



MODERN SLAVERY STATEMENT 2022

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MODERN SLAVERY STATEMENT FOR 2022

INTRODUCTION

This is the first Modern Slavery Statement submitted by Knox Grammar School (Knox / the School / we) pursuant to the Modern Slavery Act 2018 (Cth.) (the Act).

This Statement addresses the criteria in Section 16 of the Act including describing the current modern slavery risks identified in our operations and supply chains and outlining the approach being taken by the School to ensure we have a framework, policies and practices to assess and address those risks.

We recognise that modern slavery may occur in many forms and acknowledge the impact that commercial activities (including our activities in the not-for-profit education sector) can have on vulnerable people through modern slavery practices both here in Australia and overseas. These practices may include slavery and other forms of human servitude such as human trafficking, forced marriage, forced labour, debt bondage, and child labour, as well as deceptive recruiting for labour or services.

We are committed to, and acknowledge our role in, working towards the eradication of modern slavery practices from our operations and supply chains and the minimisation of modern slavery practices within Australia.

ABOUT KNOX GRAMMAR SCHOOL

Our Story

Founded in 1924, Knox Grammar School is a Uniting Church School. Knox is an independent (mostly) boys school in the upper northern suburbs of Sydney, NSW. It operates two Preparatory School campuses (one a co-educational campus) and a Senior School campus in the suburbs of Warrawee and Wahroonga. The School caters for students from Pre-Kindergarten to Year 12 and offers boarding for Senior School students in Years 7-12. All students have access and are exposed to a diverse range of educational and developmental opportunities and experiences.

In educating Knox students, we seek to develop their character and confidence. We teach them to value commitment, to actively recognise and reward those endeavours which lead to personal success, to encourage innovation and to foster valued School traditions. Our aim is to prepare students for a successful life beyond their school years and to help them become valuable and responsible members of the wider community. At the core of our Positive

Education teachings is our bespoke Knox Total Fitness Action Model, which focusses on the whole person. Students are immersed in holistic learning experiences where their wellbeing is carefully considered and integrated into academic (curricular) and co-curricular learning, including outdoor education, service learning, music and other co-curricular programs, and sport. This is underpinned by a model of pastoral care incorporating Mentor Groups, the House system, student academic care and support, and through Christian faith development.

Knox operates a number of Social Justice (or Environmental, Social and Governance (ESG)) programs. This includes, but is not limited to, Service Learning programs and initiatives, Indigenous Education programs and initiatives, including awareness programs for staff, and environmental impact measures, with a focus on recycling and sustainability. Knox also offers education access and equity opportunities for indigenous students.

Our School Motto

Knox's motto is 'Virile Agitur', meaning, the manly (honourable/right) thing is being done.

Our Mission

Being a leading school; highly respected globally for innovation, altruism and a commitment to student and teacher excellence and wellbeing.

Our Vision

To be an exemplary school, developing, within a caring Christian environment, students of faith, wisdom, integrity, compassion and courage.

Our Values

Faith, Wisdom, Integrity, Compassion and Courage.

Our Aims

At Knox, we are committed to:

- Supporting the spiritual growth of each student through Uniting Church faith and leadership
- Developing within each student their self-identity and wellbeing by providing a rich diversity of cultural, sporting, academic and service learning experiences so they can explore their passions
- Providing an exciting, challenging and enriching curriculum through which students develop creative, critical thinking, problem-solving and leadership skills in a variety of contexts

- Fostering a culture of serving others and making a difference to the lives of others through social justice
- Developing accomplished, well-resourced and inspirational staff, committed to the students under their care and imbued with a strong ethos of service, professional learning and responsibility
- Creating a safe, caring and inclusive environment that supports an outstanding education for all students
- Maintaining and developing outstanding facilities required to support a high-quality education
- Fostering close, authentic relationships with our parents and the wider community
- Developing key partnerships with alumni, business communities and universities to enrich the education of our students and staff.

STRUCTURE AND OPERATIONS

Reporting Entity

Knox Grammar School (ABN 54 645 113 104) is the reporting entity in connection with this Modern Slavery Statement.

The Knox Grammar School Council is the principal governing body of the School.

Knox became a separately incorporated entity in 2021. Its first full reporting year following incorporation was 2022. This Modern Slavery Statement (Statement) covers the activities of Knox for the calendar year 2022.

Structure

As noted above, the School Council is the governing body of the School. The Council is the descriptive name given to the School's Board of Directors.

