



St Philip's  
Christian  
Education  
FOR THE WHOLE OF LIFE

SPCEF CHRISTIAN EDUCATION FOUNDATION LTD

# Modern Slavery *Statement*

2024

1 JANUARY 2024 - 31 DECEMBER 2024

# SPCEF's Structure & Operations

St. Philip's Christian Education Foundation Ltd (ACN 002 919 584) ("SPCEF") delivers educational services via early learning centres, primary and secondary schools as well as tertiary education.

SPCEF is structured as an Australian public company, limited by guarantee, and registered with the Australian Charities and Not-for-profits Commission. Its registered office is:

## ***SPCEF Christian College***

30 Bridge Street

Waratah NSW 2298

From humble beginnings in 1982, the SPCEF group today consist of four K-12 co-ed colleges, six early learning centres, four special alternative learning school campuses, two young parents' college campuses, a tertiary training institution, an outside of school hours academy and an Aboriginal school. With 5,000 students and 914 staff, the SPCEF group leads the way in Whole of Life education across the Newcastle, Central Coast and Hunter Regions in New South Wales, Australia.

Over four decades, we have continued to challenge ourselves to explore and create better ways forward in education and to equip students with holistic foundations, embedded in Christian values. As the principal activity of SPCEF is provision of education in Australia, approximately 9.8% of our group's consolidated operational cost base (excluding depreciation, interest and tax) is employment related. Our policies and practices adhere to national and state Work Health & Safety and Workers Compensation regulations, processes in place to ensure that the awards and enterprise agreements are consistently honoured and we do not directly hire overseas workers.

Our Board of Directors ("the Board") is responsible for the governance of SPCEF. The Board, while retaining ultimate responsibility, may delegate responsibilities to the CEO, Deputy CEO, CFO, Principals or Heads of Entities, sub-committees or other person or persons as it sees fit. Along with the authority to delegate, the Board holds a responsibility to ensure that all delegations are carried out in accordance with statutory and common law requirements, as well as the organisation's internal policies.

This Modern Slavery Statement was **approved by the Board** on 26 June 2025 on behalf of all SPECF entities. **All of the SPCEF entities have been consulted in relation to the preparation and contents of this statement.**



