



**GEELONG GRAMMAR SCHOOL®**  
EXCEPTIONAL EDUCATION

# **Geelong Grammar School**

## **Modern Slavery Statement 2024**

## 1. Introduction: Geelong Grammar School

Geelong Grammar School (**the School**), ABN 92 004 971 500, is a Company Limited by Guarantee. The School is also registered as a charity with the Australian Charities and Not-for-Profits Commission (**ACNC**).

The School is an independent co-educational boarding and day School informed by its Anglican traditions. The School's registered office is at 50 Biddlecombe Avenue, Corio, Victoria.

The School currently comprises four campuses, Corio Campus, Bostock House Campus, Toorak Campus and Timbertop Campus. The School owns or controls the following active entities in Victoria, and for the purposes of this Statement has a consolidated annual revenue exceeding \$100 million:

|   | Name of entity  | ABN            |
|---|---|----------------|
| 1 | Geelong Grammar School Library Fund   | 92 004 971 500 |
| 2 | Geelong Grammar School Building Fund  | 50 285 447 478 |
| 3 | Geelong Grammar School Scholarship Fund   | 15 711 430 906 |
| 4 | Geelong Grammar School Endowment Trust  | 15 790 631 443 |
| 5 | Geelong Grammar Foundation Limited (unlisted corporate trustee company, nil individual trading) | 56 005 211 076 |

The School currently employs 319 full time employees, 152 part time employees and 495 casual employees.

The School is committed to an ethical and transparent approach to business, operating with ethicality guided by the School's strategic imperatives and informed by the School's values. Before partnering with a supplier, the School ensures that they understand the School's terms and conditions of operation, which covers important issues such as safeguarding, employee conditions, banned materials, the prohibition of child labour, sustainability and environmental practices, bribery and corruption.

The School's Ethical Sourcing Statement, which includes its conditions to trade, guides and governs the sourcing, manufacturing, and supply of those products sold in the School's Uniform Shops. This operates as the School's supplier code of conduct which aims to safeguard employees' rights and the environment, strengthen the School's supplier relationships and commitment to traceability, transparency, sourcing, and sustainability.

### ***The Modern Slavery Act 2018 (Cth)***

In 2018, the Australian Government passed the Modern Slavery Act 2018 (Cth) (**'the Act'**). The Act requires large corporations in Australia with an annual consolidated revenue of more than \$100 million, to annually report on the risks of modern slavery in their operations and supply chains, and actions taken to address those risks.

For the purposes of the Act, this is a Joint Statement as provided for in Section 14 of the Act, submitted by the School, which includes the entities referred to in the table above, for the two (2) year period, financial years 2023 and 2024 (January to December of each year).

The School recognises that modern slavery happens at the most extreme end of the working spectrum, and may involve the gravest abuses of human rights and serious crimes, having severe and often lifelong consequences for its victims. The term modern slavery is used to describe situations where there is coercion, threats or deception.

The Act defines modern slavery as including eight (8) types of serious exploitation:

1. Trafficking in persons;
2. Slavery;
3. Servitude;
4. Forced marriage;
5. Forced labour;
6. Debt bondage;
7. Deceptive recruiting for labour or services; and
8. The worst forms of child labour, which means situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

Whilst acknowledging that the School has limited or no direct overseas suppliers, by committing to enabling supply chains and operations which do not contribute to modern slavery practices, the School will enable practices and supply chain decisions which are underscored by a fundamental tenet to end all forms of modern slavery, both in Australia and overseas (where applicable). The School also undertakes to take appropriate action to respond to the humanitarian impacts of modern slavery and is further committed to consistently reviewing and strengthening its processes and systems to minimise the risk of human rights infringements in the School's operations and supply chains.

## **2. Geelong Grammar School's Structure, Operations and Supply Chains**

The School's governing School Council consists of at least 10 and not more than 16 Directors who serve in a voluntary capacity (including the Principal in an ex-officio role). Directors are nominated to the School Council and include Old Geelong Grammarians, current and past parents, educators, business executives and a representative of the Anglican Church.

The Principal is the most senior employee of the School, and is responsible for the overall management and operations of the School. The Principal reports to the School Council. The Executive Team of the School, led by the Principal, comprises the Vice Principal | Learning, Teaching & Academic Innovation (ELC – 12), Vice Principal | Residential Education, Care & Community, Executive Director | Operations & Shared Services, and Executive Director | Safeguarding & Legal Services and Company Secretary.

The School's Executive's Leadership Team reports to the Principal and comprises the Executive Team plus the Director of Employee Engagement, Director of Community Engagement, Director Student Experience & Engagement (Co-Curricular), Director of Information Services and Support, Head of Campus Toorak, Head of Campus Timbertop, Head of Campus Bostock House, and the Senior Chaplain (participating member).

