



# Barker College

## MODERN SLAVERY STATEMENT 2024

This Modern Slavery Statement was approved by The Council of Barker College  
in its role as principal governing body on 17 June 2025.

# MODERN SLAVERY STATEMENT 2024

## About this Statement

This Modern Slavery Statement (Statement) has been prepared in accordance with the requirements of the Australian Modern Slavery Act 2018 (Cth) (Act).

This Statement describes our approach and actions to manage Modern Slavery risks in our operations and supply chains during the financial year ending 31 December 2024 (Reporting Period), as well as our plans for future improvements.

We understand the intersecting risks of slavery and human trafficking within the education sector and remain steadfast in our efforts to combat these crimes. Our approach includes raising awareness, protecting vulnerable populations and continuously enhancing our processes to identify and mitigate modern slavery risks.

We recognise that Modern Slavery may occur in many forms here in Australia such as slavery, servitude, human trafficking, forced marriage, forced labour, debt bondage, child labour, and deceptive recruiting for labour or services. We further recognise our obligation to exercise our responsibility to help minimise Modern Slavery practices in Australia.

Finally, the concern surrounding modern slavery is aligned with Barker's ongoing and existing commitment towards social responsibility and environmental sustainability. The Council of Barker College will continue to demonstrate strong leadership to direct the School as it navigates through its ESG journey with our Modern Slavery Statement representing the Social element of the ESG Program, amongst other ESG initiatives.

## About Barker College

### Aligned with Australian Modern Slavery Act 2018

Founded in 1890, Barker College is an Anglican coeducational independent School on the upper north shore of Sydney, NSW. It operates two indigenous primary school campuses on the Central Coast of NSW, a campus in the Northern Territory of Australia and a Special Assistance School for students with a refugee background. The unique Barker College student experience is therefore one that offers academic care with a global vision and awareness that inspires hope.

The School caters for students from Pre-Kindergarten to Year 12 and offers boarding for Senior School students in Years 10-12. All students are exposed to a range of diverse opportunities and experiences. Students are immersed in holistic learning experiences, wellbeing is carefully considered and integrated into academic learning, outdoor education, service learning, Connect Groups, the pastoral care House system, co-curricular programs such as dance, robotics and Cadets, sports, student academic care and support, and through Christian faith development.

Barker College operates a number of Environmental, Social and Governance (ESG) programs. These include, but are not limited to, indigenous education delivery and On Country learning, Service Learning, and a student-led environmental initiative called Footprint, which evaluates and reduces our carbon footprint.

We also offer a suite of education access and equity opportunities under the Humanitarian Program for refugee students and their families, opening our Marri Mittag School to students in 2024.

Additionally, our senior school Social Service Captains represent the student voice in ESG efforts, highlighting the role of student leadership in a non-tertiary education context.

#### **Our School Motto**

*Honor Non Honores* in translation Seek Honour Above Rewards

#### **Our Mission**

An Anglican community inspiring every learner, every experience, every day.

#### **Our Vision**

To be the leader in Christian education characterised by a global vision that inspires hope.

#### **Our Values**

Commitment, Compassion, Courage, Integrity, Respect.

Barker College is committed to introduce a well-defined Modern Slavery risk management process, ensuring a qualitative review of the potential Modern Slavery risk across its operations and supply chain. We have:

- Performed a detailed assessment of our suppliers through a comprehensive risk assessment methodology that includes indicators that identify a potential Modern Slavery risk across our operations and supply chain, which are split across:
  - **Geographic risks:** regional and country risks
  - **Category risk:** products and services
  - **Business model risk:** type of business model
  - **Salient risk:** vulnerable populations
- Conducted a completeness check of all our policies, procedures, and guidelines to identify how these can be further strengthened to identify and eliminate Modern Slavery risks across the operations.
- Disclosed specific Modern Slavery risks and the actions within our global supply chain.
- Defined the effectiveness of our actions.

### **Our operations**

The key activities of the School are the provision of Kindergarten, Primary and Secondary education which are conducted in four New South Wales campuses, one Northern Territory campus and an outdoor education campus, the Grange.

### **Our organisational structure**

The Council of Barker College is the governing body of the School, and the Head of Barker College is the head of the School's operation. Under the Head of Barker College, there are six head divisions that run the School's operation namely, Chief Operating Officer, Deputy Head Student Experience, the Deputy Head People and Culture., the Head of Junior School and Indigenous Schools, the Head of Middle/Senior, and the Director of the Marri Mittag Humanitarian School.

## Reporting entity

This Modern Slavery Statement (Statement) has been prepared by The Council of Barker College (The Council of Barker College Incorporation Ordinance 1939) (The Council of Barker College) and covers the activities of Barker College (ABN 18 620 620 356 and Barker College Ordinance 1919 and The Barker College Ordinance 1978) (Barker College) for the calendar year 2024.

