



St Philip's
Christian
Education
FOR THE WHOLE OF LIFE

ST PHILIP'S CHRISTIAN EDUCATION FOUNDATION LTD

Modern Slavery *Statement*

2023

1 JANUARY 2023 - 31 DECEMBER 2023

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St Philip's Christian Education Foundation Ltd (ACN 002 919 584) (St Philip's) delivers educational services via early learning centres, primary and secondary schools as well as tertiary education.

St Philip's is structured as an Australian public company, limited by guarantee, and registered with the Australian Charities and Not-for-profits Commission. Its registered office is:

St Philip's Christian College
30 Bridge Street
Waratah NSW 2298

The main operations of St Philip's include the provision of educational services via four Kindergarten to year 12 schools, three special schools, six early learning centres, four before and after school / vacation programs.

St Philip's operations also include the facilitation of tertiary education, in conjunction with a recognised tertiary education provider, for the preparation of future teachers.

As of 30 December 2023, St Philip's employed approximately 889 permanent staff to carry out its operations.

Our Group Structure

Over four decades, we've continued to challenge ourselves to step forward and carve new paths; to explore and create better ways forward in education; and to equip students with holistic foundations, embedded in Christian values.

From humble beginnings in 1982, the St Philip's group today consists of four K-12 co-ed colleges, six early learning centres, four special schools, two young parents' colleges, a tertiary training sector, an outside of school hours academy and an Aboriginal school. With 5,000 students and 889 staff, the St Philip's group leads the way in Whole of Life education across the Newcastle, Central Coast and Hunter Regions.

Central Office

CENTRAL OFFICE, BOARD & BOARD GROUP COMMITTEES

EARLY LEARNING



Narnia Early Learning
FOR THE WHOLE OF LIFE

COLLEGES



St Philip's Christian College
FOR THE WHOLE OF LIFE

TAILORED EDUCATION



Young Parents College
FOR THE WHOLE OF LIFE



Dynamic Learning College
FOR THE WHOLE OF LIFE



Saints Academy
FOR THE WHOLE OF LIFE



Gilibaa
FOR THE WHOLE OF LIFE

TERTIARY EDUCATION



Teaching School
FOR THE WHOLE OF LIFE

Leap Year

Governance

The Board of Directors is responsible for the governance and management of SPCEF. The Board, while retaining ultimate responsibility, may delegate responsibilities to the CEO, Deputy CEO, CFO, Principals or Heads of Entities, sub-committees or another person or persons as it sees fit. Attached to the right to delegate, the Board has a responsibility to ensure that delegations are being carried out within the requirements of statute and common law and the organisation's own policies.

Board Engagement

The SPCEF board is provided with a progress report through the CEO's Board Report, with information provided from the Deputy CFO, in relation to our operational HR practices, with information provided from the Director of People & Culture, including our annual Modern Slavery Statement.

ST PHILIP'S OPERATES IN NEW SOUTH WALES, AUSTRALIA.

- Arrangements with suppliers are both short-term and part of longer-term relationships. Many of these latter relationships have been stable for many years
- St Philip's has a revenue sharing arrangement with The School Locker in the provision of school uniforms and I.T. to schools and early learning centres

ST PHILIP'S PROCURES GOODS ACROSS SEVERAL BROAD PROCUREMENT CATEGORIES, INCLUDING:

- Facilities management (including cleaning, security, landscaping, plant and equipment maintenance and inspections)
- Food and catering products
- Utilities
- Office, classroom and playground equipment
- Office supplies (including books and stationery)
- Phones, computers and other technological devices
- Technological software
- Textiles (school uniforms)
- Building and property development
- Professional services



Risks of Modern Slavery Practices

St Philip's has initiated a framework to ensure all obligations are met in accordance with our Modern Slavery Policy. An assessment of its operations and supply chains was initiated, including the entities that the organisation controls, to evaluate the risk of modern slavery practices. This assessment has now been incorporated into the planning for the College's progressive risk mitigation strategy and actions.

In Our Operations

Based on this assessment, we identify a low risk of modern slavery in our operations. Our organisation has strong employment policies based on the existing Australian employment laws, awards and other regulations within the sector.

Our schools seek to give our students the opportunity to look beyond themselves and participate in service-learning opportunities to remote Australian communities as well as overseas.

