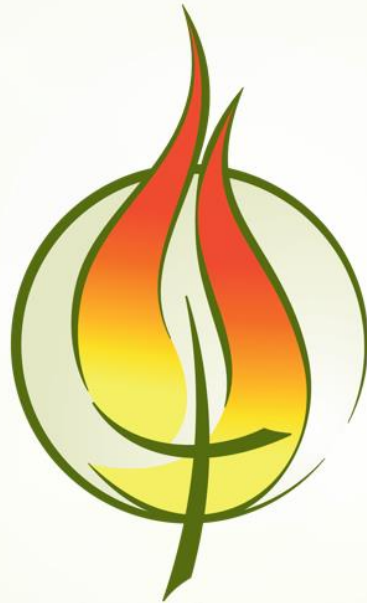


MODERN SLAVERY STATEMENT 2019-2020



Kildare
EDUCATION
MINISTRIES



MODERN SLAVERY STATEMENT 2019–20

EXECUTIVE SUMMARY

This statement sets out the actions to address Kildare Education Ministries' reporting obligations under the Modern Slavery Act 2018 (the Act) as an entity that has a consolidated revenue equal to or slightly greater than \$100 million.

Kildare Education Ministries (KEM) has zero tolerance to modern slavery and human trafficking within our operations and its business and supply chains. We are committed to being an ethical employer. We are committed to promoting responsible business and upholding high ethical standards to ensure the protection of human rights of all individuals in our supply chains.

We have identified some of the major risks of modern slavery in our operations and supply chains and are committed to implementing effective controls to ensure mitigation or elimination of those risks.

SECTION ONE: COVERED ENTITIES

Section 16(1)(a) of the Modern Slavery Act 2018 requires modern slavery statements to identify the reporting entity or entities covered by the statement. This section of the statement addresses this criterion by providing an overview of which schools are covered by the Statement.

Kildare Education Ministries Limited is a public company limited by guarantee, established in 2014 operating under ABN 34169198421.

Kildare Education Ministries is the governing Board for the following secondary Colleges employing over 600 full time equivalent staff:

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

St Joseph's College Echuca, VIC



Clonard College
Geelong



Kilbreda College
Mentone



Kildare College
Holden Hill



Killester College
Springvale



Marian College
Ararat



Marian College
Sunshine West



St Joseph's College
Echuca

This statement covers the activities of Kildare Education Ministries and its controlled entities listed above.

Kildare Education Ministries had a consolidated revenue of \$104,885,674 (2019) and \$101,440,139 (2018).

SECTION TWO: STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Section 16(1)(b) of the Modern Slavery Act 2018 requires modern slavery statements to describe the structure, operations and supply chains of the reporting entity. This section outlines Kildare Education Ministries' structure, operations and identified supply chains.

Kildare Education Ministries is a group of schools, registered as a charity with the Australian Charities and Not-for-profits Commission (ACNC). KEM is associated with religious affiliation providing education to all secondary school aged pupils under its jurisdiction. The KEM Colleges aim to create an educational environment where the dignity of each person involved with the Colleges is nurtured and valued in a broad, inclusive College community.

The Vision and Mission of Kildare Ministries are based on the Catholic social teaching which recognises the dignity of the human being and are articulated as follows :



