

# Modern Slavery Policy

## 1. INTRODUCTION

### 1.1 Background

The term modern slavery describes situations where coercion, threats or deception are used to exploit people and undermine their dignity and freedom. Modern slavery practices violate universally recognised human rights, are crimes and pose a serious risk to EREA’s operations and reputation.

As a Catholic entity, we acknowledge our role in working towards the eradication of modern slavery practices from our operations and supply chains. It is vital for us to maintain our reputation as an ethical organisation as it generates confidence in our service to the community.

This policy outlines the steps EREA will take to work with other Catholic entities, suppliers, business partners and community stakeholders to fulfil a common goal of ending modern slavery globally.

We expect all of our employees, contractors and suppliers – both current and those who seek to have a future business relationship with us – to comply with all aspects of this policy and strive to protect and respect the freedom and dignity of people everywhere.

### 1.2 Principles

Catholic social teaching calls for the dignity of work, the rights of workers and advancing the common good. These are the principles that guide this policy.

We acknowledge the impact that commercial activities - including ours - can have on vulnerable people through modern slavery practices. We have a responsibility to take practical action to manage risk -in our operations and supply chains.

The following principles inform the implementation of this policy:

- I. EREA will not knowingly use or contribute to modern slavery practices in any form.
- II. EREA will actively work to identify and eliminate modern slavery practices from our operations, business partnerships and supply chains.
- III. Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or financial) of workers in EREA’s operations or supply chains is unacceptable.
- IV. EREA shall comply with all relevant laws and regulations regarding worker recruitment, remuneration, working conditions and freedom of association.
- V. EREA’s final purchasing decisions shall not be based on price alone. Ethical business processes are an essential part of our value for money and ‘fit for purpose’ considerations. This includes consideration of worker living wage mechanisms and responsible recruitment of workers.

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EREA will continue to support our suppliers and business partners to assess and address modern slavery risks and take action to improve transparency, traceability and accountability for modern slavery practices and impacts in our collective supply chains.

### 1.3 Purpose

The purpose of this policy is to prevent modern slavery by managing and mitigating modern slavery risk within our business operations and supply chains.

This policy enables EREA to ensure that modern slavery does not flourish within our operations, business relationships and extended supply chains. This policy also provides a robust framework to ensure compliance with the reporting requirements of the Commonwealth Modern Slavery Act 2018 and Guidelines.

### 1.4 Scope

All in EREA shall comply with this policy and ensure its core principles are implemented. This policy applies to all workers, including direct employees (full-time, part-time and casual), volunteers, interns, consultants, labour hire employees, as well as contractors and sub-contractors and their employees.

## 2. ROLES AND RESPONSIBILITIES

| Role                    | Responsibilities   |
|-------------------------|--|
| EREA Board              | <ul style="list-style-type: none"> <li>• Approving this policy</li> <li>• Ensuring this policy is reviewed and updated as needed</li> <li>• Reviewing compliance with this policy</li> <li>• Ensuring this policy and its implementation complies with relevant Catholic social teachings, and legal and ethical obligations.</li> </ul> |
| EREA Executive Director | <ul style="list-style-type: none"> <li>• Developing procedures and guidelines supporting adherence with this policy</li> <li>• Ensuring this policy is implemented</li> </ul>  |
| Principals              | <ul style="list-style-type: none"> <li>• Implementing this policy and any associated procedures and guidelines</li> </ul>  |

## 3. POLICY GUIDELINES

### 3.1 Actions to prevent and manage Modern Slavery Risk

Our modern slavery risk management program is underpinned by ethical business practices and in consideration of all our stakeholders (including people who are at-risk of and/or experience modern slavery practices). Key elements of our program are summarised in Appendix 2 of this Policy.

To put this policy into practice the following actions are required of our workers, business partners and suppliers.

