

MODERN SLAVERY STATEMENT 2024





Contents

Criteria One	3
About Townsville Catholic Education Office	3
Strategic Directions	4
Criteria Two	5
Operations and Supply Chains	5
Criteria Three	6
Identifying Modern Slavery Risks	6
Criteria Four	7
Actions to Address Risks	7
Criteria Five	8
Assessing Actions	8
Criteria Six and Seven	9
Consultation with entities owned or controlled	9

Declaration

This statement outlines the activities of the Townsville Catholic Education Office (TCEO) to address modern slavery risks in business and supply chains for the financial year period ending 31 December 2024. This statement is made pursuant to Section 13(1) of the Modern Slavery Act (Cth) 2018, and is presented to comply with the mandatory criteria outlined in the Guidance for Reporting Entities: Commonwealth Modern Slavery Act 2018 (May 2023).

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).

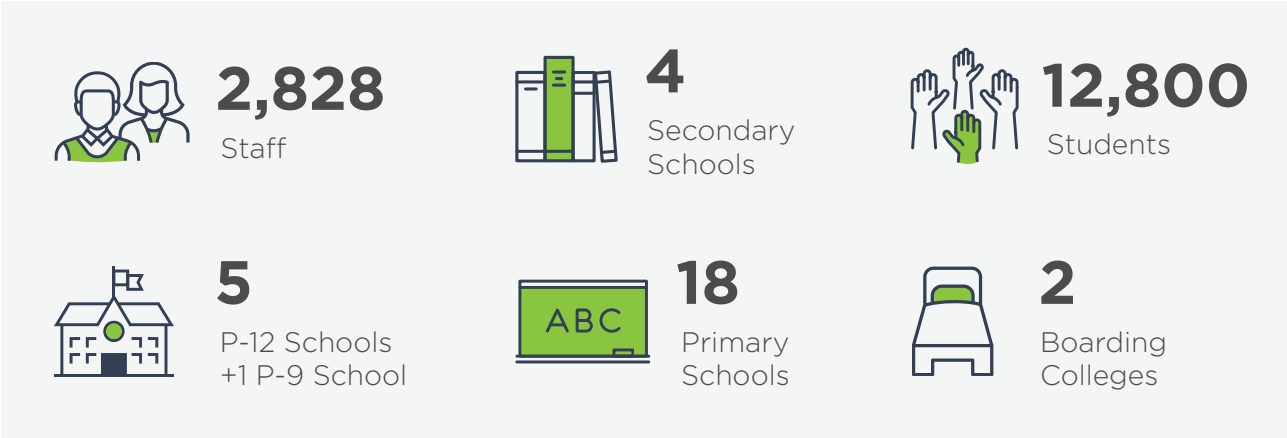
This statement has been approved by the Roman Catholic Trust Corporation for the Diocese of Townsville as the governing body of Townsville Catholic Education, and signed by the Bishop of Townsville who is the sole trustee of the Corporation.

Most Rev. Timothy J. Harris DD

Bishop of Townsville, June 2025

(Sole Trustee, Roman Catholic Trust Corporation for the Diocese of Townsville)

Criteria One



About Townsville Catholic Education Office

TCEO supports 29 schools in our Diocese, in a region extending to Mount Isa in the west, Proserpine in the south and north to Halifax. The mission of TCEO is to provide services which support schools in achieving quality outcomes for students and in promoting the ongoing development of Catholic education. Our schools range from large prep to year 12 colleges to small rural primary schools in townships such as Winton and Collinsville. As at 31 December 2024, TCEO employed 2,828 staff. The annual budget expenditure for the period was \$309,475,848.

TCEO Governance Framework

The Bishop delegates the management of Townsville Catholic Education to the Executive Director, under whose stewardship TCEO has responsibility for ensuring that each school is adequately and equitably resourced through the provision of centralised services. Four TCEO directorates provide system-wide approaches to funding and service delivery.

The Diocesan Education Council (DEC) is the Bishop's advisory body for Catholic education. In conjunction with the Executive Director and leadership team, the DEC ensures that Catholic education contributes meaningfully to the Church's mission and the communities in which our schools operate.