**Signed by Graeme Irwin**  
**Chief Executive Officer & Board Member**  
**5 September, 2025**

# Our Group Structure

## Central Office

CENTRAL OFFICE, BOARD & BOARD GROUP COMMITTEES

### EARLY LEARNING



**Narnia  
Early  
Learning**  
FOR THE WHOLE OF LIFE

### COLLEGES



**St Philip's  
Christian  
College**  
FOR THE WHOLE OF LIFE

### TAILORED EDUCATION



**Young  
Parents  
College**  
FOR THE WHOLE OF LIFE



**Dynamic  
Learning  
College**  
FOR THE WHOLE OF LIFE



**Saints  
Academy**  
FOR THE WHOLE OF LIFE



**Gilibaa**  
FOR THE WHOLE OF LIFE

### TERTIARY EDUCATION

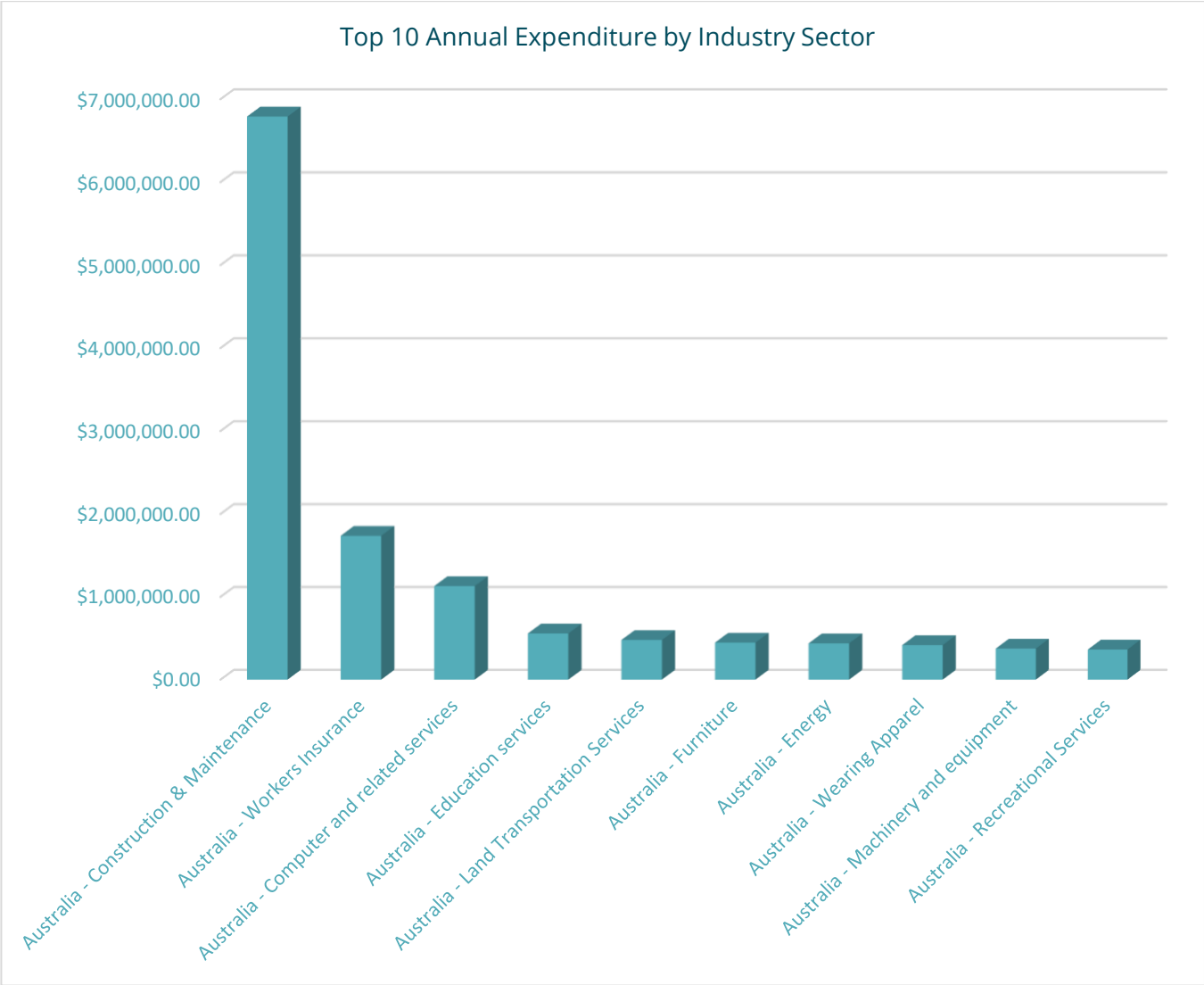


**Teaching  
School**  
FOR THE WHOLE OF LIFE

**Leap  
Year**

## SCEF’s Supply Chain

Excluding staff related costs, our supply chain comprises approximately 1230 active suppliers during the reporting period with procurement spend of almost \$20.2 million. Construction and maintenance related expense is by far our highest category (\$6.8million), followed by workers insurance (\$1.7 million) and ICT (\$1.1 million). Our top 10 annual expenditure by industry sector, which represents approximately 60% of our entire supply chain is shown below.



From a geographic standpoint, a substantial proportion (>99%) of SPCEF’s Tier 1 supply chain is situated within Australia with less than 1% in the United States and the United Kingdom.

