# 2024 MODERN SLAVERY STATEMENT



### Acknowledgment of Country

Kildare Ministries acknowledges the Traditional Custodians of Country across Australia and their ongoing connection to the lands and waterways upon which we rely. We honour and pay our respects to Elders, past and present.

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### Message from the Executive Director

At Kildare Ministries, our commitment to justice is deeply rooted in the Gospel and shaped by the principles of our Living Justice, Living Peace Charter. This Charter continues to inform our response to pressing social justice issues, including the ongoing and global crisis of modern slavery.

Modern slavery has risen in recent years, with an estimated 50 million people currently affected worldwide—28 million in forced labour and 22 million in forced marriages. We recognise that modern slavery can occur in any context, including within our own communities and supply chains. In response, we actively pursue meaningful ways to raise awareness, mitigate risk, and take action aligned with our core values.

In accordance with the Modern Slavery Act 2018 (Cth), this statement outlines the risks identified across our operations and supply chains, and the measures we are taking to address them. At Kildare Ministries, we are committed to continuous improvement—embedding ethical practices and nurturing partnerships that reflect our enduring pursuit of justice. We view this statement as an opportunity to reflect, evaluate progress, and strengthen our approach.

This is our fourth Modern Slavery Statement, reporting on our efforts throughout 2024. Alongside enhancements to our internal systems, we have continued to foster strong partnerships and prioritised justice education across our schools and ministries. Kildare Ministries remains committed to shaping the leaders of tomorrow —educating young people on social justice and equipping them to challenge injustice in all its forms. By empowering students to advocate for the voiceless and marginalised, we believe we can contribute to long-term prevention and deeper community awareness, especially among those most vulnerable to exploitation.



Any form of exploitation stands in direct opposition to the values and principles that underpin Kildare Ministries. We reaffirm our commitment to upholding the dignity, freedom, and inherent worth of every person, everywhere.

Nicole Mangelsdorf Acting Executive Director

### **Executive Summary**

This statement is issued to fulfill the reporting obligations of the Trustees of Kildare Ministries (TKM) under the Modern Slavery Act 2018 (the Act). It has been prepared by TKM as a single reporting entity and covers both TKM and its controlled entities. TKM is a body corporate registered in Australia.

This statement details the actions taken by Kildare Ministries in 2024 to identify, mitigate, and manage the risks of modern slavery and human trafficking within our ministries and supply chains. It marks our fourth submission under the Modern Slavery Act (MSA).

This statement is a joint submission on behalf of the group. The individual entities within the group fall below the \$100 million revenue threshold for the reporting period.

### Our Commitment

Our Living Justice Living Peace Charter offers a guiding framework for each of our ministries, encourages the pursuit of justice, and recognises that peace cannot exist without justice. We are dedicated to upholding high ethical standards, promoting responsible work practices, and safeguarding the human rights of everyone. In alignment with this commitment, we maintain a zero-tolerance policy towards modern slavery and human trafficking within Kildare Ministries, and are actively working to eliminate these practices in our supply chains. Kildare Ministries is dedicated to ensuring that the Trustees, Boards, and employees understand their responsibilities to report incidents of modern slavery.

We have made progress towards raising awareness in our schools and among our suppliers. In our schools, we emphasised that our procurement decisions can positively influence the lives of individuals within the supply chain. We acknowledge that respecting human rights requires long-term dedication, and our schools work with students to support them upholding these values in the future.

To address modern slavery in future reporting periods, we are dedicated to continually refining our practices. We aim to collaborate with partners who respect and protect the human rights of others. As a group of schools and community works, we aim to contribute to reducing the risk of child labour in our supply chains in collaboration with our suppliers.

### SECTION ONE: COVERED ENTITIES

This section of the statement addresses the requirement of Section 16(1)(a) of the Modern Slavery Act 2018 by providing an overview of which entities are covered by the statement.

Kildare Ministries comprises 10 schools and 3 community service NFPs and the office of the Trustees.

