

**MODERN
SLAVERY
STATEMENT
2021**

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MODERN SLAVERY STATEMENT 2021

Introduction

Within the pages of this report, you will recognize a valiant attempt from the thirteen Kildare Ministries entities to increase their knowledge and understanding of the complex issues that surround Modern Day Slavery, particularly the trafficking of humans. Our vision and mission drive our work. In our Vision we state, *Kildare Ministries is a community where all people are valued, where all creation is recognised as sacred and where hope, justice and courage are our hallmarks.* This is supported by our Mission which states, *responding to the changing needs of our world, we strive to build inclusive communities through the provision of education and community works.* Further, the *Living Justice Living Peace* Charter which provides a framework for each of our ministries, challenges our communities to seek justice so that we can all live in peace for without justice there is no peace.

The Leadership of our schools have for some time been mindful of the need to ensure that services they engage are not connected to modern day slavery. The concentrated focus of this over these last few years has ensured a more consistent approach across all schools, in 2022 there will be one Kildare Ministries policy uniting us in the same cause.

The three community works that serve the most marginalised are aware of the effects and consequences suffered by victims of modern-day slavery. They provide a vital link to recovery and healing and can scaffold a support structure that enables those affected by slavery practices, to feel they are engaged members of the society.

Kildare Ministries welcomes the opportunity to reflect and analyze our own beliefs, practices and knowledge related to Modern Day Slavery. In 2021 the focus has been on the management of well-known risk factors like supplier risk identification and engagement and employee awareness.

Kildare Ministries is committed to this work and to learning more, questioning more and taking more action so that our work for Justice is also a step closer to Living in Peace.



Erica Pegorer
Executive Director

EXECUTIVE SUMMARY

This statement is published to address Kildare Ministries' (KM) reporting obligations under the Modern Slavery Act 2018 (the Act) and is KM's first statement under the Modern Slavery Act 2018 (Cth). This Statement is prepared as a single reporting entity and includes KM's controlled entities. Kildare Education Ministries (KEM) published its first statement for 2020 but has now been included as a controlled entity under Kildare Ministries and therefore forms part of this report.

Kildare Ministries has zero tolerance to modern slavery and human trafficking within our operations, business and supply chains. We are committed to ethical and responsible conduct within our operations and to improving the communities where we live and work. We respect the human rights of all our people and those we work alongside, in both our supply chains and the communities in which we operate. Kildare Ministries is committed to the safety of all children and adults at risk; promoting the safety, wellbeing and inclusion of all.

This statement summarises the steps taken by KM and its controlled entities to identify, mitigate and manage some of the risks of modern slavery in our operations and supply chains during the financial year ending 31 December 2021 (Reporting Period). We are committed to continuous improvement in our practices in order to combat modern slavery in subsequent reporting periods too. We seek to engage with partners who respect and uphold the human rights of others.

2021 Modern Slavery Risk Management Initiatives



Modern Slavery Action Plan

An action plan was created to identify risk, actions, governance, timeframes, and reporting as a process of continuous improvement. A Modern Slavery Policy was drafted as part of this plan.



Supplier Risk Identification

Suppliers were analysed and some of those with the highest risks were targeted for action in 2021.



Supplier Engagement

We worked with suppliers to create awareness on how modern slavery occurs. Links to training were provided.



Employee Awareness

Modern Slavery awareness training was provided to Boards & staff across the ministries. They shared this knowledge in their own ministries, creating their own initiatives to combat modern slavery.



SECTION ONE: COVERED ENTITIES

Section 16(1)(a) of the Modern Slavery Act 2018 requires modern slavery statements to identify the reporting entity or entities covered by the statement. This section of the statement addresses this criterion by providing an overview of which entities are covered by the statement.

Kildare Ministries comprises 10 schools and 3 community works.

