



# C&K Modern Slavery

## STATEMENT 2020



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This Modern Slavery Statement is approved by The Creche and Kindergarten Association Limited Board of Directors on 30 June 2021.

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**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

With more than 100 years in early childhood education and care, C&K (The Creche and Kindergarten Association) is regarded as one of Queensland's leading providers of childcare and kindergarten services.

This document is C&K's first Modern Slavery Statement issued under the Australian Modern Slavery Act. 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. C&K owns and operates over 180 early childhood education and care centres throughout Queensland, and as a not-for-profit organisation, children come first in everything we do.

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.

### 1.2 Chief Executive Officer's message

Forms of modern slavery, such as forced labour, child labour, debt bondage, servitude, human trafficking, and deceptive recruiting for labour or services, violate human rights, are against the law, and are entirely at odds with C&K's core values.

We are committed to continuous improvement by raising awareness within our centres and by identifying, assessing, and mitigating modern slavery risks in our supply chains. We have engaged external expertise to help us to prioritise the areas of highest risk to ensure we put appropriate and effective processes and frameworks in place.





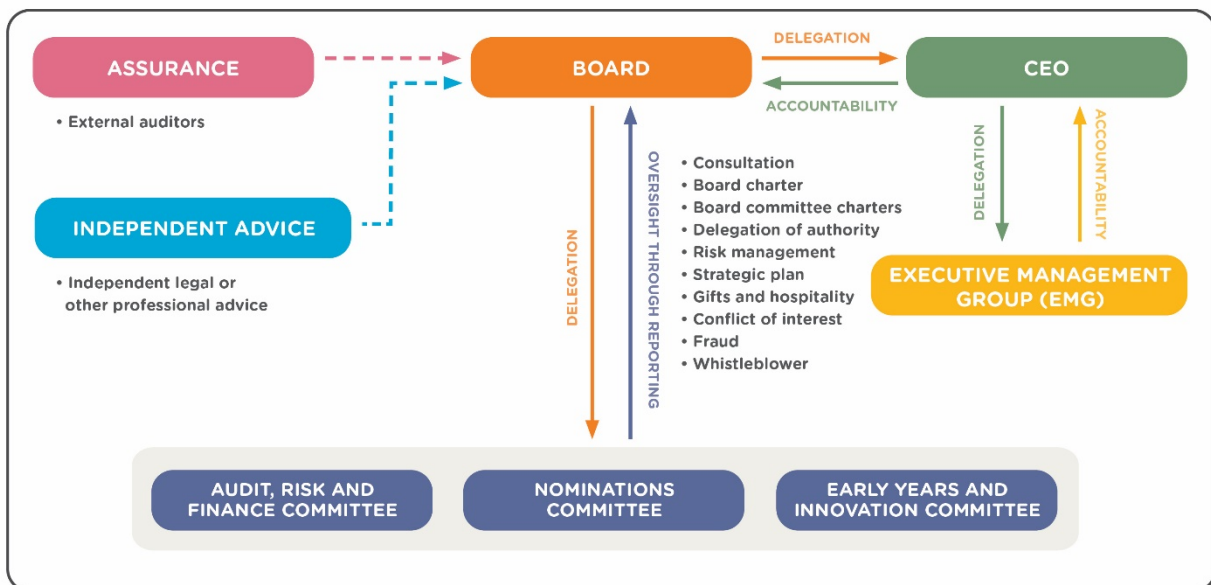
## 2. OUR STRUCTURE, OPERATIONS AND SUPPLY CHAIN

### 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 of our workforce and operations are located within Australia.

Effective corporate governance is critical to our ongoing success. Accordingly, the Board is assisted by Board sub-committees which include members of the Board, and in some circumstances the Executive Team, as set out below:

#### C&K Governance Structure



As part of our commitment to mitigate the risk of modern slavery within our supply chains and strengthen our governance, we will review key policies and procedures during 2021 to ensure compliance with modern slavery legislation and our own requirements. These include:

- Ethical conduct policy and procedures
- Recruitment policy and procedures
- Orientation material - Head office and centre staff
- Whistle-blower policy
- Procurement policy, procedures, and guides.



## 2.2 Our operations

C&K was formed in 1907 to support disadvantaged families whose children had nowhere safe to play and learn. Over the years, our organisation has evolved to continue to meet the needs of the families and communities we support, and our services now include the following:

### Early Childhood Education and Care Service

We have 182 early childhood education and care centres throughout Queensland:

- 37 childcare centres, 10-12 hours a day, children aged 6 weeks to 5 years
- 138 kindergarten centres, 6-8 hours a day, children aged 3.5 - 5 years
- 3 limited hours care centres, 20-30 hours a week, children aged 6 weeks to 5 years
- 4 Out of School Hours Care centres (co-located with 3 childcare centres and 1 kindergarten centre)

### Central Governing Body

C&K are authorised by the Queensland Government to distribute funding and provide support to approximately 160 affiliated centres. The provision of HR, IR and WH&S advice is outsourced to limit potential liability. We do not provide legal or financial advice.