## **3. Risks of Modern Slavery Practices in the Operations and Supply Chains of the School**

The School is committed to the highest standards of ethics and business integrity in its operations and supply chain. The School aims to enable the fair and respectful treatment of employees and suppliers to uphold these standards. This is also consistent with the School's Code of Conduct.

The primary function of each of the five (5) entities owned or controlled by the School are as follows:

1. Geelong Grammar School Library Fund - Supports the ongoing development and renewal of these centres of learning and creativity (libraries);
2. Geelong Grammar School Building Fund - Supports the physical infrastructure of the School;
3. Geelong Grammar School Scholarship Fund - The Scholarship Fund exists to provide funding towards scholarships, ensuring the opportunity of an exceptional education at Geelong Grammar School may be made available to all learners;
4. Geelong Grammar School Endowment Trust - Supports the School; and
5. Geelong Grammar Foundation Limited (unlisted corporate trustee company, nil individual trading) - Acting as trustee of the Geelong Grammar School Endowment Trust and Geelong Grammar School Scholarship Fund, both of which receive funds for the purposes of advancing the School. The beneficiary of both trusts is Geelong Grammar School.

Any purchases of goods/services by the Funds are facilitated through the School and re-charged through intercompany loans. The School's supply chain is decentralised throughout each cost centre within the School. Each cost centre/department is responsible for its own budget and engaging suppliers. Goods and services may be sourced from a range of locations dependent on the nature of the goods/services. Where possible, the School encourages the engagement of local suppliers.

Where services are being provided, they are often engaged through a Service Level Agreement which must be signed on behalf of the School by the Principal and Company Secretary.

Dependent on the value and nature of a contract, the School will engage in a tender process when looking to engage a new contractor. Recent tender processes have been run for the School's Catering, Security, Fire Services and Cleaning and Waste contracts (amongst others). When a tender is being run, the manager responsible for that function/contract will form a Steering Committee with appropriate stakeholders. The Steering Committee will be responsible for reviewing all quotations and tenders and will provide a recommendation to the appropriate approving parties.

The value of the contract will dictate who may approve the contract, i.e. contracts under \$100,000 may be approved by the Executive Director | Operations and Shared Services, under \$200,000 may be approved by the Principal, and over \$200,000 requires approval from the School Council. The same levels of authorisation apply to purchases that are capital in nature. Any capital purchases under \$25,000 may be approved by the Head of Campus

When addressing the School's modern slavery risks in its supply chain in 2023 and 2024, the School has considered the Modern Slavery List of Industries and List of High-Risk Countries as provided for in The Global Slavery Index 2023, in determining risks of modern slavery in School operations and supply chain. Further, the School has been informed and advised by external consultants with the benefit of having considered information and resources made available through organisations that include the *Transparency International Corruption Perceptions Index*; *Global Contact Network*; *Global Estimates of Modern Slavery 2021*; *'Hidden in Plain Sight'*, Report of the 2017 Parliamentary Inquiry into establishing a Modern Slavery Act in Australia; the Commonwealth *Modern Slavery Act 2018*, *Guidance for Reporting Entities*; and Report of the statutory review of the Modern Slavery Act 2018 (the first three years) completed June 2023, including the Government's response, which will further drive action to address modern slavery in global supply chains and operations.

The School is further aware of the *Modern Slavery Amendment (Australian Anti-Slavery Commissioner) Bill 2023*, which was passed through Parliament in May 2024 and received Royal Assent on 11 June 2024. The Act will commence within 12 months of the receipt of Royal Assent. It amends the Act, to establish the Australian Anti-Slavery Commissioner as an independent statutory office holder within the Attorney-General's portfolio. The School understands that the Commissioner's functions will allow the Commissioner to support compliance with the Act, improve the transparency of supply chains, and help fight modern slavery in Australia and overseas.

#### **4. Actions taken by the School to Assess and Address Modern Slavery Risks, including Due Diligence and Remediation Processes**

The School appointed a third-party consulting firm, to conduct a modern slavery risk assessment of its operations and supply chain for the two (2) year reporting period 1 January 2023 to 31 December 2024. In doing so, the School created a preliminary modern slavery framework for development; this has assisted the School in the preparation of its first Modern Slavery Statement. The School's Associate Director of Finance has overseen and managed the School's Modern Slavery process.

The assessment comprised two parts:

1. Identified existing risk management policies and procedures within the School and determined whether this may be broadened to include the Risks of Modern Slavery, through ethical sourcing, quality standards or other compliance reporting; and
2. Conducting a risk assessment over the School's current suppliers in terms of payment data, for the period 1 January 2023 to 31 December 2024.

In conducting a risk assessment of existing risk management policies and procedures, a review was undertaken of all relevant policies including the Code of Conduct, Whistleblower Protection, Procurement, Supplier Pre-Registration, and Supplier Statement of Commitment and Intent.