- Clonard College Herne Hill, VIC
- Kilbreda College Mentone, VIC
- Kildare College Holden Hill, SA
- Brigidine College, QLD
- Killester College Springvale, VIC
- Marian College Ararat, VIC
- Marian College Sunshine West, VIC
- Star of the Sea College, VIC
- St Joseph's College Echuca, VIC
- Brigidine College, NSW
- Presentation Family Centre, VIC
- Brigidine Asylum Seeker Project, VIC
- Wellsprings for Women, VIC



Marian College
Ararat



Clonard College
Geelong



Star of the Sea
Brighton



Brigidine College
Indooroopilly



St Joseph's College
Echuca



Killester College
Springvale



Kildare College
Holden Hill



Marian College
Sunshine West



Kilbreda College
Mentone



Brigidine College
St Ives



Presentation Family Centre
Balnarring



Wellsprings for Women
Dandenong



Brigidine Asylum Seeker Project

This statement covers the activities of Kildare Ministries and its controlled entities listed above. Kildare Ministries had a consolidated revenue of \$193,741,109 (2021).

SECTION TWO: STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Section 16(1)(b) of the Modern Slavery Act 2018 requires modern slavery statements to describe the structure, operations and supply chains of the reporting entity. This section outlines Kildare Ministries' structure, operations and identified supply chains.

Kildare Ministries comprises the educational and community works formerly governed by the Brigidine Congregation, NSW Province, Brigidine Congregation, Victorian Province and the Presentation Congregation of Victoria. Kildare Ministries offers secondary school education in Victoria, New South Wales, South Australia and Queensland, as well as community services within an inclusive and socially just context. It attempts to nurture a vision of life in which the belief in the dignity of each individual, characterised by personal integrity and compassion, informs thinking and action and enables all to take their rightful place in Church and society. The Vision, Mission and Values of Kildare Ministries are based on the Catholic social teaching which recognises the dignity of the human being and are articulated as follows:



2021 saw a new strategic plan being drawn up for Kildare Ministries with a refreshed set of values to guide our behaviour. Below is an excerpt of the plan which will guide our work in combating Modern Slavery.

As enablers of justice and faced with a world that is indifferent, we will work to be prophetic voices of hope, peace, justice and love.

	Theme We wish to address:	Strategy We will do this by:-
Living with Compassion	Our common humanity and sacred dignity compel us to embrace those suffering and disempowered	Continuing to build inclusive communities by challenging behaviour and attitudes that divide us and by strengthening our advocacy for the marginalised
Leading with Courage	Mission governance and leadership in our ministries and church takes discernment, courage and resilience	Applying frameworks for governance and leadership that encourage examination of practices and attitudes towards Living Justice: Living Peace Enabling future leaders in mission through learning, opportunity and experiences

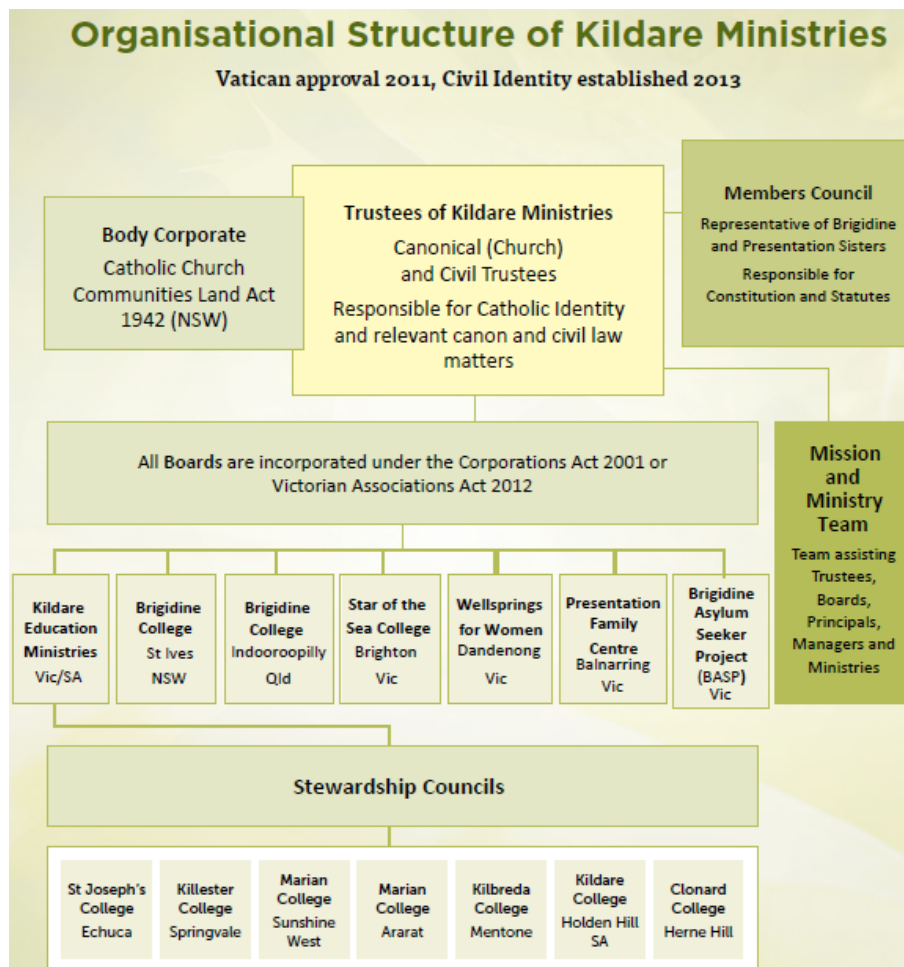
The Kildare Ministries Living Justice Living Peace Charter embodies a community that values human dignity and strives for the common good of all creation. The Charter seeks to develop an active, discerning community that speaks out against injustice through action.