The Headmaster of Knox is the most senior employee of the School and is responsible for the overall management and operations of the School. The Headmaster leads a Senior Executive team, including a Deputy Headmaster and Head of Senior Campus, Heads of the two Preparatory School campuses, a Chief Operating Officer, Chief Information Officer, Head of Teaching and Learning, Head of Learning Analytics, Head of Boarding, Enrolments and Community Engagement, and Director of People and Culture. Together with the Head of Sport, Head of Co-Curricular Operations, Director of Operations and Head of Boarding (House Operations) they jointly run the School's operations; with the support of senior managers under them.

Operations

The key activities of the School are the provision of Kindergarten, Primary and Secondary curricular and co-curricular education, conducted principally in the School's three New South Wales-based campuses.

RISKS OF MODERN SLAVERY PRACTICES IN OUR OPERATIONS AND SUPPLY CHAINS

Knox has assessed its operations and supply chains, to evaluate the risk of modern slavery practices.

In Our Operations

Based on this assessment, we identify a low risk of modern slavery in our internal operations. This is due to a number of factors including: the direct employment relationship between the School and its teaching and non-teaching staff; the direct engagement of peripatetic music tutors and many other individual contractors; the employment laws, enterprise agreements and awards that apply and with which the School is required to comply and the highly-regulated nature of the school education industry, generally, and the independent education sector, in particular. Our School has strong employment policies and practices based on existing employment laws, awards, and other regulations within the sector.

In Our Supply Chain

In assessing the risk of modern slavery practices within our supply chain, several factors were considered, including:

- Product / service category
- Suppliers that may engage a transient or low skilled workforce.
- Industry practices
- Labour status
- Geography / location

Based on the factors above, we identify that modern slavery risk may exist in the areas within our supply chain set out in the table below.

Learnings from the assessment have been incorporated in the planning for the School's progressive risk mitigation strategy and actions, discussed further below.

SUPPLY CHAIN	POTENTIAL MODERN SLAVERY RISK
Cleaning Services	<ul style="list-style-type: none"> Engagement by contracted service provider of low skilled / migrant workers with poor employment conditions / workers' rights and a restricted ability to bargain; and Possible compensation / debt-bondage situation with their employer (Knox's external contractor)
Catering / Food Services	<ul style="list-style-type: none"> Engagement by contracted service provider of low skilled / migrant workers with poor employment conditions / workers' rights and a restricted ability to bargain; and Possible compensation / debt-bondage situation with the employer (Knox's external contractor) Food products in the cafeteria that are sourced from high-risk countries, with histories of poor labour / workplace legislation / regulation and practices (rice, cocoa / chocolate, tea etc.)
Security Services	<ul style="list-style-type: none"> Engagement by contracted service provider of low skilled / migrant workers with poor employment conditions / workers' rights and a restricted ability to bargain; and Possible compensation / debt-bondage situation with the employer (Knox's external contractor)
Information and Communications Technology Equipment and Services	<ul style="list-style-type: none"> Goods and equipment produced in factories in countries with histories of poor labour / workplace legislation / regulation and practices
Sport and Co-curricular	<ul style="list-style-type: none"> Goods and equipment produced in factories in countries with histories of poor labour / workplace legislation / regulation and practices
Uniforms and Other Sales	<ul style="list-style-type: none"> Goods and equipment produced in factories in countries with histories of poor labour / workplace legislation / regulation and practices
Grounds and Building Maintenance Services	<ul style="list-style-type: none"> Goods and equipment produced in factories in countries with histories of poor labour / workplace legislation / regulation and practices Workers engaged by contractors with poor employment conditions / workers' rights with their employer / principal. For example, work may be subcontracted to third parties resulting in the exploitation of vulnerable subcontractors
Other Equipment and Consumables	<ul style="list-style-type: none"> Goods and equipment produced in factories in countries with histories of poor labour / workplace legislation / regulation and practices

OUR APPROACH TO MODERN SLAVERY – ACTIONS TO MITIGATE MODERN SLAVERY RISK

We recognise that a multi-stage approach is needed to address/mitigate any potential modern slavery risk and related issues within our operations and our supply chain in particular.

