Modern Slavery Statement 2024





Modern Slavery Statement

This is the second 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).





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).

Operations

The key activities 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 of 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 & Effectiveness)

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
- Identified high-risk areas in our supply chains and
- Review and identify 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
- Developed standard contractual clauses to address modern slavery risks
- Continue to raise awareness of modern slavery risks with key stakeholders including staff and current suppliers
- Provided education / training regarding modern slavery for relevant staff
- Developed a Modern Slavery Assessment Questionnaire for trial with high risk suppliers in 2025

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:

- Developed standard contractual clauses to address modern slavery risks
- Developed a Modern Slavery Assessment Questionnaire
- Assessed new suppliers against modern slavery requirements
- Provided education/training regarding modern slavery for relevant staff

In 2025, Carey plans to undertake the following activities:

- Develop an overarching Anti-Modern Slavery Policy
- Trial the Modern Slavery Assessment Questionnaire with key suppliers
- Continue to review existing procurement and employment practices, including consolidating to preferred suppliers to reduce modern slavery risks in our supply chain

- · Continue to provide education/training regarding modern slavery for relevant staff
- Continue to raise awareness of modern slavery risks with key stakeholders including staff and current supplier

Assessing the Effectiveness of our Actions

During this reporting period, Carey's focus was on putting in place measures to address the modern slavery risk with key suppliers. Carey was successful in introducing Modern Slavery provisions in key contracts. Carey has provided education to key staff regarding Modern Slavery risks and reporting requirements. Carey has developed a modern slavery assessment questionnaire, however it has yet to trial this with key suppliers. Carey will continue to work on developing its policies and processes to address modern slavery risks.

Consultation

Carey does not own or control any other entities.

Approval

This Modern Slavery Statement was approved by the Board on 22 May 2025.

Signed

Tim Chilvers Chair of the Board



Carey Kew

ELC, Junior, Middle and Senior Schools 349 Barkers Road Kew Victoria 3101 Telephone: +61 3 9816 1222

Carey Donvale

ELC and Junior School 9 Era Court Donvale Victoria 3111 Telephone: +61 3 8877 8500

carey.com.au