- Brigidine College Indooroopilly, QLD
- Brigidine College St Ives, NSW
- Clonard College Herne Hill, VIC
- Kilbreda College Mentone, VIC
- Kildare College Holden Hill, SA
- Killester College Springvale, VIC
- Marian College Ararat, VIC
- Marian College Sunshine West, VIC
- Star of the Sea College Brighton, VIC
- St Joseph's College Echuca, VIC
- Saltbush Balnarring Beach, VIC
- Brigidine Asylum Seeker Project, VIC
- Wellsprings for Women Dandenong, VIC
- Trustees of Kildare Ministries



Marian College

**Clonard** College





Kilbreda Colle Mentone



Star of the Sea

Kildare Col

Holden Hill



igidine College



St Joseph's College Echuca

Killester College Springvale

Marian College Sunshine West

**Brigidine College** St lves



Dandenong



Brigidine Asylum Seeker Project

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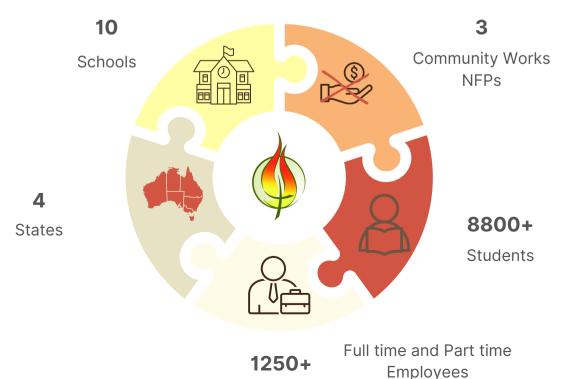
# SECTION TWO: STRUCTURE, OPERATIONS AND SUPPLY CHAINS

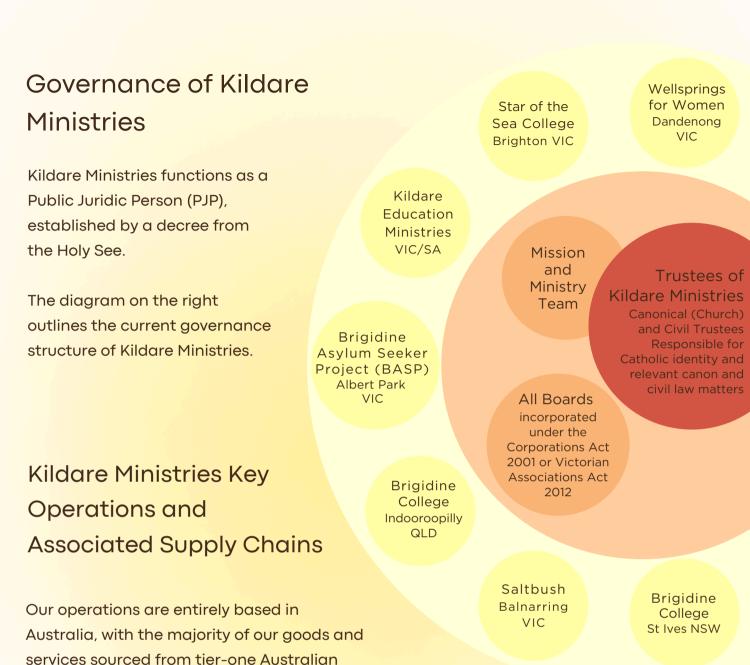
This section outlines Kildare Ministries' structure, operations and identified supply chains as required by Section 16(1)(b) of the Modern Slavery Act 2018.

Kildare Ministries encompasses the educational and community services previously governed by the Brigidine Congregation (NSW and Victorian Provinces) and the Presentation Congregation of Victoria. Now in its 11th year of operation, Kildare Ministries provides secondary school education across Victoria, New South Wales, South Australia, and Queensland, along with community services that operate within an inclusive and socially just framework.

Our mission is to foster an existence that maintains the dignity of everyone, grounded in personal integrity and compassion. This belief guides our actions and encourages everyone to take their rightful place in both Church and society.

