

Modern Slavery Statement 2021

Introduction

Townsville Catholic Education has a strong commitment to supporting the abolishment of human enslavement through addressing the devastating impact of modern slavery in communities throughout the world. This commitment is echoed in the values expressed in Catholic social teachings.

Every person and all people, are equal and must be accorded the same freedom and the same dignity. Any discriminatory relationship that does not respect the fundamental conviction that others are equal is a crime, and frequently an aberrant crime.

Pope Francis

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This Statement has been prepared in accordance with the requirements of the *Australian Modern Slavery Act 2018* (Commonwealth). The activities of the Townsville Catholic Education Office to address modern slavery risks in business and supply chains are outlined, for the financial year period ending 31 December, 2021. This statement has been prepared in accordance with the mandatory criteria outlined in the *Guidance for Reporting Entities: Commonwealth Modern Slavery Act 2018*.

This statement is made pursuant to Section 13(1) of the Modern Slavery Act (Commonwealth) 2018. This statement has been approved by the Roman Catholic Trust Corporation for the Diocese of Townsville as the governing body of Townsville Catholic Education, and signed by the Bishop of Townsville who is the sole trustee of the Corporation.



Most Rev. Timothy J. Harris DD
Bishop of Townsville, June 2022
(Sole Trustee, Roman Catholic Trust Corporation for the Diocese of Townsville)

Reporting Criteria One - About TCEO

Townsville Catholic Education Office (TCEO) is an agency of the Roman Catholic Trust Corporation for the Diocese of Townsville, which is registered as a charity with the Australian Charities and Not-for-profits Commission (ABN 13 622 319 794).

TCEO and the 29 schools/colleges under its auspice provide educational services to students in the Catholic Diocese of Townsville. At 31 December, 2021, the organisation employed 2,549 people (including casual staff).

The mission of the Townsville Catholic Education Office is to provide services to Catholic school communities which support them in achieving quality outcomes for students, and in promoting the ongoing development of Catholic education. TCEO operates under the direction of Bishop Tim Harris, Bishop of the Diocese of Townsville, and under the organisational leadership of the Executive Director.

The Townsville Catholic Education Office is based in Townsville, employing more than 70 staff who service schools/colleges in areas of speciality, including religious education, curriculum, information technology, Indigenous education, counselling, speech pathology, hearing and vision impairment, human resources, finance, planning and development and marketing.

The Diocesan Education Council (DEC) is the advisory body representing Catholic education, headed by the Bishop. The DEC, in conjunction with the Executive Director and leadership team, ensure the direction of the organisation runs in harmony with the Church's mission and vision for Catholic education in the Diocese.

Reporting Criteria Two – Operations & Supply Chains

In relation to assessing modern slavery risk, TCEO and schools/colleges are engaged in the following activities to pursue business objectives and strategy in Australia:

- Direct employment of workers
- Provision of educational services
- Purchasing of materials, goods and services relating to the provision of education
- Construction of new schools and facilities at existing schools, and facilities maintenance projects
- Investment of funds in term deposits
- Leasing of property as staff accommodation
- Overseas travel for educational purposes or spiritual development (immersion)
- Market research and other research for educational purposes
- Direct donations to charitable organisations

Townsville Catholic Education Office and schools/colleges operate no formal joint ventures or partnerships.

Supply Chains

- More than 800 suppliers are engaged by TCEO
- Approximately 200 additional suppliers service schools/colleges directly
- Three suppliers have a spend of more than \$500,000 per year

Services

- Consulting services
- Property services (e.g. leasing, utilities, cleaning, facilities and waste management)
- Investment funds in term deposits
- Labour hire
- Charitable organisations

Products

- Information communications and technology equipment
- Textiles (student and staff uniforms and promotional apparel)
- Office supplies and teaching resources
- Construction equipment and fit-out of classroom/practical education spaces
- Print and promotional goods
- Fleet purchases

Reporting Criteria Three – Modern Slavery Risks in Operations & Supply chains

Operational Risks – COVID-19

COVID-19 has had a devastating health and economic impact on communities around the world. TCEO recognises the economic and human rights effect on the most vulnerable and resource-poor, particularly those engaged in long, complex supply chains. TCEO has identified increased risk to vulnerable groups including:

- poor access to basic health care and vaccination
- worsening economic circumstances due to lockdown and illness
- lack of PPE (masks, sanitiser)
- inadequate cleaning, and
- overcrowded working conditions.