## Our supply chain

For the Reporting Period, Barker College's supply chain comprises of the following categories:

- Cleaning services;
- Security services;
- Food services;
- ICT;
- Co-curricular
- Grounds and building maintenance; and
- Equipment and consumables

During FY24, 96% of our suppliers were domestic and just 4% of them were located outside of Australia, contributing to significantly lower modern slavery risk profile

## Modern Slavery governance and reporting

The Council of Barker College has ratified the inclusion of Modern Slavery risk and compliance under the Commonwealth Modern Slavery Act 2018 into our current Risk & Compliance Framework.

The incorporation of Modern Slavery risk controls and compliance into our risk frameworks, ensures that Modern Slavery risk is evaluated, monitored and reported on routinely and with the highest level of organisational oversight

### Introduced Modern Slavery Screening in Procurement

Continuing our actions at the Stage 2 period, the School engaged in two major procurement processes to select a security service provider and an ICT service for our Digitisation Project.

In both processes we introduced our Modern Slavery Risk Questionnaire, to filter out high risk or non-compliant future suppliers from our operations and supply chain.

The range of questions presented to our future suppliers were divided into four categories:

1. working conditions
2. workforce statistics

3. business integrity; and

4. organisation requirement and management responsibility

The introduction of a Modern Slavery screen in 2024 as a part of our procurement process, added significant value to the overall tender process as well as enabling us to assess suppliers against specific risk categories.

The Modern Slavery Screen was an opportunity to understand the prospective businesses, their position in the education sector and the alignment with the Barker College values including our Modern Slavery expectations

Each of the categories were designed to capture the different risk elements of Modern Slavery that may exist in a particular supply chain.

**Working Conditions:** The working conditions category contemplated the possibility of whether the business has in place procedures to ensure that no forced labour, human trafficking, or slavery existed within the operations and supply chain. This category also inquired the existence of workers' health and safety risk procedure, compliance with local labour law when it comes to work hours, and indigenous procurement policy.

**Workforce Statistics:** The workforce statistics category is designed to capture the number of migrant workers that the business currently employs. This is to determine the level of risk that arise from business employing migrant workforce such as visa, Minimum wage, working condition, workhour, and other labour issues associated with migrant workers. We determined that the higher the number of migrant workers, especially in low-skill sector, the higher the risk would be.

**Business Integrity:** The business integrity category makes reference to the School's existing policy on anti-bribery and conflict of interest that may be involved in procurement.

**Organisation Requirement:** Finally, the organisation requirements and management responsibility category seek to gauge the business' compliance with their own supplier and the relevant applicable domestic law (including employment, labour, and corporation regulations).

In addition to the mandatory questionnaire to all future suppliers, we also required the business to provide us with their relevant procurement, supplier, business code of conduct policies for us to assess.

We will use the existence and completeness of such policies, particularly those that address modern slavery risk and concept, as a determining factor for procurement.

## Barker College Modern Slavery risks

Barker College has conducted further assessment of its operations and supply chains, with the goal of incorporating all of the entities that the School controls, to evaluate the risk of modern slavery practices.

The School remained free of Modern Slavery incident or breach

We undertook further investigation on our suppliers' procurement and operational policies to determine their level of awareness and compliance towards the modern slavery concept. Our focus and efforts this year were based on the risk and initial review stage in the previous year and we will use this continuous improvement approach under the current and future stages to address our Modern Slavery risk efforts and actions.

We developed Modern Slavery specific questionnaire to be answered by future suppliers to determine their level of risk, awareness, and compliance under the Act, demonstrating our commitment to working closely with our third party suppliers.

We will continue to articulate our commitment around Modern Slavery risk with our business partners and eradicating this within our supply chain, control, and operations.

### In our operations

Based on this assessment we are confident that our Modern Slavery risk remained low in our operations

This is due to the direct employment relationship between the School and its teaching and non-teaching staff. Our School has strong employment policies based on the existing Australian employment laws, awards, and other regulations within the sectors.

### In our supply chain

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

- supplier importance,
- customer interaction/ impact,
- spend (leverage),
- risk to people/ salient risk,



- geographic impact,
- industry/ sector risk; and
- business model.

