

2022

MODERN SLAVERY STATEMENT

KILDARE MINISTRIES



Kildare
MINISTRIES

Contents

Message from Executive Director	3
Executive Summary	4
Section One: Covered Entities	5
Section Two: Structure, Operations and Supply Chains	6
Governance and Structure of Kildare Ministries	7
Kildare Ministries Key Operations and Associated Supply Chains	7
Section Three: Risk of Slavery in our Operations and Supply Chains	8
Section Four: Action	9
Mapping against our supplier action plan	10
Our students' involvement	10
Our Employees	11
Roadmap for 2023 and Beyond	11
Remediation	12
Section Five: Effectiveness	12
Section Six: Consultation	12
Section Seven: Any Other Relevant Information	13
COVID19 Impact	13
Justice in our ministries	13
Approval of Statement	13

MODERN SLAVERY STATEMENT 2022

It gives me great pleasure to introduce you to the Kildare Ministries Modern Slavery Statement. We are a Catholic organisation, responsible for ten schools and three community works. Our values are steeped in the Gospels, and we hold that education is transformative. Our *Living Justice Living Peace Charter*, the cornerstone of our justice program, provides a questioning framework upon which we are encouraged to approach social issues, such as modern slavery. We constantly ask of ourselves:

- What more do we need to ask?
- What more do we need to learn?
- What understanding and creative leadership will we require?
- What compassionate responses will have an impact on justice and peace?

In 2022, we built upon the foundations established in our ministries in the previous reporting period. We continued to raise awareness about the uncomfortable truth that issues of modern slavery through practices such as human trafficking, debt bondage, forced marriage and child labour are enabled by the consumption of services and the greed for profits. According to the *International Labour Organization*, modern slavery is an immense and profitable business generating more than US\$150 billion a year. Constant cost cutting creates an environment where slavery-tainted goods are hidden in layers of sub-contracting and outsourced production. This is not an old-world problem of another time but one that surrounds us now.

At Kildare Ministries we have heard the challenge and appeal of Pope Francis, to remove our blindfold, to open our eyes so that we can see the misery of those in front of us and open our ears so we can hear their cries for help. This year, through our meeting agendas and education programmes we have focused on the need to be educated about the root causes, so with eyes wide open we can see the signs and notice the impact on those being robbed of their freedom.

In this report we discuss the steps we have taken to address the risks of modern slavery in our procurements, operations, business partnerships and supply chains and the steps we have taken to minimise those risks. We also share, the educational focus making our students more aware of this 'crime against humanity' so they can be discerning with their own buying power. Working as a community, we have gained traction in deepening our understanding and sharpening our awareness of the societal issues that allow such abhorrent practices. But we still have a way to go before we will be fully satisfied that we are doing our very best to eradicate modern slavery.



Erica Pegorer
Executive Director

EXECUTIVE SUMMARY

This statement is published to address Trustee of Kildare Ministries' (TKM) reporting obligations under the Modern Slavery Act 2018 (the Act). This statement is prepared by TKM as a single reporting entity and is prepared on behalf of itself and its controlled entities. TKM is an Australian registered body corporate.

This statement sets out how we work to identify, mitigate, and manage risk of modern slavery and human trafficking in our ministries and supply chains, and how we comply with the relevant legislation. This statement has been prepared for the financial year ending 31st December 2022.

Our Commitment

Our Living Justice Living Peace Charter which provides a framework for each of our ministries, challenges our communities to seek justice so that we can all live in peace: for without justice there is no peace. We are committed to promoting high ethical standards, responsible work practices and protecting human rights of all individuals. As part of this commitment, we do not tolerate modern slavery and human trafficking within our operations and supply chains. TKM aims to ensure the Trustees, Boards and employees are aware of their obligations to disclose any act of modern slavery.

We have been able to create awareness within our schools through compiling our first statements. The slavery seemed far education sector, understanding process of reporting has taught are now far more required to end our supply chains.