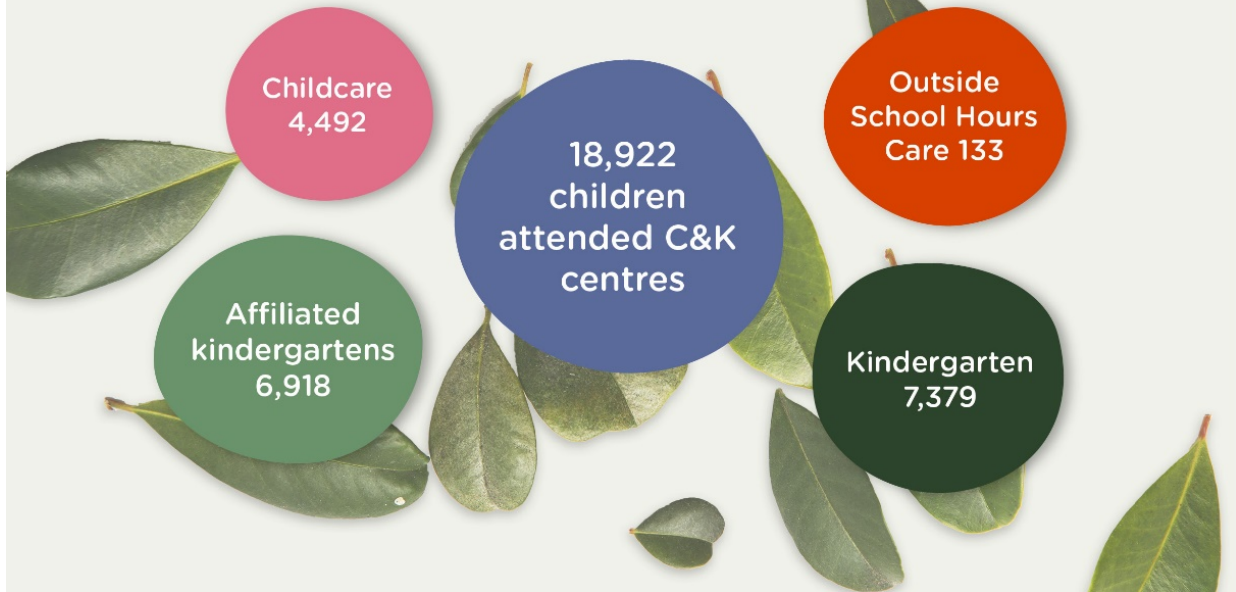
### Registered Training Organisation

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 employees and the public.





## C&Ks Across Queensland



**2035**

Total number of employees

**1098**

Total number of full-time and part-time employees

**937**

Total number of casual employees

**13.24%**

OVERALL  
EMPLOYEE  
TURNOVER



### 2.3 Our supply chain

Our supply chains are diverse – ranging from small family businesses through to national and international conglomerates. We work with over 1,100 direct suppliers of both goods and services. Suppliers are a critical component of C&K’s business. 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. This means treating their employees with fairness, respect, and dignity and following practices that protect health and safety for the employees in their facilities.

During 2020, we procured goods and services across 22 broad procurement categories, identified below:

Building and construction	Government and agency fees	Medical supplies
Cleaning and security services	ICT - software and communications	Office and activity supplies
Events	ICT - Hardware	Print and Mail
Facilities and property	Incursions and Excursions	Professional services
Financial expenses	Laundry and textile products - linen	Protective equipment and uniforms
Fleet services	Licences and membership fees	Travel and accommodation
Food and catering services	Marketing and Advertising	Utilities
		Waste management services

We will conduct a high-level assessment of modern slavery risk for each category during reporting period two.



### 3. IDENTIFYING RISKS IN MODERN SLAVERY PRACTICES

C&K recognises the difficulties in identifying modern slavery practices. Although most of our suppliers are Australian entities, some form part of larger multinational groups with diversified supply chains in multiple countries. We acknowledge that modern slavery risks may be present in the products and services we purchase.

#### 3.1 Operations risks

At C&K, we respect each other, we work with integrity, and we strive for excellence in everything that we do. We have reviewed our operations and have found that we have a low-risk modern slavery internal profile. C&K staff members are employed directly and paid in accordance with our enterprise agreements, where relevant. These agreements apply to both permanent and casual staff, which lowers the internal staffing modern slavery risk. C&K pays higher than award rates which contributes towards high staff retention. Our assessment is also based on the geographic location of our centres, our existing policies, procedures, and controls, our ongoing engagement with our centre staff, and the availability of numerous ways in which staff may raise any concerns. In addition, due to our core business of caring for and educating children, our operations are also subject to regular internal and external audits, which subjects us to further scrutiny. All these controls indicate that the risk of internal incidences of modern slavery is low.