# Identifying & Assessing Modern Slavery Risk in SPCEF’s Supply Chain

In the 2024 reporting period, we engaged Fair Supply Analytics (“FSA”) to conduct an in-depth mapping of our supply chain, based on our 2024 financial data. This initiative has significantly enhanced transparency across multiple tiers of the supply chain and facilitated a more rigorous evaluation of associated risks. Based on FSA’s risk assessment methodology, supply chain risk is represented by ‘theoretical slavery footprint’ (“TSF”), i.e. the estimated number of people in forced labour per \$million spent within the supply chain. To measure TSF overtime, per \$million spent is preferred overall an absolute figure. This is so that TSF cannot be manipulated simply by reduced spending. The results of our risk assessment are as follows:

The TSF covering SPCEF’s entire supply chain (Tier 10+) for Year 2024 was **0.0155 per \$million spent**. Our Tier 1 TSF was even lower at 0.0041 per \$million spent. As this is our first year of quantitative assessment, we are not yet able to establish a trend. However, based on FSA’s global benchmarking data, the TSF of companies that are rated “Low” (lowest 7%) is 0.022 per \$million or below. Thus, **our overall exposure to modern slavery is relatively low**.

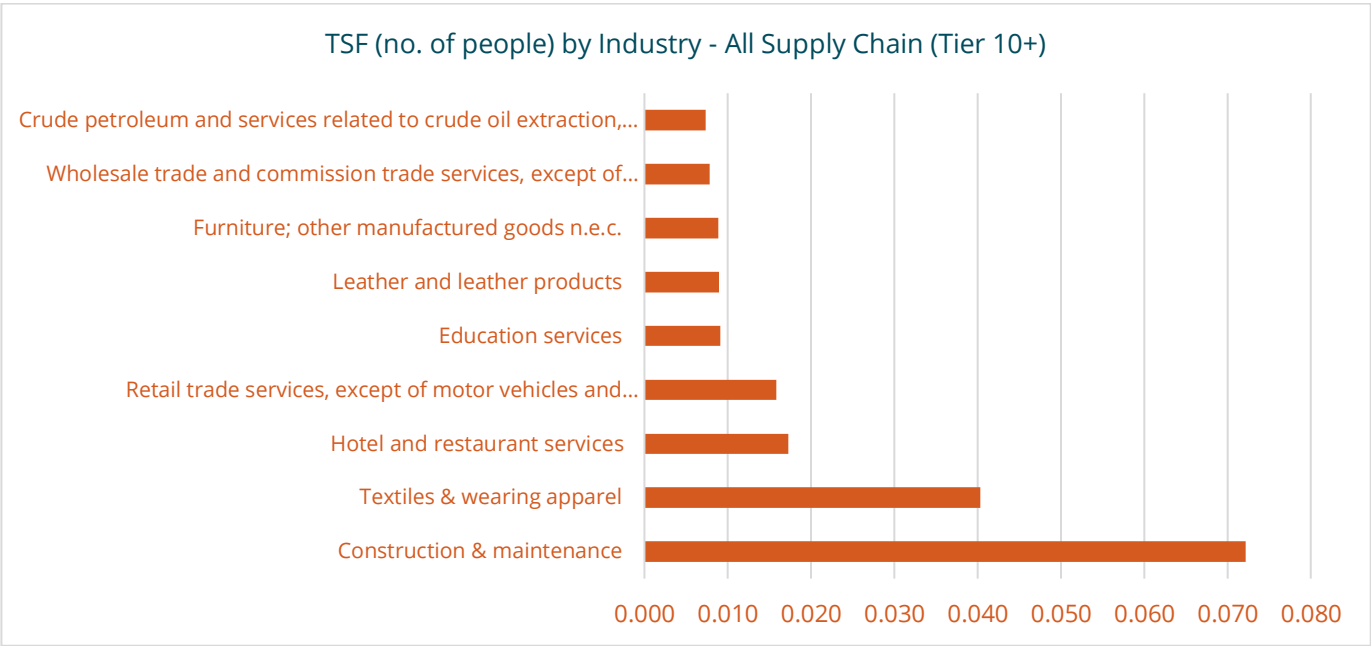
## Supply Chain – Industry Risk

The highest exposure of our entire supply chain (Tier 10+) to modern slavery was “Construction & Maintenance” (approx. 0.07 persons) and “Textiles & Wearing Apparel” (0.04 persons).