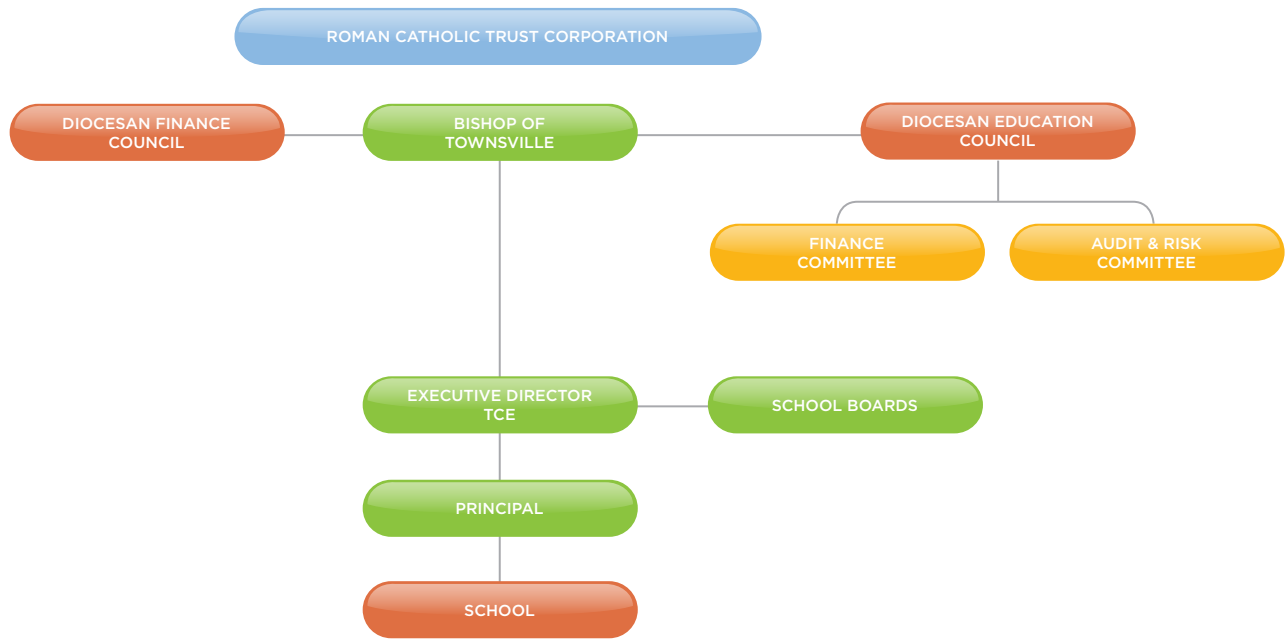


Figure 1: Structure of the Roman Catholic Trust Corporation for the Diocese of Townsville.

Strategic Directions

The TCE Strategic Directions 2022–2026 provide the structure to achieve the organisation's objective of guaranteeing every student has a valuable Catholic school education. This structure includes the Strategic Intention and six key areas to direct activities.

Strategic Intention

Systemic Catholic schools in the Townsville Diocese strive to ensure that each student can experience the joy of learning and achieve success as a learner, guided by teachers who are inspired by Jesus Christ. This vision for systemic Catholic schooling will build on our traditions and expertise and embrace new possibilities. Through collaboration, co-responsibility, diversity and on-going renewal of mission and purpose, our Catholic schools will plan for a future that is hope-filled and sustainable.

Learning and Teaching

which inspires each student's high expectations.

An experience of Faith and Mission

which enriches student's lives and futures.

Authentic Faith Leadership

which inspires all to witness the Mission.

Diversity and Wellbeing

practices which prioritise care and dignity for all.

Strengthening Capabilities and Partnerships

to foster community.

Governance and Sustainability

to manage stewardship of resources.

Criteria Two

Operations and Supply Chains

TCEO and our schools/colleges continue to engage in the following operational activities in pursuit of business objectives and educational delivery across Australia:

- Direct employment of workers
- Provision of educational services
- Procurement of materials, goods and services supporting educational outcomes
- Construction and maintenance of school facilities
- Staff and student travel and accommodation
- Investment in term deposits
- Leasing of staff accommodation
- Leasing and purchase of vehicles
- Travel for educational or spiritual immersion
- Educational research and market research
- Direct donations to charitable organisations
- Food and catering services

Supply Chains

In 2024, TCEO engaged 1,501 suppliers. Schools are estimated to have engaged between 1,300 and 1,600 additional suppliers directly. Due to differences in how schools record supplier data, this number remains an informed estimate.

Across our most frequently used suppliers — defined as those with over 100 invoices — TCEO spent a total of \$7,053,428 across 30 suppliers, representing 21% of the total annual expenditure of \$309,475,848.

Our largest supply categories in 2024 were:

- Energy
- Information technology (hardware and software)
- Insurance
- Building repairs and maintenance
- Travel and accommodation
- Fleet management

These categories remain the primary focus of our procurement activities and continue to be assessed for potential modern slavery risks as part of our due diligence processes. Centralisation of accounts payable across the organisation has strengthened visibility over procurement practices and supported improved contract and risk management.

Services

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

Products

- Information Communications and Technology (ICT) equipment
- Textiles (uniforms, promotional)
- Office supplies and teaching resources
- Construction equipment, material and fit-out of classroom/education spaces
- Print and promotional goods
- Fleet purchases

Figure 2: Supply chains identified in TCEO operations associated with Modern Slavery risk.

