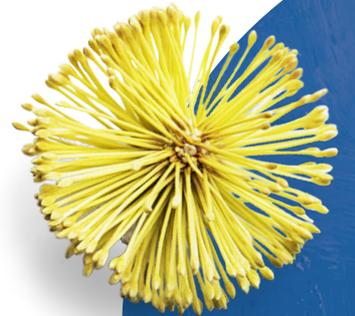


# Modern Slavery Statement 2022



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This Modern Slavery Statement is approved by The Creche and Kindergarten Association Limited Board of Directors on 30 June 2023.



**Therese Mulherin**  
Chair - Board of Directors

## Disclosure Note

This statement has been made on behalf of The Creche and Kindergarten Association Limited.  
ACN - 150737849 ABN - 59150737849

# 1. Introduction

## 1.1 About

For the past 115 years, C&K has developed, nurtured and educated generations of Queensland children. We are experts in supporting learning, wellbeing and resilience by providing environments that help children become confident, creative and persistent learners.

As a not-for-profit organisation, children come first in everything we do. We embrace the diversity of children, families and communities and are committed to reconciliation with children from Aboriginal and Torres Strait Islander communities.

We re-invest our profits to ensure our longevity so we can continue to support thousands of Queensland families each year. With 331 branch and affiliated centres across the state, C&K support urban, regional and remote communities to provide the necessary foundations for children to become lifelong learners.

C&K delivers a range of early childhood education and care services, including kindergarten, extended hours kindergarten, childcare and out-of-hours school care. We aim to respond to changing social circumstances and opportunities, such as implementing new Early Years Centres to support vulnerable children.

This document is C&K's Modern Slavery Statement for the 2022 reporting year issued under the Modern Slavery Act 2018. It outlines the steps we have taken to identify, manage and mitigate the specific risks of modern slavery in our operations and supply chain.

C&K is committed to respecting human rights, including the right to be free from slavery, forced labour, domestic servitude, and, most specifically – the exploitation of children.

We work with integrity and strive for excellence - every day. Our purpose is to nurture and inspire children to succeed in an ever-changing world. Modern slavery is completely unacceptable to us, and we are committed to continuous improvement so that our processes remain effective in preventing and remediating modern slavery.



# 1. Introduction (continued)

## 1.2 Chief Executive Officer’s message

C&K opposes all forms of modern slavery, such as forced labour, child labour, debt bondage, servitude, human trafficking, and deceptive recruiting for labour or services. These actions violate human rights, are against the law and are entirely at odds with C&K’s core values. We are committed to continuous improvement and understanding the risk of modern slavery by raising awareness within our centres and by identifying, assessing, and mitigating modern slavery risks in our supply chains.

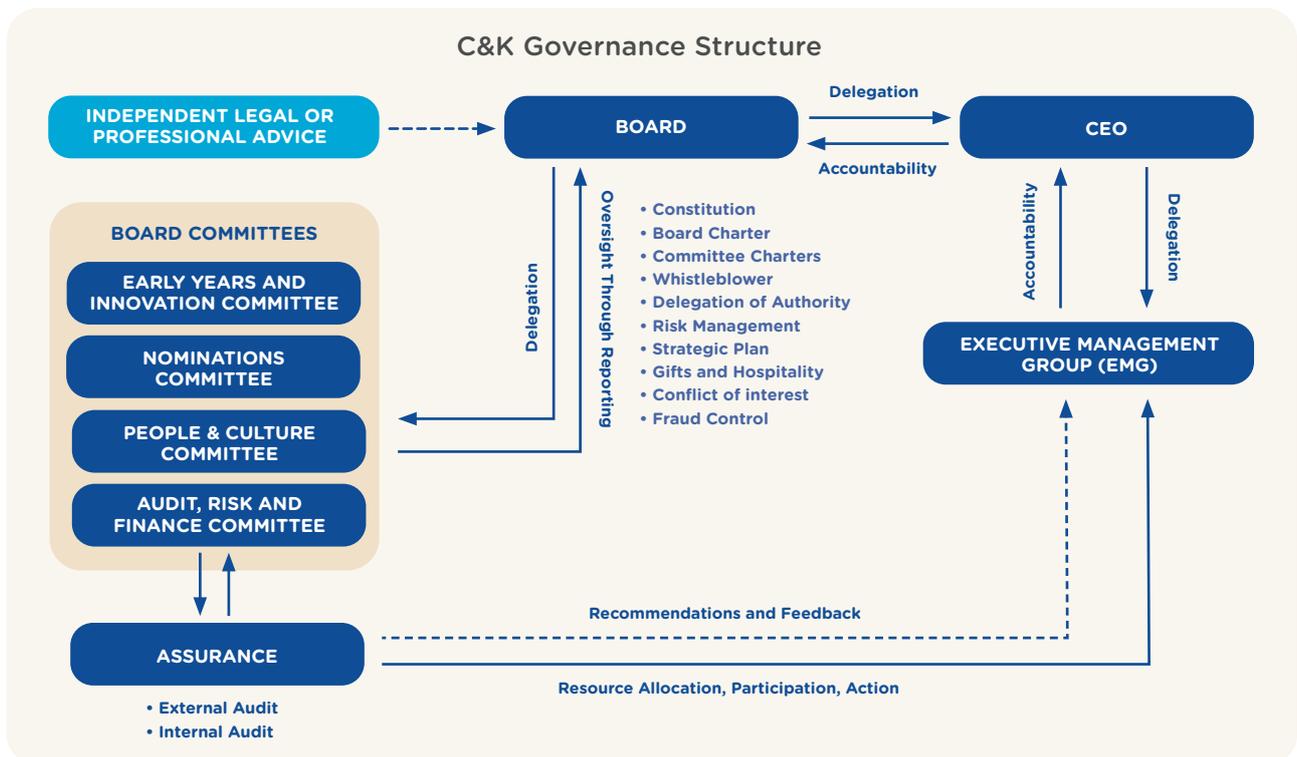
We believe that C&K has an overall low risk profile, and during 2022, did not detect any instances of modern slavery in our operations or supply chain. We have prioritised the areas of highest risk to ensure we put appropriate and effective processes and frameworks in place to ensure our approach to Modern Slavery continues to improve and increase in effectiveness.

