

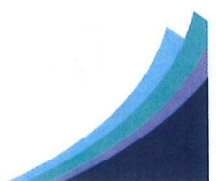
Diocese of Sale Catholic Education Limited

Modern Slavery Statement 2020–2021



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1 Introduction: Diocese of Sale Catholic Education Limited

Diocese of Sale Catholic Education Limited owns and operates Catholic Primary and Secondary Schools within the Diocese of Sale, (excluding Catholic College Sale and Lavalla Catholic College Traralgon).

Diocese of Sale Catholic Education Limited, (**DOSCEL**), ABN 91 621 266 993, was established in 2018. DOSCEL has been registered with the Australian Charities and Not-for profits Commission (**ACNC**) since 2017.

The primary activity of DOSCEL is the education of students. The long-term objectives of DOSCEL are to:

- support and advance Catholic education
- govern and manage the operation of the Catholic primary schools and secondary schools within the Diocese of Sale and
- provide support, service and leadership to those schools.

DOSCEL has developed a strategy document *'Inspiring Faith, Inspiring Learning'*, which outlines the commitments to and the partnership with schools, families and parishes, to nurture the faith of children and youth, and develop their intellectual, physical, emotional and social knowledge, skills and attributes to meet their challenges with hope and faith.

Catholic education within the Diocese of Sale is centred on a vision for its students that sees them as engaged and successful learners who achieve their personal best and who progressively come to know, value and draw on the life-giving traditions and spirituality of the Catholic faith. The DOSCEL strategic direction (for period 2020-2024) places a strong emphasis on building and strengthening each school's capacity to achieve high quality learning outcomes for each student, effective ongoing professional learning for staff, and enhanced Catholic identity.

In 2018, the Australian Government passed the *Modern Slavery Act No. 153, 2018* (**'the Act'**), that requires large corporations in Australia with turnover in excess of \$100 million, to annually report on the risks of modern slavery in their operations and supply chain, and actions taken to address those risks.

For the purposes of the Act, this is a single statement for the reporting entity, DOSCEL, which is submitting this Statement, as provided for in Section 13 of the Act.

DOSCEL recognises that modern slavery happens at the most extreme end of the working spectrum, and that it involves the gravest abuses of human rights and serious crimes, having severe and often lifelong consequences for its victims. The term *modern slavery* is used to describe situations where there are coercion, threats or deception.

The Act defines modern slavery as including eight types of serious exploitation:

- 1) trafficking in persons
- 2) slavery
- 3) servitude
- 4) forced marriage
- 5) forced labour
- 6) debt bondage
- 7) deceptive recruiting for labour or services
- 8) the worst forms of child labour. The worst forms of child labour mean situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

DOSCEL intends achieving a zero-tolerance approach to modern slavery and we are committed to consistently reviewing and strengthening our processes and systems to minimise the risk of human rights infringements anywhere in our operations and supply chain.

2 DOSCEL's structure, operations and supply chain

DOSCEL serves 38 primary schools and seven secondary schools in the Diocese of Sale. The Diocese spans metropolitan, regional and rural areas between Narre Warren and Cranbourne in the west of the Diocese, to Wonthaggi in the south and to Orbost in the east. In 2021, approximately 10,000 primary school students and 8,600 secondary students are educated in the Catholic school communities in our Diocese.