Criteria Three

Identifying Modern Slavery Risks

SUPPLY CHAINS PRODUCTS AND SERVICES → Medium to High Risk

TCE has identified risks in the range of supply chain levels that encompass international vendors, especially those linked to electronics, clothing, car production and products such as cleaning agents. The following are some of the long supply chain categories identified.

- Building materials – construction and maintenance
- Fit out materials – schools and office
- Provision of Information Communications Technology
- 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
- Cleaning products and services
- Charitable donations to overseas entities

In 2024, TCEO commenced construction of Mary Help of Christians Catholic College in Shaw, a new secondary school in Townsville. The college is set to open in 2025 with an initial intake of 120 Year 7 students and is expected to grow to accommodate up to 1,000 students. Given the scale of this capital

project—valued at \$24,183,111—modern slavery risks were carefully considered, particularly in relation to the procurement of construction materials, ICT equipment, furniture and fit-out items, and uniforms for staff and students. The risk associated with this project has been assessed as medium to high, reflecting the complexity and length of the supply chains involved, and aligned with TCEO's ongoing capital works and maintenance programs.

WORKFORCE → Low Risk

TCEO and its schools directly employ all staff under legally compliant contracts and enterprise agreements consistent with the Fair Work Act 2009 (Cth). Eligibility to work checks are mandated during recruitment. Labour hire and consultancy providers are contractually required to meet the same employment standards. As a result, this risk is considered low.

INVESTMENTS → Low Risk

The Roman Catholic Trust Corporation for the Diocese of Townsville invests in regulated Australian term deposits. Due to the oversight and transparency of the domestic financial system, this risk is also assessed as low.

RESEARCH → Low risk

TCE controls risk relating to research undertaken in the organisation through scrutiny of applications mandated by established TCE research guidelines. All research activities undergo Executive Director approval and must comply with the research guidelines. As a result, this area is considered low risk.



Criteria Four

Actions to Address Risks

Governance and Audit

The TCE Modern Slavery Working Group comprises representatives from key teams including People and Safety, Governance, ICT and Finance/Procurement. The group aims to meet twice each year, with an agenda focusing on discussions to identify, review and address modern slavery risks. Reporting accountabilities are to the TCE Strategy and Governance Forum, comprising TCEO leadership staff, which meets regularly throughout the year.

The process for assessing Modern Slavery is integrated into TCE governance through the TCE Risk Management Framework. The Diocesan Education Council received the 2023 Modern Slavery Statement at the August meeting, following ratification and discussion at the DEC Audit and Risk Committee. This reporting process, along with engagement of the Strategic Leadership Team, ensured executive understanding of modern slavery risks, mitigations and reporting requirements. Supporting the governance efforts of all Queensland dioceses is the Queensland Catholic Education Commission (QCEC) Governance Network.

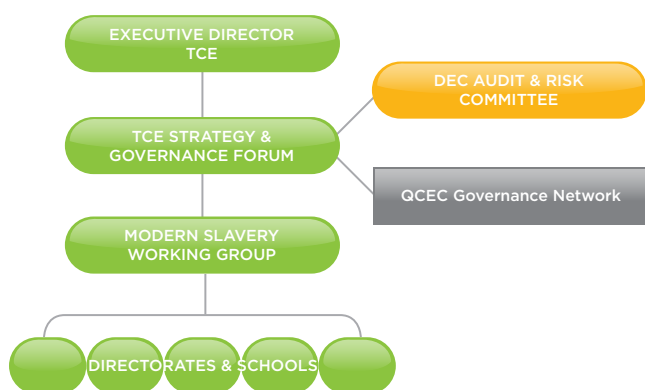


Figure 3: TCEO Governance Structure—Modern Slavery

Addressing Modern Slavery Risks - 2024 Activities

Activity	Date
Modern Slavery Working Group Meeting	December
Review of TCE risk register for modern slavery	December
2023 TCEO Modern Slavery Statement submitted	June
Centralisation of accounts payable functions	Ongoing

Supply Chains

Since 2022, TCE has implemented Procurement Guidelines and standard contract clauses that require suppliers to take proactive steps in

identifying, managing, reporting, and addressing incidents of modern slavery. In 2024, the accounts payable functions of 17 schools were transitioned to TCEO's centralised finance department, improving oversight and enhancing visibility of the broader supplier network.

As part of this centralisation, TCEO will undertake a review of supplier declarations confirming compliance with the Modern Slavery Act 2018 (Cth). The 20 highest-value suppliers to TCEO will be subject to additional scrutiny regarding their modern slavery risk management and compliance practices.

Workforce

The organisation's commitment to providing fair, favourable and equitable working conditions is mandated in the DEC Equal Opportunity Policy, DEC Enrolment Policy and the TCE Staff Code of Conduct. 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.