# 2. Our structure, operations and supply chain

## 2.1 Our organisation structure

C&K is a public company limited by guarantee and a registered charity. We are headquartered in Brisbane, Queensland, and all our workforce and operations are located within Australia.

Effective Corporate Governance is critical to our ongoing success. Our Governance Structure for the 2022 reporting year is set out below and highlights the interaction between the Board, external advisors and the Executive Management Group.



## 2. Our structure, operations and supply chain (continued)

### 2.2 Our operations

C&K was formed in 1907 to support disadvantaged families whose children had nowhere safe to play and learn. Throughout C&K's 115-year history, our organisation has met the needs of the families and communities we support. Our business operates in three key areas:

1. C&K operates 178 early childhood education and care centres throughout Queensland, including kindergartens, childcare centres, limited hours care and outside of school hours care.
2. C&K are authorised by the Queensland Government to distribute funding and provide support to 153 affiliated early childhood education and care centres.
3. Our C&K College of Early Childhood offers formal courses in Early Childhood Education (certificate III and diploma). The college caters for 200-250 students per year and is open to C&K employees and the public.

C&K centres

**178**

Branch centres

**153**

Affiliated centres

**Workforce  
snapshot**

Number of  
employees

**2,098**

**3.2%**

identify as Aboriginal and/or  
Torres Strait Islander

Employee retention

**79.1%**

**18,920**  
attended C&K  
centres

Children of C&K

**1,315**

extended hours  
kindergarten

**191**

OSHC

**5,698**

branch  
kindergarten

**4,586**

branch childcares

**7,130**

affiliate  
kindergartens

## 2. Our structure, operations and supply chain (continued)

### 2.3 Our supply chain

C&K works with more than 1,200 direct suppliers of both goods and services, who are critical to our business. Our supply chains are diverse - ranging from small family businesses through to national and international organisations. C&K is committed to respecting the fundamental human rights of all people and we will be working with our key suppliers to communicate our expectations of them. C&K expects the highest ethical practices and professional standards from its suppliers through their commitment to:

- Compliance with laws and regulations
- Socially responsible and sustainable practices
- Valuing and respecting all people by respecting diverse backgrounds, experiences and perspectives
- Robust corporate governance
- Displaying integrity with a proactive focus on risk awareness and management
- Environmental stewardship.

The diagram below shows the categories of expenditure in C&K's supply chain and the assessed risk for each category:



C&K assessment based on Department of Home Affairs Modern Slavery Guidance Notes and the Global Slavery Index

## 3. Identifying risks in modern slavery practices

C&K's modern slavery risk assessment indicates that, overall, we have a relatively low modern slavery risk profile in terms of our direct operations, however, we acknowledge that modern slavery risks may be present in the products and services we purchase, and that primarily engaging Australian suppliers does not necessarily offset this risk.

