

The Anglican Schools Corporation

Modern Slavery Act Statement 2022

This statement, made pursuant to the Commonwealth Australian Modern Slavery Act 2018, sets out the actions taken by The Anglican Schools Corporation (referred to as “The Corporation”, “us”, “we” or “our”) to address modern slavery and human trafficking risks in our business and supply chain for the year ending 31 December 2022.

The Corporation is committed to contributing to the eradication of modern slavery and human trafficking by:

- acting ethically and with integrity and transparency in our business dealings and relationships; and
- implementing processes to minimise the occurrence of modern slavery and human trafficking either within our own operations or in any of its supply chains.

In 2022 the Corporation continued the operation of cross-functional teams to drive our response. The Corporation mapped key aspects of our supply chain and completed a risk assessment of our major suppliers in order to better understand our supplier base. In support of the risk assessment, the Corporation also extended deployment of a modern slavery questionnaire across major suppliers in three industrial sectors – cleaning, uniform supplies and food and catering. The responses from the questionnaire formed an important part of the Corporation’s modern slavery risk review.

This document sets out our actions and plans for the way in which we approach risks of modern slavery and human trafficking in our supply chain.

About Us

The Corporation is an organisation established by the Anglican Church Diocese of Sydney to provide a Christian education for the communities we serve.

Each of our schools’ nurtures and educates young people in accordance with the doctrines, tenets, beliefs and teachings of the Anglican Church Diocese of Sydney.

The Vision of the Corporation is: ‘Serving Christ by equipping students for His world’ and our Mission is: ‘To provide affordable quality Christian education’.

Under our Mission we have five objectives:

- to provide high quality education within a Christian worldview that is shaped by the Bible,
- to communicate in word and deed the gospel of Jesus Christ to students, staff, parents and the wider community,
- to provide education that is financially accessible to local communities,
- to operate the Corporation efficiently and safely, and

- to grow the Corporation.

Organisational Structure

The Anglican Schools Corporation (ABN 63 544 529 806) was originally established as an unincorporated body by the Synod of the Anglican Church Diocese of Sydney in 1947. The Corporation was incorporated as a body corporate pursuant to the Anglican Church of Australia (Bodies Corporate) Act 1938 on 2 April 1965.

The governing constitution of the Corporation is an ordinance of the Synod of the Anglican Church Diocese of Sydney or the Synod's Standing Committee.

The Corporation is governed by a Board of up to 13 people, nine of whom are elected by the Synod of the Anglican Church Diocese of Sydney, two are appointed by the Archbishop of Sydney and two appointed by the Board itself.

The Chairman is Mr Philip Bell OAM.

The Chief Executive Officer of the Corporation is Mr Peter Fowler. The Chief Executive Officer is responsible to the Board for driving the implementation of the Corporation's Strategic Plan, for the implementation of the policies and decisions of the Board and for the general administration and daily operation of the Corporation. Under the direct responsibility of the Chief Executive Officer is the Corporation's Group Office located in Hurstville, NSW.

The Board establishes School Councils to govern the operation of one or more Corporation schools. A School Council consists of a Chair and at least four and up to nine additional persons appointed by the Board. The primary role and responsibility of a School Council is to promote the Objects of the Corporation by ensuring that each school for which it has governance responsibility operates in a manner that:

- Upholds the Corporation's Objects,
- Supports the Corporation's Philosophy of Education,
- Implements the School's strategic plan and policies that are consistent with the Corporation's Strategic Plan and Policies; and
- Develops the individual character of the school in the context of its local environment and in a relationship of interdependence with the Corporation.

Each school is led by a Principal who is responsible to the Board through the School Council for the implementation of the School's strategic plan; the implementation of the Board's and the School Council's policies and decisions; and the general administration and daily operation of the School.

Operations

The Corporation's operations include delivery of high-quality education with a Christian worldview to boys and girls from Pre-K to Year 12. Our operations are entirely based in NSW, across 16 schools and 18 campuses (with one additional school to commence operations in 2023), supported by a centralised Group Office function located in Hurstville, Sydney. These schools provide education to approximately 15,000 students and employ approximately 1,600 full-time equivalent staff.

In 2022 the Corporation recorded gross annual revenue of \$396m and a total procurement spend of approximately \$64m¹ on goods and services and \$72m on Capital expenditure to support our operations.

Risks of Modern Slavery in Operations and Supply Chain

The Corporation recognises that our Corporate social responsibilities fall in both our own direct activities and those of our supply chain.