The School also developed a draft Modern Slavery Policy, to be implemented during the next reporting period, which:

1. Demonstrates the School's commitment to the right of all individuals to live and work freely, together with its opposition to all forms of modern slavery;
2. Seeks to inform and educate the School's employees, suppliers (third party contractors) and volunteers regarding the risks associated with modern slavery; and
3. Demonstrates the School's commitment to implementing and maintaining effective systems and controls, which will ensure the School play a constructive role in helping to reduce the risk of modern slavery occurring within its business and supply chain.

The School's internal policies are published to and accessible by School Employees on the GGS Intranet. Publicly available policies are published on the [School's website](#). In most instances, published Policies include a clause which details the consequences of non-compliance with the Policy.

Enforcement of compliance by suppliers with policies is managed in accordance with the terms of the relevant Service Level Agreement. In circumstances of non-compliance, the School may rely upon the terms of the Service Level Agreement and if required, act to terminate the supplier's engagement.

The relevant Team or Department within the School has responsibility for undertaking the associated work to support the published policies and procedures. In addition, many Teams or Departments have published 'Hubs' accessible on the Hive (the School's learning management and communication system), which contains information to assist School Employees with the practical steps associated with the implementation and application of various Policies.

Policies are developed by reference to the applicable legislation, published minimum standards and guidelines, this includes for example the VRQA Minimum Standards, Child Safe Standards and Fair Work Australia, informed by the School's individual circumstances and legal and regulatory requirements. Further, if a gap is identified in the School's policies and procedures, the Responsible Department will either draft or review a Policy which is subsequently provided to the School Executive Team for review and endorsement.

The relevant policy will have an approving party, including the Executive Team, or the Principal, and in some instances, approval is granted by the Directors of the School Council. The Responsible Department is also responsible for monitoring compliance with each Policy.

As part of the supplier engagement process, suppliers are expressly required to meet the terms of the School's Service Level Agreement. These terms are negotiated between the School and the supplier, and prepared and reviewed by the School's Legal Services department.

From a retail perspective, the School also provides the School's 'Statement of Commitment and Intent' which sets out the School's ethical expectations for its retail suppliers. In some instances, suppliers are required to complete a 'Supplier Pre-Registration Form' which requires them to provide details of applicable insurances, ISO compliance, certifications or licences, etc. The School may also seek they provide Modern Slavery or other ethical sourcing policies for the School to assess against its 'Statement of Commitment and Intent'.

Where the School enters into a Service Level Agreement, where the School will be impacted by the policies of the supplier, the School will review and assess such policies and determine whether these are acceptable. Further, the School's draft Procurement Policy (once finalised) will set out the policies employees should be assessing before engaging a third-party supplier.

In performing the Modern Slavery risk assessment of the School's suppliers, the School conducted a desk top review of its Top 50 suppliers of goods and/or services in terms of spend, that comprise approximately 60% of its total spend to external suppliers. The School considered risks that may potentially cause, contribute to or be directly participating in modern slavery practices, consistent with the Act and the *Commonwealth Modern Slavery Act 2018 - Guidance for Reporting Entities*. These risks areas included Financial; Industry; Country (geographic location), use of sub-contractors and evidence as to whether the supplier has submitted a modern slavery statement in Australia (if applicable).

The results of the School's desk top review identified that 45 of its Top 50 suppliers scored an overall modern slavery risk rating of low risk, whilst the remaining 5 of the 50 suppliers scored an overall modern slavery risk rating of moderate risk. The moderate risk suppliers operate in high risk industries and use sub-contractors in Australia, and these two factors primarily contributed to a moderate risk to modern slavery outcome. Hence, there are no suppliers identified within the School's Top 50 at high risk to modern slavery. This review is based on what was determined using publicly available records, and information where necessary that the School had previously obtained from its suppliers and recorded within School systems.

The School's review further identified that its Top 50 suppliers all operate their businesses in Australia, in several industries, including the following that are considered to be high risk to modern slavery:

1. Catering;
2. Cleaning;
3. Construction & Engineering;
4. Commercial Services & Supplies;
5. Electrical Equipment & Services;
6. Food Products;
7. Garments;
8. IT Services & Supplies; and
9. People Services.

The School has also developed a modern slavery questionnaire that it intends to distribute to suppliers; this will provide additional information to that obtained in the desk top review. The School will commence distributing the questionnaire to its Top 50 suppliers, and also require it to be completed by all new suppliers where the cumulative Service and Professional Level Agreements for services are expected to be in excess of the Determined Threshold for the year. The questionnaire contains inquiring questions relevant to modern slavery directed to the School's suppliers, as opposed to the standard/generic type modern slavery questions. Based on the answers provided, the School will

conduct an evaluation of each questionnaire, that will allow the School to obtain a risk rating for 10 pertinent modern slavery questions, and for the submission of supporting documents to the School where applicable. The School considers this to be a critical step in identifying and where applicable, eliminating human trafficking and modern slavery, where there is any suggestion or the slightest suspicion that this may be occurring.

