



## Introduction

This is the second Modern Slavery Statement submitted by Barker College pursuant to the Commonwealth Modern Slavery Act 2018 (the Act).

The purpose of this Statement is to showcase our ongoing commitment in minimising modern slavery practices in Australia that may occur in many forms such as slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services.

In the prior report, we have identified potential modern slavery risks within our supply chain, control, and operation. We further discovered gaps in our goods and service procurement, hiring, and employment policy that required amendment to better address the requirement imposed by the Act.

This second statement captured our progress thus far as we moved from review and identification stage to the planning stage. In accordance with our multi-step approach, we began to develop modern slavery policies to govern the School's hiring and procurement process and integrating modern slavery into our complaint policy and process. We also introduced modern slavery risk screen in the form of a questionnaire in two major procurement contracts in a security tender and ICT digitisation project supplier selection process.

Finally, the concern surrounding modern slavery is aligned with Barker's ongoing and existing commitment towards social responsibility and environmental sustainability. The Council of Barker College will continue to demonstrate strong leadership to direct the School as it navigates through its ESG journey with our Modern Slavery Statement representing the Social element of the ESG Program, amongst other ESG initiatives.

## About Barker College

Founded in 1890, Barker College is an Anglican coeducational independent School on the upper north shore of Sydney, NSW. It operates two indigenous primary school campuses on the Central Coast of NSW and a campus in the Northern Territory of Australia.

The School caters for students from Pre-Kindergarten to Year 12 and offers boarding for Senior School students in Years 10 – 12. All students are exposed to a range of diverse opportunities and experiences.

Students are immersed in holistic learning experiences. Wellbeing is carefully considered and integrated into academic learning, outdoor education, service learning, Connect Groups, the House system, co-curricular programs, sport, student academic care and support, and through Christian faith development.

Barker College operates a number of Environmental, Social and Governance (ESG) programs. This includes, but is not limited to, indigenous education delivery and On Country learning and a student led environmental impact program called Footprint, to evaluate and reduce our carbon footprint.

Barker College also offers a suite of education access and equity opportunities under the Humanitarian Program for refugee students and has senior school Social Justice Captains, expressing the unique student voice aspect to Governance of an ESG program in a non-tertiary education context.

## **Our School Motto**

Honor Non Honores in translation Seek Honour Above Rewards

## **Our Mission**

An Anglican community inspiring every learner, every experience, every day.

## **Our Vision**

To be the leader in Christian education characterised by a global vision that inspires hope.

## **Our Values**

Commitment, Compassion, Courage, Integrity, Respect.

## **Structure and Operations**

### **Reporting Entity**

This Modern Slavery Statement (Statement) has been prepared by The Council of Barker College (The Council of Barker College Incorporation Ordinance 1939) (The Council of Barker College) and covers the activities of Barker College (ABN 18 620 620 356 and Barker College Ordinance 1919 and The Barker College Ordinance 1978) (Barker College) for the calendar year 2023.

### **Structure**

The Council of Barker College is the governing body of the School and the Head of Barker College is the head of the School's operation. Under the Head of Barker College, there are six head divisions that run the School's operation namely, Chief Operating Officer, Deputy Head Student Experience, Head of Junior School, Head of Middle/Senior, Deputy Head Academic Care, and Deputy Head People and Culture.

### **Operations**

The key activities of the School are the provision of Kindergarten, Primary and Secondary education which are conducted in four New South Wales campuses, one Northern Territory campus and an outdoor education campus, the Grange.

## **Risks of Modern Slavery Practices in Our Operations and Supply Chains**

Barker College has conducted further assessment of its operations and supply chains, incorporating all of the entities that the School controls, to evaluate the risk of modern slavery practices.

For 2022-2023 the School remained free of modern slavery incident or breach

We undertook further investigation on our suppliers' procurement and operational policies to determine their level of awareness and compliance towards modern slavery concept. Our focus and efforts this year were based on the risk and initial review stage in the previous year and we will use this continuous improvement approach under the current and future stages to address our modern slavery risk efforts and actions.