During 2021, TCEO focused on the health and wellbeing of staff and students and maintained educational continuity in line with Federal and State Government response strategies. This also meant that TCEO was able to maintain contractual obligations with suppliers and contractors, minimising job losses that may have put workers at increased risk of being exploited.

Workforce

Direct employment

On most occasions, the Townsville Catholic Education Office and school/college staff are employed directly by the governing entity (the Roman Catholic Trust Corporation for the Diocese of Townsville). They are employed under employment contracts aligned to Enterprise Agreements or employment contracts which meet the requirements of the *Fair Work Act 2009* (Commonwealth) in Australia. All employees are subject to eligibility to work checking mechanisms during recruitment.

Labour hire and consulting agencies

TCEO have agreements in place with preferred suppliers who, on occasions, may provide recruitment and selection services. In the event an employee is engaged via an agency, they will be subject to the same provisions as direct employment.

Ongoing assessment concludes the risk of modern slavery practices in the direct employment of staff is low.

Supply chains – products and services

The following list outlines some of the long supply chain categories that have been identified within TCEO operations.

- Information Communications and Technology (ICT) – the provision of personal and system ICT
- Textiles – the provision of school and work uniforms and other clothing items, such as sports uniforms, protective clothing (lab coats etc.)
- Office consumables, printing and promotional products
- Vehicles and associated fuel/materials
- Building materials – construction and maintenance
- Fit out materials – schools and office
- Cleaning products and services
- Charitable donations to overseas entities

Ongoing assessment concludes that the risk of being directly linked to modern slavery practices is medium to high. This is due to the potential depth of supply chains which include overseas suppliers, particularly supply chains associated with electronic goods, textiles, vehicle manufacture and consumables such as cleaning products.

Investments

The Roman Catholic Trust Corporation for the Diocese of Townsville holds investment funds in short and long timeframe term deposits.

Ongoing assessment concludes the risk of modern slavery practices in the operations and supply chains of these service providers is low, because of their jurisdiction of operations and regulatory oversight.

Research

The Executive Director approves all applications for research occurring within TCEO and schools/colleges that engages outside organisations for system improvement purposes.

Ongoing assessment concludes the risk of modern slavery practices in the operations and supply chains of these service providers is low, because of internal scrutiny of contractor operations and regulatory oversight.

Reporting Criteria Four- Actions to Address Risks

Summary of Key activities in 2021

Review of TCE Risk Register for Modern Slavery	February 2021	Report to TCE Strategy and Governance Forum	February 2021
Presentation to Principals	June 2021	Report to DEC Audit and Risk Committee	June 2021
Inaugural TCE Modern Slavery Statement submitted to comply with the Act	June 2021	Approval and distribution of TCE Position Statement on Modern Slavery	July 2021
Update to webpage on TCE website tsv.catholic.edu.au	December 2021		

Governance and Audit

In 2021, TCE further embedded the identification and addressing of modern slavery risks into the TCE governance structures and processes. The Diocesan Education Council, through their Audit and Risk Committee, received the annual TCE Modern Slavery statement at a mid-year meeting. Engagement of the TCE Strategic Leadership Team and Bishop’s Council ensured executive understanding of the modern slavery risks, mitigations and reporting requirements.

The TCE Modern Slavery Working Group met half yearly to advise the TCE Strategy and Governance Forum on the organisation’s actions in addressing modern slavery risks. The Working Group is comprised of leaders from key areas of the organisation including Human Resources, Governance, ICT and Finance/Procurement.

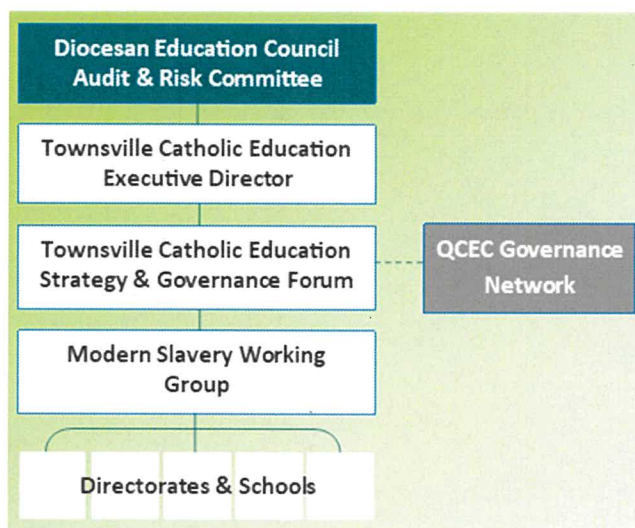


Figure 1: Governance structure - Modern Slavery

The Queensland Catholic Education Commission (QCEC) supported the efforts of all Queensland dioceses in managing business risks, through the QCEC Governance Network.

