



Modern Slavery Statement 2020

About Caulfield Grammar School

Founded in 1881, Caulfield Grammar School is a leading independent co-educational day and boarding school, offering Early Learning to Year 12 education.

Located in Australia's Victorian capital of Melbourne, we are a five-campus school with over 3,300 students and more than 1,000 staff (including 400 casual sport coaches supporting our winter, spring and summer programs). Our size and scale allow us to provide an extensive range of broad and balanced programs for our students and employees.

Day-to-day school takes place at a choice of three Melbourne metropolitan campuses: Wheelers Hill, Malvern, and Caulfield. Boarding is offered for Years 9 – 12 at our Caulfield Campus. Our campuses in Yarra Junction (Education Outdoors) and Nanjing, China (Year 9 Internationalism Program) offer immersive learning experiences for students.

We are a purpose-led and values-based school. The health, safety and wellbeing of all members of our School community is central to all our decisions.

Our Purpose.

To enable quality learning every day in every experience for every learner for life.

Our Vision.

To be a leading, internationally recognised, co-educational school fostering responsible global citizens.

Our Values.

Inspired by our Anglican tradition of faith, hope and love, our values drive our behaviour, inform our decisions, shape our perspective and underpin our culture:

- Pursuing Excellence
- Inspiring Creativity
- Thriving Together
- Embracing Diversity
- Living Wholeheartedly

Our School is committed to operating responsibly and establishing and adhering to the highest ethical standards. This is the School's first Modern Slavery Statement.



Structure and Operations

Reporting entity

Caulfield Grammar School ACN 004 170 772 is a company limited by guarantee and incorporated in Australia, with its registered office in St Kilda East, Victoria. The company is registered as a charity with the Australian Charities and Not for Profit Commission. Caulfield Grammar School and its controlled entities during the reporting period 1 January 2020 to 31 December 2020 were Caulfield Grammar School Foundation Limited ACN 005 544 598, Malvern Memorial Grammar School ACN 004 257 532, Caulfield Grammar Supporters' Association Inc ABN 16 782 617 264, CGS Extension Services Pty Ltd ABN 59 056 568 891.

Caulfield Grammar School is the Group's main operating entity and as such is the chief acquirer of goods and services. Caulfield Grammar School is submitting this Modern Slavery Statement as a joint statement on behalf of the Company and its controlled entities and consultation has occurred in the preparation of this Statement.

Structure

The School Council is the governing body of the School. The Principal is responsible for the overall management of the School.

The School Council has been updated on the reporting and compliance requirements under the Modern Slavery Act (Cth).

Operations

The principal/key activities of the School are provision of Kindergarten, Primary and Secondary education.

Risks of Modern Slavery Practices in Our Operations and Supply Chains

Caulfield Grammar School has performed an assessment of its operations and supply chains, including entities that the School controls to evaluate the risk modern slavery practices.

In Our Operations

We believe the risk of modern slavery within operations is low. 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 regulated nature of the sector.

In Our Supply Chain

In assessing the risk of modern slavery practices within our supply chain, several factors were considered including:

- Total contract value
- Product/service category
- Country of manufacture/origin
- 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/transient 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)

Caulfield Grammar School's initial approach to the assessment and addressing of modern slavery risks in 2020 consisted of:

- A review of the School's supply chains to identify where the potential risk of modern slavery practices may exist
- The inclusion of Modern Slavery conditions in the School's standard contract templates
- Easy access to existing Complaints Handling and Whistleblower policies and procedures

The School is committed to implementing the following four-step approach for 2021 and beyond:





1. Risk Assessment

- Development of relevant policies and processes to monitor those suppliers where the risk of modern slavery practices may be present including within the School's procurement practices
- Development of an action plan for how the School will respond to modern slavery risks
- Formalising the responsibility for assessing and responding to modern slavery risks to the School's Risk and Compliance team
- Communicating those mechanisms available to report concerns of modern slavery risks in the School's operations and supply chains

2. Review Policies and Processes

- Publish Modern Slavery policy on the School website
- Review existing policies and processes to ensure alignment with the School's position on modern slavery
- Enhance awareness of modern slavery risks through appropriate training
- Continue to ensure contracts used by the School have modern slavery conditions
- Review, improve and leverage child safe processes and policies

3. Supplier Engagement

- Develop a Modern Slavery Supplier Assessment Questionnaire for current at-risk suppliers to complete
- New suppliers to be assessed and where at risk will be required to complete prior to engagement by the School
- Ongoing consultation and relationship management with suppliers

4. Monitor and Report

- The School will monitor modern slavery risks and its management and report accordingly to the Audit & Compliance Committee and School Council on an annual basis.

This Modern Slavery Statement was approved by School Council on 10 June 2021.

James L B Hayman
President of CGS School Council