

Modern Slavery Statement 2023



Carey
Baptist Grammar School

Modern Slavery Statement

This is the first Modern Slavery Statement submitted by Carey Baptist Grammar School pursuant to the *Modern Slavery Act 2018 (Cth)*.

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.

About Carey Baptist Grammar School

Founded in 1923, Carey Baptist Grammar School is a leading co-educational independent school with campuses in Kew and Donvale, Victoria, Australia, catering to students from three-year-old Early Learning to Year 12.

Carey is known for being innovative, progressive and leading the way in best practice teaching and learning, supporting strong academic results and personal development for each student. Carey works in partnership with families to develop wise, independent, motivated young people who are inspired and equipped to create positive change.

Carey's cultural foundations are recognised in our values of care, respect and growth. Those values can be seen throughout our history and are displayed through our impact on local, national and global communities and through our thousands of alumni whose education has led them to achieve great things. Over the years, Carey has demonstrated a strong and consistent commitment to an inclusive, progressive and complete education; one which benefits all students, families, staff and the broader community.

Our Purpose

Together we inspire, nurture and develop students who are equipped for life and ready to create positive change.

Our Vision

An inclusive community that values the development of each individual and supports them to have a positive impact in our society.

Structure and Operations

Carey Baptist Grammar School Ltd ABN 83 051 576 062 is a public company limited by guarantee, incorporated under the Corporations Act 2001 (Cth) and registered as a charity under the *Australian Charities and Not-For-Profits Commission Act 2012 (ACNC Act)*.

Our Values and Strategic Priorities



Carey has the following three registered deductible gift recipient funds:

- The Carey Building Fund
- The Carey Scholarship Fund
- The Carey Library Fund

Ultimate responsibility for the governance of the School rests with the Carey Board of Directors. The Principal is responsible for overall management of the School.

The Board of Directors understands the reporting and compliance requirements under the Modern Slavery Act (Cth).

The key activity of the School is providing a co-educational Christian education for an Early Learning Centre and a School ranging from Preparatory to Year 12.

Risks of Modern Slavery in Our Operations and Supply Chains

Carey has conducted an assessment of its operations and supply chains to evaluate the risk of modern slavery practices.

Operations

Based on this assessment, we identify a low risk of modern slavery in our internal operations. This is due to the direct employment relationship between the School and its staff, the employment laws that the School is required to comply with and the highly-regulated nature of the independent education sector. Carey has strong employment policies and practices based on existing employment laws, awards and other regulations within the sector.

Supply Chain

In assessing the risk of modern slavery in our supply chain, the following factors were considered:

- total contract value
- product/service category
- suppliers that may engage a transient or low-skilled workforce

Based on this assessment, the following supply chains were identified as areas of focus:

Supply Chain	Modern Slavery Risk
Cleaning	Engagement of a low-skilled/migrant workforce who may have a limited understanding of their legal rights and a restricted ability to bargain with their employers.
Catering	Engagement of a low-skilled/migrant workforce who may have a limited understanding of their legal rights and a restricted ability to bargain with their employers.
Construction	Engagement of a low-skilled/migrant workforce who may have a limited understanding of their legal rights and a restricted ability to bargain with their employers.
Technology equipment and information technology services	The manufacture of equipment and the delivery of services may be a result of individuals working in poor and unlawful conditions.
Uniforms	The manufacture of uniforms may result in individuals working in poor and unlawful conditions
Maintenance services	Work may be subcontracted to third parties resulting in the exploitation of subcontractors.
Security	Engagement of a low-skilled/migrant workforce who may have a limited understanding of their legal rights and a restricted ability to bargain with their employers.

Our Approach to Modern Slavery (Actions)

Carey recognises 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.

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

1. Identification and Risk Assessment (initial review)

- Review of existing procurement practices and employment practices, and identification of gaps and areas for improvement
- Identify high-risk areas in our supply chains and, as a subset of that, goods and services procurement origins
- Engage with key suppliers with respect to modern slavery risks

2. Review Policies and Processes

- Develop an overarching Anti-Modern Slavery Policy
- Develop policies and processes to monitor those suppliers where the risk of modern slavery may be present, including within the School's procurement practices
- Develop standard contractual clauses to address modern slavery risks
- Continue to raise awareness of modern slavery risks with key stakeholders including staff and current suppliers
- Provide education / training regarding modern slavery for relevant staff
- Trial a Modern Slavery Assessment Questionnaire with high risk suppliers

3. Implementation and Supplier Engagement

- Apply new policies and processes in procurement and employment settings
- Assess new suppliers against modern slavery requirements
- Ongoing consultation and relationship management with suppliers, using Modern Slavery Assessment Questionnaire
- Review and analyse each supply chain for compliance with new policies and procedures

4. Monitoring and Control

- Regular review and monitoring of the School's supply chains and periodic audit
- Periodic assessment of the effective implementation and operation of the new or amended policies, processes and procedures and related contract documentation
- Reporting to sub-committees of the School Board.

In 2024, Carey plans to undertake the following activities:

- Continue to review existing procurement and employment practices, so as to identify gaps and areas for improvement
- Develop an overarching Anti-Modern Slavery Policy
- Develop standard contractual clauses to address modern slavery risks
- Trial a Modern Slavery Assessment Questionnaire with high risk suppliers
- Provide education / training regarding modern slavery for relevant staff
- Continue to raise awareness of modern slavery risks with key stakeholders including staff and current suppliers
- Assess new suppliers against modern slavery requirements

Assessing the Effectiveness of our Actions

During this reporting period, Carey's 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're unable to adequately assess the effectiveness of measures 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.

Consultation

Carey does not own or control any other entities.

Approval

This Modern Slavery Statement was approved by the Board on 28 June 2024.

Signed

A handwritten signature in grey ink, appearing to read 'Tim Chilvers', is positioned above the printed name and title.

Tim Chilvers
Chair of the Board



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