



Swan Christian
EDUCATION ASSOCIATION

Modern Slavery Statement



For the period of
1 July 2024 to
30 June 2025



Table of Contents

Introduction	4
Our Vision, Mission and Virtues	5
Reporting Entity and Governance	6
Our Operations	7
Our Schools	8
Our Modern Slavery Risk Areas in Operations and Supply Chains	12
Risk Assessment	13
Risk Assessment Methodology and Rating System	14
Actions Taken to Address Modern Slavery	18
Future Actions Scheduled to Address Modern Slavery Risks	20
Continuous Improvement Roadmap	21
Effective Assessment of Actions	22
Consultation with Entities	23



Introduction

This Modern Slavery Statement is made pursuant to the *Modern Slavery Act 2018 (Cth)* (the Act) and outlines the commitment of Swan Christian Education Association (SCEA) (ABN 91 922 863 387) to identifying, assessing, and mitigating the risks of modern slavery across our operations and supply chains.

SCEA is a faith-based and charitable system of independent schools with an identity and mission rooted in the teachings of Jesus Christ. We uphold strong ethical beliefs and practices grounded in an unwavering commitment to the dignity and inherent worth of every individual, affirming that all human beings are created in God's image, loved beyond measure, and infinitely precious. In alignment with this position and responding to our obligations under the Act, SCEA is implementing a multi-faceted strategy to identify, assess, and address any exposure to modern slavery, recognising that such practices are fundamentally incompatible with our mission and values.

SCEA has adopted six (6) seminal virtues - Courage, Humility, Appreciation, Respect, Integrity, and Self-control - that guide and direct our behaviours, inform our decision making, and which indelibly shape the educational environments we cultivate in our schools. These virtues also direct our commitment to creating safe, ethical, and inclusive learning communities that are grounded in grace and love, and free from exploitation, coercion, and injustice.

Our response to modern slavery is both a legal responsibility and a natural extension of our Christ-centred mission. As SCEA continues to grow and serve our communities, we remain steadfast in our resolve to consistently act with integrity, steward resources responsibly, and ensure that our operations and procurement practices uphold the dignity of all people.

This Statement sets out the steps that SCEA is taking to assess and effectively respond to modern slavery risks in our organisational activities and supply chains. We do so not only in compliance with legislation but as a tangible expression of our faith and our responsibility to love our neighbour, protect the vulnerable, and pursue justice for the oppressed.

Our Vision, Mission and Virtues

 <p>COURAGE</p> <p>We are determined to achieve what is worthwhile, even in the face of difficulty.</p> <p><i>"So let's not get tired of doing what is good. At just the right time we will reap a harvest of blessing if we don't give up."</i> Galatians 6:9</p>	 <p>HUMILITY</p> <p>We recognise our limits, value others, and embrace opportunities to learn.</p> <p><i>"Don't be selfish; don't try to impress others. Be humble, thinking of others as better than yourselves."</i> Philippians 2:3</p>	 <p>APPRECIATION</p> <p>We are grateful to God for our lives, others, and all he provides.</p> <p><i>"Be thankful in all circumstances, for this is God's will for you who belong to Christ Jesus."</i> - 1 Thessalonians 5:18</p>
 <p>RESPECT</p> <p>We treat everyone fairly and justly as we would like to be treated.</p> <p><i>"Do to others as you would like them to do to you."</i> - Luke 6:31</p>	 <p>INTEGRITY</p> <p>We use good judgement and do what is right and true.</p> <p><i>"Whoever walk in integrity walks securely, but he who makes his ways crooked will be found out."</i> - Proverbs 10:9</p>	 <p>SELF-CONTROL</p> <p>We take responsibility for our thoughts and behaviour and won't be controlled by our desires.</p> <p><i>"A person without self-control is like a city with broken-down walls."</i> Proverbs 25:28</p>

Reporting Entity and Governance

Swan Christian Education Association (SCEA) is a faith-based, not-for-profit, and charitable organisation registered under ABN 91 922 863 387. It operates a network of independent schools under a purpose to deliver high quality education that transforms lives for God's glory.

As a registered reporting entity under the Act, SCEA recognises that governance is central to fulfilling its moral and legal responsibilities. SCEA's governance framework is intentionally designed to ensure professional and robust oversight, transparency, and ethical accountability across all levels of the organisation. SCEA is governed by a Board of Directors that are responsible for strategic leadership, fiduciary stewardship, and compliance with applicable legislation, including the prevention of exposure to modern slavery practices. The Board is supported by a structured network of sub-committees, including a dedicated Risk, Governance and Assurance Committee and Finance and Audit Committee that provide oversight of operations, compliance obligations, and risks.

