



Modern Slavery Statement 2025

Introduction

This is the first Modern Slavery Statement submitted by Trinity Grammar School (Trinity / the School) pursuant to the Commonwealth Modern Slavery Act 2018 (the Act).

About Trinity Grammar School

Trinity Grammar School is an Anglican foundation governed by a Council (appointed by ordinance of the Diocese of Sydney).

The Archbishop of Sydney is President and the School is one of the original members of the Combined Associated Schools in New South Wales. The other members in the Association are Barker College, Cranbrook School, Knox Grammar School, St. Aloysius' College and Waverley College. The Headmaster is a member of the Association of Heads of Independent Schools of Australia, (A.H.I.S.A.).

The Right Reverend G.A. Chambers, O.B.E., D.D., subsequently Bishop of Central Tanganyika, founded the School in 1913 at Dulwich Hill, of which Parish, the "Parish of Holy Trinity", he was then Rector.

The imposing property at Summer Hill, set on eight hectares of land, was purchased in 1926, and the property at Strathfield shortly afterwards. The School consists of several separate but closely-linked establishments. The Senior and Middle Schools (Years 7 to 12) and the Junior School (K to Year 6), are located at the Summer Hill Campus and the Preparatory School (Pre-K to Year 6) is located at the Strathfield Campus.

In 2016, the School opened a new Field Studies Centre at Woollamia in the Shoalhaven region. This replaced the School's previous Outdoor Education Centre at Pine Bluff near Bigga, NSW, which operated from 1993 – 2014.

Boys are received from the age of four years (Pre-K). The School ceased to offer boarding facilities at the end of 2019.

Our School Motto

Detur Gloria Soli Deo translating to Let Glory be Given to God Alone.

Mission Statement

Trinity Grammar School provides boys with a thoroughly Christian education in mind, body and spirit.

The Ethos of Trinity Grammar School

First and foremost, Trinity Grammar School is Christian in its foundation and in its orientation. The School is built on the convictions that this is God's world, we are wonderfully made in his image, and tragically broken in sin. Sustained by him and loved by him, all people are called to look to Jesus Christ as both Lord and Saviour. This Christian faith is reflected in the life of the School, and shapes our understanding of ultimate meaning, purpose and identity.

Reflecting the meaning, purpose and identity found in relationship with God, Trinity is a school that prioritises relationships and community. Relationships shaped by respect and humility build a community in which

people belong and to which they will contribute. More and more, we want to be a community that considers, includes, and cares for others.

Educating boys in mind, body and spirit requires us to value breadth in educational experiences. In these formative years of schooling, boys benefit from their participation in, and exposure to, a wide variety of curricular and co-curricular activities and experiences. School should be a time for expanding horizons and exploring new possibilities. We are convinced that our boys are better equipped for the years to come if they have a broad base of interests, capabilities, experiences and memories by the end of their school years.

This breadth of our educational offering necessarily challenges our students. We believe that there is more in them than they know. Therefore, we require and encourage them to lean into the challenges that they face, and to seek to overcome obstacles. In academics, in co-curricular, and in their participation in our community, we have high expectations of them. Their experience of these challenges is preparing them for the road ahead.

However, at the same time that we challenge our students, we also support them. The journey from childhood through adolescence to adulthood is not easy, and each of our boys has unique needs and circumstances. In partnership with families, we aim to ensure that they are adequately and appropriately supported, at whatever stage of their development, to give them every chance of experiencing success. They do not face their battles alone; their School is for them.

In challenging and supporting our students across the breadth of our education, our focus is on growth. The School celebrates excellence in performance, and many of our boys rise to the highest of standards in the various spheres of their endeavour, but growth is the more important lens through which we look. Every student can learn, every skill can be developed, and every boy can make progress.

Ultimately, our goal is the formation of character. Our world needs men who are decent and trustworthy, and our School aims to play our role in shaping them. Through a Trinity education, we want boys to develop their moral compass, to act in service to others, to take responsibility for those things that are within their power, and perhaps even to form a personal faith in Christ. The true value of a Trinity education is seen in the character of our men in the years long after their graduation.