In Our Supply Chain

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

- Geography
- Industry practices
- Labour status

Based on the factors above, we identify that modern slavery risks may exist in the following areas within our supply chain.

SUPPLY CHAIN	POTENTIAL MODERN SLAVERY RISK
Cleaning Services	Migrant workers with poor employment condition/workers' rights and compensation/debt-bondage situation with the employer (SPCEF (St Phillip's Christian Education Foundation) external contractor)
Food Services	Food products in the cafeteria that are sourced from high-risk countries with histories of poor labour legislations and practices (rice, chocolate etc.)
ICT	Goods and equipment produced in factories in countries with histories of poor labour legislations and practices
Uniform	Goods and equipment produced in factories in countries with histories of poor labour legislations and practices (SPCEF external contractor)
Capital Works Development	Goods and equipment produced in factories in countries with histories of poor labour legislations and practices and workers with poor employment condition/workers' rights and compensation/debt-bondage situation with the employer (SPCEF external contractor)
Grounds & Building Maintenance	Goods and equipment produced in factories in countries with histories of poor labour legislations and practices and workers with poor employment condition/workers' rights and compensation/debt-bondage situation with the employer (SPCEF external contractor)

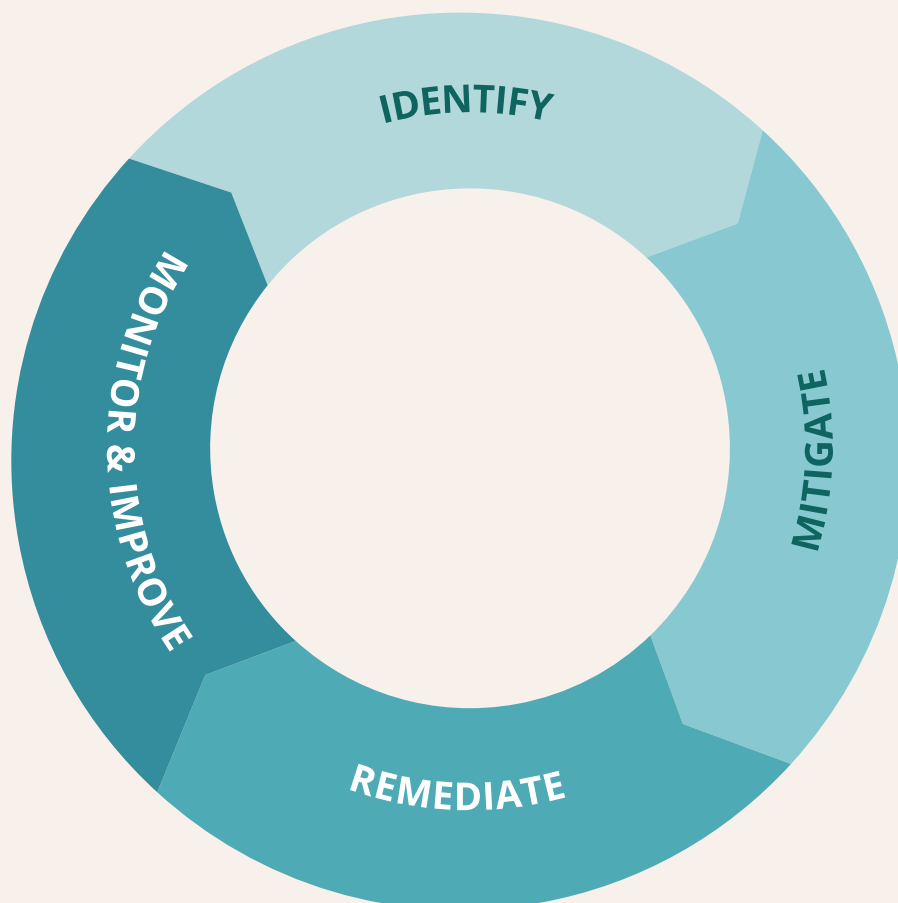
St Philip's considers there is a relatively low risk of it causing, or contributing to, modern slavery in its operations and supply chains.

As an Australian provider of educational services, St Philip's Christian Education Foundation considers its operations and supply chain to be simple in comparison to many other industries. St Philip's employs most of its staff directly on permanent contracts and is not directly involved in overseas labour or manufacturing.

