



# MODERN SLAVERY STATEMENT

June 2021

## Introduction

This Modern Slavery Statement is submitted on behalf of Haileybury (ABN 34 004 228 906), under section 13 of the *Modern Slavery Act 2018 (Cth)*(MSA) to cover our first reporting period of 1 January 2020 – 31 December 2020.

## About Us

With 130 years of history, Haileybury is one of the leading independent schools in Australia and the Asia-Pacific region with campuses in Keysborough, Brighton, Berwick, Melbourne (City) and (through a subsidiary) Darwin, and associated educational delivery in Asia in China, Vietnam, the Philippines and Timor-Leste. The School is recognised for its outstanding academic achievements and broad range of co-curricular activities. Learning is based on the different learning styles of students, and on their gender, age, interests and potential.

Haileybury's mission is to develop high-achieving students, connected globally, to each other, and to the communities in which they live and which they will serve.

The School is strongly committed to principles of fairness, equity and human rights. We believe we have a shared responsibility to contribute to positive social change both locally and globally.

Haileybury has three wholly-owned subsidiaries none of which is a reporting entity for purposes of the MSA. These are as follows: Haileybury Foundation (ABN 70 142 288 346), Haileybury International (ABN 80 159 734 193) and Haileybury Rendall School (ABN 84 325 837 304).

This statement extends to the activities and operations of Haileybury and its above-mentioned subsidiaries.

Haileybury 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

As mentioned above, Haileybury is an independent School for girls and boys with campuses in Keysborough, Brighton, Berwick, and Melbourne (City). Haileybury has three subsidiaries being Haileybury Foundation, Haileybury International and Haileybury Rendall School, which is based in Darwin. None of these subsidiaries meets the reporting threshold under the MSA.

Haileybury is registered as a charity with the Australian Charities and Not-for-profits Commission and is governed by a board of directors known as its Council, comprising non-executive volunteers. The CEO | Principal, supported by the Chief Operating Officer and Senior Executive Team, is responsible for the day to day management and operations of the School and its subsidiaries.

The principal activity of the School operations in Australia is provision of kindergarten, primary and secondary education.

Schooling is provided in Tianjin, China under the Haileybury name, but Haileybury does not have a majority interest in these schools, nor does it control them. Haileybury Senior School Tianjin



is a boarding school for Chinese students from Y10 to Y12. Haileybury has a non-controlling share in a joint venture company in China. That company has a Management Agreement with Haileybury Senior School Tianjin. Another school, Tianjin Haileybury Elite International School, which is neither owned nor controlled by Haileybury, is a Years 1-9 Chinese School that leases facilities and shares some staff with Haileybury Senior School Tianjin.

Haileybury has two out of five members on the joint venture company board. Haileybury Senior School Tianjin is neither majority owned nor controlled by Haileybury and its board is made up entirely of Chinese citizens, none of whom is connected to Haileybury.

Notwithstanding the fact that Haileybury does not control Haileybury Senior School Tianjin within the meaning of the Australian *Modern Slavery Act*, Haileybury recognises that it has an interest in the school, given it is a part of Haileybury's investments. Haileybury is working to understand, assess and address any risks which may be present within the operations and supply chains of the Chinese school.

## Supply Chains

Haileybury procures goods and services from a wide range of industries.

Goods and services that we procure fall primarily into the following categories:

- Catering
- Construction trades and services
- Grounds and facilities services, equipment and consumables
- Musical instruments and equipment
- Office furniture, equipment and consumables
- Professional services
- Sporting equipment
- Teaching and learning equipment and consumables
- Information technology
- Transport
- Uniforms

## Supply Chain Risks

We recognise that no supply chain is without risk and it is incumbent upon the School to continually strive to further identify and mitigate modern slavery risks. Risks within our supply chain exist predominantly in the deeper layers, where visibility can be difficult. Our forward-looking initiatives to address modern slavery risks are aimed in part at gaining a greater understanding of these layers within our supply chain.

In the course of our operations, we procure a broad range of goods and services. We understand that this exposes the School to supply chains where there is potential higher risk of modern slavery practices, for example in the procurement of school uniforms, computer equipment and cleaning and catering services. We also utilise labour hire companies and acknowledge that this can increase the risk of modern slavery by reducing visibility over recruitment practices.



## Operational Risks

Haileybury provides (either directly or through a subsidiary or affiliate):

- Early Learning, including kindergarten, for children aged 3-5 in Australia
- Schooling for international and local children aged 5 – 18 in Australia
- Boarding and residential care (via a third-party homestay provider) in Australia for local and international children
- The Victorian Certificate of Education (**VCE**) and English as an Additional Language (**EAL**) courses in Chinese Schools including in Qingdao, Chengdu, Tianjin, Ningbo, Wuhan, Luoyang, Tongcheng, Sanshui and Beijing (Haidian District) and in schools in Timor-Leste, the Philippines and Vietnam.

Haileybury's delivery of the VCE internationally (as referred to above) extends only to the provision of curriculum advice and teacher training. Students undertaking the Haileybury VCE internationally are cared for by their local schools.