Structure and Operations

This Modern Slavery Statement (Statement) has been prepared by the Council of Trinity Grammar School and covers the operations of Trinity Grammar School (ABN 79 245 605 610) for the calendar year of 2024. The Council operates under an Ordinance of the Synod of the Diocese of Sydney and is empowered to carry on the School.

The Council is composed of eighteen (18) persons. Of these, six (6) clergy nominees and six (6) Lay are elected by the Synod of the Diocese. Three members are elected by the Old Trinitarians' Union and two by the Council itself. The Archbishop of Sydney is ex officio its President, but regular meetings are under the control of the Chairman of Council. The Headmaster is not a member of the Council but is "in attendance" at all Council meetings.

The Headmaster is employed by the School and is responsible for the overall management of the School. He is supported by a School Executive team who are responsible for the operations of the School, across all campuses, in conjunction with other senior staff.

The primary functions of the School involve offering Kindergarten, Primary, and Secondary education across two campuses in New South Wales as well as the outdoor campus, the Field Studies Centre located in Huskisson.



Risks of Modern Slavery Practices in our Operations and Supply Chains

Trinity Grammar School has conducted an assessment on its operations and supply chains, inclusive of the associated entities to evaluate risks of exposure to modern slavery practices.

In Our Operations

Based on this assessment, we have identified a low risk of modern slavery within our internal operations. This conclusion is supported by several factors, including the direct employment relationships between the School and its teaching and non-teaching staff, as well as the direct engagement of peripatetic music tutors and various individual contractors. Additionally, the School operates under strict compliance with employment laws, enterprise agreements, and industry awards. The highly regulated nature of the school education sector, particularly the independent education sector, further mitigates this risk. Moreover, our School upholds strong employment policies and practices grounded in existing legal frameworks and industry standards.

In Our Supply Chain

When evaluating the risk of modern slavery in our supply chain, various factors were taken into account, such as:

- ▲ Product/ Service type
- ▲ Suppliers employing temporary or low skilled workers
- ▲ Industry standards
- ▲ Labour conditions
- ▲ Geographic location/s

Based on these considerations, we recognize that the risk of modern slavery may be present in the specific regions of our supply chain detailed in the table below.

Supply Chain	Potential Modern Slavery Risk
Cleaning Services	<ul style="list-style-type: none"> ▲ Engaged contractor employing low skilled/ migrant workers unable to interpret worker's rights and minimum wage ▲ Possible compensation / debt-bondage situation with their employer (Trinity's external contractor)
Catering Services	<ul style="list-style-type: none"> ▲ Engaged contractor employing low skilled/ migrant workers unable to interpret worker's rights and minimum wage ▲ Possible compensation / debt-bondage situation with the employer (Trinity's external contractor) ▲ Food products that have been sourced from unsustainable environments and poor labour practices
Security Services	<ul style="list-style-type: none"> ▲ Engaged contractor employing low skilled/ migrant workers unable to interpret worker's rights and minimum wage



	<ul style="list-style-type: none"> ▲ Possible compensation / debt-bondage situation with the employer (Trinity's external contractor)
Information and Communications Technology Equipment and Services	<ul style="list-style-type: none"> ▲ Goods/ equipment and services produced in factories in low socio-economic countries with limited workers' rights
Sport and Co-curricular	<ul style="list-style-type: none"> ▲ Goods/ equipment and services produced in factories in low socio-economic countries with limited workers' rights
Uniforms	<ul style="list-style-type: none"> ▲ Goods/ equipment and services produced in factories in low socio-economic countries with limited workers' rights
Grounds and Building Maintenance Services	<ul style="list-style-type: none"> ▲ Goods/ equipment and services produced in factories in low socio-economic countries with limited workers' rights ▲ Engaged contractor employing low skilled/ migrant workers unable to interpret worker's rights and minimum wage
Other Equipment and Consumables	<ul style="list-style-type: none"> ▲ Goods/ equipment and services produced in factories in low socio-economic countries with limited workers' rights

Trinity Grammar School's Approach to Modern Slavery – Actions to Mitigate Modern Slavery Risk

The School acknowledges that a multi-phase strategy is essential to effectively address and mitigate any potential risks of modern slavery and related issues within our operations, particularly in our supply chain.