All Kildare Ministries' entities are united in the belief that action against modern slavery is fundamental to the Catholic Social Teaching.

Governance of Kildare Ministries

Kildare Ministries operate as a Public Juridic Person (PJP) established in 2011 by decree of the Holy See. Kildare Ministries has both canonical (Catholic Church) and civil authority to conduct its ministries according to its approved constitution and statutes. The Trustees of Kildare Ministries, appointed by the Members Council, are responsible for protecting and assuring fidelity to the mission and preserving property for the purpose of the ministries.

The following diagram outlines the current structure of Kildare Ministries:



Kildare Ministries key operations and associated supply chains

Our operations and activities are conducted wholly within Australia. As primarily educational and service-based institutions, the key element of our expenditure is payment to teaching and support staff whose salaries and employment related costs represented 66% of our turnover in 2021. Most of our school staff are employed directly by the schools and wages are paid in accordance with the respective Enterprise Agreements. Some of our staff are also members of the Independent Education Union (IEU), which has within it, provision for staff consultation on matters related to workload issues amongst other things.

Mapping operations and supply chains is a significant exercise and was largely carried out in the Kildare Education Ministries schools in 2021. The decision to consolidate the reporting of the entire Kildare Ministries group was made in 2021. As a result, some data collected is partial and will be captured more fully on the 2022 report. This, together with the pressures of the pandemic on the schools, didn't allow for the targeted group-wide approach to be addressed as planned.

School and community works operations require services and supplies that have the potential for modern slavery. Prior to recent knowledge about modern slavery in Australia, Kildare Ministries engaged with its suppliers on the assumption that workers in these supply chains are not exploited. We have begun to test this assumption in 2021 by interrogating the supply chains of goods and services procured.

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 high-risk areas in Kildare Ministries' operations and supply chains

Investigation in 2020 for the KEM schools identified the potential for high slavery risk across the following supply chain areas which are largely applicable to the other schools in the KM group and some areas of the community works too. We have commenced discussions with the targeted supplier groups who have 2nd and 3rd tier supply chains stretching across multiple countries.

- Technology – Forced labour, debt bondage, child labour and other slavery in electronics supply chain including child cobalt mining labour in Congo (source: Modern Slavery Risk Map).
- Outsourcing – trafficking and debt bondage of contract workers by labour hire companies, use of migrant & low skilled workers in handling hazardous jobs with significant WHS risks.
 - Cleaning & waste management services
 - IT services
 - Maintenance
 - Security Services
 - Temporary / Casual relief staff hired externally.
- Canteen & food production – forced labour, debt bondage and child labour in food and beverage supply chains.
- Office consumables and promotional material - Forced labour, debt bondage, child labour and other slavery. This is a product-based risk from items largely produced in

China & Malaysia where the commodity risk is high. (source: Modern Slavery Risk Map).

