

# Modern Slavery Statement

---

2023

*Pymble Ladies' College*

### Introduction

This is the first Modern Slavery Statement submitted by Pymble Ladies' College (*Pymble*) pursuant to the Commonwealth Modern Slavery Act 2018 (the Act).

The purpose of this statement is to demonstrate *Pymble's* ongoing commitment to minimising Modern Slavery practices in Australia, which can manifest in various forms such as slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

In this initial statement we have identified potential risks related to Modern Slavery within our supply chain, professional services, and operations. We also discovered areas within our goods and services procurement and hiring policies, where adjustments to better comply with the requirements outlined in the Modern Slavery Act were needed. In response to this *Pymble* has since developed its Modern Slavery Policy, which came into effect on 29 February 2023.

This current statement highlights the first steps in our journey of developing and transitioning to an environment that actively manages the risks contributing to Modern Slavery practices. Our Modern Slavery Policy provides a framework for the governance and risk management and outlines how our procurement processes should manage Modern Slavery risks moving forward. Part of this risk management includes an assessment that is undertaken on procurement activities, allowing *Pymble* to identify high risk vendors and take appropriate actions prior to a formal engagement.

Additionally, we have also included Modern Slavery prevention clauses in all the College standard contract templates, giving us the ability to hold newly contracted vendors to account.

As the concern surrounding Modern Slavery is tightly aligned with our *Social Intelligence Pillar* within the College's Strategic Plan and our vision of *Watch Us Change the World*, our ongoing commitment towards our social responsibility in preventing Modern Slavery is therefore constantly evolving and at the forefront of *Pymble's* strategic and operational requirements. The College Board, together with the Executive Management of *Pymble*, will continue to demonstrate strong leadership in directing the College as it transitions through its Modern Slavery prevention responsibilities, ensuring that effective steps are taken to minimise Modern Slavery practices in our direct supply chain and the supply chain of our various vendors.

### About Pymble

Originally Presbyterian Ladies' College Pymble, the school was founded on 8 February 1916 as a branch of Presbyterian Ladies' College, Sydney. Following the establishment of the Uniting Church in Australia in 1977, which saw the coming together of the Methodist Church, the Presbyterian Church and the Congregational Church, P.L.C. Pymble became Pymble Ladies' College.

Students at *Pymble* are nurtured to be inquisitive, courageous, and determined, so they can make a difference that will positively change the world. Our Pymble campus sits on 50 acres of beautiful park-like grounds on Sydney's upper North Shore. Our Arcadia campus sits on 97 acres and hosts our Outdoor Education programs. The College is a non-selective, independent school for girls from Kindergarten to Year 12, with Boarding available from Year 7.

*Pymble's* Strategic Direction 2021-2030 is an exciting new chapter in the life of the school and for our students. It aims to develop the whole student, in all areas of her life, by focusing on four key intelligences – Academic, Social, Emotional and Digital – which are underpinned by the Mind, Body and Spirit Framework supporting holistic wellness.

## Structure and Operations

### Reporting Entity

This Modern Slavery Statement has been prepared by Pymble Ladies' College (ACN 645 100 670) and covers the activities impacted by modern slavery during the period of 2023. The following entities are included as part of this statement:

- Pymble Ladies' College Trust (ABN 79 441 309 051);
- Pymble Ladies' College Property Limited (ACN 645 148 723); and
- Pymble Ladies' College Foundation Limited (ACN 661 575 677).

### Structure

The Board of Pymble Ladies' College is the governing body of *Pymble*, and the Principal of Pymble Ladies' College is the head of *Pymble's* Senior Executive Management team. Reporting to the Principal are the Deputy Principal, Deputy Principal Academic (K-12), Deputy Principal Students (K-12), Head of Junior School, Chief Operating Officer, Director of Innovative Learning Technologies, Director of Staff, Director of Strategic Projects, Chief Financial Officer, Chief People and Culture Officer, Director of the *Pymble* Institute, Head of Campus Vision Valley and Director of Co-Curricular.