Knox's current multi-stage approach is outlined below:

1. Identification and Risk Assessment (Initial Review)

- Review of existing procurement policies, processes and procedures and employment practices, and identification of gaps and areas for improvement
- Identification of high-risk areas in our supply chains and, as a subset of that, goods and services procurement origins
- Engagement with key suppliers with respect to modern slavery risks
- Initial treatment of risk within the high-risk areas of our supply chains as captured in our initial risk assessment / review

2. Review of Policies and Processes and Planning

- Development of an overarching Anti-Modern Slavery Policy
- Development of proposed amendments to the current procurement and employment policies, processes and procedures, to ensure alignment with the School's position on modern slavery, with a particular focus on:
 - monitoring and seeking assurance from those suppliers where a heightened risk of modern slavery practices may be present, including through utilisation of modern slavery assessment questionnaire
 - ensuring tender documents and contracts used or entered into by the School include provisions / contain conditions addressing modern slavery
- Continuing to raise awareness of modern slavery risks with key stakeholders including staff and current suppliers
- Provision of education / training regarding modern slavery (both concept and risk) for staff
- Adoption / publication of the proposed amendments to the current procurement and employment policies, processes and procedures
- Trialing of a Modern Slavery Supplier Assessment Tool

3. Implementation and Supplier Engagement

- Application of the amended procurement policies and procedures (and where necessary, employment policies) incorporating provisions addressing modern slavery
- Assessment of new suppliers against modern slavery requirements
- Ongoing consultation and relationship management with all suppliers, utilising Modern Slavery Supplier Assessment Tool or questionnaire
- Review and analysis with respect to each supply chain for compliance with the new policies and procedures

4. Monitoring and Control

- Regular review and monitoring of our various supply chains and periodic audit
- Periodic assessment of the effective implementation and operation of the amended policies, processes and procedures and related contract documentation
- Reporting to the Audit, Finance and Risk Committee of the School Council

We have begun the process of implementing a Modern Slavery Framework establishing the School's processes with respect to modern slavery. This has included reviewing our existing purchasing / procurement policies, procedures and guidelines, and identifying potential gaps and inconsistencies with the aims of the Modern Slavery Act.

We also recognise that addressing modern slavery risks is an ongoing process, which we are committed to continue to build upon each year. The timeline below sets out our action plan for the 12 months from March 2023, showing our ongoing commitment to mitigate modern slavery within Knox's operations and supply chain and assess the effectiveness of our actions.

March – July 2023 Ongoing Risk and Gap Identification

- Ongoing policy and framework review, and analysis
- Deeper assessment of supply chains and origin risks
- Development of overarching Anti-Modern Slavery Policy
- Engagement with current suppliers – further awareness raising, utilisation of modern slavery assessment questionnaire

August – November 2023

Planning – Policies, Processes, Procedures, Tender and Contract Documents

- Updating of existing policies, guidelines, processes, procedures, tender and contract documents
- Deeper engagement with current suppliers
- Trial of Modern Slavery Assessment Tool

December 2023 – March 2024

Implementation and Supplier Engagement

- Implementation of revised procurement processes
- Initial evaluation of practicality and effective operation of revised processes
- Ongoing engagement with suppliers

April 2024 onwards

Monitoring and Control

- Ongoing review and monitoring and periodic audit, for modern slavery reporting

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

During this reporting period, our focus was to gain a better understanding of our modern slavery risks and how such risks may be present in our operations and supply chains. At this early stage, we are unable to adequately assess the effectiveness of measures we have undertaken. However, we have commenced and will continue to work on developing a framework and processes to ensure we can review and assess the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains – and inform the path forward.

For the identification and planning stages, we are relying on existing policies, processes and procedures and related records and documents, as well as consultation with key personnel with a view to further developing operationally practicable, effective, processes and related documents aimed at minimising the risks of modern slavery. We will use a combination of surveys and reporting mechanisms to ensure the effectiveness of these processes, in the implementation

and monitoring stages. Dedicated risk and operations personnel will prepare and guide the process of development, implementation and control of modern slavery risk mitigation. These staff members will report directly to the Audit, Finance and Risk Committee of the School Council.

CONSULTATION

Knox does not own or control any other entities. Knox has consulted with its key suppliers and surveyed current procurement practices.

APPROVAL

This Modern Slavery Statement was approved by the Council of Knox Grammar School on 26 June 2023.

SIGNED



Scott James

Headmaster, Knox Grammar School
26 June 2023



David Caspari

Deputy Chairman, Knox Grammar School Council
Authorised to sign on behalf of the Council
26 June 2023



**KNOX
GRAMMAR
SCHOOL**

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