In 2022 we have built on the foundations laid out in 2020 and 2021, by prioritising action within our organisation and taken to reduce risk supply chains. We are committed to continuous improvement in our practices to combat modern slavery in subsequent reporting periods. We seek to engage with partners who respect and uphold the human rights of others.

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SECTION ONE: COVERED ENTITIES

This section of the statement addresses the requirement of Section 16(1)(a) of the Modern Slavery Act 2018 by providing an overview of which entities are covered by the statement.

Kildare Ministries comprises 10 schools and 3 community services NFPs.

- Brigidine College Indooroopilly, QLD
- Brigidine College St Ives, NSW
- Clonard College Herne Hill, VIC
- Kilbreda College Mentone, VIC
- Kildare College Holden Hill, SA
- Killester College Springvale, VIC
- Marian College Ararat, VIC
- Marian College Sunshine West, VIC
- Star of the Sea College Brighton, VIC
- St Joseph's College Echuca, VIC
- Saltbush Balnarring Beach, VIC
- Brigidine Asylum Seeker Project, VIC
- Wellsprings for Women Dandenong, VIC



Marian College
Ararat



Clonard College
Geelong



Star of the Sea
Brighton



Brigidine College
Indooroopilly



St Joseph's College
Echuca



Killester College
Springvale



Kildare College
Holden Hill



Marian College
Sunshine West



Kilbreda College
Mentone



Brigidine College
St Ives



Wellsprings for Women
Dandenong



Brigidine Asylum Seeker Project



SECTION TWO: STRUCTURE, OPERATIONS AND SUPPLY CHAINS

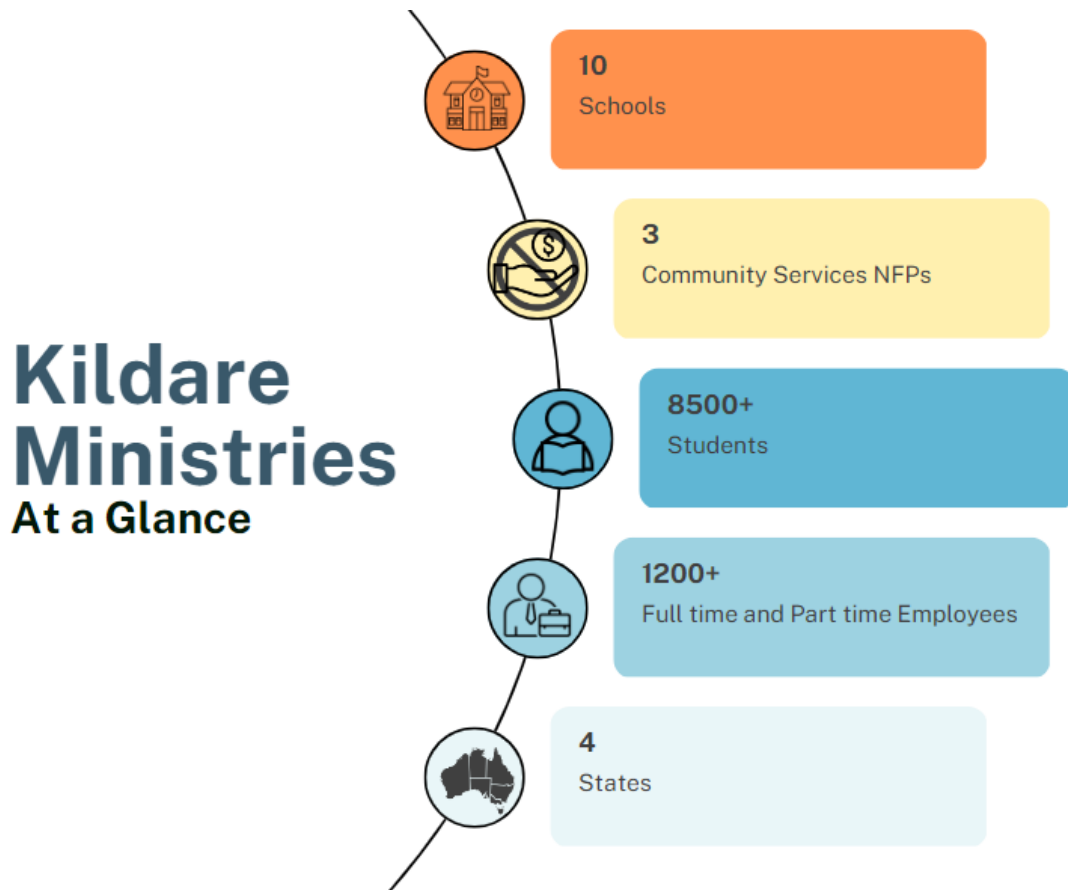
This section outlines Kildare Ministries' structure, operations and identified supply chains as required by Section 16(1)(b) of the Modern Slavery Act 2018.