- Other equipment - The construction of assets overseas (e.g., photocopiers) may involve workers subjected to modern slavery and may involve raw materials that could have been produced using modern slavery.
- School and Sports uniforms & equipment – Forced labour and debt bondage in clothing and equipment supply chains.
- Building and construction – Forced labour and debt bondage: Building materials, sub-contracting and labour hire services. Labour hire and complex layers of subcontracting are characteristics of many Australian building sites.
- Investments – some indirect investments in emerging economies in Africa, Eastern Europe and Asia may have elevated modern slavery risks.
- There is a risk of forced marriage linked to the age group of students in the schools.

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.

In the 2021 reporting period, Kildare Ministries created **awareness** about the Modern Slavery Act (2018) with the Trustees, Boards of Directors, Key Management Personnel, staff and students. The team from Australian Catholic Religious Against Trafficking in Humans (ACRATH) assisted in the presentations, bringing to life some of the real examples from Australia and around the world. Detailed discussions were held about the various forms of slavery such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. This served as a reminder to the KEM schools where the work commenced in 2020 and continued with a stronger focus on Supplier Engagement in 2021.

The dates below are where Modern Slavery was addressed at various group meetings.

KEM Board Meeting (25th March)

KEM Board Meeting (9th September 2021)

2021 KEM AGM (17th June)

KEM Finance and Audit Committee meeting (3rd June 2021)

KM Finance and Audit Committee meeting (9th March 2021)

KEM Principals' meeting (16th June 2021)

KEM Principals' meeting (1st September 2021)

KEM Business Managers (26th March 2021)

KEM Business Managers (24th August 2021)

KM group Business Managers (18th June 2021)

KM group Business Managers (12th November 2021)

Trustees of KM meeting (14th – 15th September 2021)

Trustees of KM meeting (7th-8th February 2022)

Chairs of Boards network meeting (16th July 2021)

The KM group adopted a **zero-tolerance** approach to modern slavery and a strong commitment to act ethically, ensuring effective systems and controls are in place to prevent any form of modern slavery in our own schools or supply chains. A Modern Slavery Policy was approved by the KEM Board in 2021 and rolled out in the KEM schools. A policy for TKM was drafted and is in the process of approval by the Trustees, ready for adoption in 2022.

It was recommended that supplier contracts must contain an **anti-slavery clause** stating the seller warrants that it shall comply, and ensure that its sub-contractors comply, with all applicable wage, anti-slavery and human trafficking laws and shall not engage in human trafficking or use child or forced labour in connection with its supply of products and/or services or its performance of this contract. The seller shall notify the school or community works as soon as it becomes aware of any actual or suspected slavery, child or forced labour, or human trafficking in its supply chain which has a connection with the contract.

The KEM **Delegation of Authority guidelines** were updated to require Business Managers to act in accordance with the KEM Modern Slavery Policy in high-risk procurement areas. The other schools and community works will be encouraged to do the same.

Discussions were held with **Investment** Managers in regard to processes they have in place to identify and report on Modern Slavery risk in their investments. Work is ongoing and will continue into 2022.

Employee awareness creation has included:

- The presentations by ACRATH focused on the culture shift encouraged by the Australian Modern Slavery Act (2018).
- The Pope's message stating we are all responsible for ending Modern Slavery. 'It is the responsibility of all to denounce these injustices and to firmly oppose this shameful crime.'
- Creating awareness of where there is potential for Modern Slavery in our supply chains.
- Attention drawn to the contribution each person can make towards creating awareness of modern slavery and examining its purchasing and employment practices.
- Introduction to the MSA (2018) reporting requirements.
- Awareness-raising of the Kildare Ministries Modern Slavery Policy across the entity
- Action plan for 2021 including the recommendation to include a Modern Slavery clause in new contracts (see further details in Annexure 1 below).
- Detailed Supplier Engagement guidelines created for Business Managers and Procurement Officers (see annexure 11).
- Workshops conducted with Business Managers and Risk Coordinators to inform them of processes and action plans needed.
- Guidelines provided on different types of Modern Slavery relevant to business settings.