The Mission, Vision and Values of Kildare Ministries are deeply rooted in Catholic social teaching. Our vision is for a community that cherishes human dignity and works towards the common good of all creation. We aim to foster a proactive, insightful community that takes a stand against injustice through tangible action. Each of the ministries within our group are aligned in the belief that addressing modern slavery is essential to upholding the Catholic Social Teaching.





TKM comprises 10 schools and 3 community service not-for-profit organisations, each operating independently with its own management team, responsible for the ethical sourcing of supplies.

suppliers.

Employment related costs make up the largest component of operating expenditure, at approximately 70% of total expenditure. Most school staff are directly employed, and their wages are paid in line with the respective Enterprise Agreements. Additionally, some staff are members of the Independent Education Union (IEU), which provides a framework for staff consultation on matters such as workload issues, among others. Apart from staff-related costs, our expenditure can be broadly grouped into the following categories:

Expense Category	Typical Goods and Services	
Property expenses	Rent, Utilities, Repairs, Maintenance, Construction and related costs	
Teaching and Learning materials	Books, Teaching materials and other consumables	
Uniforms and Sport	School and Sport Uniforms, Sports Equipment	
Technology and equipment	Computers, Hardware, Software, Mobile phones, AV equipment, Gym, Musical instruments	
Administration Expenses	Office equipment, Stationary, Furniture, Services such as cleaning, onsite canteen, waste management, security	
Promotion and Communication	Advertising material and Communication services	
Professional Services	Audit, Legal services, Insurance, Consultancy	
Travel, Meetings and Event	Air travel, Accommodation, Transport and Venue hire	

Our suppliers operate in the following sectors:

- Accommodation and Food Service
   Activities
- Administration and Support Services
- Agriculture, Forestry, and Fishing
- Arts, Entertainment and Recreation
- Building services contractor
- Cleaning
- Construction
- Domestic work
- Education
- Electricity, Gas, Steam and A/C supply
- Finance and Insurance
- Transportation and Storage
- Real estate

- Government administration,
   Defence and Social Security
- Health and Social Work
- Information and Communication
- Labour hire
- Maintenance and Repair of motor
  vehicles
- Manufacturing
- Mining and Quarrying
- Personal services
- Professional and Scientific Services
- Retail
- Security services

## SECTION THREE: RISK OF SLAVERY IN OUR OPERATIONS AND SUPPLY CHAINS

Section 16(1)(c) of the Modern Slavery Act 2018 requires modern slavery statements to describe the modern slavery risks in operations and supply chains of the reporting entity. This section outlines the risk areas in Kildare Ministries' operations and supply chains.

We note that the Modern Slavery Act 2018 (Cth) defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour. The worst forms of child labour refers to situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

TKM has assessed the risk of modern slavery within our own operations as low. Our workforce is primarily self-recruited and compensated according to the relevant Enterprise Bargaining Agreement (EBA) of the state in which the schools operate. These agreements ensure minimum pay and entitlements, and we uphold our staff's right to engage in collective bargaining through their respective unions.

While we have a low risk within our operations, we acknowledge the potential for Kildare Ministries to contribute to modern slavery practices through the procurement of certain goods and services. An analysis of our supply chains has highlighted potential slavery risks in specific areas, which will be discussed in further detail in the following sections of this statement. We have continued our work with iPRO to further analyse our suppliers and the supply chains in which they operate.

### Supply Chain

Our suppliers operate across various sectors, some of which are classified as high-risk. High-risk sectors are those where human trafficking and child labour exploitation are more prevalent, as identified in the Global Estimates of Modern Slavery and Child Labour: Global Estimates 2020 Trends and the Road Forward report (ILO and UNICEF, 2021).