We acknowledge potential risks that our operations pose and have taken actions as described below in order to address those potential risks. However, given our primary operations consist of the education of children, the very core of our business requires a deep understanding of how to ensure the best interests of the child are prioritised at all times. We are very familiar with the inherent vulnerability of children and work every day to safeguard the wellbeing and education of our students. We consider this focus of our business to lower the risks of modern slavery posed by our operations.

Through our interaction with Haileybury Senior School Tianjin, we will work to influence and ensure a similar ethos within that school's Chinese operations, recognising that as an investment of Haileybury it is important for us to manage any risks of modern slavery within that environment.

## COVID-19 Pandemic

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 worldwide.

Being an independent school, driven by consistent demand, our budgetary pressures were relatively unaffected by COVID-19 (although we did receive some Australian government assistance). 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.

## Actions taken to assess and address risks

Our early goals in developing anti-modern slavery practices at the School have been focussed on opening dialogue with our suppliers and building greater knowledge. We have begun to lay the foundations of what we think will be a robust anti-modern slavery program through commencing improvements in contractual agreements with our suppliers and the development of supporting policies.



Some of the due diligence measures we have implemented during the reporting period include:

- Incorporating anti-modern slavery practice clauses in standard supplier contracts which require our suppliers to:
  - ensure that their practices, and those of their supply chain, do not constitute modern slavery
  - provide information we require from them to mitigate modern slavery risks
- Strengthening the basis of our contractual arrangements generally to ensure responsible business practice and adherence to regulations, standards and internal policies which drive business ethics
- Initiating supplier surveys to collect data on modern slavery risks in our supply chain and promote awareness of modern slavery risks among our suppliers
- Initiating detailed supplier investigations on representative suppliers in higher risk categories.

This is in addition to existing due diligence, governance and risk management measures, including:

- Established processes to ensure that all labour hire companies are licensed by the Victorian Labour Hire Authority or its equivalent elsewhere in Australia
- A Financial Delegation Policy and Framework governing procurement authority to ensure appropriate management oversight over supplier selection and management
- A Whistleblower program, including a dedicated, independent 24-hour whistleblowing hotline
- Processes for supplier onboarding and the approval of new suppliers
- An online contracts management system
- Consolidating and improving the management of the School's suppliers which, in combination with the financial delegation policy and formal approval gates, ensures that there is greater scrutiny over supplier selection.

## Reporting and Effectiveness

We take our obligations to our students, staff and community very seriously. The School has a range of reporting mechanisms to ensure that the effectiveness of our governance and risk control measures are monitored by the Senior Executive and School Council. This includes the completion of mandatory training programs, whistleblower complaints and other key assurance measures designed to ensure our risk control measures are effectively implemented.

We see collaboration in the supply chain as a critical success factor in addressing modern slavery risks and, as such, supplier engagement in our anti-modern slavery program initiatives is an important indicator of effectiveness.

In the early stages of our concerted anti-modern slavery approach, much of the focus is on capturing information and data and developing a deeper view of our supply chain. As the School achieves a greater level of maturity and experience in mitigating modern slavery risks, there will be a greater focus on the development of key risk and performance indicators.



## Consultation with Subsidiaries

Many of Haileybury's central functions are shared amongst its wholly-owned subsidiaries referred to above, and they share our key suppliers. A majority of the members of the governing bodies of our subsidiary entities are members of the Haileybury School Council.

There is significant collaboration and consultation between Haileybury entities in all aspects of our operations, including our approach to addressing modern slavery risks.

## Looking Ahead

Beyond the current reporting period, we are exploring ways in which the information we are collecting can inform better procurement practices and richer engagement with our supply chain. The data we collect will be used to explore key risk and performance indicators which can be incorporated into regular governance reporting.

Continuation of detailed supplier investigations on representative suppliers in higher risk categories will be undertaken, such as:

- Uniforms
- Cleaning
- ICT services
- Facilities
- Catering
- Transport

We have programmed a review of aspects of our procurement practices, including the development of key procurement policies, by a third-party consultancy and continue to seek opportunities to engage our staff and student cohorts in our anti-modern slavery program.

Over our next reporting period we expect also to be gaining a greater understanding of the risks of modern slavery that exist within the Chinese operations of Haileybury Senior School Tianjin, as well as developing a strategy for how we as an Australian-based entity can help influence that Chinese organisation to ensure that it has good processes and systems to manage modern slavery risks within its operations and supply chains.

Our Modern Slavery Statement will be reviewed and updated annually.

## From our Principal Governing Body

Haileybury makes this Statement in accordance with section 13 of the *Modern Slavery Act 2018* (Cth). This Modern Slavery Statement was considered and approved by the Haileybury School Council on 25 June 2021. The Haileybury School Council is Haileybury's Principal Governing Body under the MSA.

Richard Tom Poulton  
Chairman of Council  
Responsible Member of Haileybury's Principal Governing Body.