Supplier Risk Identification

Guidance was provided on how to conduct supplier risk assessments at an individual school level. At a group level, we analysed our supply chains and highlighted some we considered higher risk. The following categories were targeted for action in 2021. Issues with Covid and lack of resources prevented a complete analysis of all supplier groups being conducted. Building contractors and other contract work required by the entities will be reviewed in 2022.

- ✓ Uniforms
- ✓ Sports equipment
- ✓ Sub-contractors within employment practices – includes casual staff, canteen, cleaning, or staff engaged in maintenance sub-contracts, builders etc.

Supplier due diligence

- Incorporating anti-modern slavery practice clauses in standard supplier contracts which require our suppliers to give assurance that action is being taken.
- Ensure that all labour hire companies KM engages are licensed by the Victorian Labour Hire Authority or its equivalent elsewhere in Australia.
- Initiating supplier surveys to collect data on modern slavery risks.
- Processes for supplier onboarding and the approval of new suppliers.
- It was recommended a link to an educational video '<https://vimeo.com/324750931>' from 'Be Slavery Free' be included as a prerequisite for suppliers to acknowledge their understanding of the severity of the issue prior to signing a contract with the school.
- Whistle-blower program.
- For contracted labour hire it was recommended that physical verification of police and working with children's checks, obtaining verbal references, and looking for signs of forced labour through discussions be conducted. Verifying new employee (especially migrant workers) details such as encouraging bank accounts to be in their own name and checking to ensure a labour hire fee was not paid to the recruitment agency etc. was also advised.

Awareness creation and action in the schools

- ACRATH guided learning – some schools have incorporated units in their Religious education curriculum based on materials provided by ACRATH focusing on Human Trafficking (including forced marriage).
- Fundraising for the work of ACRATH & raising awareness about Human Trafficking through this initiative.
- Easter Egg promotion - buy Fair Trade. Students are encouraged to buy Fair Trade Products in the lead up to Easter. Information is shared in House assemblies, in the newsletter, and at the whole school assembly.
- Signage in some staffrooms encouraging purchase of fairtrade/slavery free products.
- Modern Slavery Training Module introduced in some schools.
- A school newsletter featured Modern Slavery as its main focus in order to create awareness about the Act and what we can do, linking with the KM Living Justice Charter and Principals of Catholic Social Teaching. Staff were provided with a copy of the KEM Modern Slavery Statement as well.

Roadmap for 2022 and beyond

- Review and update our modern slavery risk framework.
- Broaden the scope of our supplier risk assessment to include other products and services.

- Improve supplier monitoring via desktop audit checklists and conversations.
- In-depth analysis of the tiers in our supply chains and related risks of modern slavery
- Introduce a group supplier code of conduct.
- Develop a response protocol which sets out processes for each school to follow in the event of identifying Modern Slavery in the Supply Chain of a supplier. The response protocol will highlight the importance of acting in the best interests of survivors and the obligations to address any harm they identify was caused or contributed to by their actions.
- Asking suppliers to provide evidence of grievance mechanisms in the companies in source countries within the supply chain and that worker voice is heard.
- Develop a modern slavery training module for all new staff as part of their mandatory learning.
- Continue to engage with Investment Advisors to discuss their processes for managing modern slavery risks.
- Improve governance and reporting by:
 - Developing mechanisms to monitor effectiveness and include modern slavery reporting as part of the annual assurance and attestation processes with schools and community works
 - Gap analysis will be conducted to identify any gaps in processes which will assist in our continuous improvement focus
 - Evidence based reviews will be conducted where practical
 - Include periodic reports to the Risk and Audit committees, Boards and Trustees.
- Evaluate mechanisms, such as external whistle-blower contacts.
- Formalise the Modern Slavery Working Group which includes school Business Managers, Risk & Compliance Managers and Faith & Justice leaders. They will take leadership in the procurement and general education aspects of the modern slavery work.