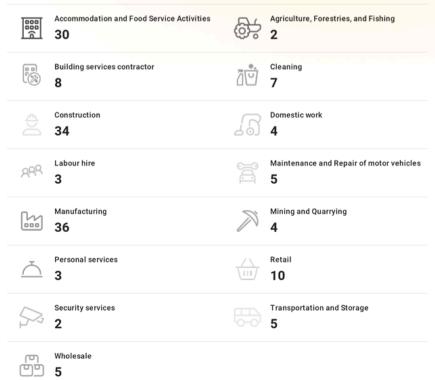
### Sourcing Goods in High-risk Sectors

The graphics below illustrate the high-risk sectors in which our suppliers operated in the year 2024. The numbers within the graphic represent the number of suppliers in each corresponding sector based on the iPRO assessment tool.

High-risk Sectors of Operation:

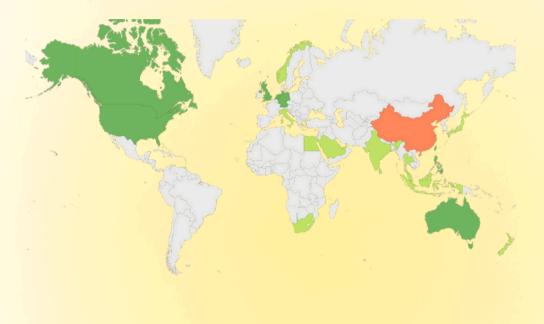
880 (c	Accommodation and Food Service Activities	<u></u>	Agriculture, Forestries, and Fishing 3
	Building services contractor 5	āŮ	Cleaning 6
DCD	Construction 8	19	Domestic work 2
2999	Labour hire 3	ĨA	Maintenance and Repair of motor vehicles <b>2</b>
<b>1</b>	Manufacturing 12	N	Mining and Quarrying 2
$\overline{\bigcirc}$	Personal services 2		Retail 15
53	Security services 3	₽	Transportation and Storage
e D	Wholesale 9		

#### Production of goods in High-risk Sectors:



Certain countries or regions where our suppliers operate, along with some of the goods they produce and source, are considered high-risk due to the potential association with modern slavery practices, including Forced Labour, Human Trafficking, Child Labour, and Debt Bondage.

The map below highlights the geographical regions where our supply chain partners operate. This map, along with the following supply chain maps, has been overlaid with the color tier system from the <u>Trafficking-in-Persons Report.</u>



The production of the following goods in the listed countries carries a risk of modern slavery:

#### o China

- Electronics
- Garments
- Gloves
- Textiles
- Toys
- o India
  - Garments
  - Soccer Balls

o Malaysia

- Rubber Gloves
- o Vietnam
  - Furniture
  - Textiles

We have also identified a number of countries where there is modern slavery risk associated with sourcing a number of goods.

### SECTION FOUR: ACTION

Section 16(1)(d) of the Modern Slavery Act 2018 requires modern slavery statements to describe the action taken. This section outlines the action taken by Kildare Ministries to assess and address risks, including due diligence and remediation processes.

### Approach to Due Diligence

We prioritise the Kildare Ministries values in all aspects of our work, and our commitment to responsible practice extends to our procurement processes, where we set clear expectations for our suppliers. The supplier code of conduct outlines TKM's minimum standards and non-negotiable requirements regarding human rights and labour practices. We understand that human rights due diligence is an ongoing process, and is most effective when it is embedded in the risk and procurement processes of each of our ministries.

Our Business Managers help us in holding suppliers accountable, insisting on workplace fairness, and trying to ensure there is respect for human rights and address the risk of modern slavery.

We assess our exposure to modern slavery risks through a combination of external research, screening new suppliers against our supplier code of conduct, and following our supplier engagement guidelines.

In 2024, we saw improved engagement with suppliers, allowing us to more thoroughly examine supply chains and identify potential areas of risk

The partnership with iPRO software continued in 2024, using their Modern Slavery Assessment Tool to evaluate the risks within our supply chain. During the reporting period, we worked with iPRO to conduct a bulk assessment of 605 suppliers.