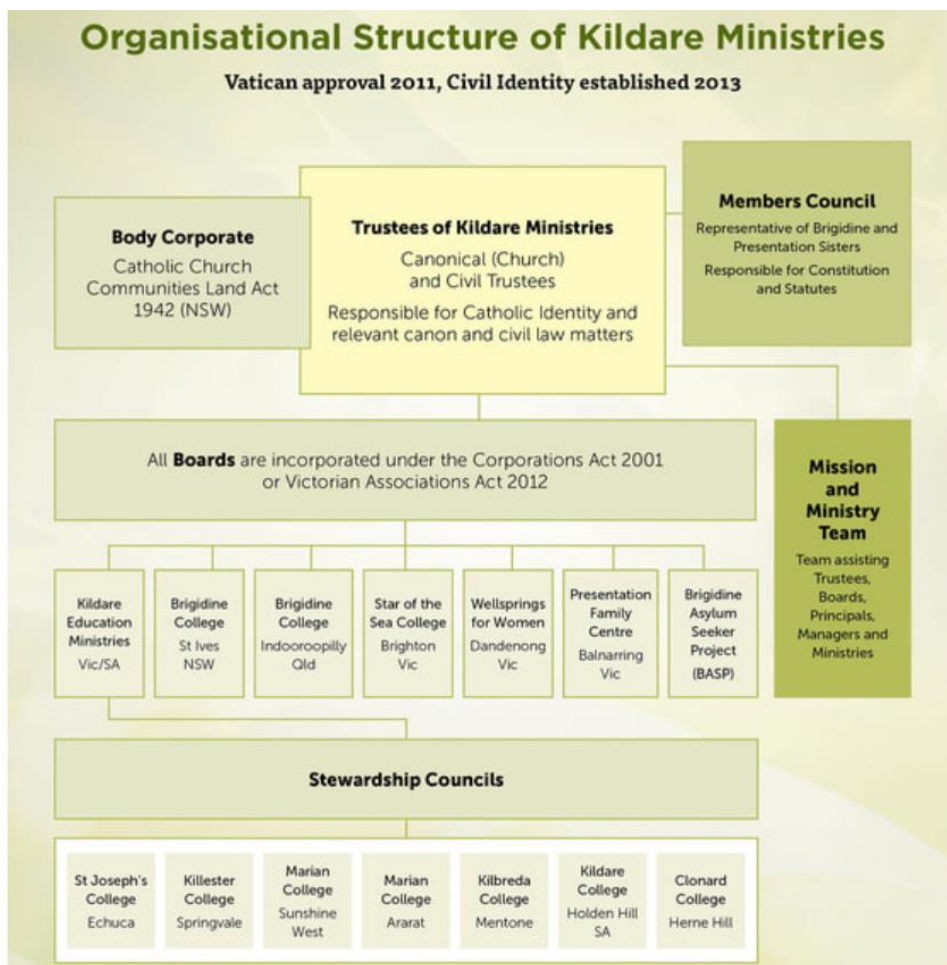
Justice was a key theme in our Colleges in the Year 2020. Our Living Justice Charter embodies a community that values human dignity and strives for the common good of all creation. The Charter seeks to develop an active, discerning community that speaks out against injustice through action. A copy of this document is included in the appendix.



Kildare Education Ministries Colleges operate as entities under the jurisdiction of Kildare Ministries, a Public Juridic Person (PJP) established in 2011 by decree of the Holy See. Kildare Ministries has both canonical (Catholic Church) and civil authority to conduct its ministries according to its approved constitution and statutes. Kildare Ministries established Kildare Education Ministries Ltd in 2014 as a company limited by guarantee to exercise governance responsibilities for the seven secondary Colleges that formerly were conducted by the Brigidine Sisters in Victoria and South Australia.

Kildare Ministries exercises authority in respect to the ministries according to the provisions of Canon Law. In the exercise of this authority Kildare Ministries applies the principles of subsidiarity and the common good. The civil authority is exercised by the company, Kildare Education Ministries, which is governed by the appointed Board of Directors. The Board of Directors, together with the Principal of the school, is responsible for the management of the Company.

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



Within this structure Kildare Education Ministries is the only body that has revenue falling within the reporting requirements of the Modern Slavery Act.

Kildare Education Ministries key operations and the associated supply chains

Our operations and activities are conducted wholly within in Australia. Mapping operations and supply chains is a significant exercise. The pandemic caused severe disruptions to the schools having to move from face-to-face learning to home based learning a few times during 2020. This required a major contribution from the administrative staff in setting up platforms and ensuring adequate controls were in place for a smooth transition in learning. Unfortunately, this meant that it was not possible to develop & implement the targeted group-wide approach addressing Modern Slavery Risk as planned. The actions taken during the 2019-20 reporting year will be listed further in Section four of the statement and the Roadmap in-progress for 2020-21 and beyond is also listed.