Day-to-day operations of the Association are led by a Senior Executive Team that is accountable to the Board and charged with implementing SCEA's vision and mission, and ensuring that organisational practices through our system of schools align with our Christian virtues, policies and procedures, and legal obligations. The Senior Executive Team is supported by a collegiate of school-based and head office leaders as well as professional services teams including finance, human resources, ICT, marketing, property, data analytics, and risk management.

SCEA's multi-tiered governance structure ensures that risk identification, due diligence, procurement controls, and reporting responsibilities are integrated into both head office and individual school decision making. Importantly, it provides clear lines of accountability for monitoring and addressing modern slavery risks across all operational areas and supply chains. As part of our ongoing governance maturity, SCEA is formalising internal processes to identify, assess, and mitigate modern slavery risks. This includes the development of a Modern Slavery Framework, implementation of supplier due diligence protocols, creation of legal obligations relating to modern slavery in our goods and services contracts with vendors, and introduction of a Supplier Code of Conduct. These measures are subject to routine internal review and Board oversight to ensure continuous improvement and responsiveness to emerging risks.

Through this governance-led approach, SCEA seeks to not only comply with the obligations of the Act but to reflect a deep commitment to human dignity, justice, and stewardship. As an organisation defined by Christian principles, we believe that governance is not simply a matter of compliance but an expression of our calling to love people and behave ethically. SCEA remains committed to fostering a governance culture where transparency, diligence, and faith-informed morality converge to ensure that all students, families, staff, and stakeholders can participate in a safe, just, and respectful environment.

Our Operations

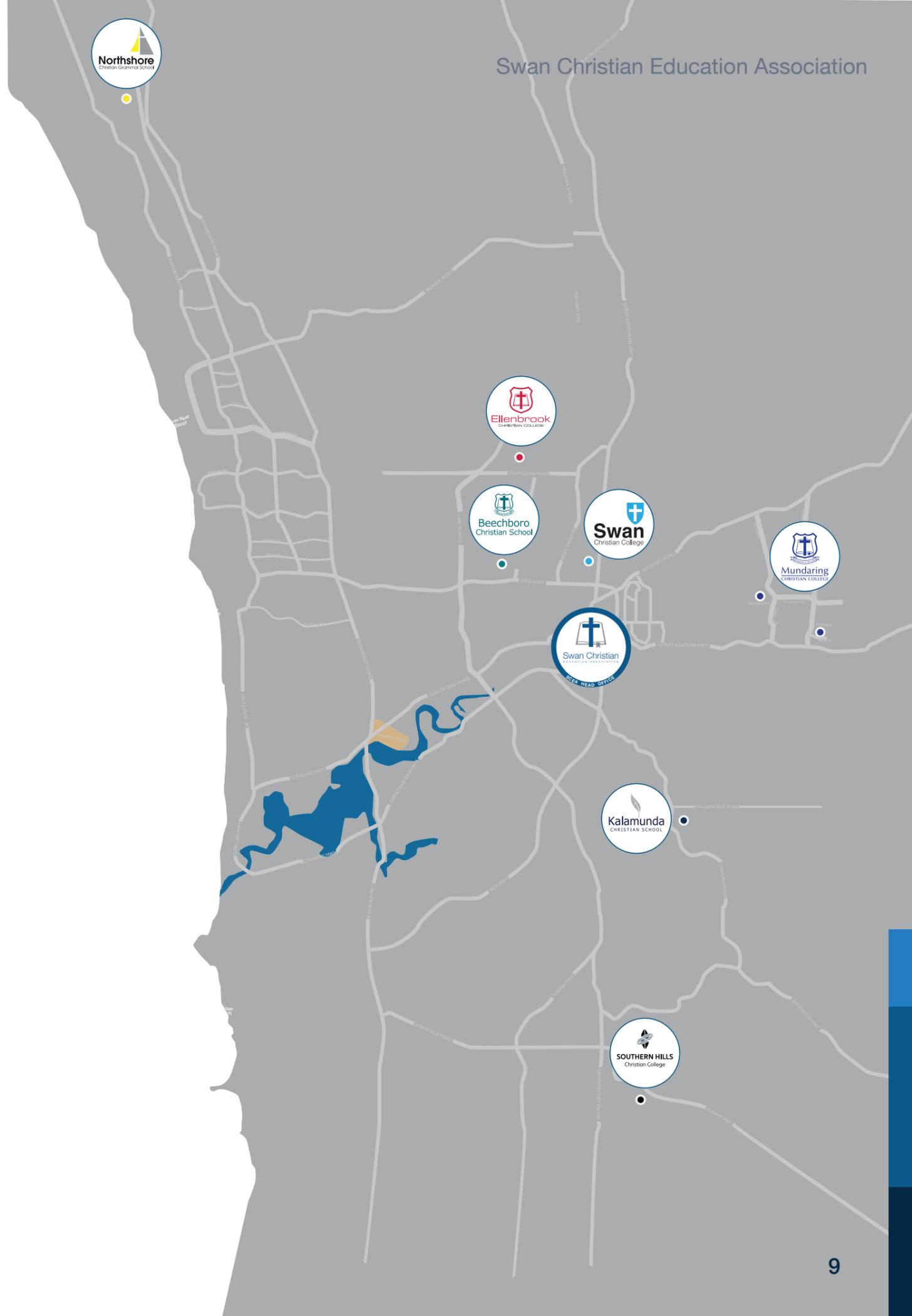
SCEA operates within the Western Australian educational sector, providing high quality Christian education across multiple campuses. Our core operations focus on teaching, student welfare, curriculum delivery, and community engagement. We work with a wide range of suppliers, contractors, and third-party service providers who support our educational activities, including but not limited to common use goods and services, educational support, technology, construction and asset maintenance.