We have identified the following areas of potential Modern Slavery Risks:

- **Cleaning services:** Our supplier for this service has an existing modern slavery policy and a published Modern Slavery statement, indicating a low risk and standard-high degree of compliance with the Act

- **Security services:** Our new supplier for this service demonstrated during the tender process an existing Modern Slavery policy and a published Modern Slavery Statement, indicating a low risk and standard-high degree of compliance with the Act

- **Food services:** Our cafeteria workers are directly employed by the School and are subject to our comprehensive employment policy. At this stage, the origin and risk of the food products in the cafeteria are under ongoing review and would otherwise be subject to our newly developed procurement process

- **ICT:** Our information technology workers are directly employed by the School and are subject to our comprehensive employment policy. The preferred supplier for the school's records digitisation project has an existing Modern Slavery policy and a published Modern Slavery Statement, indicating a low risk and standard-high degree of compliance with the Act

- **Co-curricular:** Our sports coaches are directly employed by the School and our visiting music tutors are subject to our comprehensive employment policy as contractors. Where the School requires the engagement of a third party supplier for cocurricular programs, we are currently conducting investigation into their supply chain to determine level of risk and mitigation strategy

- **Grounds and building maintenance:** Our grounds, building and maintenance workers are directly employed by the School and are subject to our comprehensive employment policy. Where the School does contract out these services, from time to time, we are currently conducting investigation into their supply chain to determine level of risk and mitigation strategy

- **Equipment and consumables:** Where equipment and consumables are provided across the Schools activities, we will work with budget holders to determine level of risk and mitigation strategy.

Based on the factors above, we recognise that Modern Slavery risk may exist in the following areas within our supply chain, but are nonetheless under control or reasonably mitigated

## Actions to assess and address Modern Slavery risks

### Assessing our Modern Slavery risks

We have conducted our Modern Slavery risk assessment for the reporting period. We have analysed our supply chain data using a data analytics tool and performed a comprehensive review of our operations, including our policies and procedures.

No instances of Modern Slavery have been identified during the Reporting Period.

We are committed to continually improving our understanding of Modern Slavery risk exposure and will adapt our risk management approach, measurement of effectiveness, and actions accordingly.

### Actions to address Modern Slavery risks

Barker College is committed to fostering a safe, ethical, and socially responsible environment. All processes, policies, guidelines, and reporting mechanisms have been developed with a strong emphasis on identifying and managing risks related to Modern Slavery.

In line with Barker College's culture of continuous improvement, it has become clear that effectively addressing Modern Slavery within Barker College requires a comprehensive approach<sup>4</sup>one that includes prevention, early detection, effective response, and clear accountability.

The following actions have been identified to strengthen Barker College's efforts in mitigating modern Slavery risks:

### Governance and policy

Barker College maintains a strong governance and policy framework that guides ethical conduct and compliance with applicable laws and standards.

During FY24, Barker College has embedded Modern Slavery considerations across its governance and policy framework to ensure a consistent and accountable approach:

#### 1. Policy Integration: Modern slavery risk is addressed in key policies including:

- Staff Complaints Policy (updated 2024)
- Child Protection Policy (published on our website 2024)
- Student & Parents Complaints & Feedback Policy (published on our website 2024)
- Whistleblower Policy (updated 2024)
- Procurement Policy (updated 2023)
- Third party platform WHISPLI for protected disclosures on our website (since 2020).

#### 2. Compliance Program (2025-2026):



- Inclusion of the Modern Slavery Act 2015 (Cth) in the School Council's compliance monitoring program Agenda item on the Governance Risk & Compliance Committee
- Use of Lexis Nexis legal database to stay current with legislative changes and best practices Barker College

## Our people

Barker College fosters a culture of ethical awareness and continuous improvement among staff.

**Executive Risk Register:** Modern slavery is identified as a key risk under Human Resource Management, with defined controls and treatments in place

**Internal Reporting Mechanisms:** Staff are supported by clear pathways to raise concerns through the Staff Complaints Policy and other internal channels such as the child safety team report, anonymous reports via concerns@barker email and whistleblower protections under that policy.

## Our suppliers and supply chain

The College actively manages supply chain risks through due diligence and procurement practices: e  
**Cleaning Services:** Transition to a new cleaning company included modern slavery screening and contractual safeguards to mitigate risks such as indentured labour

**Technology Procurement:** The shift to leasing laptops through Apple Financial Services introduces reduced visibility over third-party supply chains, which is being monitored as a potential risk area.

### Training and awareness

Barker College is committed to raising awareness and contributing to broader social impact: e

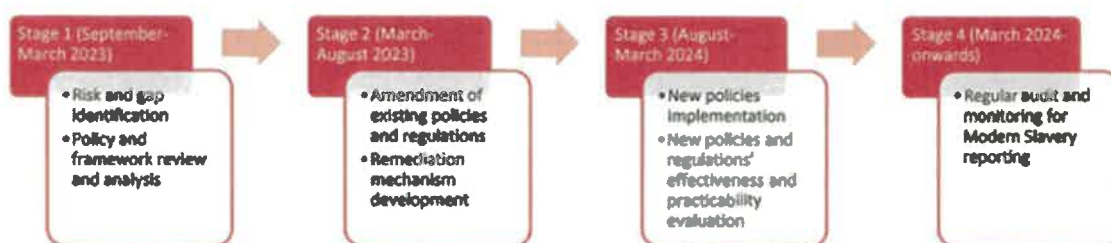
**Education Access:** Through the Marri Mittag Humanitarian School, operating since Term 2, 2024, the College is supporting refugee children and their families from regions affected by child exploitation and conflict, helping to break cycles of vulnerability.