### Operations

The key activities of *Pymble* are the provision of Kindergarten, Primary, Secondary, Boarding and Outdoor education for girls in Years K-12 which are conducted at our Main Campus located on Avon Road in Pymble and our Vision Valley Campus located on Vision Valley Road, Arcadia.

### Risks of Modern Slavery Practices within *Pymble* Supply Chains

*Pymble* has conducted an initial assessment of its supply chains, incorporating all operations across the College, to evaluate the risk associated with Modern Slavery practices. For this period the College remained free of any Modern Slavery incidents or breaches and has not recorded any reports of Modern Slavery incidents within our direct and indirect supply chains.

Assessments have commenced on our suppliers that are considered "High Risk" which focused on their awareness, compliance, and adherence to Modern Slavery deterrences. Additionally, we have made considerable efforts this year to integrate mandatory Modern Slavery assessments through all our formal procurement activities as a pre-qualification, prior to the vendors' offers being assessed qualitatively.

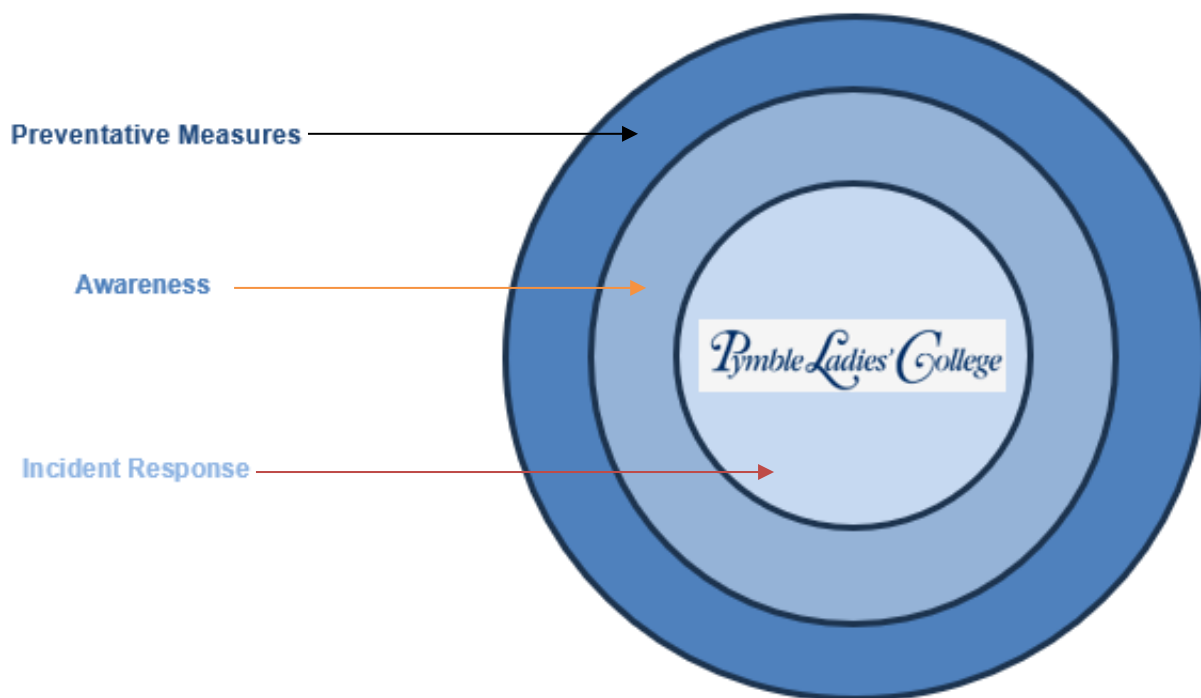
The purpose of this process is to assess most vendors partnering with the College prior to any formal engagement taking place, which proactively safeguards the College from Modern Slavery incidents and sends a clear and deliberate message to all vendors that *Pymble's* zero tolerance to Modern Slavery practices remains at the forefront of our procurement activities.