We developed modern slavery specific questionnaire to be answered by future suppliers to determine their level of risk, awareness, and compliance under the Act, demonstrating our commitment to working closely with our third-party suppliers. We will continue to articulate our commitment around modern slavery risk with our business partners and eradicating this within our supply chain, control, and operations.

## In Our Operations

Based on this initial assessment we are confident that our modern slavery risk remained low in our operations

This is due to the direct employment relationship between the School and its teaching and non-teaching staffs. Our School has strong employment policies based on the existing Australian employment laws, awards, and other regulations within the education sector including child protection and reporting child abuse under reportable schemes.

## In Our Supply Chain

In assessing the risk of modern slavery practices within our supply chain, several factors were considered, including:

- Geography
- Industry practices
- Labour status

Based on the factors above, we recognise that modern slavery risk may exist in the following areas within our supply chain, but those are nonetheless under our control or reasonably mitigated

Supply Chain	Potential Modern Slavery Risk – Post-Internal Review
Cleaning services	Our supplier for this service has an existing modern slavery policy and a published Modern Slavery statement, indicating a low risk and standard-high degree of compliance with the Act
Security services	Our new supplier for this service demonstrated during the tender process an existing modern slavery policy and a published Modern Slavery statement, indicating a low risk and standard-high degree of compliance with the Act
Food services	Our cafeteria workers are directly employed by the School and are subject to our comprehensive employment policy. At this stage, the origin and risk of the food products in the cafeteria are under ongoing review and would otherwise be subject to our newly developed procurement process
ICT	Our information technology workers are directly employed by the School and are subject to our comprehensive employment policy. The preferred supplier for the school's records digitisation project has an existing modern slavery policy and a published Modern Slavery Statement, indicating a low risk and standard-high degree of compliance with the Act
Co-curricular	Our sports coaches are directly employed by the School and our visiting music tutors are subject to our comprehensive employment policy as contractors. Where the School requires the engagement of a third party supplier for these cocurricular programs, we are currently conducting investigation into their supply chain to determine level of risk and mitigation strategy
Grounds and building maintenance	Our grounds, building and maintenance workers are directly employed by the School and are subject to our comprehensive employment policy. Where the School does contract out these services, from time to time, we are currently conducting investigation into their supply chain to determine level of risk and mitigation strategy
Equipment and consumables	Where equipment and consumables are provided across the Schools activities, we will work with budget holders to determine level of risk and mitigation strategy

## Our Actions to Mitigate Modern Slavery Risk

We recognise that a multi-stage approach is needed to mitigate any potential modern slavery risk and related issues within our supply chain.

Our multi-stage approach is set out below:

### 1. Identification and Review

- Identification of high-risk goods and services procurement origin
- Treatment of risk within the high-risk supply chain as captured in our initial risk assessment review

### 2. Planning

- Proposed amendments to the current procurement and employment policies
- Communication and education of modern slavery risk and concept to college staff
- Adoption of the proposed amendments

### 3. Implementation

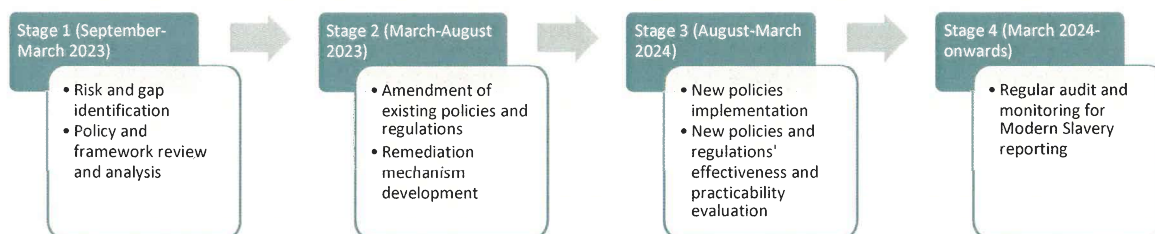
- Application of the amended procurement and employment policies with modern slavery requirements
- Rigorous review and analysis on each supply chain division for compliance with the new policies

### 4. Monitoring and Control

- Regular audit and monitoring of our supply chain divisions

## Stages 1-4

The timeline proposed below showed our ongoing commitment and progress to mitigate modern slavery within our operation and supply chain.