Our Schools

SCEA is actively committed to upholding its moral commitment against modern slavery. Our head office and schools are committed to maintaining a workplace that is aligned with our Statement of Faith, Vision, Mission, Virtues and Code of Conduct, and supported by a comprehensive suite of policies and procedures that are reviewed regularly. Led by dedicated leadership teams, our schools work in close alignment with SCEA's governance and ethical standards to ensure local practices reflect a shared responsibility to safeguard human dignity. Through conscious procurement decisions, staff awareness, and adherence to SCEA's policies and procedures, each school plays a vital role in identifying, preventing, and responding to modern slavery risks within their operations and broader community engagement.

SCEA employs a diverse and dedicated workforce across its head office and network of schools, comprising teaching, support, administrative, and operational staff. Recruitment processes are structured to ensure that all prospective employees, whether engaged directly or through third-party labour hire arrangements, undergo rigorous verification of their right to work in Australia. This process includes identity confirmation, background screening, and, where applicable, appropriate visa and immigration checks, to mitigate the risk of labour exploitation and non-compliant employment practices.



Our Modern Slavery Risk Areas in Operations and Supply Chains

Following a detailed assessment of operational expenditure and supplier engagement, four primary modern slavery risk areas were identified and consolidated into the following key categories:

1. Wages, Labour Hire and Temporary Staffing
2. Construction and Facilities Maintenance
3. Procurement of Goods and Services – Capital
4. Procurement of Goods and Services – Other

In addition, one indirect risk category was identified and classified as Outsourced Services and Indirect Supply Chains (indirect). This indirect category relates specifically to the purchasing of services outside of SCEA's direct procurement oversight such as school uniform suppliers that are engaged independently by schools and patronised by parents of enrolled children.

Of SCEA's aggregated \$96 million in expenditure during 2024, 77% was allocated to wages which based on our analysis, represents the lowest modern slavery risk exposure within our operational profile. The remaining expenditure was distributed across the other identified risk areas including 4% attributed to Construction and Facilities Maintenance, 10% to Procurement of Goods and Services (Capital), and 9% to Procurement of Goods and Services (Other).

These figures provide a proportional understanding of risk concentration, highlighting that while wages represents the largest financial exposure, the more significant modern slavery risks may exist in smaller expenditure categories or in indirect and less visible supply arrangements.



**Risk
Assessment**

Risk Assessment Methodology and Rating System

To evaluate exposure to modern slavery risks, SCEA conducted a desktop risk analysis across operational and procurement areas. This assessment was informed by:

- The Global Slavery Index
- Commonwealth guidance for modern slavery reporting entities
- Industry-specific risk profiles
- The nature of supplier relationships (direct vs indirect)
- Degree of control and visibility over procurement and labour practices
- Geographic origin of goods and services
- Known sector risks
- Country of origin exposure
- Vulnerability of labour type involved
- Complexity of supply chain
- SCEA's level of influence and due diligence capacity

It is important to note that a “Low” rating does not mean the absence of risk. Rather, it indicates that controls are already in place and the likelihood of undetected modern slavery is reduced under current operating conditions. “Medium” ratings signal areas where improvements in transparency or supplier engagement are warranted.