**Ongoing Awareness:** The College's continuous improvement mindset ensures that modern Slavery risks are regularly reviewed and addressed across Barker College.

## Expanding the mandatory reporting criteria

The Australian Government has committed to expanding the mandatory reporting criteria under the Modern Slavery Act to include more detailed disclosures regarding products, services, and suppliers<sup>4</sup> particularly those associated with high-risk regions. This initiative aims to enhance transparency around the origin of goods and services and to support entities in identifying and addressing potential Modern Slavery risks within their supply chains. During the current reporting period, no instances of Modern Slavery were identified within our operations or supply chains.

As such, while we acknowledge the importance of the expanded reporting requirements, no additional disclosures are required at this time.



We remain committed to continuous improvement in our due diligence processes. In line with the forthcoming changes, we will reassess our supply chain and procurement practices in the next reporting cycle. Should any relevant risks or findings emerge, they will be addressed and disclosed in our next Modern Slavery Statement, including reference to any high-risk regions, products, or suppliers as guided by the updated criteria.

## Barker College Modern Slavery Roadmap

As outlined in previous years, the roadmap below has served as a strategic guide for our progress. We are currently in Stage 4, a significant milestone that reflects our ongoing commitment to achieving our goals and embedding meaningful change across the organisation. This stage marks a period of active implementation and consolidation, building on the foundations laid in earlier phases.

Area - Actions undertaken	Assessment of effectiveness
Governance and policy	These governance measures have strengthened accountability, with policies now clearly outlining expectations and responsibilities. Regular updates and integration into compliance programs have improved visibility and alignment with legal standards.
Our people	Embedding modern slavery into the Executive Risk Register has elevated awareness at leadership levels. Staff are increasingly confident in identifying and reporting concerns, as reflected in internal feedback and engagement.
Our suppliers and supply chain	Supplier screening and contract due diligence have proven effective in identifying potential risks early. Procurement teams report improved awareness and are actively engaging with vendors on ethical sourcing.
Training and awareness	Initiatives like the Marri Mittigar Humanitarian School have deepened community impact and awareness. Positive feedback and increased engagement suggest that our messaging is resonating and driving cultural change.

## Assessing effectiveness and looking ahead

### Assessing effectiveness of our actions

Below we have included our assessment on the actions undertaken during the reporting period:

### Looking ahead

We look to continue to improve our understanding of our Modern Slavery risk exposure which informs our approach to measuring the effectiveness of our actions.

Over the next 12 months, we will work on enhancing current systems, policies and procedures to more effectively combat Modern Slavery and evaluate the success of our initiatives.

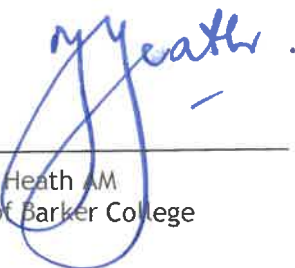
This will include:

Actions proposed (2025-2027)	Description
Integration Under ESG Framework	Modern Slavery will continue to be addressed under the 'Social' pillar of our ESG Program. Our ESG Statement of Commitment, endorsed by the School Council and published in 2022, outlines our dedication to ethical supply chains and social responsibility.
Sustainable Energy Certification	In 2025, Barker College aims to achieve certification for its Sustainable Energy Commitment through a third-party provider, Mamachi. This initiative reinforces our broader ESG goals and reflects our commitment to responsible environmental and social practices.
Policy Development	We continue to embed modern slavery considerations across our existing policy suite. This integrated approach ensures that modern slavery remains a live issue across governance, procurement, and community engagement.
Training and Capacity Building	We recognise the importance of building internal capability to identify and respond to modern slavery risks. In 2025–2026, we will explore targeted training for: The Governance, Risk & Compliance (GRC) Sub-Committee of the School Council, Executive leaders and key staff.
High-level due diligence on recruitment practices	Design and implement a more structured due diligence exercise covering the recruitment practices of all our third-party labour providers; for example, contractors. We take a risk approach to address modern slavery in known high risk activities at this stage and will target those material providers.
Due Diligence on Supplier Compliance	To conduct a due diligence on our current suppliers to ensure their compliance with Modern Slavery regulations. This will help us maintain high ethical standards and transparency in our supply chain. We will start with those high risk material providers first.

## Consultation and Approval

Barker College consulted with all the operational campuses in Australia and surveyed current procurement practices.

This Modern Slavery Statement was approved by The Council of Barker College in its role as principal governing body on 17 June 2025.



Phillip Heath AM  
Head of Barker College



David Charles  
Chair of the Council of Barker College