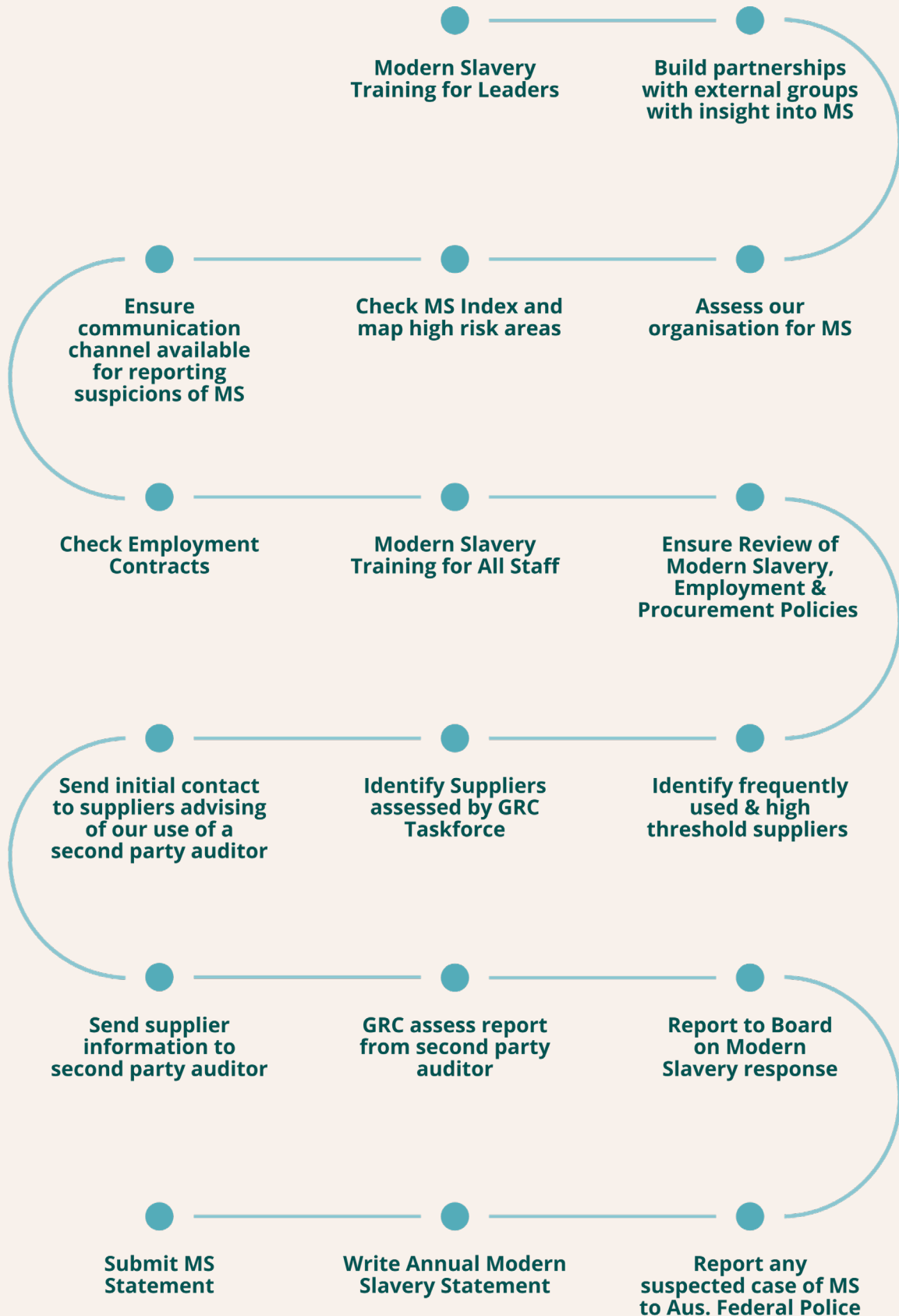
St Philip's recognises there is risk of it being indirectly linked to modern slavery, as our suppliers may source products or raw materials from overseas companies connected with modern slavery.

