



**ST DOMINIC'S
PRIORY COLLEGE**

EDUCATING GIRLS, INSPIRING CONFIDENCE




inspiring confidence

ST DOMINIC'S PRIORY COLLEGE

MODERN SLAVERY POLICY

LAST REVIEW DATE	NEXT REVIEW DATE
May 2025	2029
RESPONSIBLE OFFICER	College Principal

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We acknowledge St Dominic's Priory College is situated on Kaurna Land and we pay our respects to Elders past, present and future.



OUR MISSION

A Catholic College educating girls in the Dominican Tradition.

OUR VISION

Inspired by the Gospel of Jesus Christ, we are a girls' College committed to truth and compassion. In the spirit of St Dominic, we contemplate the possibilities and honour the sacred dignity of each person through word and action. We aspire to provide an innovative, rigorous and inclusive education that leads girls and young women to achieve excellence in their studies and confidence in their future.

OUR VALUES

As a Dominican community we value:

- A sense of the sacred; joyful, eucharistic and reflective.
- A love of learning through creative and critical thinking.
- Modelling a eucharistic community as the basis of transformation.
- Teaching the truth, by word and example.

Further information about the College's principles and objectives can be found within the [2021 – 2025 Strategic Plan](#).

GOVERNANCE

Dominican Education Australia (DEA) is the governing authority of St Dominic's Priory College, an independent Catholic School. A Board of Directors, established in 1987, governs the College which is incorporated under the *Corporations Act 2001 (Cwlth)*. The Trustees of DEA and the College Board of Directors assures our Catholicity, fidelity to the Dominican charism, formation of Board members, excellence in teaching and learning and financial stability.

For more information about DEA visit: <https://dominicaneducationaustralia.com/>

CHILD SAFE

We are a Child Safe employer and are committed to the welfare and protection of children and young people. The College is committed to upholding a diverse and inclusive learning environment, ensuring children and young people are valued and respected. In accordance with the National Catholic Safeguarding Standards, all employees are required to comply with the College's relevant policies and procedures.

To read the College's **Safeguarding Commitment Statement** in full, and access *College Policies, Procedures* and other resources, please [click here](#).

1. PURPOSE

- 1.1 St Dominic's Priory College recognises that people who are trapped in modern slavery are often manipulated in schemes that do not allow them to escape, ask for help or gain an understanding that they are victims of exploitative activity.
- 1.2 This policy aims to mitigate the risk of modern slavery within College operations and supply chains. It provides a framework to ensure compliance with the reporting requirements of the *Modern Slavery Act 2018 (Cth)* and adheres to the mandate from DEA to entities within the DEA group to implement appropriate procedures to prevent and address modern slavery risks and implement a program of work to demonstrate compliance with the *Modern Slavery Act 2018 (Cth)* and any other applicable modern slavery laws and regulations.
- 1.3 This policy should be read in conjunction with the DEA Modern Slavery Policy 2025. DEA as the consolidated entity are required to report under the act.

2. SCOPE

- 2.1 This Policy applies to all persons involved in the operations within St Dominic's Priory College, including Ministry Board Members, paid staff of St Dominic's, volunteers, seasonal workers, agency staff, business partners, suppliers of goods and services, contractors and sub-contractors and their employees, apprentices and out workers.

3. DEFINITIONS

- 3.1 **DEA group:** Dominican Education Australia, a public juridic person (PJP) incorporated under the Corporations Act 2001 and each of its separately incorporated Ministries. St Dominic's Priory College is one such separately incorporated Ministry within DEA group.
- 3.2 **Modern Slavery:** Modern slavery describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Practices that constitute modern slavery include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and child labour.

4. GUIDING PRINCIPLES

St Dominic's Priory College's Modern Slavery Policy is underpinned by ethical business practices and in consideration of our stakeholders, including people who are at risk of modern slavery practices and people who experience modern slavery practices. Key elements of our modern slavery risk program include:

- 4.1 A policy which outlines a commitment to prevent and manage modern slavery within the College's operations, business partnerships and supply chains.
- 4.2 Communication of this policy and related program initiatives to staff, business partners and supply chains.
- 4.3 Consultation with people with lived experience of exploitation and modern slavery, wherever possible, conducted according to ethical engagement principles.