Each category was assigned a relative risk rating (Low, Medium, or High) based on:

The following table summarises the outcome of our risk review:

Risk Area	Risk Summary	Controls in Place	Residual Risk Rating
Wages, Labour Hire, Temp Staffing	Globally recognised risk area due to exploitation of vulnerable workers, deceptive recruitment, underpayment, and poor conditions in subcontracting environments.	SCEA employs staff directly under Fair Work-aligned Enterprise Agreements registered with the FWC. Where third-party labour is used, contractual obligations, due diligence, and provider vetting apply. No internal labour hire practices.	Low
Construction and Facilities Maintenance	Construction sector risks include multi-tier subcontracting, migrant labour exploitation, and lack of visibility into lower-tier suppliers.	SCEA uses vetted Australian contractors subject to WHS laws and legal obligations embedded in new Goods and Services Agreements. Contracts require ethical compliance. Project oversight includes performance reviews and assurance controls.	Low

Risk Area	Risk Summary	Controls in Place	Residual Risk Rating
Goods & Services – Capital	Capital goods sourced globally may involve forced labour in manufacturing or materials, particularly in steel, electronics, or textiles.	SCEA's tender and contract processes incorporate modern slavery clauses. Use of Common Use Agreements and reputable vendors with published statements. Supplier due diligence is embedded in procurement governance.	Low
Furniture & Office Supplies	Offshore manufacture of furniture and supplies carries risk of unethical labour, especially in timber and textile supply chains.	SCEA procures through Australian distributors and central contracts. Contracts mandate supplier obligations for ethical sourcing and modern slavery compliance.	Medium
ICT Hardware	Electronics involve complex supply chains and risk from conflict minerals and forced labour in raw material extraction.	SCEA engages only Australian vendors who provide modern slavery statements. Reliance on Common Use Agreements and centralised contracts with due diligence built in.	Low
Advertising and Marketing	Low risk sector, but potential risks in promotional goods production or outsourced offshore content creation.	SCEA uses local, professional firms with transparent operations. Modern slavery obligations are embedded in all supplier agreements.	Low
Cleaning and Security Services	Sector known for vulnerable migrant workers, wage theft, and subcontracting opacity.	SCEA currently engages Australian-based firms with ethical oversight. A single whole-of-SCEA cleaning contract is being developed for implementation in 2025 with embedded compliance obligations.	Low
Uniforms and PPE	Manufactured in high-risk regions with risks of forced labour and poor working conditions. Often outside direct procurement controls.	SCEA encourages schools to use reputable Australian-based suppliers. A centralised uniform and PPE contract is planned to enhance control and ethical assurance.	Medium

SCEA acknowledges that while many areas have been assessed as “Low” or “Medium” risk due to robust governance or regulatory oversight in Australia, modern slavery can persist even in seemingly compliant environments. Therefore, our emphasis remains on transparency, supplier engagement, and proactive controls regardless of rating.

Risk Assessment Methodology and Rating System (cont).

Wages, Labour Hire and Temporary Staffing

In the category of Wages, Labour Hire and Temporary Staffing, SCEA does not directly hire temporary or casual staff through internal labour hire mechanisms. However, in the course of its operations, SCEA occasionally engages third-party service providers who may utilise their own workforce to deliver services across areas such as facilities maintenance, IT support, cleaning, and event operations. These external arrangements introduce potential modern slavery risks, particularly where there is limited visibility over employment conditions, subcontracting layers, or the treatment of migrant workers.

Where SCEA hires staff, it ensures that all individuals are employed through robust, ethical, and compliant employment process and using appropriate employment agreements and industrial instruments (including Enterprise Agreements for teaching and support staff that are vetted and registered by the Fair Work Commission). Given this domestic context and the closely regulated nature of employment conditions in Australia, the risk of modern slavery in this category is considered low. Nevertheless, SCEA remains vigilant by ensuring that labour hire providers adhere to Australian labour laws, maintaining appropriate employment records, and upholding fair work practices that align with our organisational virtues and legal duty of care.