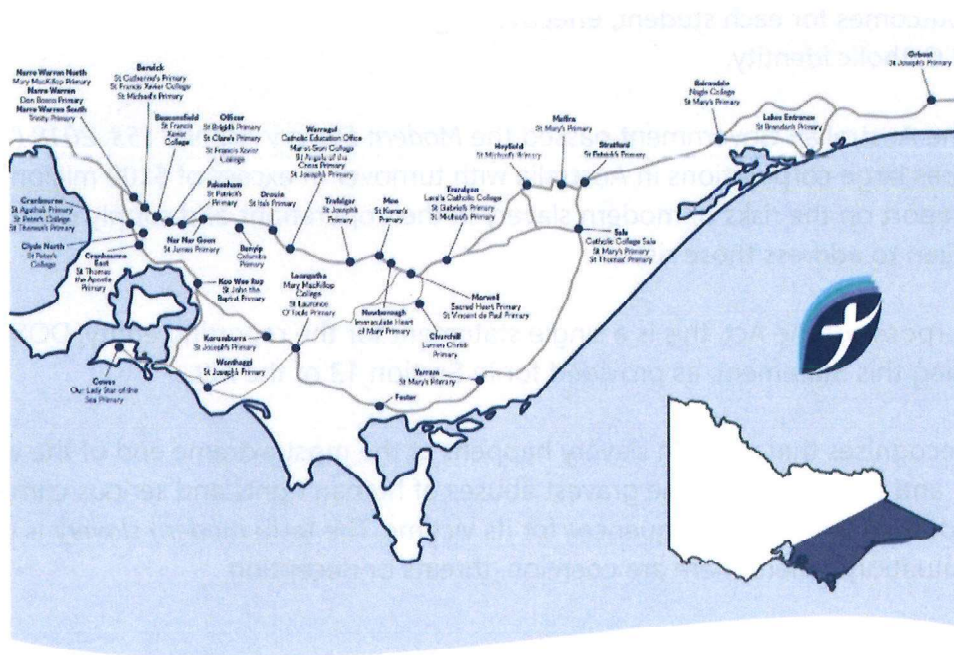


Figure 1: Location of DOSCEL schools in the Diocese of Sale

DOSCEL is responsible for the management of all aspects of Catholic education in the Diocese of Sale. It is a Company Limited by Guarantee with a Board of Directors. This Board reports directly to the Bishop of the Diocese who is member of the Company.

The day to day management of the schools is delegated to the Chief Executive Officer ('CEO')/Director of Catholic Education, supported by the DOSCEL Secretariat. The Principals of our schools, who are part of our Senior Management Structure, are responsible to the CEO.

Our Senior Management further consists of the following officers who report to the CEO:

- 1) Chief Financial Officer: Finance Services.
- 2) Chief Information and Infrastructure Officer: Information and Infrastructure.
- 3) Chief Compliance Officer, Executive Manager - Industrial Relations/Human Resources: Industrial Relations/Human Resources.
- 4) Chief Operations Officer, Deputy Director - Catholic Identity, Leadership, Learning and Teaching: Catholic Identity, Leadership, Learning and Teaching.

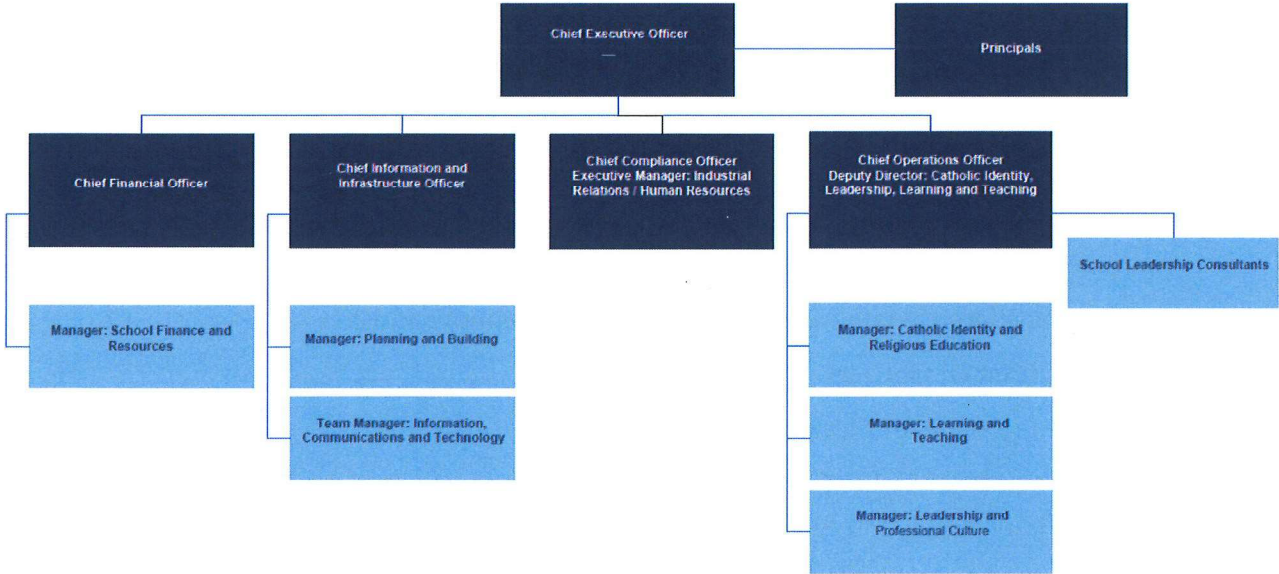
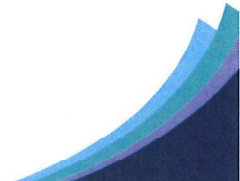