Although industries such as construction workers, materials, and cleaning services account for 34% of our procurement and are considered to carry higher modern slavery risks, **FSA rates our actual exposure as ‘low’** due to our predominantly Australian-based suppliers, who are subject to stronger labour laws.

On the other hand, although our absolute spending on “Textiles & Wear Apparel” accounts for only 2.8% of our procurement expenses, the industry carries a relatively higher TSF per dollar spent due to its exposure to higher geographical risk (refer to next section).

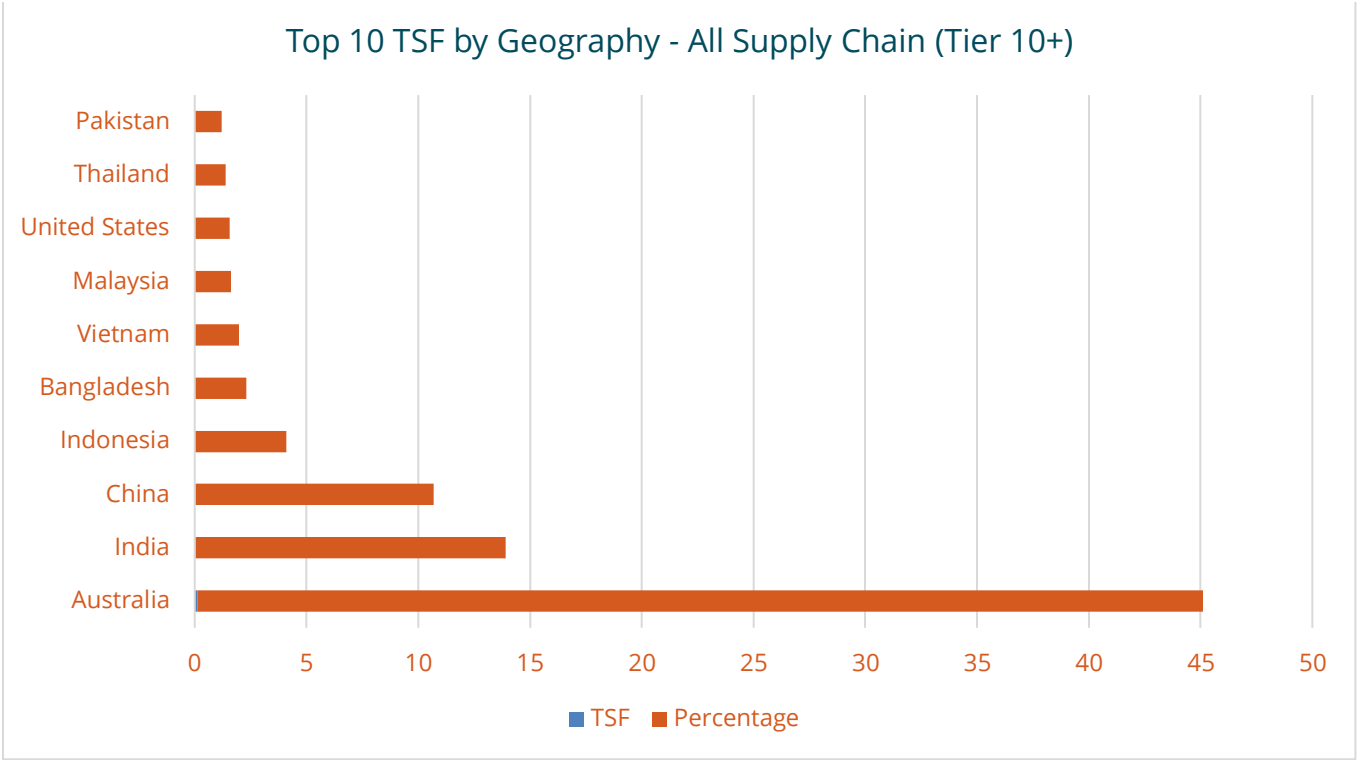
Our spending on workers insurance though significant is not considered to carry material modern slavery risk as our sole insurer for this purpose is controlled by the NSW Government.