Construction and Facilities Maintenance

The construction, renovation, and maintenance of school buildings and infrastructure represents a key potential area for modern slavery risk within SCEA's operations. While SCEA engages Australian-based construction companies that are subject to domestic industrial relations, workplace health and safety requirements, and anti-slavery laws, the inherent complexity of construction supply chains, including subcontracting and labour hire arrangements, can present challenges in ensuring consistent adherence to ethical labour standards. Even within Australia's regulated environment, risks such as wage theft, exploitative labour hire practices, or lack of visibility into lower-tier subcontractors can arise. These risks are amplified where large-scale projects involve multiple layers of subcontracting, reducing direct oversight and increasing the potential for unethical practices.

To mitigate these risks, SCEA applies a rigorous contractor selection process for all construction and facilities work. Contractors are required to comply with SCEA's new Goods and Services Agreement, which outlines our expectations regarding ethical employment, fair treatment, and modern slavery prevention. Ongoing monitoring is supported through contract management practices, performance reviews, and where relevant, compliance audits. SCEA remains committed to working only with ethical construction and maintenance providers that align with both Australian legal requirements and our ethical values of integrity, justice, and respect for human dignity.

Procurement of Goods and Services (Capital)

In the area of procuring capital goods and services, SCEA engages Australian-based companies that are subject to the requirements of the Act. Many of these suppliers have published modern slavery statements and maintain structured processes to identify and mitigate modern slavery risks within their operations and supply chains. SCEA further strengthens its approach through an enhanced tendering and contracting process, which explicitly incorporates modern slavery obligations. These expectations are embedded within our procurement approach and supplier agreements, ensuring that ethical sourcing and labour practices are addressed upfront. While we acknowledge that residual risk remains due to the global nature of some supply chains, our due diligence practices reflect a commitment to partnering with reputable and transparent vendors that share our ethical values.

Procurement of Goods and Services (Other)

This category captures a diverse range of goods and services procured across SCEA's operations, including sub-categories such as furniture and office supplies, ICT hardware, advertising and marketing services, and cleaning and security services. These areas vary in their exposure to modern slavery risks, particularly where products are manufactured offshore or where services involve low-paid, manual labour. SCEA undertakes reasonable due diligence when selecting suppliers, with a preference for Australian-based providers and a focus on ethical sourcing and transparent practices.

i. Furniture & Office Supplies

SCEA sources furniture and office supplies primarily through established Australian distributors. While many of these items are manufactured offshore, our preference for reputable suppliers with transparent sourcing practices helps mitigate the risk of modern slavery. Where possible, we prioritise suppliers who provide ethical assurances and/or reference to their own modern slavery statements and mitigations. Bulk procurement is managed through centralised processes to ensure consistency and scrutiny in supplier selection. SCEA's new Goods and Services Agreement includes stringent modern slavery obligations on suppliers and we will increasingly look to the use of State Government Common Use Agreements and reputable aggregated procurement arrangements that incorporate due diligence and supplier obligations around modern slavery risks.

ii. ICT Hardware

Given the known global supply chain risks associated with ICT hardware manufacturing and issues associated with certain raw materials (e.g. cobalt, lithium etc), SCEA takes a risk-aware approach by engaging well-established Australian vendors who, in many cases, are subject to the Act and publish their own compliance statements. These suppliers often work directly with global technology companies that have end-to-end visibility over their manufacturing processes and labour practices. While full supply chain transparency remains a challenge in this sector, SCEA relies on documented due diligence and supplier accountability through contractual terms. SCEA's new Goods and Services Agreement

includes stringent modern slavery obligations on suppliers and we will increasingly look to the use of State Government Common Use Agreements and reputable aggregated procurement arrangements that incorporate due diligence and supplier obligations around modern slavery risks.

iii. Advertising & Marketing

Modern slavery risk within the advertising and marketing category is assessed as low. These services are predominantly delivered by Australian-registered companies operating in professional, office-based environments and are subject to stringent employment legal requirements. SCEA engages directly with local providers and agencies, ensuring a high level of transparency and oversight. Ethical expectations are clearly articulated through SCEA's new Goods and Services Agreement and we will increasingly look to the use of State Government Common Use Agreements and reputable aggregated procurement arrangements that incorporate due diligence and supplier obligations around modern slavery risks.