Kildare Ministries comprises the educational and community works formerly governed by the Brigidine Congregation, NSW Brigidine Province, Victorian Brigidine Province, and the Presentation Congregation of Victoria. Kildare Ministries offers secondary school education in Victoria, New South Wales, South Australia, and Queensland, as well as community services within an inclusive and socially just context.

It attempts to nurture a vision of life in which the belief in the dignity of each individual, characterised by personal integrity and compassion, informs thinking and action and enables all to take their rightful place in Church and society.

The Vision, Mission and Values of Kildare Ministries are based on Catholic social teaching. The KM Living Justice Living Peace Charter embodies a community that values human dignity and strives for the common good of all creation. The Charter seeks to develop an active, discerning community that speaks out against injustice through action.

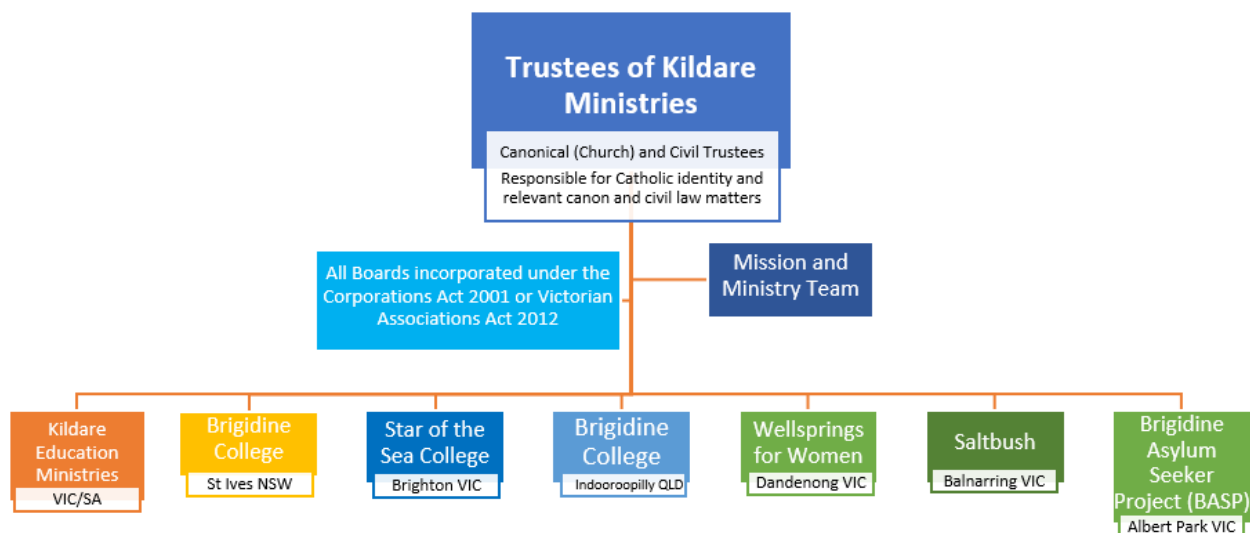
All KM entities are united in the belief that action against modern slavery is fundamental to the Catholic Social Teaching.