#### 3.2 Supply chain risks

We have conducted an initial high-level review of our supply chain expenditure, which indicated that a portion of C&K's expenditure falls into categories that are considered higher-risk when reviewed against the Department of Home Affairs Guidance Notes and the Global Slavery Index. C&K's procurement policy calls for a tender and assessment process for substantive expenditure, including a due diligence review of prospective suppliers, which will be enhanced to meet modern slavery considerations. A more detailed analysis has been scheduled for reporting period two.

### 4. ACTIONS TAKEN TO ASSESS AND ADDRESS THE RISK OF MODERN SLAVERY

Throughout the first reporting period, C&K focused on understanding the risk of modern slavery in our operations and supply chains and planning our approach to mitigating these risks.

We undertook an internal gap analysis to collaboratively identify areas of improvement across four key business areas within our operations. The analysis provided insights into our governance specific to modern slavery and identified gaps and opportunities to implement risk mitigation strategies over subsequent modern slavery reporting periods. In the table below, the Current Reporting Period highlights the extent to which we undertook specific initiatives in each of the four areas during the reporting year to further reduce our Modern Slavery risk within C&K. We seek to continually improve our current position, year-on-year, via implementation of our modern slavery risk mitigation strategy. Key Performance Indicators will be evaluated and established at the beginning of each reporting period to track our progress.







Area / Pillar	Current Reporting Period	Foundations	Build	Embed
GOVERNANCE				
PROCUREMENT PURCHASING AND SUPPLY CHAIN				
OPERATIONS				
HUMAN RESOURCES AND RECRUITMENT				

**KEY**

Not yet addressed	Aware/ planned actions	WIP actions	Informal or new practice	Formalised/ systematic

### Modern Slavery Risk Mitigation Roadmap

During the second reporting period (Foundations as referenced in *Modern Slavery Risk Mitigation Roadmap*), we intend to provide our key suppliers, service providers, and other agents or contracted third parties with a Supply Code of Conduct. Each recipient will be required to read, understand, and accept this policy before entering into contracts with us. The policy will detail our supplier expectations, including modern slavery risks, and will require suppliers to:

- adhere to all relevant laws and regulations
- not knowingly use any form of bonded, slave, or child labour
- maintain a blame-free work environment and encourage whistle-blowing disclosures
- comply with legal minimum rates of pay and other conditions of employment
- treat staff fairly and equitably and ensure all employee entitlements are provided.

We will undertake a high-level supplier risk assessment to identify which suppliers are higher in modern slavery risk to focus our attention on. Suppliers identified as high-risk will be asked to provide additional information as part of our due diligence process so that we can measure their response to the risk of modern slavery.

We also intend to review our procurement governance framework to include consideration of modern slavery risks at tender, evaluation, and contract execution stages. In addition, we will provide our procurement team with tailored training to help them understand the context of modern slavery risk in Australian supply chains and provide them with tools to manage supplier evaluations.

Our staff are a significant part of our operations, and we have committed to providing training and resources to help them recognise potential modern slavery risks. Our C&K Code of Conduct sets out our position and expectations regarding our



teams’ decisions and behaviours. We demonstrate appropriate workplace behaviour by complying with the laws and principles of human rights. We do not accept any behaviour that could be regarded as bullying, discrimination, or harassment.

We obtained an online “Modern Slavery Risk” training module in 2020, and in 2021 we will make this available to central employees who are responsible for engaging and working with C&K’s key suppliers. Following this, C&K will look to roll out the training to the rest of the organisation. In addition, as part of C&K’s induction process, we intend to develop orientation material to help our centre staff identify situations of concern and the appropriate actions to take. We also intend to update our contractor management procedure to prompt consideration of potential modern slavery risks when engaging temporary educators.

We actively promote to our staff the need to speak up when they have concerns about fraud, corruption, illegal activity, harassment, or victimisation. We will update this program to include modern slavery. We also intend to establish a resource library containing relevant material specific to modern slavery risks in our industry, including case studies, reports, guides, and links to legislation.

Modern slavery was included in the C&K Corporate Risk Register during 2020 and will be reported bi-annually going forward.

## 5. ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

We understand the importance of assessing the effectiveness of our actions to mitigate the risk of modern slavery in our organisation and our supply chain. For the first reporting period, we have evaluated the effectiveness of our actions against the following key indicators:

INDICATOR/TARGET 2020	OUTCOME ACHIEVED
Modern slavery review process established	✓
Requirements of the Modern Slavery Act outlined to the Board	✓
Operational executive and senior leaders engaged on the issue	✓
Training developed and available for staff	✓
External expertise engaged to identify gaps and opportunities	✓



## 6. PROCESS OF CONSULTATION WITH ENTITIES OWNED OR CONTROLLED BY US

Not Applicable.

## 7. OTHER RELEVANT INFORMATION

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

- International Bill of Human Rights
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights
- Sustainable Development Goals - including Target 8.7 to eradicate modern slavery.