Additionally, SCEA maintains membership with relevant governing bodies that support the engagement of reputable, professional, and accountable service providers.

iv. Cleaning and Security Services

The cleaning and security services sectors typically employ low skilled (often migrant) workers who face significant language barriers and a lack of understanding of their rights. SCEA seeks to engage with suppliers that are predominantly Australian-based and whose values align with our Christian ethos and virtues. While we acknowledge the limitations in controlling the full extent of supplier supply chains, we make reasonable efforts to ensure that our providers are aware of their obligations under the Act.

We encourage the active management of modern slavery risks, including maintaining visibility over how their products and labour are sourced. Through open communication and an emphasis on ethical partnerships, we aim to promote responsible practices, even where we are not directly involved in procurement or manufacturing processes.

A single whole of SCEA cleaning services contract will be progressed later in 2025 that will be procured and contracted to ensure compliance with modern slavery obligations.

v. Uniforms and Personal Protective Equipment (Indirect)

SCEA acknowledges the modern slavery risks associated with outsourced services and indirect supply chains, particularly in relation to uniform suppliers selected independently by schools. While these arrangements currently fall outside our direct procurement controls, we recognise the ethical and reputational implications.

To manage this, we encourage schools to engage reputable, Australian-based providers and promote awareness of ethical sourcing expectations. We continue to explore ways to improve oversight and transparency, despite the limited visibility and influence over upstream manufacturing processes.

vi. Outsourced Services and Indirect Supply Chains (indirect).

Outsourced services and indirect supply chains present an area of modern slavery risk, particularly where there is limited visibility and influence over upstream practices. At SCEA, this is most relevant in the context of uniform suppliers, which are external providers selected by schools and communicated directly to parents.

These suppliers operate outside of our direct procurement controls, and while they serve a critical function in ensuring students have access to appropriate uniforms, the

production and sourcing practices behind these goods remain largely opaque. We are unable to verify whether ethical labour standards are being upheld throughout their supply chains, particularly in the manufacturing stages, which often occur overseas in high-risk regions.

This lack of control is compounded by uncertainty regarding the total expenditure associated with these arrangements, making it difficult to assess the exposure or implement proportionate due diligence. As such, the risk is not only financial but reputational and ethical, requiring strategic attention despite the practical limitations on direct intervention. It is expected that future procurement will secure a single whole of SCEA uniform and PPE contract that will ensure compliance with modern slavery obligations.



Actions Taken to Address Modern Slavery

While SCEA has previously taken informal steps to promote fairness, human rights, and transparency across its operations and supply chains, the introduction of this Modern Slavery Statement represents a significant progression in our approach.

It signals our formal commitment to meeting the moral obligations of opposing modern slavery in all of its forms and to satisfy the legal requirements of the Act. SCEA is moving beyond foundational awareness to implementing a more strategic, proactive, and accountable response to responding to modern slavery risks.

This includes strengthening our procurement and supplier due diligence practices, engaging responsibly with suppliers and holding them to higher levels of ethical accountability, and fostering a culture of vigilance and shared responsibility across all levels of the organisation. In preparation for this formal Statement, SCEA has undertaken several foundational actions to identify, mitigate, and address the risk of modern slavery across our operations and supply chains.

These actions reflect both our legal obligations and our commitment to ethical stewardship grounded in our Christian mission and values.

Risk Assessment

SCEA conducted a preliminary risk assessment of its supply chains to identify areas of heightened exposure to modern slavery. This review focused on high-risk sectors including:

- Employment and wages.
- Labour hire arrangements.
- Construction and facilities maintenance.
- Procurement of goods and services, particularly those sourced from offshore or complex supply chains.

The findings informed our prioritisation of engagement and due diligence measures.

Supplier Engagement

We initiated targeted engagement with key suppliers to communicate SCEA's commitment to ethical sourcing and to promote awareness of modern slavery risks. These conversations have laid the groundwork for collaborative partnerships aimed at improving transparency and responsible procurement practices.

Introduction of a Supplier Goods and Service Agreement

SCEA developed and implemented a Supplier Goods and Service Agreement, which sets out clear expectations regarding compliance with Australian labour laws, including those related to human trafficking, forced labour, and modern slavery. The Agreement applies to all suppliers and contractors and forms part of our procurement governance processes.

Procurement Documentation and Contractual Obligations

Modern slavery compliance clauses have been embedded in all relevant procurement documentation, including RFx requests, contracts, and service-level agreements. These provisions:

- Clearly articulate SCEA's expectations regarding ethical labour practices, transparency, and compliance with the Act.
- Require suppliers to confirm their adherence to these obligations as a condition of engagement.
- Encourage suppliers to cascade equivalent standards through their own supply chains.
- Enable SCEA to monitor compliance and take appropriate action in the event of breach or concern.