#### 3.1.1 Management, Staff and Contractors

- Anyone working for EREA or on our behalf is expected to implement the following measures:
  - ensuring that the identification, prevention, management and mitigation of modern slavery risk is a core responsibility of all workers;

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- business operations or relationships that knowingly support, facilitate or encourage worker exploitation or modern slavery practices are strictly forbidden;
- any actual or suspected activity that could breach this policy must be reported immediately.
- Any relevant external stakeholders engaged will support this policy (for example suppliers, contractors, joint venture or other business partners).
- Anti-slavery clauses shall be incorporated into procurement tenders and contracts which include the right to audit, review documentation and interview workers.
- Supplier reviews (including self-assessment questionnaires) shall be undertaken to assess levels of modern slavery risk, commitment and capacity to manage identified risks. This includes any new company that wants to do business with EREA.

### 3.1.2 Suppliers and business partners

- EREA will actively engage with suppliers to promote this policy and assist to develop their capabilities to identify and manage modern slavery risks.
- EREA expects suppliers to share our goals and values in relation to ending modern slavery.
- Suppliers are expected to support EREA’s efforts to assess the levels of risk within their operations and supply chains, and to gauge their commitment and capability to manage modern slavery risks.
- Suppliers shall demonstrate how they identify, prevent, manage and mitigate modern slavery risk in their operations and supply chains.

## 3.2 What to do if slavery is suspected or discovered

Internal reporting of actual or potential modern slavery risks by workers is expected. Workers shall immediately report any suspected violations of the policy or other illegal or unethical conduct to their line manager for escalation.

Information is confidential and there shall be no retribution or retaliation for reports made in good faith.

Suppliers are also required to report suspected or actual modern slavery practices, indicators or red flags immediately without fear of retribution, retaliation or loss of business with us. EREA commits to working with our suppliers to address issues, ensure effective remedy and implement prevention measures.

If a supplier or any other person outside EREA provides information to a staff member about suspected or actual modern slavery practices, indicators or red flags within our organisation or supply chain, the information must be immediately passed onto their line manager for escalation.

## 4. POLICY COMPLIANCE

### 4.1 Annual Compliance Statement

**4.1.1** The Commonwealth Modern Slavery Act 2018 entered into force on 1 January 2019. The Act established a national Modern Slavery Reporting Requirement applicable to entities in the Australian market with annual consolidated revenue in excess of AUD\$100 million.

**4.1.2** EREA’s statement must set out our actions to assess and address modern slavery risks in our global operations and supply chains and is due for annual submission to the Australian Government Department of Home Affairs no later than 30<sup>th</sup> June

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each year.

- 4.1.3** EREA will collect the relevant information from each of its schools and provide a consolidated, single Compliance Statement to the Department of Home Affairs each year.

## **4.2 Breach of this policy**

EREA takes infringements very seriously. Employees who fail to abide by these principles may face disciplinary action, including dismissal.

Individuals who are aware of a suspected breach of this Policy should refer to EREA's procedure for reporting complaints and can make a report to EREA's Complaints Officer. All reports will be treated confidentially.

EREA will not criticise or penalise employees for any loss resulting from adherence to these principles. Similarly, we will not penalise employees/officers who report concerns in good faith even if on closer investigation these turn out to be unfounded.

EREA retains the right to terminate its relationship with individuals, suppliers and organisations working on its behalf or engaged by it if they breach this policy.

## **4.3 Policy review**

A review of this policy shall be conducted every three years or earlier if required, such as where there are changes in legislation.

The EREA Board is responsible for ensuring this policy is reviewed and updated as needed and endorsing this policy.