Governance of Kildare Ministries

Kildare Ministries operate as a Public Juridic Person (PJP) established in 2011 by decree of the Holy See.





The following diagram outlines the current operational structure of Kildare Ministries:



Kildare Ministries key operations and associated supply chains

Our operations and activities are conducted wholly within Australia, and most of our purchases of goods and services are from tier one Australian suppliers. As primarily educational and service-based institutions, the key element of our expenditure is employment related costs which represent approximately 70% of total expenditure. Most of our school staff are employed directly by the schools and wages are paid in accordance with the respective Enterprise Agreements. Some of our staff are also members of the Independent Education Union (IEU), which has within it, provision for staff consultation on matters related to workload issues amongst other things.

Other than staff related costs, our expenditure can be broadly categorized as follows:

Expense Category	Typical Goods and Services
 Property expenses	Rent, Utilities, Repairs, Maintenance, Construction and related costs
 Teaching and Learning materials	Books, Teaching materials and other consumables
 Uniforms and Sport	School and Sport Uniforms, Sports Equipment
 Technology and equipment	Computers, Hardware, Software, Mobile phones, AV equipment, Gym, Musical instruments



Admin Expenses

Office equipment, Stationary, Furniture, Services such as cleaning, onsite canteen, waste management, security



Promotion and Communication

Advertising material and communication services



Professional Services

Audit, Legal services, Insurance, Consultancy



Travel, Meetings and Events

Air travel, Accommodation, transport & venue hire

SECTION THREE: RISK OF SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

Section 16(1)(c) of the Modern Slavery Act 2018 requires modern slavery statements to describe the modern slavery risks in operations and supply chains of the reporting entity. This section outlines the risk areas in Kildare Ministries' operations and supply chains.

We recognise there is a potential for KM to contribute to modern slavery practices through the purchase of certain goods and services.

Previous analysis of our supply chains identified the potential for slavery risk across the following supply chain areas.

Modern Slavery Risk Areas	
Goods/Services	Type of risk
Technology	Forced labour, debt bondage, child labour and other slavery in electronics supply chain including child labour in cobalt mining in Congo linked to laptops and mobile phones purchased (source: Modern Slavery Risk Map).
Outsourcing <ul style="list-style-type: none"> • Cleaning & waste management services • IT services • Maintenance • Security Services • Temporary / Casual relief staff hired externally 	Trafficking and debt bondage of contract workers by labour hire companies, use of migrant & low skilled workers in cleaning and similar services requiring manual labour. The heightened vulnerability of these workers is something our managers are now aware of.
Canteen & food production	Forced labour, debt bondage and child labour in food and beverage supply chains.

Office consumables and promotional material	Forced labour, debt bondage, child labour and other slavery. This is a product-based risk from items largely produced in China & Malaysia where the commodity risk is high. (Source: Modern Slavery Risk Map)
Other equipment	The construction of assets overseas (e.g., photocopiers) may involve workers subjected to modern slavery and raw materials that could have been produced using modern slavery
School and Sports uniforms & equipment	Forced labour and debt bondage in clothing and equipment supply chains. 2 nd and 3 rd tier supply chains need to be investigated and will be focussed on in 2023.
Building and construction	Forced labour and debt bondage: Building materials, sub-contracting, and labour hire services. Labour hire and complex layers of subcontracting are characteristics of many Australian building sites
Investments	Some indirect investments in emerging economies in Africa, Eastern Europe and Asia may have elevated modern slavery risks

We are also conscious of potential risks in the following areas:

- There is a risk of forced marriage linked to the age group of students in the schools.
- Kildare Ministries acknowledges the potential risk to our students when they engage in paid employment, voluntary work and learning experiences and any other setting which could involve exploitation.