Relying on resources such as *Global Slavery Index*, *Pymble* can constantly maintain its Modern Slavery assessment criteria to ensure vendors, products, industries and locations are updated and assessed appropriately based on the type of engagement being undertaken. This will allow us to undertake more comprehensive assessments and reporting and develop consistent data on vendors engaged by the College as our Modern Slavery deterrence's come into effect.

Supply Chain	Modern Slavery Risks
Facilities	This area of the College is focused on both hard and soft services that ensures the maintenance and operations of both <i>Pymble</i> campuses. The activities typically included in this area are Security Services, Ground Maintenance, Furniture Purchases, Cleaning Services, Plumbing Services, Electrical Services and Minor Renovation Works.
Operations	This area of the College is focused on academic and student services that typically include activities such as Stationary Purchases, Printing Services, Bus Services, Tuition, Co-Curricular Services, Catering, Back to School Resources, Uniform Design and Purchases, Online Portals and Software, and IT Hardware.
Professional Services	This area of the College is focused on Professional Services that typically include activities such as Emergency Service Management, Audit Services, Marketing and Branding Services, Consultancy Services, Legal Services, Financial Services and IT Services.
Construction and Master Planning	This area of the College is focused on Capital works. Activities typically included in this area include Construction Design Services, Construction Professional Services, Construction and Building Services and Council Application and Approval Services.
Human Resources	This area of the College is focused on attracting, recruiting, rewarding, developing and retaining academic and professional services staff to work at the College, including those on continuing, fixed term and casual contracts.

## Risk Mitigation

Our objective is to ensure that effective risk mitigation strategies are applied throughout the College's operations to help combat exposure to Modern Slavery practices within our supply chains. During this initial period, we have implemented a three-phased layered approach consisting of the following:



**Preventative Measures** The preventative measures implemented by *Pymble* are focused on protecting the College from external factors that may expose *Pymble* to direct or indirect contribution to Modern Slavery practice. These preventative measures are typically completed prior to formally engaging a vendor for the provision of any goods or services. The mechanism used to fulfill this measure is the issuing of a mandatory Modern Slavery Questionnaire that is assessed by the College for the vendor to be categorised as presenting a “Low”, “Medium” or “High” risk of exposing *Pymble* to Modern Slavery Practices. This is currently being undertaken by Procurement Services for all formal procurement activities.

**Awareness** This measure is undertaken internal to the College which will develop staff knowledge of the risks associated with Modern Slavery practices when engaging vendors. This is mandated by *Pymble*'s Modern Slavery Policy, which has come into effect during this period. This measure will be supported by the development of future training and resources to better equip staff who are involved in making decisions in relation to procurement activities in their awareness of this risk as well as abilities to identify and report incidents that may expose the College to being complicit in Modern Slavery Practices.

**Incident Response** This measure is currently being developed to ensure that the College can take swift and effective action in the event a Modern Slavery incident arises. It is our intention to develop a process that can be verified efficiently by reviewing the data obtained by the other measures, allowing us to mitigate the risk immediately. In the event a vendor is found to be complicit in participating in Modern Slavery Practices, the College will be further supported by the *Pymble* standard Terms and Conditions which include Modern Slavery prevention clauses, allowing the College to terminate the agreement with immediate effect.

## Implementation Timeline

The Modern Slavery Implementation Timeline has been included below to detail the anticipated progress of *Pymble's* Modern Slavery development. Included below are the first 3 years of development that will form the foundations of *Pymble's* Modern Slavery reporting capabilities.