## Supply Chain – Geographical Risk

Based on FSA’s data which accounts for our whole supply chain (Tier 10+), our top 10 geographical exposures account for 83.5% of our total TSF. **Australia carries approximately 45% of our TSF exposure, followed by India (13.8%) and China (10.6%),** reflecting our Australian suppliers’ importation of textile and wearing apparels from these overseas locations arising from our school uniform and sportswear needs.

Nonetheless our **above 99% domestic concentration of Tier 1 suppliers** affords SPCEF a heightened capacity to influence supplier practices, which will be a key consideration in the organisation’s ongoing efforts to address modern slavery risks.



## Conclusion

SCEF considers there to be **a relatively low risk of it causing or contributing to modern slavery** in its operations and supply chains.

As an Australian provider of educational services, SPCEF considers its operations and supply chain to be significantly less complex relative to many other industries. SPCEF employs most of its staff directly on permanent contracts and is not directly involved in overseas labour or manufacturing.

SPCEF acknowledges the potential risk of indirect linkage to modern slavery, as our suppliers may source products or commodities from overseas entities with stronger exposure to modern slavery.

## Actions Taken to Address Modern Slavery Risk

- Established Modern Slavery Policy with the Board's approval
- Heightened awareness by publishing our Modern Slavery Statement on the public SPCEF policy webpage
- Making a reporting channel for suspected modern slavery publicly available
- Identified and piloted online Modern Slavery training module
- Developed Modern Slavery Management Plan
- Engaged Fair Supply Analytics to conduct initial supplier risk assessment
- Briefed business managers of all controlled entities on supplier due diligence processes
- Implemented new and existing supplier screening processes

## Assessing The Effectiveness of Actions Taken

Our primary objective during the current reporting period was to enhance our understanding and measuring of modern slavery risks, and to identify potential areas where such risks may exist within our operations and supply chains. As our work is still in the early stages of implementation, we are not yet in a position to comprehensively evaluate the effectiveness of the measures implemented to date. Nonetheless, we have commenced the implementation of governance frameworks and procedural mechanisms designed to support ongoing assessment and review of the actions undertaken to identify, mitigate, and manage modern slavery risks across our business activities and supply network.

## Next Steps

- Review and uplift our governance and policy framework
- Rollout online training to Board members and all staff
- Implement Modern Slavery Management Plan
- Assess alternative supplier risk assessment tools
- Explore the inclusion of modern slavery contract clauses with key and suppliers of higher risk profiles
- Continue to identify and address significant risks in and beyond Tier 1 of our supply chain based on a risk-based approach

# Modern Slavery Compliance Maturity Framework

	LEVEL 1: INITIAL	LEVEL 2: DEVELOPING	LEVEL 3: ESTABLISHED	LEVEL 4: LEADING
IDENTIFY	Ad hoc awareness of modern slavery risks. No formal processes.	Basic mapping of supply chains and operations. Some risk awareness.	Comprehensive risk assessments conducted regularly. Key risk areas identified.	Advanced analytics and stakeholder engagement used to proactively identify emerging risks.
MITIGATE	No formal controls or policies in place.	Policies and supplier codes of conduct introduced. Some training provided.	Risk-based due diligence embedded in procurement. Contracts include modern slavery clauses.	Integrated risk management across operations. Industry collaboration and innovation in mitigation.
REMEDiate	No remediation processes or grievance mechanisms.	Basic grievance mechanisms in place. Limited remediation actions.	Clear remediation protocols. Victim support pathways established.	Victim-centered remediation embedded. Transparent reporting and continuous improvement.
MONITOR & IMPROVE	No monitoring or reporting.	Some internal monitoring. First modern slavery statement drafted. KRIs being identified.	Regular monitoring, audits and reporting. KRIs measured and tracked.	Continuous improvement culture. Independent assurance and stakeholder feedback integrated.



SPCEF Modern Slavery Statement | 2024



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