Figure 2: Overview of DOSCEL Management Structure

Our employees’ safety and wellbeing are of pivotal importance and we do whatever we can to keep our people healthy and happy. We aim to hire and retain the very best people, provide them with a balance of stimulation and security, and create a working environment that is inclusive and supportive. We also place great emphasis on education and training – keeping staff up-to-date with professional development requirements and safety regulations to ensure that staff maintain a high standard of integrity, honesty and diligence in performing their duties.

DOSCEL has extended our accountability to ensure our business and our people are aware of the risks of modern slavery in our operations and supply chain, and actions taken by DOSCEL to address these risks. We aim to be equally proud in ensuring our compliance with modern slavery requirements.



DOSCEL and school principals are responsible for managing compliance for our schools and external vendors.

3 Risks of modern slavery practices in the operations and supply chain of DOSCEL

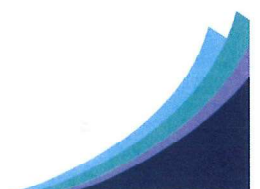
DOSCEL is committed to the highest ethical standards and business integrity in our operations and supply chain. We aim to ensure our staff and suppliers are treated fairly, with respect and dignity, in order to uphold the said highest standards.

DOSCEL's foremost risk of modern slavery in our operations and supply chain, vests in our use of external suppliers in the Construction and Engineering, and Information Technology industries. All major suppliers/contractors are required to complete our DOSCEL Service Agreement, being a formalised documented process which ensures supplier engagement, uniformity and standardisation, that suppliers are subject to ongoing monitoring, review and improvement and suppliers act in a reasonable manner in accordance within DOSCEL's internal policies. Suppliers are carefully vetted to ensure they align with our legal and contractual obligations. Similarly, our high ethical standards are at the core of how we engage with our suppliers and reflect how we work as an organisation.

We have considered the Modern Slavery List of Industries and List of High-Risk Countries, as provided for in The Global Slavery Index 2018, in determining our risks of modern slavery in our operations and supply chain. We have further considered information and resources made available through organisations that include:

- The Transparency International Corruption Perceptions Index
- Global Contact Network
- Global Estimates of Modern Slavery 2017
- 'Hidden in Plain Sight', Report of the 2017 Parliamentary Inquiry into establishing a Modern Slavery Act in Australia and
- The Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities.

We understand that the vast majority of our top 60 vendors, in regards to spend, are locally based with only two vendors stating that they have operations overseas. Initial review of our supply chain indicates that the majority of our vendors are a moderate to low risk of modern slavery.



4 Actions taken by DOSCEL to assess and address modern slavery risks, including due diligence and remediation processes

In 2020, DOSCEL, working in consultation with a third-party consulting firm, conducted a modern slavery risk assessment of our operations and supply chain, creating a modern slavery framework, which assisted us in the preparation of our first modern slavery statement. The process was driven and headed by our Chief Executive Officer, supported by our:

- Executive Manager: Industrial Relations/Human Resources, and Compliance and Risk Support Coordinator, responsible for our policy development, due diligence processes and compliance monitoring
- School Finance and Resources Manager, responsible for the creditor financial information.

The assessment comprised two elements:

- Identified existing risk management policies and procedures within DOSCEL and determined whether these can be broadened to include mitigating the Risks of Modern Slavery, through ethical sourcing, quality standards or other compliance reporting.
- Conducting a risk assessment over our current suppliers in terms of our payment data, for a 24-month period 1 January 2018 to 31 December 2019.

In conducting a risk assessment of existing risk management policies and procedures, we reviewed all relevant policies including:

- Complaints and Grievances
- Child Protection and Safety
- Working with Children Check Declaration
- External Proprietors Qualification and Experience Declaration
- Information Request Forms
- Facilities License Information Request Form
- Service Agreement
- Facilities License
- Code of Conduct for the Care, Protection and Safety of Children and Vulnerable Adults
- Whistleblower Policy
- Code of Conduct (June 2017)
- Mandatory Reporting

We have reviewed all our policies and as a result we will update our Code of Conduct and Whistleblower policies to refer to and include the requirements of the Act. We have also developed a Modern Slavery policy.