As the employing entity, Kildare Education Ministries pays just wages in accordance with the Multi-Enterprise Agreements of Victoria and South Australia (Victorian Catholic Education Multi-enterprise Agreement 2018 & South Australian Catholic Schools Enterprise Agreement 2017). Our staff are also members of the Independent Education Union (IEU).

School operations require services and supplies that have the potential for modern slavery. Prior to recent knowledge about modern slavery in Australia, KEM has worked with its suppliers on the assumption that contract workers in each of these supply chains are not exploited. This assumption will be tested by interrogating the operations in conducting the business of the colleges and in the supply chains of goods procured during 2021.

During the reporting period 2019-20, KEM has identified its key first-tier suppliers in its supply chain. Discussions have commenced with some key suppliers eg. Uniform Suppliers in creating awareness around reporting requirements and the need to identify the various tiers in the supply chain to put an end to Modern Slavery. A CFO was appointed in 2020 with a view to streamlining some of the processes across the Group including having more oversight of the Procurement function in future. The CFO and Executive Officer are working with the Principals, Business Managers and Risk Coordinators of each College in creating awareness of modern slavery in supply chains and driving the slavery-free initiatives.

We have mapped some of the key operation areas and the linked supply chains as shown in the table below. This has assisted in identifying the potential for exploitation in high-risk commodities and areas requiring additional focus on in 2021 and beyond.

Functional Area	Main operations	Supply chain
<ul style="list-style-type: none"> • Corporate functions • School functions 	<ul style="list-style-type: none"> • Information Technology • Labour Hire • Contractors and subcontractors • Canteen • Marketing & Communication • Maintenance • Student welfare • Finance 	<ul style="list-style-type: none"> • Technology (Hardware, software and cloud services) • Contract staff, building contractors, cleaning, security workers • Food Production • Office consumables & promotional material • Office & grounds furniture & equipment • School uniforms • Sports Equipment • Investments

To date, these have not been prioritised or tested.

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

Initial investigation has identified the potential for high slavery risk across the following supply chain areas. Long and complex supply chains, stretching across multiple countries, have posed a challenge in tracking and monitoring 2nd and 3rd tier suppliers and their modern slavery risk management processes in the first year of reporting. Education and awareness-raising has led to identifying possible high-risk areas for KEM.

- Technology – Forced labour, debt bondage, child labour and other slavery in electronics supply chain including child cobalt mining labour in Congo (source Modern Slavery Risk Map). All schools purchase laptops for use by staff and students. KEM could be contributing to the slavery risk by purchasing this commodity.
- Outsourcing – trafficking & debt bondage of contract workers by labour hire companies. This applies to areas of IT services, capital works, maintenance and catering.
 - The Kildare Education Ministries Colleges have contractual agreements with service providers for six cleaning services across the Colleges.
 - Temporary / Casual relief staff are sometimes hired externally.
 - Areas along the Murray river have been highlighted as high-risk areas for undocumented workers. One of our Colleges in the area could be contributing to this slavery risk through its location in this high-risk area for forced labour.
- Canteen & food production – forced labour, debt bondage and child labour in food and beverage supply chains. The KEM colleges have contractual agreements with service providers for the conduct of two on-site canteens. All seven Colleges use local businesses for catering for school functions. The Colleges could be contributing to this Sector based risk.
- Office consumables and promotional material - Forced labour, debt bondage, child labour and other slavery. This is a product-based risk to which KEM Colleges could be contributing to by purchasing products linked to modern slavery 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 may involve raw materials that may have been produced using modern slavery. This is a product-based risk to which KEM Colleges could be contributing to by purchasing products linked to modern slavery.
- Clothing & equipment – Forced labour and debt bondage in clothing and equipment supply chains. The KEM schools purchase School and Sports uniforms from local 1st tier suppliers. However, the 2nd and 3rd tier suppliers could be from manufacturing hubs where the commodity risk of slavery is extreme or high, thus KEM colleges could be contributing to this risk.
- Investments – some indirect investments in emerging economies in Africa, Eastern Europe and Asia may have elevated modern slavery risks. KEM Colleges do not have any direct investments.
- There is a risk of forced marriage linked to the age group of students in the colleges.
- Risk associated with activities undertaken by the Colleges – immersion in communities of emerging nations. KEM recognised the potential risk to children and families in these communities and decided against organising overseas trips to these countries.