## Modern Slavery Governance

The Council of Barker College has ratified the inclusion of modern slavery risk and compliance under the *Commonwealth Modern Slavery Act 2018* into our **2023-2024 Risk & Compliance Framework**.

The incorporation of modern slavery risk controls and compliance into our framework, ensures that modern slavery risk is evaluated, monitored and reported on routinely and with the highest level of organisational oversight.



## Introduced Modern Slavery Screening in Procurement

Continuing our actions at the Stage 2 period, over the course of 6 months, the School engaged in two major procurement processes to select a security service provider and an ICT service for our Digitisation Project.

In both processes we introduced our newly developed Modern Slavery Risk Questionnaire, an initiative the School's Risk and Compliance team had launched to filter out high risk or non-compliant future suppliers from our operations and supply chain.

The range of questions presented to our future suppliers were divided into four categories:

1. working conditions
2. workforce statistics
3. business integrity; and
4. organisation requirement and management responsibility

The introduction of a modern slavery screen as a part of our procurement process added significant value to the overall tender process as well as enable us to assess suppliers against specific risk categories. It was recognised as an opportunity to understand the prospective businesses, their position in the education market and the alignment with the Barker College values and our modern slavery expectations.

Each of the categories were designed to capture the different risk elements of modern slavery that may exist in a particular supply chain.

**Working Conditions:** The working conditions category contemplated the possibility of whether the business has in place procedures to ensure that no forced labour, human trafficking, or slavery existed within the operations and supply chain. This category also inquired the existence of workers' health and safety risk procedure, compliance with local labour law when it comes to work hours, and indigenous procurement policy.

**Workforce Statistics:** The workforce statistics category is designed to capture the number of migrant workers that the business currently employs. This is to determine the level of risk that arise from business employing migrant workforce such as visa, minimum wage, working condition, workhour, and other labour issues associated with migrant workers. We determined that the higher the number of migrant workers, especially in low-skill sector, the higher the risk would be.

**Business Integrity:** The business integrity category makes reference to the School's existing policy on anti-bribery and conflict of interest that may involve in procurement.

**Organisation Requirement:** Finally, the organisation requirements and management responsibility category seeks to gage the business' compliance with their own supplier and the relevant applicable domestic law (including employment, labour, and corporation regulations).

In addition to the mandatory questionnaire to all future suppliers, we also required the business to provide us with their relevant procurement, supplier, business code of conduct policies for us to assess. We will use the existence and completeness of such policies, particularly those that address modern slavery risk and concept, as a determining factor for procurement.

### Planned Improvements:

Relevantly, the Finance team is in the process of developing mechanism and policy to be used by the Budget Holder within Barker College to help them consider modern slavery requirement in deciding procurement of goods and services.

As we move towards eradicating modern slavery risk in our supply chain and operations, Barker College will aim for further visibility to modern slavery risk in our supply chains and raising staff awareness with modern slavery risk being an integral part of our Barker Risk & Compliance Framework

## Assessing Effectiveness

With modern slavery risk embedded in our 2023-2024 Barker College Risk & Compliance Framework and a standing item agenda on the Governance Risk & Compliance Committee agenda, the effectiveness and gap identification continues under a routine and proportionate monitoring cycle and evaluation process under Stage 3 Planning.

For the planning stage, we are relying on expert consultants in the subject matter to help us amend and develop policies and any remediation mechanism. We also rely on our current and future suppliers' documentation and policy to assist in procurement decision.

## Consultation

Barker College consulted with all the operational campuses in Australia and surveyed current procurement practices. This Modern Slavery Statement was approved by the Council of Barker College on 23 May 2023.

Signed:



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Phillip Heath AM  
Head of Barker College



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David Charles  
Chair of the Council of Barker College