



Modern Slavery Statement

2021

About Caulfield Grammar School

Founded in 1881, Caulfield Grammar School is a leading independent co-educational day and boarding school, offering Early Learning to Year 12 education.

Located in Melbourne, we are a five-campus school with over 3,390 students and more than 1,000 staff (including 400 casual sports coaches supporting our winter, spring and summer programs). Our size and scale allow us to provide an extensive range of broad and balanced programs for our students and employees.

Day-to-day school takes place at a choice of three Melbourne metropolitan campuses: Wheelers Hill, Malvern, and Caulfield. Boarding is offered for Years 9 – 12 at our Caulfield Campus. Our campuses in Yarra Junction (Education Outdoors) and Nanjing, China (Year 9 Internationalism Program) offer immersive learning experiences for students.

Given the impact of COVID-19, the China experience is currently unavailable and has been substituted with an experiential program in the Northern Territory.

We are a purpose-led and values-based school. The health, safety and well-being of all members of our School community are central to all our decisions.

Our Purpose

To enable quality learning every day in every experience for every learner for life.

Our Vision

To be a leading, internationally recognised, co-educational school fostering responsible global citizenship.

Our Values

Inspired by our Anglican tradition of faith, hope and love, our values drive our behaviour, inform our decisions, shape our perspective and underpin our culture:

- Pursuing Excellence
- Inspiring Creativity
- Thriving Together
- Embracing Diversity
- Living Wholeheartedly

Our School is committed to operating responsibly and establishing and adhering to the highest ethical standards.



Structure and Operations

Reporting Entity

Caulfield Grammar School ACN 004 170 772 is a company limited by guarantee and incorporated in Australia, with its registered office in St Kilda East, Victoria. The company is registered as a charity with the Australian Charities and Not for Profits Commission. Caulfield Grammar School and its controlled entities during the reporting period 1 January 2021 to 31 December 2021 were Caulfield Grammar School Foundation Limited ACN 005 544 598, Malvern Memorial Grammar School ACN 004 257 532, Caulfield Grammar Supporters' Association Inc ABN 16 782 617 264, CGS Extension Services Pty Ltd ABN 59 056 568 891.

Caulfield Grammar School is the Group's main operating entity and, as such, is the chief acquirer of goods and services. Caulfield Grammar School is submitting this Modern Slavery Statement as a joint statement on behalf of the Company and its controlled entities, and consultation has occurred in the preparation of this Statement.

Structure

The School Council is the governing body of the School. The Principal is responsible for the overall management of the School.

The School Council understands the reporting and compliance requirements under the Modern Slavery Act (Cth).

Operations

The principal/key activities of the School are the provision of Kindergarten, Primary and Secondary education.

Risks of Modern Slavery Practices in Our Operations and Supply Chains

Caulfield Grammar School has performed an assessment of its operations and supply chains, including entities that the School controls, to evaluate the risk of modern slavery practices.

In Our Operations

Based on this assessment, we believe the risk of modern slavery within operations continues to be low. This is due to the direct employment relationship between the School and its staff, the employment laws that the School is required to comply with, and the regulated nature of the sector.

In Our Supply Chain

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

- Total contract value
- Product/service category
- Country of manufacture/origin
- Suppliers that may engage a transient or low-skilled workforce

Based on this assessment, the following supply chains were identified as areas of focus:



Supply Chain	Modern Slavery Risk
Cleaning	Engagement of a low-skilled/migrant workforce who may have a limited understanding of their legal rights and a restricted ability to bargain with their employers.
Catering	Engagement of a low-skilled/migrant/transient workforce who may have a limited understanding of their legal rights and a restricted ability to bargain with their employers.
Technology equipment and information technology services	The manufacture of equipment and the delivery of services may be a result of individuals working in poor and unlawful conditions.
Uniforms	The manufacture of uniforms may result of individuals working in poor and unlawful conditions
Maintenance services	Work may be subcontracted to third parties resulting in the exploitation of subcontractors.
Security	Engagement of a low-skilled/migrant workforce who may have a limited understanding of their legal rights and a restricted ability to bargain with their employers.

Our Approach to Modern Slavery (Actions & Effectiveness)

Caulfield Grammar School’s approach to the assessment of and response to modern slavery risks consists of:

- Regular reviews of the School’s supply chains to identify where the potential risk of modern slavery practices may exist
- Completion of the Modern Slavery Supplier Assessment Questionnaire for at-risk suppliers. The inclusion of Modern Slavery conditions in the School’s tender process and standard contract templates
- Easy access to existing Complaints Handling and Whistleblower policies and procedures

The School continues to be committed to implementing the following four-step approach:





1. Risk Assessment

- Formalise policies and processes to monitor those suppliers where the risk of modern slavery practices may be present, including within the School's procurement practices
- Develop an action plan to respond to modern slavery risks

2. Review Policies and Processes

- Develop and publish a Modern Slavery Policy
- Review existing policies and processes to ensure alignment with the School's position on modern slavery
- Continue to raise awareness of modern slavery risks with key stakeholders.
- Continue to ensure contracts used by the School have modern slavery conditions.
- Review, improve and leverage child safe processes and policies.

3. Supplier Engagement

- Continue to assess new suppliers.
- Ongoing consultation and relationship management with suppliers

4. Monitor and Report

- The School will monitor modern slavery risks and its management and report accordingly to the Audit & Compliance Committee and School Council.

This Modern Slavery Statement was approved by School Council on 19 May 2022.

James L B Hayman
President of CGS School Council