SECTION FOUR: ACTION

In the 2019-20 reporting period, Kildare Education Ministries has created **awareness** about Modern Slavery Act (2018) with the Board of Directors, Key Management Personnel, staff and students. Presentations were conducted with the various groups with the assistance of the team from Australian Catholic Religious Against Trafficking in Humans (ACRATH). Awareness was created about current levels of slavery across the globe and here in Australia with detailed discussions held about the various forms of slavery such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

The group adopted a **zero-tolerance** approach to modern slavery and a strong commitment to act ethically ensuring effective systems and controls are in place to prevent any form of modern slavery in our own schools or supply chains. Development of a Modern Slavery Policy for KEM began and was in draft stage as at 30th of June 2020. This draft is under consultation with stakeholders.

Education of Principals, Managers and KEM Board was carried out during the year. The dates below are where Modern Slavery was addressed at the meetings listed.

KEM Board Meetings

5th December 2019

13th February 2020

7th May 2020

18th June 2020

KEM Principals' Meetings

10th June 2020

KEM Business Managers' Meetings

18th October 2019

15th May 2020

29th May 2020

KEM Risk and Compliance Officers' Meetings

18th November 2019

May/June 2020 working groups.

Education of KEM personnel has included:

- The presentations by ACRATH focussed on the culture shift encouraged by the Australian Modern Slavery Act (2018)
- The Pope's message of 29th July 2018 stating we are all responsible for ending Modern Slavery. 'It is the responsibility of all to denounce these injustices and to firmly oppose this shameful crime.'
- Creating awareness of where there is potential for Modern Slavery in our supply chains.

- Attention drawn to the contribution each College can make towards creating awareness of modern slavery and examining its purchasing and employment practices.
- Introduction to the MSA (2018) reporting requirements

Consultation regarding reporting was held with Intermondo through discussion and purchasing their reporting framework.

Be Slavery Free was engaged to discuss and provide advice on the reporting requirements.

During the reporting period KEM started including an anti-slavery clause in new contracts entered with suppliers. This will be enforced for all contracts entered into from 2021.

Participation in system-wide awareness-raising of modern slavery

Catholic Education Melbourne championed a slavery-free tea & coffee initiative, launched by the Archbishop of Melbourne and President of ACRATH. All KEM schools participated in the initiative with head office and Colleges introducing slavery free tea, coffee and chocolate in staff rooms. These items have high recognition as highly personal choices with end-user buy-in importance and is being used to create awareness and cultural change within the school communities.

The posters are displayed in all staffrooms – see sample below:



Initiatives of Colleges:

At this early stage of understanding the implications of modern slavery and of the MSA requirements, schools within Kildare Education Ministries have taken individual initiatives. To date there has been insufficient education, prioritising of areas and risk assessments to put in place any collective action.

1. Students are encouraged to purchase slavery-free Easter eggs.
2. Some of our students hold an annual “Fair Trade” expo with investigation and research into slavery-free products. *Research incorporates the subject areas of Religious Education, Science and Humanities.*