Future Actions Scheduled to Address Modern Slavery Risks

To further address and mitigate modern slavery risks, SCEA will undertake the following actions:

Develop a Modern Slavery Framework

SCEA will formalise a comprehensive Modern Slavery Framework that integrates risk assessment tools, due diligence procedures, supplier engagement protocols, staff training, and governance reporting mechanisms. This framework will align with both the Act and SCEA's Christian mission and virtues, and will be progressively implemented across all schools and operational functions from 2026.

Strengthen Supplier Audits

SCEA will implement more robust supplier audits, particularly for high-risk sectors, to ensure compliance with commitments given during the procurement process and the Goods and Service Agreement that has been executed between SCEA and the supplier.

Improve Due Diligence Processes

SCEA will enhance its due diligence processes when engaging with new suppliers and contractors, with a focus on modern slavery vigilance and prevention.

Ongoing Staff Training

SCEA will expand our training programs to include staff across the organisation, with specific focus on those in leadership and procurement roles to raise awareness of modern slavery risks and to equip them with the tools to identify and respond to potential issues.

Board Involvement and the Review of the Risk Appetite Statement

SCEA will formally engage the Board in reviewing and endorsing the organisation's approach to modern slavery risk, including incorporating modern slavery considerations into SCEA's broader Risk Appetite Statement. This will ensure that modern slavery is recognised as a strategic risk area for the Association, embedded within our Enterprise Risk Management Framework and monitored through appropriate governance and assurance channels. The Board's oversight will strengthen accountability and reinforce the importance of ethical sourcing across all levels of decision-making.

SCEA acknowledges the importance of addressing modern slavery risks across various areas of operations and supply chains. By implementing these mitigation measures, SCEA will seek to create an operating environment and procurement channels that are ethical and aligned with its Christian mission and virtues. The focus will be on continuous monitoring, assurance validation, education, and collaboration with ethical suppliers to mitigate risks and uphold human dignity. Moving forward, SCEA will continue to develop its due diligence processes, ensuring that modern slavery is addressed proactively and effectively across all areas of operations.

Continuous Improvement Roadmap

SCEA is committed to a phased and proactive approach to strengthening its modern slavery risk identification and management. Our roadmap outlines a three-year strategy focused on building capability, embedding accountability, and fostering continuous improvement across our operations and supply chains. This roadmap reflects our ongoing commitment to ethical practice, transparency, and stewardship in alignment with our Christian mission and virtues and our legal obligations under the Act.

2025 – Setting the Foundation

- In this foundational year, we will focus on building a robust base of knowledge and policy alignment:
- Conduct a comprehensive risk assessment across all areas of our operations and supply chain to identify and prioritise modern slavery risks.
- Enhance and distribute an updated Supplier Code of Conduct and our new Goods and Service Agreement, outlining our ethical expectations and explicit obligations on vendors relating to modern slavery.
- Commence the creation of single whole-of-Association procurement arrangements for use by SCEA schools that provide improved supplier scrutiny and evaluation of modern slavery measures in the procurement process, and greater accountability and enforcement around compliance with modern slavery obligations.
- Increase use of State Government Common Use Agreements and reputable aggregated procurement arrangements that incorporate due diligence and supplier obligations around modern slavery risks.
- Develop and implement a modern slavery training module for staff across the Association to increase awareness around modern slavery risks and build internal capability.

2026 – Integration

- With foundational structures in place, we will integrate modern slavery risk management into core operational processes:
- Engage in targeted supplier training and consultation, with a focus on identifying high-risk indicators and supporting supplier improvement initiatives.
- Apply an enhanced risk assessment and assurance framework to further analyse and risk-rate operational areas with specific reference to modern slavery vulnerabilities.
- Continue the creation of single whole-of-Association procurement arrangements for use by SCEA schools that provide improved supplier scrutiny and evaluation of modern slavery measures in the procurement process, and greater accountability and enforcement around compliance with modern slavery obligations.
- Increase use of State Government Common Use Agreements and reputable aggregated procurement arrangements that incorporate due diligence and supplier obligations around modern slavery risks.