The questions include:

1. Does your company operate in any high-risk countries?
2. Does your company operate in any high-risk industries?
3. Does your company engage with suppliers who have operations in any high-risk countries?
4. Does your company engage with suppliers who have operations in any high-risk industries?
5. Does your company have any migrant employees?
6. Does your company have any employees under the age of 18 years?
7. Does your company have policies or procedures in place to manage and mitigate risks of modern slavery?
8. Does your company provide training on modern slavery?
9. Has your company taken actions to increase visibility and transparency of your supply chain?
10. If your company engages the service of subcontractors, labour only companies or labour from employment businesses; do you have procedures or controls in place to ensure subcontractors and such are not being forced to work or subject to bonded labour?

The School has also prepared a draft Introductory Modern Slavery Training Pack, for further consideration by the School's Executive's Leadership Team and future internal distribution to School employees.

## **5. Assessing the Effectiveness of Actions Taken by the School**

The School has described above, its activities performed during the immediate assessment of modern slavery risk within the School's operations and supply chain. This includes policy review, drafting of a Modern Slavery Policy, the establishment of a modern slavery questionnaire for completion by suppliers, a desk top risk assessment for high spend suppliers and a draft introductory training pack.

In completing the above, the School has mapped out key parts of operations and supply chains to improve its understanding of potential modern slavery risks.

As reported above, initially the School's modern slavery questionnaire will be rolled out for completion by its Top 50 suppliers, and all new suppliers. The School aims to use the information obtained from this, to build transparent and collaborative relationships with suppliers. This will further enable expectations for the reporting of modern slavery risks within the respective supplier's supply chain to have been clearly communicated, and that the School will have satisfied itself that modern slavery risks have been and are being effectively managed.

The School will review its policies that now incorporate and make provision for modern slavery compliance to enable School employees and suppliers where applicable, to certify that they have read and understand these policies, on an annual basis. The School will regularly review and improve its modern slavery internal controls and procedures to monitor their effectiveness and respond to areas that are not compliant. This will include updating policies and procedures (where deemed necessary).

Whilst the School is not aware of any modern slavery having occurred within its operations and supply chain and that of its suppliers (that may reasonably be determined at this stage), the School



acknowledges its process is still in its infancy and requires further development. As such, the ability to assess the effectiveness of the School response, is similarly in its early stages. The School expects that the development of stronger modern slavery assessment processes will develop, as its initiatives are further integrated within its operations and supply chain, and more information becomes available from the actions taken and implemented to date.

## **6. Describe the Process of Consultation with Any Entities the Reporting Entity Owns or Controls**

The School's supply chain and employee engagement are centrally controlled through the School, however, where required the School has consulted with the other entities owned or controlled by the School. This has occurred when commencing with the School's current Modern Slavery actions and during the implementation of actions taken during this reporting period by the School, to assess and address modern slavery risks, including due diligence and remediation processes.

This included a consulting session with other stakeholders prior to finalising this statement and submission to the School Council. The stakeholders comprised a cross section of employees from the School, with representation from various parts of the School's enterprise (as applicable).

Within the School, there has been agreement with the steps and actions to be taken on the way forward, and the need for regular forums to discuss and agree on the School's modern slavery processes.

The School's Modern Slavery process is being driven by the Associate Director of Finance and supported by other business streams, including Finance, Employee Engagement, and Safeguarding and Legal Services.

## **7. Other Relevant Information - The Way Forward for the School**

The School commits to work proactively to reduce modern slavery within its supply chain and operations, and expects all suppliers engaged to do the same. In order to build on the draft modern slavery framework, established to date, the School will focus in the next two (2) calendar years on the following areas and the extent to which these are achievable:

1. Roll out of the modern slavery supplier questionnaire and review of answers and information provided. Undertake further actions where required and additional communications with suppliers;
2. Offer modern slavery introductory training to all employees;
3. Develop internal accountability standards and procedures further, to hold employees and third party contractors accountable for non-compliance with School standards on modern slavery and human trafficking, including establishing consequences for non-compliance; and establishing a process to remediate such breaches; and
4. Undertake social accountability audits, within reason, by conducting onsite inspections of School suppliers and sub-contractors to evaluate their practices concerning the treatment of their workers and identifying and determining any potential risks, including modern slavery and human trafficking.



This statement was approved by the School Council of Geelong Grammar School Limited in their capacity as principal governing body of Geelong Grammar School Limited on:

24 October 2025 (Date)

Signed by :

A handwritten signature in black ink, appearing to read 'PG Handbury', written in a cursive style.

Patrick Geoffrey Handbury (Name)

Chair of the School Council of Geelong Grammar School Limited