

### **Modern Slavery Statement**

Kambala was founded in 1887 and is one of Australia's leading independent girls' schools, situated in the eastern suburbs of Sydney on a beautiful site overlooking the Harbour.

Kambala's student body encompasses students enrolled from Hampshire House (early learning centre) to girls completing the Year 12 Higher School Certificate (HSC) and International Baccalaureate (IB) Diploma.

Hampshire House is licensed for 68 students (boys and girls) per day and caters for babies from six months through to school age. The main school commences for girls only in Preparation (four year old entry) and continues to Year 12. Preparation to Year 12 has an enrolment of 1,009 girls, 610 of whom are in the Secondary School.

#### About Kambala

The vast majority of day students live within a 10 kilometre radius of the School. The Boarding community is mostly made up of students from rural and regional NSW, with a small number coming from overseas and other parts of Australia.

A vibrant learning community, Kambala is dedicated to—and passionate about—the education of girls. Educational excellence is combined with a holistic approach to intellectual, social, emotional and spiritual development. Our Christian tradition affirms the worth of each individual and underpins our School Values of *Humanity, Courage, Curiosity* and *Respect*.

Kambala's turnover is under the Commonwealth Modern Slavery reporting threshold of \$100 million however Kambala is committed to operating responsibly and establishing and adhering to the highest ethical standards and so the School wishes to voluntarily comply with the requirements of the Modern Slavery scheme. This is the School's first Modern Slavery Statement.

#### Reporting entity

Kambala ACN 000016811 and ABN 32000016811 is a company limited by guarantee and incorporated in Australia, with its registered office in Rose Bay, New South Wales. The company is registered as a charity with the Australian Charities and Not for Profit commission. Kambala is a single reporting entity.

#### Structure

# Structure and Operations

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 2018 (Cth).

#### **Operations**

The principal/key activities of the School are provision of early childhood, primary and secondary education.

Kambala has performed an assessment of its operations and supply chains to evaluate the risk modern slavery practices.

#### In Our Operations

Risks of Modern Slavery Practices in Our Operations and Supply

**Chains** 

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 multi-enterprise agreements that specify staff salaries and entitlements. In addition the education sector is highly regulated and the majority of our suppliers are Australian Based.

#### In Our Supply Chain

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

- total contract value
- sector and industry risks
- product and services risk
- country of origin (geographic risk)
- supply chain risk

Supply Chain	Risk of Modern Slavery
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.

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.
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.  Food may be from suppliers who engage individuals working in poor and unlawful conditions.
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 be a result of individuals working in poor and unlawful conditions
Maintenance services	Work may be subcontracted to third parties resulting in the exploitation of subcontractors.  The manufacture of maintenance and building supplies may be a result of individuals working in poor and unlawful conditions.
Stationery, sporting and musical equipment	The manufacture of these goods may be a result of individuals working in poor and unlawful conditions.

### Transport services

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.

Kambala's initial approach to the assessment and addressing of modern slavery risks in 2021 consisted of:

- A high level review of the School's supply chains to identify where the potential risk of modern slavery practices may exist
- Easy access to existing Complaints Handling and Whistleblower policies and procedures via the Your Call service

The School is committed to implementing the following for 2022/23 and beyond:

### Our Approach to Modern Slavery (Actions & Effectiveness)

- Publish Modern Slavery policy on the School website
- The inclusion of Modern Slavery conditions in the School's standard contract templates
- 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 a questionnaire prior to engagement by the School
- Communicating those mechanisms available to report concerns of modern slavery risks in the School's operations and supply chains
- The School will monitor modern slavery risks and its management and report accordingly to the Finance, Audit & Risk Committee and School Council on an annual basis.

# Council endorsement

This Modern Slavery Statement was approved by School Council on 19 September 2022. This statement has not been formally submitted to Australian Border Force as a voluntary statement but has been published on the School's website to demonstrate the school's commitment to adhering to the highest ethical standards.

Ainslie van Onselen

Council President