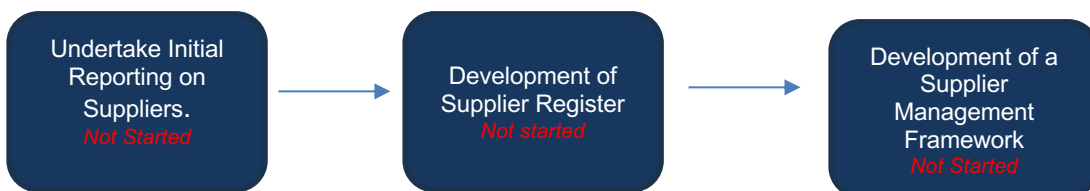
### Initial period Commencing 2023 ending 2024 (Current)



### Period commencing 2024 ending 2025



### Period commencing 2025 ending 2026



## Assessing Effectiveness

*Pymble's* procurement services team will monitor and evaluate the College's Modern Slavery requirements and processes all year round. This includes an assessment of process efficiency, including our essential tools such as the Modern Slavery questionnaire, Modern Slavery registers, and Contract Terms and Conditions. Also, the complexity of individual procurement activities will play a critical role in determining the necessary level of oversight needed, which will be evaluated by the procurement team case-by-case. *Pymble* recognises the importance of adapting risk management strategies for Modern Slavery and utilising a flexible approach guided by overarching processes. This comprehensive methodology highlights *Pymble's* dedication to combatting this critical issue.

## Modern Slavery Governance

Our Board, through management, is responsible for putting into place actions to address risks of Modern Slavery in our operations and supply chains, including approving our annual modern slavery statement and ensuring that it complies with our disclosure obligations under the Modern Slavery Legislation. Our Board has delegated functions under this Policy to a 'Modern Slavery Committee'. The Modern Slavery Committee's responsibilities extend to:

- the primary and day-to-day responsibility of investigating potential and actual incidents of modern slavery in our operations and supply chains, including breaches of this Policy;
- monitoring, consulting and auditing internal controls and procedures to identify risks of modern slavery practices in our operations under the Modern Slavery legislation, including in our subsidiary organisations;
- developing measures to assess and address any risks of modern slavery practices, including through due diligence in our contractual relations;
- monitoring the effectiveness of those measures;
- developing appropriate training materials and programs for our employees to comply with this policy; and
- preparing our annual modern slavery statement in accordance with our disclosure obligations under the Modern Slavery Legislation.

The Modern Slavery Committee reports and refers matters of significance to the Board and is also responsible for working with our other key teams (such as the Human Resources and Procurement teams) in order to conduct modern slavery risk assessments of our operations and Suppliers.

The Modern Slavery Committee shall include:

- Principal
- Deputy Principal
- Chief Operating Officer
- Chief Financial Officer
- Chief People and Culture Officer
- Director of Risk and Compliance
- Manager of Procurement.

Management must, in addition to the responsibilities of personnel under this Policy:

- promote and disseminate this Policy within their work area and ensure that appropriate training is provided so that those who report to them understand and comply with this Policy;
- manage any objections to this Policy including by refusing requests, from any party, to modify or be excused from compliance;
- model appropriate behavior themselves;
- monitor the work environment to monitor that acceptable standard of conduct are observed; and
- encourage openness and support for anyone who raises genuine concerns in good faith under this Policy.

**Visit** Avon Road Pymble NSW 2073

**Mail** PO Box 136 North Ryde BC NSW 1670 Australia

**Telephone** +61 2 9855 7799

**pymblelc.nsw.edu.au**

A SCHOOL OF THE UNITING CHURCH | ACN 645 100 670 | CRICOS 03288K

# Pymble Ladies' College

## Consultation

*Pymble* has consulted key internal stakeholders across our operations and reviewed our current procurement practice in all of the College operations. This Modern Slavery Statement was approved by the Board of Pymble Ladies' College on 27 May 2024.

Signed for and on behalf of  
Pymble Ladies' College



sign

Chair of the Board

Title

Christopher Fydler

full name



sign

Deputy Chair of the Board

Title

Melinda Graham  
(aka Melinda Douglas)

full name

**Visit** Avon Road Pymble NSW 2073

**Mail** PO Box 136 North Ryde BC NSW 1670 Australia

**Telephone** +61 2 9855 7799

**pymblelc.nsw.edu.au**

A SCHOOL OF THE UNITING CHURCH | ACN 645 100 670 | CRICOS 03288K

**WATCH US  
CHANGE  
THE WORLD™**