Trinity Grammar's multi-phase strategy is outlined below:

1. Identification and Review

- ▲ Identification of the origin of high-risk goods and services procurement
- ▲ Addressing risks within the high-risk supply chain as identified in our initial risk assessment review
- ▲ Interaction with key suppliers regarding modern slavery risks

2. Planning and Review of Policies and Processes

- ▲ Development of an Modern Slavery Framework
- ▲ Revising procurement and employment policies, processes, and procedures to align with the School's stance on modern slavery, with a focus on:
 - Monitoring and obtaining assurances from suppliers at higher risk of modern slavery through tools like modern slavery assessment questionnaires.
 - Including provisions in tender documents and contracts to address modern slavery practices.
- ▲ Continuing to educate key stakeholders, including staff and current suppliers, about modern slavery risks.
- ▲ Providing staff with training on modern slavery concepts and risks.
- ▲ Adopting and publishing revised procurement and employment policies and procedures.



- ▲ Piloting a Modern Slavery Supplier Assessment Tool.
- ▲ Applying updated procurement policies and procedures, and, when necessary, employment policies, to incorporate modern slavery provisions.
- ▲ Assessing new suppliers against modern slavery standards.

3. Supplier Engagement and Compliance:

- ▲ Conducting ongoing consultations with suppliers using tools like the Modern Slavery Supplier Assessment Tool or questionnaires.
- ▲ Reviewing supply chains for compliance with updated policies and procedures.

4. Monitoring and Control

- ▲ Regularly reviewing and auditing supply chains.
- ▲ Periodically assessing the implementation and effectiveness of updated policies, procedures, and related contract documentation.
- ▲ Reporting outcomes to the Audit, Finance, and Governance Committee of the School Council.

Progress on the Modern Slavery Framework

The School has initiated the implementation of a Modern Slavery Framework to establish processes addressing modern slavery. This includes reviewing purchasing and procurement policies to identify gaps and inconsistencies relative to the Modern Slavery Act. Recognizing that addressing modern slavery is an ongoing effort, the School is committed to continuous improvement. The timeline below sets out our action plan for the 12 months from January 2025, showing our ongoing commitment to mitigate modern slavery within Trinity's operations and supply chain and assess the effectiveness of our actions.

January – April 2025 Ongoing Risk and Gap Identification

- ▲ Ongoing policy and framework review, and analysis
- ▲ Deeper assessment of supply chains and origin risks
- ▲ Engagement with current suppliers – further awareness raising, utilisation of modern slavery assessment questionnaire

May – August 2025 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

September - December 2025 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 efforts were focused on gaining a deeper understanding of modern slavery risks and how they may manifest in our operations and supply chains. At this early stage, we are not yet able to fully evaluate the effectiveness of the measures we have implemented. However, we have begun developing a framework and processes to review and assess the impact of our actions in addressing modern slavery risks. This work will guide our future efforts.

In the identification and planning stages, we are leveraging existing policies, processes, procedures, and related documentation, as well as consulting with key personnel. These steps aim to establish operationally feasible and effective measures to minimize modern slavery risks. As part of the implementation and monitoring phases, we will use a combination of surveys and reporting mechanisms to evaluate the effectiveness of these processes.

Dedicated risk and operations personnel will lead the development, implementation, and control of modern slavery risk mitigation measures. These staff members will provide regular updates to the Audit, Finance, and Risk Committee of the School Council to ensure accountability and oversight.

Consultation

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

Approval

This Modern Slavery Statement was approved by the Council of Trinity Grammar School on 28 March 2025.



Richard Pegg
Chairman