It is expected this process continues annually, incorporating improvements each year. Currently 48% of our suppliers participate in the process. A more targeted effort is required to ensure better engagement in the process from our suppliers. A lack of resources has hindered some non-responders from participating in the process, and we plan to simplify it to encourage greater participation. Additionally, several suppliers have not reviewed their assessment responses for over 12-months. We aim to put an engagement plan into place to ensure suppliers update their responses on an annual basis.

### Further Action with Suppliers

As part of the onboarding process, new suppliers need to undertake the modern slavery assessment alongside our other quality and compliance checks. We have started conducting due diligence on modern slavery risks by incorporating the iPRO Modern Slavery Assessment Tool into our new supplier procurement process. The tool enables us to request supporting documentation from suppliers during their assessment.

While the International Labor Organisation estimated that 50 million people around the world are victims of modern slavery in 2021, according to a recent report published by them indicates that through the adoption of the Sustainable Development Goals (SDGs), the global community has committed to ending modern slavery among children by 2025, and universally by 2030.

In 2025, we hope to collaborate with ACRATH, ACU and other organisations striving to see an end to child labour. Given cocoa and lithium battery production are two significant areas using child labour, we will support initiatives targeting these aspects.

Other initiatives for 2025 include the following:

- Use the educational training (as part of iPRO's resource library's subscription) on modern slavery, raising awareness and highlighting vulnerability across supply networks. This will be available to our staff and for suppliers to participate in.
- Continue to increase engagement with suppliers completing the modern slavery risk assessment.
- Encourage suppliers (positioned in a high-risk category) to review their assessment, to assist them with understanding where vulnerability may apply, given their sector of operations.
- We will collaborate with the Justice Leaders Network to raise awareness in our schools about child labor in cobalt mining and advocate for its end, working alongside other organizations dedicated to this cause.

### Cultivating the Leaders of Tomorrow

Kildare Ministries is dedicated to shaping the leaders of tomorrow by educating young people on social justice and preparing them to take on the fight against modern slavery. We believe that by empowering students to speak up for the voiceless and marginalized, we can make a significant impact. Our students are provided with opportunities to engage with our Community Works to learn and participate in the programs run for the vulnerable.

Areas of action in our ministries include:

- Wellsprings for Women offers programs and services to aid women who experience socioeconomic barriers to participate in society. The education and empowerment provided helps make them less vulnerable to forced marriage and forced labour.
- Likewise, the support provided by the Brigidine Asylum Seekers Project (BASP) helps reduce the likelihood that asylum seekers will be exploited, manipulated or coerced into forced labour.
- Our schools aim to aid these efforts in whatever capacity they can. Students volunteer at our community works and raise funds so they can continue to support the vulnerable. Multiple schools invite key figures from BASP to give talks, educating students and staff about the organisation's important work.
- Make a Difference Monday: Students from Brigidine College St. Ives cut cloth squares and pack items for menstruation kits for young women in Pacific nations. This initiative enables young women to participate in their education and work while menstruating, lifting a barrier that could otherwise trap them in poverty and lead to forced labour and slavery.
- In 2024 Killester College ran a Human Trafficking working party with attendees from the AFP; Governor General's Department; Home Affairs Office; ACRATH; Wellsprings; Taldumande Youth Services; Centre for Multicultural Youth; Foundation House; City of Greater Dandenong; Local Catholic, Independent and Government Schools
- Following the working party, a resource sharing online community was established, which has seen the sharing of a significant amount of resources between government/NFP and schools to enable the inclusion of this work in the curriculum. A tool kit is being developed to assist with appropriate intervention at a school level. This is going to be targeted at students in 2025 and a community outreach plan for 2026 and beyond

The following initiatives focused on fostering a culture of generosity and hope within the next generation.

- A Social Justice Retreat where students gathered to explore ways to tackle social injustice and inequality, guided by our core value of Hope.
- Students were encouraged to critically examine social justice issues and consider ways to advocate for society's most vulnerable individuals. These ideas are central to the fundraising efforts for Caritas, BASP, and Wellsprings for Women. The event aimed to foster a spirit of giving and community support, encouraging students to contribute to important causes.
- The Kildare Ministries Justice and Sustainability Network met, offering students the opportunity to hear from guest speakers on topics such as Advocacy, Activism, and Action.