### 3.1 Operations risks

There were no material changes to our operations during 2022 that would impact our modern slavery risk profile, and no issues or concerns were raised as part of our control mechanisms, therefore, we continue to assess our modern slavery profile as low risk. The largest contributors to our low-risk profile relate to staff employment conditions, the geography of our business, and our governance.

The following elements contribute to C&K's low operational risk profile:

- permanent and casual centre staff are employed directly and paid under enterprise agreements.
- C&K pays higher than award rates.
- C&K has higher staff retention than the sector average.
- C&K operations are subject to regular internal and external audits, as part of a highly regulated sector.
- centres are all located in Australia.

### 3.2 Supply chain risks

While C&K does purchase certain goods and services that are generally considered to be higher risk based on the Department of Home Affairs Modern Slavery Guidance Notes and the Global Slavery Index, over 89% of C&K's annual expenditure actually falls into low-risk categories, such as employee costs, depreciation, finance costs and occupancy costs.

C&K recognises that while this may reduce our overall risk of inadvertently contributing to modern slavery, it does not remove the risk entirely. For higher risk sectors such as building and construction services, cleaning and security services, food and catering services, furniture and office supplies and ICT hardware, C&K further reduces its risk by prioritising the use of major suppliers who demonstrate their own due diligence, such as through their own modern slavery statements, and provide information on their own supply chains. However, the wide geographical distribution of C&K's centres across Queensland means that this is not always achievable, and we need to rely on smaller local suppliers who do not necessarily have the same knowledge of, nor systems and process to manage, modern slavery risks.

## 4. Actions taken to assess and address the risk of modern slavery

In 2020 and 2021 C&K implemented a number of modern slavery related initiatives to establish the foundational structures to ensure that managing modern slavery risks became an active consideration in the operations of the business. This included reviewing corporate policies and procedures, the development of a Supplier Code of Conduct, offering training to our head office personnel, seeking supplier feedback on their modern slavery policies and processes, and building in potential modern slavery risk as a part of new supplier evaluations.

In 2022 C&K undertook the following activities to assess and address the risk of modern slavery:

- a. The percentage of C&K's head office employees employed as at 31 December 2022, who had undergone modern slavery training increased to 47% (2021: 17%);
- b. All formal tender processes conducted by the procurement team in 2022 sought details from tenderers on their organisations approach to mitigating modern slavery risks in their business and supply chain. This also formed part of the tender evaluation process;
- c. Commenced work on the development of organisational KPIs for monitoring C&K's Modern Slavery actions.
- d. During 2022 C&K's review process of a potential new supplier in a high-risk category, highlighted some concerns with the working conditions at the factory producing the goods. On this occasion C&K elected not to work with this supplier while these issues remained unresolved.
- e. On 24 August 2022, C&K also became aware of potential modern slavery issues associated the manufacturing of gloves in Malaysia. C&K responded by identifying which vendors we purchased gloves from in the previous 12 months and asked these suppliers to provide C&K with information on whether any of these purchases were from the manufacturer or country in question. All suppliers confirmed that no C&K purchases, or the products being sold by them, were associated with this manufacturer.



## 5. Assessing the effectiveness of our actions

We acknowledge that the review and assessment of our actions to identify and tackle modern slavery risks within our operations and supply chain is an ongoing and evolving process. We are fully committed to enhancing and expanding this process.

We have already initiated and will continue to work on developing frameworks and procedures, including the establishment of organisational Key Performance Indicators (KPIs). These measures will enable us to consistently enhance our review of the effectiveness of our actions in evaluating and addressing modern slavery risks throughout our operations and supply chains. This will involve monitoring our actions and outcomes, as well as conducting internal governance and external assurance processes, such as internal audits. Based on the findings of these processes, we will modify and reinforce our actions to continually enhance our response to modern slavery.

Any modern slavery issues arising are escalated to our senior management for discussion and decision.

## 6. Process of consultation with entities owned or controlled by us

Not applicable.

## 7. Other relevant information

We commit to recognised human rights frameworks, standards, and goals, including:

- International Bill of Human Rights (United Nations Human Rights, Office of the High Commissioner).
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work (1998).
- United Nations Guiding Principles on Business and Human Rights. Implementing the United Nations 'Protect, Respect and Remedy' Framework (United Nations Human Rights, Office of the High Commissioner).
- United Nations Sustainable Development Goals - including Target 8.7 to eradicate modern slavery.
- Human Rights Act 2019 (Qld).





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[candk.asn.au](http://candk.asn.au)



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