Risk Identification & Mitigation

AN OVERVIEW OF OUR APPROACH TO RISK IDENTIFICATION AND MITIGATION



Modern Slavery Flowchart



Actions Assessed & Addressed

Steps taken in 2023

St Philip's endeavoured to undertake several actions to assess and address the risks of modern slavery throughout its operations and supply chains during the 2023 calendar year. Including, but not limited to:

- Developed a Modern Slavery Policy and Framework
- Identified high risk industries and regions;
- Screened frequently used and high threshold suppliers for modern slavery risks
- Initiated regular meetings with the Governance, Risk & Compliance working group who are responsible for assessing and addressing any identified modern slavery risks
- Undertook an investigation of software products to assist in supplier checks
- Identified staff undertook Modern Slavery Awareness training
- The Board was addressed regarding the development of the Modern Slavery Statement.
- Business Managers were addressed regarding the initiation of supplier checks for modern slavery

Steps being taken in 2024

St Philip's will endeavour to undertake actions to assess and address the risks of modern slavery throughout its operations and supply chains. Including, but are not limited to:

- Identify high risk industries and regions
- Screen frequently used and high threshold suppliers for modern slavery risks
- Assess medium and low risk suppliers for modern slavery risks;
- Map operations and supply chains
- Regularly meet with the Governance, Risk & Compliance working group to assess modern slavery reports and address any identified modern slavery risks
- Purchase external software for supply verification and management
- Initiate requests for information from frequently used and high threshold suppliers
- Modern Slavery Awareness for Managers training for executive leadership teams
- Develop Modern Slavery Awareness training module for all staff
- Notify all staff of their responsibilities in regards to modern slavery
- Develop a communication channel for reporting suspicions of modern slavery
- Ending business relationships with entities identified as causing risk
- Building partnerships with business peers, community groups and industry bodies to improve understanding modern slavery risks
- Consistently reviewing supplier information to identify any possible modern slavery risks
- Update Employment Policy and Procurement Policy to include and address modern slavery

St Philip's recognises that a multi-stage approach is needed to mitigate any potential modern slavery risk and related issues within our operations and supply chain.

Modern Slavery Roadmap

IDENTIFY

1	2	3	4
Map SPCEF activities, locations and relationships to consider risk of modern slavery in operations.	Map supply chain at a high level to determine highest risk providers.	Identify other tiers of suppliers based on risk priority.	SPCEF assess and disclose the risk of modern slavery in its operations and supply chain.

MITIGATE

1	2	3	4
Review policies and processes to strengthen governance and controls around high risk areas.	Introduce measures to address gaps in supply chains.	Ensure training is undertaken and an awareness of MS for SPCEF.	Consider more fundamental organisational model changes.

REMEDiate

1	2	3	4
Focus on safety and wellbeing of staff.	Utilise other industry and NGO collaborations.	Inform Board as required.	Inform authorities as appropriate.

MONITOR & IMPROVE

1	2	3	4
Ensure risks are present on Risk Management Framework.	Determine how effectiveness of measures will be monitored.	Disclose the actions taken to assess and address the risks, including due diligence and remediation.	Undertake annual Modern Slavery report to describe how SPCEF is assessing the effectiveness of its actions.

Effectiveness of Actions to Assess & Address Risks

St Philip's is committed to continuously improving its systems and processes to effectively assess and address modern slavery risks in an efficient manner. To meet our obligations, St Philip's has instituted the following.

For the identification and planning stage, we are relying on previous policy records, documents, and consultation with key personnel to ensure practicable compliant policies can be developed for the school. We will develop modern slavery risk reporting mechanisms to ensure the effective implementation and monitoring stage.

The People, Governance & Risk committee has been assigned to prepare and guide the process of development, implementation and control of modern slavery risk mitigation. This group will report directly to the board on content and progress.

St Philip's will endeavour to:

- Set up an annual senior management review of St Philip's actions, including;
 - » Review of recruitment
 - » Review of employment contracts and wages
 - » Review supplier reports
 - » Review of any reported instances of modern slavery
 - » Review Modern Slavery, Employment & Procurement Policies regularly
- Ensure modern slavery training is undertaken;
- Ensure staff awareness of communication channel for reporting suspicions of modern slavery;
- Conduct internal audits/monitoring actions;
- Record the actions taken and track their impact;
- Keep up to date with trends in modern slavery risks and how cases are handled;

Consultation Process

St Philip's Christian Education Foundation Ltd consulted with each of the entities identified and surveyed current procurement practices. This Modern Slavery Statement was approved by the Board of Directors of SPCEF on 27 June 2024.

Signed the 28th day of June 2024.

Signed by: Brian Weld

Position: Deputy Chief Financial Officer



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