Our operations

The Corporation is confident that the risks of modern slavery and human trafficking in our direct operations is very low due to the strict regulations in the education sector and employment laws that the Corporation is required to comply with.

Our Supply Chain

The majority of our direct suppliers are based in Australia.

During 2022 the Corporation again completed its supplier categorisation, identifying high expenditure and high-risk categories. A supplier database was expanded and risks were assessed against:

- the industry in which the supplier operates,
- the category of the product or service being procured,
- the geographic location of the supplier, including known import or export locations; and
- the entity, including whether the supplier has any public evidence of compliance with human rights and modern slavery laws (e.g. a published Modern Slavery Statement or Human Rights Policy).

Categories identified as high risk included:

- Building, construction and maintenance
- Cleaning
- Food and catering services
- ICT hardware
- School uniforms
- Furniture

The Corporation's largest suppliers are from the building, construction and maintenance sector. Building, construction and maintenance suppliers include builders, architects, consultants, engineers, plumbers, electricians and air-conditioning technicians.

In an effort to better understand these suppliers' modern slavery risk awareness and risk management practices, the Corporation is progressively deploying a Modern Slavery questionnaire across high risk industries. The questionnaire was designed to:

- support the identification of modern slavery risks in these segments of our supply chain;
- commence working with suppliers to address these risks;
- improve transparency and understanding; and

¹ 2021 comparative restated to \$55m due to an error in classification as prior year figure included salaries and wages

- allow both parties to increase awareness of risk factors in the supply chain.

2021 was our first instance of engaging suppliers on such matters, and we continued this engagement throughout 2022. During 2022 we engaged with the cleaning, food and catering and uniform industries. The outcomes from the questionnaire during 2022 contributed to our risk assessment and indicated a good level of awareness of modern slavery risks amongst the Corporation's high risk suppliers in these industries.

During 2022 the Corporation updated its standard form building contract to include an acknowledgement of Modern Slavery Legislation and a commitment from contractors to work with the Corporation in regard to minimising the impact within capital works projects.

31 Corporation staff across Group Office and Corporation schools completed an on-line training program on Modern Slavery risks in the procurement cycle. At least one staff member from 14 of our schools and Group Office completed this training.

Our WhistleBlower Policy allows for anonymous reporting of modern slavery and human trafficking incidents either directly to the Corporation or through the "Your Call" whistleblowing service <https://www.yourcall.com.au/report>.

Improvement initiatives planned for 2023 include:

- ongoing risk assessment of key suppliers by industry categorisation and geographic location;
- continuing to raise awareness of modern slavery and human trafficking across additional high risk industries in our supply chain and amongst a broader cross section of our management and staff through deployment of additional questionnaires, learning and professional development;
- Continuing to work towards improvements in our procurement practices and workflows; and
- updating the Corporation's procurement policy to incorporate ethical procurement practices.

How we assess the effectiveness of our actions

Tracking the impact of our initiatives to mitigate modern slavery risks is a key part of our response to Modern Slavery. This monitoring and assessment will assist us to understand what works and where further action is required. As our modern slavery response expands and matures, we will continue to develop ways to assess the effectiveness of our actions.

During the course of the next reporting period, we will seek to:

- embed, monitor and review our supplier risk management practices as they relate to modern slavery and human trafficking;
- develop and implement elements of an ethical procurement framework; and
- measure increased awareness of modern slavery and human trafficking across the Corporation's management and staff.

Consultation with any entities owned or controlled

The Anglican Schools Corporation controls Capstone Finance Limited and ATC Western Sydney Limited, although the Corporation is not a member of either entity. Control arises because the

directors of Capstone Finance Limited and ATC Western Sydney Limited are those Members of Anglican Schools Corporation who have been appointed as directors of each of the two entities by the Board of Anglican Schools Corporation.

This statement has been produced in consultation and reviewed by those CFL and ATC Western Sydney Directors who are also Directors of the Corporation.

This Statement was approved by the Board of the Anglican Schools Corporation on 27 June 2023.

Any other relevant information

Nil

Signed by:

A handwritten signature in black ink, appearing to read 'Philip Bell', written in a cursive style.

Philip Bell OAM,
Corporation Chairman

Date:

29 June 2023

A snapshot of our progress in 2022

Our 2022 efforts focused on understanding risks across a broader range of high risk industries, and improving understanding of modern slavery risks in the procurement cycle across our staff and suppliers.



Undertaking detailed risk assessments across high risk industries in our supply chain



Improving supplier understanding of modern slavery risks through additional clauses in contractual arrangements with major suppliers



Building capacity and awareness among our staff and suppliers