3. One of the Colleges is looking at new ESO *Education Support Officer's* uniforms, looking to source locally made in an Australian factory with Australian merino wool. While this will somewhat eliminate Modern Slavery in our Supply chain, from a humanitarian point of view we may be driving these poorer overseas communities further into poverty. The aim is to try and influence suppliers to provide better working conditions and pay to the exploited workers a living wage.
4. A College hosted a "How comfortable are you?" day to mark World Day Against the Trafficking of Humans.
5. Colleges engaged with their local uniform provider to discuss how they can provide us with evidence that they source their products, including fabrics, from ethical sources which are slavery free. Some students got involved in the discussion to ensure their sport uniforms will be slavery-free.
6. Investigation of Green Procurement Procedures - which makes direct reference to the Modern Slavery Act.
7. As part of their Staff Spirituality Day a College had a representative from Fairtrade ANZ present a workshop to staff on "Freedom and Justice: Modern Slavery, Fairtrade and the impact of consumer choice."
8. ACRATH was invited to speak at some of the College Student wellbeing sessions and students were informed of the risks around forced marriage.
9. In the reporting period, research was carried out in methods of developing a risk framework around Modern Slavery. A supplier template "SRA global template" was found useful and will be used in the process of testing for slavery risk in 2021 and beyond.
The "CHECKLIST OF PRACTICAL STEPS TO TAKE TO TACKLE MODERN SLAVERY IN YOUR SUPPLY CHAIN – Marks and Spencer" was also found to be useful and will be adapted to KEM's requirements in the 2021 reporting period.

Roadmap 2021 and beyond

- Finalise KEM's Modern Slavery Policy
- Develop a modern slavery risk management framework based on international best practice human rights due diligence.
- Complete mapping of our current supply chains.
- Supplier education and engagement.
- Develop a Procurement Toolkit to assist Business Managers to identify, assess and address risks of modern slavery.
- Develop a modern slavery supplier questionnaire to help identify any risks in the supply chain.
- Review all current contracts and ensure all new contracts contain the anti-slavery clause and Inform our current suppliers we will be looking for risk assessment in their supply chains.
- Include a link to an educational video such as '<https://vimeo.com/324750931>' from Be Slavery Free as a prerequisite for suppliers to acknowledge prior to signing a contract with the Colleges.
- Commencing in 2021 we will work with targeted suppliers to resolve identified risks through corrective and preventative action planning as part of the Remediation process. It is hoped that 3 supply chains could be interrogated, possibly uniforms, sports equipment in procurement and sub-contractors within employment practices. These plans will be tracked and monitored by us, with the supplier reassessed annually to measure improvements. We

will work with the suppliers to eliminate modern slavery risk from their supply chains by encouraging negotiation with overseas business partners/suppliers as we believe that terminating the relationship may not prevent the elimination of slavery and may in fact create more distress to the communities already subject to modern slavery.

- Develop a response protocol which sets out processes for each College to follow in the event of identifying Modern Slavery in the Supply Chain of a supplier. The response protocol will highlight the importance of acting in the best interests of survivors and the obligations to address any harm they identify was caused or contributed to by their actions.
- Ensure suppliers have a grievance mechanism in place for their staff and the worker voice is heard.
- Engage with banks to discuss their processes for managing modern slavery risks.
- Develop a modern slavery training module for all new staff as part of their mandatory learning.
- Location based risk related to labour hire - we will advise the Colleges in this area on the risk and request precautionary action in hiring contractors/cleaners/canteen staff. Some of these will be physically verifying police and working with children's checks, verbal references and looking for signs of forced labour through discussions, verifying new employee (especially migrant workers) details such as encouraging bank accounts to be in their own name, checking to ensure a labour hire fee was not paid to the recruitment agency etc. (ILO – Combating Forced Labour - guidance to employers)
- Student risk of forced marriage - work with each of the Colleges in 2021, in consultation with ACRATH, to create awareness & provide education to students and families to mitigate the risk.



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 the actions being taken to assess and address modern slavery risks.

During the reporting period KEM committed to creating awareness across the Colleges and commenced preliminary work in high-level supplier audits and engagement. Discussions were held with the Board, Executive Officer and CFO regarding next steps to be taken with the Colleges and action plans were drawn up. This was to help ensure that risks are accurately identified, and actions can be taken to respond to identified risks.