Remediation

Kildare Ministries hopes that through our continuous monitoring and oversight of supplier activity, and work with suppliers to ensure there is follow through on action plans and compliance with requirements, they will actively manage and respond to identified slavery risks. We will work with suppliers to ensure continuous improvement in the working conditions of survivors.

When suspicions of modern slavery practices come to our attention through whistle-blower or other channels, KM staff will contact relevant law enforcement agencies

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

Kildare Ministries recognises the importance of developing a clear reporting framework to measure the effectiveness of our modern slavery risk assessment, addressing said risk and continuous improvement in processes and practices.

We continued to measure our approach and develop work already commenced in KEM and introduce these practices across the rest of the group in 2021.

Policy commitment and Modern slavery due diligence were of particular focus during the year.

During the reporting period, effectiveness was assessed through our governance process by engagement with our Boards, Principals, Business Managers, Risk & Compliance Managers and Faith & Justice leaders.

We recognise there is more to be done in the development of a more reliable Risk Management Framework and a better assessment mechanism to ensure the effectiveness of controls and actions.

We will continue to review our modern slavery risks as part of our overall risk management framework.

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.

During the reporting period, KM worked closely with the ten schools and engaged with the community works to create further awareness and assess and address modern slavery risks. The various meetings at which these discussions took place are listed in section four above. The discussions influenced the drafting of KM's Modern Slavery Policy. Continuous discussions are being held with the schools on creating action plans to achieve the KM group objective of eliminating modern slavery from our supply chains.

As part of these discussions, advice has been sought from organisations such as ACRATH. Resources have been widely researched and useful tools identified to assist in the development of a risk management framework for KM. Work done by ACAN and others in the Education Sector, the Australian Border Forces Website, Be Slavery Free and Melbourne Archdiocese Catholic Schools (MACS) have been considered. The key learnings from these areas will be shared with the group and our living action plan enhanced as a part of our continuous endeavour for improvement.

In our schools, members of the College Executive/Leadership actively give witness to the role of justice. All documentation demonstrates a commitment to justice. Staff role descriptions explicitly indicate a commitment to the Living Justice and Living Peace Charter. Structured processes are in place to ensure appropriate dissemination of information amongst staff and the community.

Every staff member is an enabler of justice. Justice is incorporated into every curriculum area through the use of social justice themes. Co-curricular justice programs are integrated and aligned with the whole school approach to justice education. Programmes are rigorous, strategically planned and allow sufficient time for the development of skills to address issues of injustice and to bring student voice to them. The curriculum is regularly reviewed in consultation with staff and students to include current issues and student voice.

SECTION SEVEN: ANY OTHER RELEVANT INFORMATION

COVID19 Impact

We acknowledge that the COVID-19 pandemic may have increased the vulnerability of those within our operations and supply chains. The pandemic has led to unprecedented and unanticipated pressures on businesses and communities worldwide.

We did not have to take any drastic action in relation to our operations or supply agreements as a result of the COVID-19 pandemic. We therefore did not filter down pressure upon our own workers or suppliers or other businesses. We will continue to support our suppliers throughout these troubled times, and we remain committed in continuing to identify and address the risks of modern slavery in our operations and supply chains.

Other challenges

Among the challenges faced by KM are the potential short-term impacts on finances driven by having to pay higher prices for ethically sourced products. Also, the requirement to identify modern slavery risks in our supply and chains, dive into the many tiers within these supply chains and closely work with the suppliers, will put a strain on the very limited resources in the procurement and finance areas of the schools. These challenges will need to be managed.

This statement for Trustees of Kildare Ministries was approved by the Trustees of Kildare Ministries as the parent entity on 14th June 2022.

This statement is signed by Rosemary Copeland and Kathy McEvoy in their roles as Co-Chairs on 28th June 2022.



Rosemary Copeland

28th June 2022



Kathy McEvoy

28th June 2022