# **5. RELATED POLICIES, PROCEDURES AND LEGISLATION**

## **5.1 EREA policy linkage**

This policy should be read in conjunction with the following related documents:

- a) EREA Child Safeguarding Policy
- b) EREA Procedures for Responding to and Reporting Child Safety Incidents or Concerns
- c) EREA Charter and Touchstones
- d) EREA Code of Conduct
- e) EREA Health and Safety Policy
- f) EREA Internal Grievance Policy
- g) EREA Workplace Harassment and Bullying Policy
- h) EREA Complaints Handling Policy and Guidelines
- i) EREA Whistleblower Protection Policy and Guidelines

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## **5.2 Legislation**

- a) Commonwealth Modern Slavery Act 2018 and Guidelines
- b) Australian Criminal Code Act 1995

## **5.3 Appendix 1: Types of Modern Slavery relevant to Operations**

## **5.4 Appendix 2: EREA Modern Slavery Risk Management Program – Key Elements**

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# Appendix 1: Types of Modern Slavery Relevant to Operations

## Debt bondage (or bonded labour)

Debt bondage is the most common form of slavery. This occurs when a person is forced to work to pay off an excessive debt unfairly imposed on them by a recruitment agent or employer. The person works for little or no pay, with no control over their debt. Over time, the value of their work becomes greater than the original debt.

Examples of debt bondage are associated with recruitment fees, travel, visas, work materials or schemes where a person has to pay to get a job.

## Deceptive recruiting for labour or services

Deceptive recruiting occurs when a victim is misled about the job they are recruited for, and it leads to them being trapped in modern slavery.

Types of deceptive conduct used by recruiters include offering exaggerated rates of pay, reasonable work hours and inclusions of accommodation, food, transport and other expenses. The reality turns out to be vastly different.

## Forced Labour

Forced labour is any work or service which people are forced to do against their will under threat of penalty. A victim is not free to stop working or to leave their place of work because of physical and/or psychological coercion. This may include threats and violence against themselves, other workers, family members or others.

## Human Trafficking

The legal definition of human trafficking in Australia is:

*...the recruitment, transportation, transfer, harbouring or receipt of a person through means such as threat or use of force, coercion, deception, or abuse of power or vulnerability; for the purpose of exploiting that person ...*

Human trafficking is a serious crime which often, ends up with the trafficked people being exploited through modern slavery, forced labour, servitude, debt bondage, organ removal or other forms of exploitation

## Worst Forms of Child Labour

The worst forms of child labour includewhere children are:

- exploited through slavery, forced labour or similar practices;
- engaged in hazardous work which may harm their health, safety or morals;
- used to produce or traffic drugs.

The worst forms of child labour can occur in a variety of contexts and industries. This may include orphanage trafficking and slavery in residential care institutions, as well as child labour in factories and manufacturing sites, mining and agriculture.

Importantly, not all child labour is illegal if the correct controls are in place such as children being engaged in the light physical labour only, not be subjected to hazardous work, and where working hours are limited and outside school time etc.

## Slavery or slavery like offences

Slavery is defined in the Australian Criminal Code Act 1995 (Section 270) as where the 'powers attaching to the right of ownership are exercised': people are dehumanised to the point where they are literally owned by others.

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Slavery is the exploitation and control of others through coercion, such as:

- Restricting where people live, work, move or communicate with others
- Using threats or actual violence against the person or their family
- Forcing them to work, withholding food or water, pay and other forms of abuse

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## Appendix 2: EREA Modern Slavery Risk Management Program – Key Elements

- A **policy** which outlines our commitment to prevent and manage modern slavery within our operations, business partnerships and supply chain;
- **Communication** of this policy and related program initiatives to staff, business partners and supply chains;
- **Assessment of modern slavery risks** within our operations and supply chain and the development of effective, efficient and transparent controls to manage and mitigate risks;
- Integrating **anti-slavery requirements** into relevant tenders and contract terms and conditions;
- Adopting **due diligence measures** for review of suppliers and business partners coupled with a requirement that they implement systems and processes to effectively manage their own modern slavery risk;
- **Raising awareness, engaging and educating staff, students** and other key stakeholders so they take individual responsibility to identify modern slavery practices and take practical steps to prevent and manage risk; and
- Implementing a robust **escalation protocol** where actual/suspected/perceived modern slavery is detected and **remedy pathways** to ensure human rights impacts caused by our activities are effectively addressed.

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