## Actions taken to assess and address risks

During the year ended 31 December 2024, CEM continued its work with Fair Supply Analytics to gain better insight into its suppliers and organisational spend with each, the industries in which they operate, and took initial steps to better understand our modern slavery footprint as a means of identifying future actions to mitigate potential supply chain risks. Being the second year in which CEM has been regulated under the MSA, the analysis of the 2023 and 2024 years has provided a deeper insight into the organisation's modern slavery risks.

The actions taken have included:

- Fair Supply Analytics
  - Engaging with Fair Supply Analytics to undertake detailed supply chain mapping and risk assessment for our supplier base where annual spend exceeded \$20,000. Fair Supply Analytics employed their proprietary analysis methods to CEM's supplier and spend data, and a multi-regional input-output table, to thoroughly map our supply chain reaching up to 10 tiers.
  - A slavery footprint using existing research data was then overlaid to estimate the impact and risk level of CEM's supply chain, represented as our TSF.
  - This extensive analysis has provided invaluable insights to CEM to understand our existing risk profile as well as informing anti-modern slavery initiatives moving forward.
- Engaging with significant suppliers to obtain their Modern Slavery Statements and/or seeking their response to CEM-initiated Modern Slavery Questionnaires.
- Board approval of CEM's Modern Slavery Policy.
- Review of significant, new supply agreements to ensure that they include provisions related to compliance with the MSA and reasonable management of upstream modern slavery risks.





## Looking ahead

During the year ending 31 December 2024 CEM will:

- Continue to consider modern slavery risks in significant, new supply contracts, and obtain assurance through review of supplier MSA's.
- Refresh our supply chain risk analysis based on the 2025 spend data and looking specifically to any new suppliers within our supply chain.
- Implement processes and systems to better manage the onboarding of new suppliers to ensure that the required data elements for new suppliers are captured and inform future risk assessments.



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