We will continue to work with the schools to ensure students are made aware of these risks and how they could be mitigated. Will also work towards incorporating these risks into our child safety standards framework.

SECTION FOUR: ACTION

Section 16(1)(d) of the Modern Slavery Act 2018 requires modern slavery statements to describe the action taken. This section outlines the action taken by Kildare Ministries to assess and address risks, including due diligence and remediation processes.

We continued to work with the Trustees, Boards of Directors, Key Management Personnel, staff and students to increase awareness of Modern Slavery. The team from Australian Catholic Religious Against Trafficking in Humans (ACRATH) assisted in the presentations, bringing to life some of the real examples from Australia and around the world.

The Trustees of Kildare Ministries reinforced its zero-tolerance approach to modern slavery and strong commitment to act ethically, ensuring effective systems and controls are in place to prevent modern slavery in our schools and supply chains. A Modern Slavery Policy was approved by the Trustees in 2022 and is uploaded on our website.

Modern Slavery has been included as a risk in our group Risk Register.

KM has a Whistle-blower Policy which encourages the reporting and investigation of misconduct to protect the integrity and standards of ethical behaviour in our organisation.

Mapping against our supplier action plan for 2022

SUPPLIER DUE DILIGENCE

- We published a Supplier Code of Conduct in 2022, to be included as part of our supplier onboarding process, together with our supplier engagement guidelines.
- This code of conduct details KM's minimum expectations and non-negotiable requirements in the areas of human rights and labour practices.

Most of our schools have :

- Incorporated anti-modern slavery practice clauses in standard supplier contracts
- Recommended a link to an educational video '<https://vimeo.com/324750931>' from 'Be Slavery Free' for smaller suppliers
- As part of the tender processes asked suppliers whether they comply with MS Laws including the Modern Slavery Act 2018 (Cth). Also, to ensure their suppliers, contractors and third-party providers comply with MS Laws.
- Requested that suppliers provide us with their own Modern Slavery Statement and information about their risk assessments and other due diligence steps.

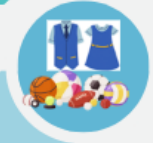
TECHNOLOGY

Supplier Modern Slavery statements have been viewed and risk areas highlighted for further review and action in 2023



UNIFORMS & SPORT EQUIPMENT

Work has been done with a large number of uniform suppliers but 2nd and 3rd tier supply chains need to be investigated