### Remediation

TKM is dedicated to safeguarding all children and vulnerable adults, fostering a safe and inclusive environment for everyone.

Within our schools we have had the AFP individually involved in intervention with 5 families at risk of forced marriage and servitude. The AFP process is one that is victim led and makes sure it doesn't place potential victims at greater risk of harm. It has led to two of our at-risk students being stopped and interviewed upon their return to Australia from travelling overseas

One of our schools has engaged with the Refugee Education Support Program (RESP) run by Foundation House and Centre for Multicultural Youth (CMY) that has as its focus for 2025 and into 2026, a community engagement strategy designed to work on dialogue improvement with families. The piece around Human Trafficking will then become part of this wider dialogue.

In one of our schools, we have made a recent report to the AFP about a student where there is concern regarding domestic servitude; we are still working through this with them

TKM aims to manage slavery risks by continuously monitoring supplier activity and ensuring action plans and compliance requirements are followed. We will also continue collaborating with suppliers to improve working conditions for survivors.

TKM staff will notify the appropriate law enforcement agencies when suspicions of modern slavery arise through whistle-blowers or other channels.

### SECTION FIVE – EFFECTIVENESS

Section 16(1)(e) of the Modern Slavery Act 2018 requires modern slavery statements to describe how the reporting entity assesses effectiveness of its actions.

We rely on the benchmarking and KPIs provided by the iPRO Modern Slavery Assessment Tool to evaluate the success of our efforts in our work with the suppliers. This marks our second year using the platform for assessments and due diligence.

The key KPIs we use to evaluate our progress are the risk scores produced through the assessment process. The two risk scores given to each organisation that completed the assessment questionnaire were:

- Inherent Risk Score
- Unmitigated Risk Score

Kildare Ministries receives an aggregated risk score of all assessed suppliers, which we use to evaluate the overall risk across the entire supply chain.

We are committed to continually improving these KPIs. We will assess the effectiveness of our modern slavery action plan, by tracking the reduction in the Unmitigated Risk Scores, after the introduction of relevant policies and procedures. We also evaluate our engagement with suppliers and acknowledge we need to encourage greater participation in our assessment program, to better identify and mitigate modern slavery risks in our supply chain.

The work with our own staff to ensure there is no risk of slavery in our operations is ongoing and will be assessed annually. The impact of prevention of forced marriage and servitude on our students will also be assessed annually and will continue with the help of ACRATH, RESP, AFP & CMY as stated above.

### SECTION SIX: CONSULTATION

Section 16(1)(f) of the Modern Slavery Act 2018 requires reporting entities to describe the process of consultation with any entities that the reporting entity owns or controls

We have continued to collaborate with the Business and Risk Managers as well as the Religious Education and Justice Leaders of our schools on improving awareness and help reduce modern slavery risks.

We have also consulted with ACRATH, BASP, AFP, Foundation House and CMY in our work.

All schools participated in the supplier assessment and engagement program and we will continue to address the areas highlighted in our annual survey.

### SECTION SEVEN: ANY OTHER RELEVANT INFORMATION

We recognise that modern slavery doesn't take place in a vacuum and that there are likely to be a range of other violations of human rights of workers and students where modern slavery takes place. Justice programs are integrated with our whole school approach to creating a more just and fair world based on the teachings of Jesus. We will build on these values and continue to work with our ministries to reduce the risk of modern slavery in our network.

This statement was approved by the Trustees of Kildare Ministries in their capacity as the principal governing body of Kildare Ministries on 27th March 2025.

This statement is signed by Rosemary Copeland and Kathy McEvoy in their roles as Co-Chairs of the Trustees of Kildare Ministries on 27th March 2025.

R. Ropp

Rosemary Copeland 27th March 2025

Kathy the Eva

Kathy McEvoy 27th March 2025