Future actions

- The Modern Slavery Working Group Terms of Reference will be developed in 2022 and presented to the TCE Strategy and Governance Forum for ratification.
- TCE Research Guidelines will be reviewed to include consideration of any issues associated with coercive practices related to modern slavery, and an ethical human rights approach to the approval of research applications.

Supply chains

Suppliers play a key role in supporting TCE, and the following actions have been implemented to address and eliminate modern slavery in TCE’s supply chains in 2021:

- Yearly review of the risks in current supply chain sectors was completed.
- Contract clauses were added to all strategic supplier agreements and templates, requiring suppliers to take steps to identify, manage, report and address incidents of modern slavery.
- TCE Procurement Guidelines were updated to mandate the inclusion of the above clauses in all contracts.

- TCE requested declarations from all suppliers, stating compliance to the *Modern Slavery Act 2018* (Commonwealth). The results of the declarations were entered in the TCEO finance system and will be updated in 2023. The declarations improve visibility of supply chains, especially those with links to overseas manufacture/supply.

Future actions

- A review of risks in supply chains will be conducted each year.
- A granular analysis of supplier categories and resultant risks will further inform TCE practices and guidelines/procedures.
- TCE will follow up suppliers who we believe are at risk and did not complete supplier declarations.

Workforce

In recruitment practices, TCEO aims to act in a way that is fair and equitable. During recruitment, proof of eligibility to work is checked. Expectations are also made clear, including that every person employed by TCEO and schools/colleges behaves in accordance with the TCE Staff Code of Conduct, policies, procedures and guidelines. The DEC Equal Opportunity Policy, DEC Enrolment Policy and the TCE Staff Code of Conduct specifically commit to providing fair, favourable and equitable working conditions. In addition, all permanent employees are paid wages that meet required legislative and agreement terms. All new employees must complete onboarding training and yearly compliance training including a module on the Staff Code of Conduct. Yearly training is conducted at relevant leadership forums and information is available for leadership staff. This information includes what TCEO is doing and key risk management/reporting roles in the organisation.

Future actions

- Education about modern slavery will be incorporated into TCE Staff Code of Conduct training.
- Modern Slavery information will be included on the TCE staff intranet hub.

Organisation-wide commitment

The preparation of this report highlights the achievement of the milestone of establishing governance in relation to assessing and mitigating modern slavery risks in key areas of operations. The structure outlined in Figure 1 also provides the mechanism for ensuring an ongoing commitment and continuous improvement in this important area. TCE has articulated its commitment to further addressing modern slavery risks through the development of a Position Statement; a key governance document which outlines governing principles, intent, commitment and standards to be embedded into operations. The TCEO internet page has been created to articulate the organisation's actions toward the reduction of modern slavery practices and provide resources on the national and international risks and actions.

Future actions

- Review of the TCE Position Statement on Modern Slavery will be conducted in 2023.











































Reporting Criteria 5 - Assessing Actions



TCEO recognises the provisions of the Act to drive continuous improvement over time. The organisation's governance framework drives this continual improvement, and work continues in assessing the highest areas of risk in supply chains. TCEO has demonstrated a commitment to working with suppliers through affirming compliance in supply chains or identifying areas of concern to be addressed. This has occurred in the process of evaluating supplier responses to modern slavery in vendor's supply chains. TCEO will track the number of



actions that have been implemented according to the organisation’s timetable, the number of high-risk suppliers engaged, and levels of awareness amongst staff.

Progress

An analysis was undertaken to understand the progress of TCEO in addressing modern slavery risks. The analysis was first conducted in December 2020 and again at the end of 2021.

Risk category	Mitigation	2020	2021	Change
Customers and Stakeholders	Attitude			↑
	Information Provision			↑
	Feedback channels			=
	Staff engagement			↑
HR & Recruitment	Awareness			=
	Policies & Systems			=
	Training			=
	Labour hire/outsourcing			=
Procurement & Supply	Policies & procedures			↑
	Contract Management			↑
	Screening			↑
	Supplier engagement			=
	Monitoring and Corrective action			↑
Management Systems	Governance			=
	Commitment			=
	Business Systems			=
	Reporting			↑
Risk Management	Risk identification			↑
	Operational risks			↑
	External risks			=
	Reporting			=

 Investigating/ready to action
 Making Progress

 Starting out
 Leading practice