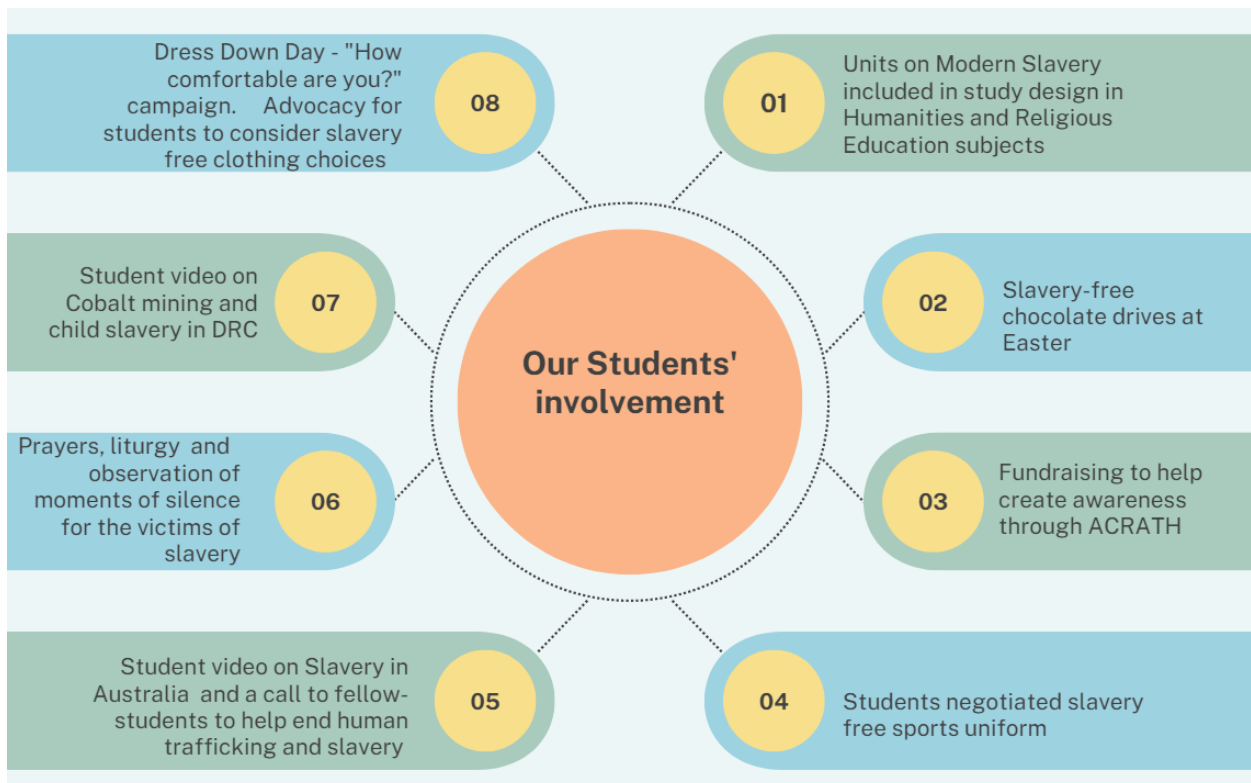
CONTRACT LABOUR

Where services are outsourced, anti-slavery clauses are included in contracts, discussions held and MS statements cited when available



OFFICE CONSUMABLES AND EQUIPMENT

MS statements cited for office consumables and equipment suppliers. Fairtrade tea, coffee and chocolate is purchased and every attempt is made to purchase ethically sourced products



Our Employees

Our schools have committed to:



01.

Employment

- Take all reasonable steps to ensure that no forced or involuntary labour of any kind is used and that employment must be voluntary, and workers shall not be mentally or physically coerced to provide their labour

02.

Child Labour & Wage Laws

- Compliance with all child labour laws and all applicable wage laws and regulations

03.

Respect

- Treat all employees with respect and dignity and not engage in physical discipline or abuse or the threat thereof or other forms of physical coercion or harassment
- Creating awareness of where there is potential for Modern Slavery in our supply chains
- Inform staff of the contribution each person can make towards eliminating modern slavery

04.

Recruitment and Fees

- Only work with reputable registered recruitment agencies and not pass on any recruitment costs to employees. Ensure that all workers have the right to work in Australia

05.

Health and Safety

- Provide a safe and healthy workplace and comply with all applicable health and safety laws, regulations and practices

Roadmap for 2023 and beyond

- Broaden the scope of our supplier risk assessment to include the Technology supply chain.
- Work with ACRATH to take collective action to influence larger suppliers with slavery in their supply chains. E.g., Child labour (Cobalt mining - DRC) in Laptop and mobile phone supply chains.
- Deep dive into 2nd and 3rd tiers of uniform, sports & other equipment supply chains and assist with remediation efforts where slavery is identified.
- Request suppliers to provide evidence of grievance mechanisms and that worker voice is heard in companies in source countries.
- Roll out the modern slavery training module developed at one of our schools to all staff with procurement responsibilities, as part of their mandatory learning.
- Improve governance and reporting by:
 - Developing mechanisms to monitor effectiveness and include modern slavery reporting as part of the annual assurance and attestation processes with schools and community works.
 - Gap analysis will be conducted to identify any gaps in processes which will assist in our continuous improvement focus.
 - Evidence based reviews will be conducted where practical.
 - Include periodic reports to the Risk and Audit committees, Boards and Trustees.
- Formalise the Modern Slavery Working Group which includes school representatives. They will make recommendations to procurement systems and general education aspects of the work on modern slavery.

