

# Anglican Schools Corporation

## Modern Slavery Act Statement 2021

This statement, made pursuant to the Commonwealth Australian Modern Slavery Act 2018, sets out the actions taken by 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 2021.

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 2021 the Corporation established a cross-functional team 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 deployed a modern slavery questionnaire across major suppliers in one industrial sector – property development and maintenance. 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**

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.

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, up to two are appointed by the Archbishop of Sydney and up to two are appointed by the Board itself.

The Corporation 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 the 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, supported by a centralised Group Office function located in Hurstville, Sydney. These schools provide education to approximately 16,250 students and employ approximately 1,750 full-time equivalent staff.

In 2021 the Corporation recorded gross annual revenue of \$355.9m and a total procurement spend of approximately \$274.2m on goods and services and \$49.0m 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 risk 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 2021 the Corporation completed its supplier categorisation, identifying high expenditure and high-risk categories. A supplier database was developed 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 majority of 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 deployed a Modern Slavery questionnaire. The questionnaire was designed to:

- support the identification of modern slavery risks in this segment of our supply chain;
- commence working with suppliers to address these risks;
- improve transparency and understanding; and
- allow both parties to increase awareness of risk factors in the supply chain.

This is our first instance of engaging suppliers on such matters, and we intend to continue this throughout 2022. The outcomes from the questionnaire contributed to our risk assessment and indicated a relatively low level of awareness of modern slavery risks amongst the Corporation's largest suppliers.

Following the risk assessment, the Corporation is in the process of updating 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.

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 2022 include:

- ongoing risk assessment of key suppliers by industry categorisation and geographic location;
- continuing to raise awareness of modern slavery and human trafficking across our supply chain and amongst 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
- developing an ethical procurement policy.

#### **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**

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.

Capstone Finance Limited (CFL) receives deposits from Corporation schools, and pays them interest, while also making loans to Corporation schools for land, buildings and working capital. CFL's external

source of funds is from our banking syndicate. ATC Western Sydney Limited has minimal operations, following the closure of Trades Norwest Anglican Senior College, and will be wound up in due course.

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 Anglican Schools Corporation on 26<sup>th</sup> April 2022.

**Any other relevant information**

Nil

Signed by:

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

Mr Philip Bell OAM

Corporation Chairman

Date:

28<sup>th</sup> April 2022