2027 – Continuous Improvement

- Our final phase will focus on reviewing progress, refining practices, and strengthening stakeholder engagement:
- Continue the creation of single whole-of-Association procurement arrangements for use by SCEA schools that provide improved supplier scrutiny and evaluation of modern slavery measures in the procurement process, and greater accountability and enforcement around compliance with modern slavery obligations.
- Increase use of State Government Common Use Agreements and reputable aggregated procurement arrangements that incorporate due diligence and supplier obligations around modern slavery risks.
- Evaluate the effectiveness of actions taken through formal progress assessments.
- Consult with key stakeholders to identify opportunities for improved impact, transparency, and accountability.
- Refine our approach based on findings and sector developments to ensure a dynamic and responsive modern slavery strategy.

Effective Assessment of Actions

SCEA is committed to ensuring that its actions to address modern slavery risks are both effective and aligned with its legal and moral responsibilities. The following measures will be adopted to assess the impact and maturity of SCEA's modern slavery response over time:

Internal Governance Reviews

Periodic internal assurance reviews will be conducted to evaluate the effectiveness of procurement practices, supplier engagement activities, and risk mitigation controls. These reviews will consider relevance, currency, and responsiveness to emerging modern slavery risks.

Supplier Engagement and Responsiveness

Mechanisms will be established to seek structured feedback from suppliers regarding the clarity, feasibility, and practical implications of SCEA's modern slavery expectations, including compliance with the Supplier Code of Conduct and our Goods and Service Agreement. This may include formal surveys, supplier consultation forums, direct engagement, and potential audits.

Training Uptake and Capability Assessment

Participation in modern slavery awareness training will be tracked, with post-training assessments and staff feedback informing the evaluation of knowledge transfer, practical comprehension, and organisational readiness.

Monitoring of Risk Ratings and Exposure Trends

Risk ratings assigned to key operational and procurement areas will be reviewed annually by the Senior Leadership Team and Board to determine whether levels of exposure are reducing over time, whether through

strengthened controls, changes in suppliers, or increased transparency in supply chains. Also identify new treatment plans to improve risk control and mitigation.

Use of Grievance and Reporting Mechanisms

The utilisation and outcomes of internal and external grievance channels will be monitored to assess whether concerns relating to modern slavery are being raised, investigated, and resolved appropriately and without fear of reprisal.

Progress Against Strategic Milestones

Implementation progress will be measured against defined milestones within SCEA's modern slavery roadmap. Indicators will include training completion, supplier onboarding to ethical requirements, and scheduled risk assessments.

External Benchmarking and Sector Comparison

SCEA's practices will be compared with peer organisations and relevant industry benchmarks to identify strengths, opportunities for improvement, and alignment with emerging best practice in modern slavery governance.

These measures will be embedded within SCEA's existing governance, assurance, and continuous improvement frameworks, and will inform the ongoing refinement of its modern slavery strategy. Progress and outcomes will be reported to the Board to ensure accountability and alignment with the Association's values and legislative obligations.

Consultation with Entities

This Statement reflects SCEA's commitment to taking action against modern slavery, in line with our Christian values and mission, and underscores our ongoing dedication to ethical practices, transparency, and accountability in all our operations and supply chain. SCEA is committed to consulting with relevant stakeholders, including employees, contractors, suppliers, and partners, to ensure our modern slavery policies and practices are aligned with industry standards and legal requirements. We will also continue to engage with other educational institutions, sector groups, and stakeholders to share best practices and collaborate on strategies to address modern slavery risks across the sector.

Disclosure Note

This Statement has been formally approved by the Senior Leadership Team and Board of Swan Christian Education Association (SCEA).

From the Chair

This Statement marks an intentional shift of the SCEA from informal awareness to structured accountability in relation to modern slavery risks. As a faith-based organisation, the Association recognises that the fight against modern slavery is not simply about compliance but about reflecting our Christian mission and virtues in every aspect of our operations and in every transaction and partnership with external parties. Our concerted efforts to build transparency, invest in ethical partnerships, and raise our internal capability will continue to evolve as we deepen our understanding and commitment in this important space.

Blessings,



Mr Craig Clark
Board Chair



Dr Graeme Cross
Chief Executive Officer



Swan Christian

EDUCATION ASSOCIATION



Beechboro
Christian School



Ellenbrook
CHRISTIAN COLLEGE



Kalamunda
CHRISTIAN SCHOOL



Mundaring
CHRISTIAN COLLEGE



Northshore
Christian Grammar School



SOUTHERN HILLS
Christian College



Swan
Christian College