Remediation

We are committed to ethical and responsible conduct within our operations and to improving the communities where we live and work. We respect the human rights of all our people and those we work alongside, in both our supply chains and the communities in which we operate. Kildare Ministries is committed to the safety of all children and adults at risk, promoting the safety, wellbeing, and inclusion of all.

Kildare Ministries hopes that through our continuous monitoring and oversight of supplier activity, and work with suppliers to ensure there is follow through on action plans and compliance with requirements, they will actively manage and respond to identified slavery risks. We will work with suppliers to ensure continuous improvement in the working conditions of survivors.

When suspicions of modern slavery practices come to our attention through whistle-blower or other channels, KM staff will contact relevant law enforcement agencies.

SECTION FIVE – EFFECTIVENESS

Section 16(1)(e) of the Modern Slavery Act 2018 requires modern slavery statements to describe how the reporting entity assesses effectiveness of its actions.

During this reporting period, we worked to embed our governance mechanisms, policy, and framework for managing the risks across our schools. While we have worked with our schools to improve our processes to provide some internal assurance, there is much more to be done to ensure this work has a measurable impact on the victims of modern slavery.

We found that smaller businesses are becoming aware of modern slavery and its impact on victims, through our dialogues and sharing of material with them. KM is committed to continuous improvement in this area and will establish clear targets and measures to assess effectiveness in the future.

We will continue to review our modern slavery risks as part of our overall risk management framework in the next financial year, and ensure we are effectively identifying opportunities to leverage our power as buyers, to effect change.

SECTION SIX: CONSULTATION

Section 16(1)(f) of the Modern Slavery Act 2018 requires reporting entities to describe the process of consultation with any entities that the reporting entity owns or controls.

During the reporting period, KM engaged and consulted with all the schools in developing this statement. We worked closely with our communities to create further awareness, frame expectations, and strengthen our approach to addressing modern slavery risks. The various Board and Committee meetings at which such discussions took place have been formally documented.

Schools were provided with information and resources about modern slavery. A survey was conducted across the schools to ascertain the work undertaken against each of the supply chains chosen for investigation during the year. Employment practices were also part of the survey.

Continuous discussions are held with the schools on creating action plans to achieve the KM group objective of eliminating modern slavery from our supply chains. As part of these discussions, advice has been sought from organisations such as ACRATH. Resources have been widely researched and useful tools identified to assist in the process. Work done by ACAN and others in the Education Sector, the Australian Border Forces Website, Be Slavery Free and Melbourne Archdiocese Catholic Schools (MACS) have been considered.

SECTION SEVEN: ANY OTHER RELEVANT INFORMATION

We acknowledge that the COVID-19 pandemic increased the vulnerability of those within our supply chains. We continued to support and work with our suppliers during this period.

In all of our ministries, all staff including members of the Executive/Leadership Teams actively give witness to the role of justice. Every staff member is an enabler of justice.

Justice is incorporated into the curriculum in our schools using social justice themes. Co-curricular justice programs are integrated and aligned with the whole school approach to justice education. Programmes are rigorous, strategically planned and allow sufficient time for the development of skills to address issues of injustice and to bring student voice to them. The curriculum is regularly reviewed in consultation with staff and students to include current issues and student voice.

This statement was approved by the Trustees of Kildare Ministries in their capacity as the principal governing body of Kildare Ministries on 4th April 2023.

This statement is signed by Rosemary Copeland and Kathy McEvoy in their roles as Co-Chairs of the Trustees of Kildare Ministries on 4th April 2023



Rosemary Copeland
Co-Chair
4th April 2023



Kathy McEvoy
Co-Chair
4th April 2023