In performing the risk assessment of our suppliers, we conducted a desk top review of 60 of our top spend suppliers, that comprise 55% of our total spend to external suppliers. DOSCEL considered risks that may potentially cause, contribute to or be directly participating in modern slavery practices, consistent with the Act and the *Commonwealth Modern Slavery Act 2018, Guidance for Reporting Entities*. These risks areas included:

- financial
- industry
- country (geographic location)
- sub-contractors
- evidence that the supplier has submitted a modern slavery statement if applicable.

The results of our desk top review identified that the 60 suppliers scored an overall modern slavery risk rating of moderate to low risk. This is based on what was determined by us using publicly available records and information we had previously obtained from our suppliers.

We have recently created a modern slavery questionnaire that will be sent out to high risk, moderate risk and all new suppliers. The questionnaire contains probing rather than generic modern slavery questions, which also provide for a risk rating for each relevant modern slavery question, and the submission of supporting documents to us where applicable. We believe this is a vital step in identifying and, where applicable, eradicating human trafficking and modern slavery, where there is any indication or slightest suspicion that this may be occurring.

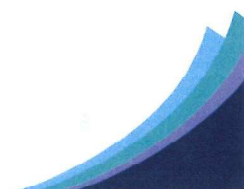
5 Assessing the effectiveness of actions taken by us

We have described our actions taken in the immediate assessment of modern slavery risk within our operations and supply chain. This includes policy review, drafting of new policies and a risk assessment for our high spend suppliers.

In doing so DOSCEL has mapped out key parts of our operations and supply chain to improve understanding of potential modern slavery risks.

All high risk, moderate risk and new suppliers will be vetted for modern slavery risks through the completion of a questionnaire that incorporates modern slavery requirements and the provision of supporting documents where applicable. DOSCEL aims to use the information obtained from this to build transparent and collaborative relationships with suppliers and will further ensure that our expectations of reporting of modern slavery risks within the suppliers supply chain have been clearly communicated by us, and that we have satisfied ourselves that modern slavery risks have been effectively managed.

We will review our policies that now incorporate and make provision for modern slavery compliance and ensure that DOSCEL staff and suppliers, where applicable, certify on an annual basis that they have read and understand these policies. We will regularly review and improve our modern slavery internal controls and procedures in order to monitor their effectiveness, and respond to areas that are not. This will include updating policies and procedures, where deemed necessary.



6 Describe the process of consultation with any entities the reporting entity owns or controls

We consulted with our schools when commencing with our current modern slavery actions, which included requesting and obtaining all supplier payment data, in order to complete the risk assessment over our current suppliers for the 24-month period 1 January 2018 to 31 December 2019. We intend presenting a formal session on modern slavery with our school principals over the coming months and also the distribution of information via circular.

7 Other relevant information - the way forward for DOSCEL

In order to build on the modern slavery framework we have established to date, we will be focusing on the following areas and the extent to which these are achievable:

- Introduce modern slavery training for our staff and school principals in the next calendar year. This may entail the distribution of booklets, online courses, in-person meetings with management and/or other written resources.
- Consideration will be given to providing modern slavery literature to our vendors. This may be dependent on the results achieved in the completion of our required modern slavery questionnaire.
- More intensive training to management employees, particularly those in charge of supply chain management, to understand in more detail what slavery and human trafficking entails and how to mitigate the risk of these in their respective supply chain.
- Performing social accountability audits on our building and cleaning suppliers, within reason, by conducting random on-site inspections to evaluate their practices with respect to the treatment of their workers and identifying and determining any potential risks, including modern slavery and human trafficking.
- Developing internal accountability standards and procedures further, to hold our employees and contractors accountable for non-compliance with our standards on modern slavery and human trafficking, including establishing:
 - consequences for non-compliance
 - a process to remediate such breaches.



Diocese of Sale Catholic Education Ltd (DOSCEL) Board unanimously approved the DOSCEL Modern Slavery Statement at their meeting held on Friday 18 June 2021.

G. L. Mc Mullen

Signature of Authorised Person

GABRIELLE LUCY MCMULLEN

Name of Authorised Person (print)

CHAIR, DOSCEL BOARD

Position of Authority (print)

18 June 2021

Date

Garry J McLean

Signature of Witness

GARRY J McLEAN

Name of Witness (print)

18-June-2021

Date