The effectiveness of these discussions and plans put in place are visible through the actions taken during the reporting period and also the roadmap developed for 2021 and beyond.

In order to capture the foundational work being undertaken, initial assessments will focus on the following areas with related action plans and expected outcomes listed below. While work commences during the reporting period, in-depth analysis of the tiers in our supply chains and related risks of modern slavery are necessary and will continue through 2021 and beyond. The areas of assessment will broaden as KEM matures in its approach to modern slavery risk assessment and management through mitigating action.

Area of Assessment	Action	Outcome
1. Staff and Student Training & Awareness	1. Deliver training to raise awareness of modern slavery risks. Develop training modules and lesson plans	1. Increased awareness created Training modules & lesson plans created for ongoing learning.
2. Procurement	2. Identify and actively manage Modern Slavery Risks in existing & new contracts using templates developed.	2. Risk Management controls are applied to actively manage identified risks
3. Supplier Engagement	3. Educate and engage with suppliers to ensure they understand their obligations & actively manage identified risks	3. Change in supplier behaviour and improvement in their staff working conditions.
4. Response & Remediation	4. Continuous monitoring and oversight of supplier activity. Work with suppliers to ensure there is follow through on action plans & compliance with requirements	4. Colleges actively manage & respond to identified risks and work with suppliers to ensure continuous improvement in the working conditions of survivors.

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, KEM worked closely with the seven Colleges in the group to assess and address modern slavery risks. The various meetings at which these discussions took place are listed

in section four above. The discussions influenced the drafting of KEM's Modern Slavery Policy which is to be published after consultation with KEM stakeholders. Continuous discussions are being held with the Colleges on creating action plans to achieve the KEM group objective of eliminating modern slavery from our supply chains.

As part of these discussions, advice has been sought from organisations such as ACRATH, Intermondo and Be Slavery Free. Resources have been widely researched on the internet and useful tools identified to assist in the risk management framework development for KEM.

SECTION SEVEN – ANY OTHER RELEVANT INFORMATION

KEM has worked in close partnership with ACRATH and the Catholic Education office Melbourne and follows the teachings of the Catholic Church in ensuring social justice principles are practised and taught in our Colleges. The dignity of the human person and subsidiarity are two of the four core principles of Catholic Social Teaching and are integral values in our College communities.

In Our Schools, members of the College Executive/Leadership actively give witness to the role of justice. All documentation demonstrates a commitment to justice with explicit reference in the College Annual Plan. Staff role descriptions explicitly indicate a commitment to the Living Justice Charter. Structured processes are in place to ensure appropriate dissemination of information amongst staff and the community.

Every staff member is an enabler of justice. Justice is incorporated into every curriculum area through the use of 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 issue of injustice and to bring student voice to them. Curriculum is regularly reviewed with staff and students to include current issues and student voice.

The humanitarian work carried out by the Community Works organisations within the Kildare Ministries group such as the Brigidine Asylum Seeker Project, Wellsprings for Women and the Presentation Family Centre are all based on the same values mentioned above and are associated with deeds of hospitality and compassion. For instance, the Brigidine Sisters today focus on the following:

- Spirituality
- Education
- Peace, Advocacy, Justice & Human Rights
- Human Trafficking
- Ecological Justice, Peace & Integrity of Creation

The staff and students in our Colleges are constantly exposed to these values, practical works & outreach and acts of selfless giving in order to improve the lives of those less fortunate.

The Living Justice Charter of Kildare Ministries is included in the appendix and demonstrates the values taught and lived by in each College.

Among the challenges faced by KEM are the potential short-term impacts on finances driven by having to pay higher prices for ethically sourced products. Also, the requirement to identify modern slavery risks in our supply and chains, dive into the many tiers within these supply chains and closely

work with the suppliers will put a strain on the very limited resources in the procurement and finance areas of the schools. These challenges will need to be managed.

Approved by the Board on 25th March 2021

Louise Cleary

Chair of the Board

Kildare Education Ministries Limited

Date : 25th March 2021

Appendix : Living Justice document