- 4.4 Assessment of modern slavery risks within the College's operations and supply chain and the development of effective, efficient and transparent controls to manage and mitigate risks.
- 4.5 Integration of anti-slavery requirements into relevant tenders and contract terms and conditions.
- 4.6 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.
- 4.7 Raising awareness, engaging and educating staff and other key stakeholders so they take practical steps to prevent and manage risk.
- 4.8 Implementation of an escalation protocol and remedy pathway to ensure human rights impacts caused by St Dominic's Priory College's activities, contributed to by the College or that are linked to St Dominic's Priory College are effectively addressed.
- 4.9 Collaboration with other organisations, wherever possible, to increase the College's impact in the prevention of modern slavery. Management of staff, contractors, suppliers and business partners. Risk management actions include:
 - 4.9.a Communicating with staff to ensure they are aware of this policy, are provided with regular training in its application and have sufficient resources for its implementation.
 - 4.9.b Staff are expected to acknowledge that business operations or relationships that knowingly support, facilitate or encourage worker exploitation or modern slavery are strictly forbidden.
 - 4.9.c Staff are expected to ensure that the identification, prevention, management and mitigation of modern slavery risk is known and accepted to be a core responsibility of all workers.
 - 4.9.d Staff are expected to acknowledge that any actual or suspected activity that could breach this policy will be reported immediately.
- 4.10 Inclusion of anti-slavery clauses in procurement tenders and contracts of significant purchases in selected procurement categories regarding modern slavery which include the right to audit, review documentation and interview workers.
- 4.11 Undertake supplier reviews (including self-assessment questionnaires) to assess levels of modern slavery risk, commitment, capability and capacity to manage identified risks. This includes any new companies that would like to do business with the College.
- 4.12 Actively engage with relevant external stakeholders (for example, suppliers, contractors or other business partners) to promote this policy and assist in developing their capabilities to identify and manage modern slavery risks with the expectation that suppliers share College values and its goal to ending modern slavery, and support the College's efforts to assess the levels of risk within their operations and supply chain and gauge their commitment and capability to manage modern slavery risks.
- 4.13 Request major suppliers to demonstrate how they identify, prevent, manage and mitigate modern slavery risk in their operations and supply chains Principles for procurement are set out in the Procurement Policy. Child safe procurement applies regardless of the value of the product or service.

5. MONITORING AND REPORTING

- 5.1 The College will collect relevant information to enable implementation of this Policy and annual reporting as required. Internal reporting of actual or suspected modern slavery risks by staff is expected. Staff should immediately report any suspected violations of the policy other illegal or unethical conduct to the Business Manager. Information provided by staff will be treated confidentially and there will be no reprisal, retribution, retaliation or unfavourable treatment for reports made in good faith.
- 5.2 Suppliers are also required to report immediately, any:
- 5.2.a suspected or actual modern slavery impacts to people.
 - 5.2.b Staff are expected to acknowledge that business operations or relationships that knowingly support, facilitate or encourage worker exploitation or modern slavery are strictly forbidden.
 - 5.2.b indicators or “red flags” indicating potential modern slavery activity, without fear of retribution, retaliation or loss of business.
- 5.3 If a supplier or any other person outside the College provides information to any staff member about suspected or actual modern slavery impacts to people, indicators or red flags within our organisation or supply chain, the information must be immediately passed by the staff member to their line manager for escalation. The escalation process for reporting suspected or actual modern slavery impacts is governed by the College’s Community Grievance Policy.
- 5.4 The College commits to implementing a modern slavery management program in accordance with the Appendices in the DEA Modern Slavery Policy 2025.

6. COMPLIANCE

- 6.1 Staff who knowingly and wilfully breach this policy may face disciplinary action. This could, in the most severe circumstances include dismissal for misconduct or gross misconduct. St Dominic’s Priory College will exercise its right to terminate relationships with individuals, suppliers, contractors and business partners working in, on behalf of or engaged by St Dominic’s Priory College if they knowingly and wilfully breach this Policy. Disciplinary actions for breaches of this policy will be managed in accordance with the College’s Staff Code of Conduct Policy.

7. POLICY STATEMENT

Catholic social teaching calls for the dignity of work, the rights of workers and advancing the common good. These core principles underpin this Policy.

- 7.1 Slavery has been identified as a major issue for Australian businesses within Australia and in extended supply chains.
- 7.2 St Dominic’s Priory College will not knowingly use or contribute to modern slavery practices in any form.
- 7.3 St Dominic’s Priory College will actively work to identify and eliminate modern slavery practices from our operations, business partnerships and supply chain.

- 7.4 Any form of exploitative treatment, punishment, abuse of labour rights, coercive control (physical, mental, psychological or financial) of workers in St Dominic's Priory College or supply chains is unacceptable.
- 7.5 St Dominic's Priory College shall comply with relevant laws and regulations regarding recruitment, remuneration, working conditions and freedom of association of its staff.
- 7.6 St Dominic's Priory College'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.
- 7.7 A policy which outlines a commitment to prevent and manage modern slavery within the College's operations, business partnerships and supply chains.
- 7.8 St Dominic's Priory College will support its staff, 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.

8. RELATED DOCUMENTATION

- Procurement Policy
- Child Safety and Wellbeing Policy
- Safeguarding Children and Young People Code of Conduct
- Whistleblower Policy
- Dominican Education Australia (DEA) Modern Slavery Statement 2023
- Modern Slavery Policy 2025
- Community Grievance Policy
- Staff Code of Conduct Policy

7. REVISION RECORD

Document Title	Modern Slavery Policy					
Document Type	Policy					
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