In 2024, TCE made the strategic decision to bring the drafting and issuing of contracts for general employees from the schools into a centralised team within TCEO. The basis of this decision was not directly tied to the risk of modern slavery, however the expertise this contracting team possesses has mitigated the risk of modern slavery occurring. By reducing the likelihood of an employment contract being drafted with non-compliant terms and conditions (in error), TCE has implemented a more efficient HR process with residual risk mitigation.

As part of their onboarding and yearly compliance training, staff are required to complete a module reinforcing the expectations of the TCE Staff Code of Conduct. Modern Slavery information is updated yearly on the TCEO staff intranet hub. This information includes what TCEO is doing to address modern slavery risks, and key reporting roles in the organisation.

Organisation-wide commitment

The preparation of this statement marks a key milestone in TCE's ongoing journey to strengthen governance and accountability around modern slavery risk. The governance structure now in place provides a foundation for sustained action and continuous improvement across all operational areas.

TCE's commitment is further articulated in its Modern Slavery Position Statement—a foundational governance document that outlines the organisation's intent, principles, and standards for addressing modern slavery risks. This document guides operational implementation and will undergo review in 2025, three years after its initial adoption, to ensure continued relevance and effectiveness.

Criteria Five

Assessing Actions

Progress

Each year, TCEO conducts an analysis to evaluate its progress in addressing modern slavery risks across operations and supply chains. This annual review process was first established in December 2020, and continues to inform our strategy and actions. Progress in key result areas is summarised in *Figure 4*.

TCEO's progress has been influenced by improved internal awareness, increased access to relevant data, and a maturing understanding of the obligations under the Modern Slavery Act 2018 (Cth).

In 2024, several actions have contributed to improved outcomes, including:

- Centralisation of accounts payable for 17 schools, creating improved visibility and oversight of the supplier network.
- Centralisation of recruitment and contracting for general employees, reducing the risk of inconsistent or non-compliant employment terms.

- Enhanced staff awareness through annual compliance training and updated intranet resources on modern slavery, including reporting pathways.
- Refinement of supplier engagement processes, including the review of compliance declarations and closer scrutiny of high-value suppliers.
- Adoption of standardised procurement clauses requiring suppliers to address modern slavery risks in their own operations.

TCEO continues to develop its internal capability to assess and manage modern slavery risks. While formal effectiveness indicators are still being refined, progress is monitored through procurement system data, contract reviews, and operational feedback. Centralisation efforts and governance improvements are key enablers for identifying and responding to risk more effectively.

Looking ahead, TCEO will continue to build on this progress by strengthening supplier due diligence, improving risk assessment tools, and preparing for the **2025 review of the Modern Slavery Position Statement** to ensure it remains relevant and impactful.

Risk category	Mitigation	2020	2021	2022	2023	2024
Customers and Stakeholders	Attitude	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	Information Provision	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	Feedback channels	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	Staff engagement	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
HR & Recruitment	Awareness	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	Policies & Systems	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	Training	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	Labour hire/outsourcing	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
Procurement & Supply	Policies & procedures	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	Contract Management	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	Screening	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	Supplier engagement	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	Monitoring and Corrective action	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
Management Systems	Governance	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	Commitment	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	Business Systems	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	Reporting	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
Risk Management	Risk identification	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	Operational risks	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	External risks	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>
	Reporting	<div></div>	<div></div>	<div></div>	<div></div>	<div></div>

Figure 4: TCEO Progress in achieving key outcomes—Modern Slavery.

Investigating/preparing action Starting out Making progress

List of TCEO System Schools

- Burdekin Catholic High School, Ayr
- Columba Catholic College, Charters Towers
- Gilroy Santa Maria College, Ingham
- Good Shepherd Catholic College, Mount Isa
- Good Shepherd Catholic School, Rasmussen
- Holy Spirit Catholic School, Cranbrook
- Marian Catholic School, Currajong
- Our Lady of Lourdes Catholic School, Ingham
- Ryan Catholic College, Kirwan
- Southern Cross Catholic College, Annandale
- St Anthony's Catholic College, Deeragun
- St Benedict's Catholic School, Shaw
- St Catherine's Catholic College, The Whitsundays
- St Clare's Catholic School, Burdell
- St Colman's Catholic School, Home Hill
- St Francis Catholic School, Ayr
- St Francis Catholic School, Hughenden
- St John Bosco Catholic School, Collinsville
- St Joseph's Catholic School, Cloncurry
- St Joseph's Catholic School, Mount Isa
- St Joseph's Catholic School, Mundingburra
- St Joseph's Catholic School, The Strand
- St Kieran's Catholic School, Mount Isa
- St Margaret Mary's College, Hyde Park
- St Mary's Catholic School, Bowen
- St Michael's Catholic School, Palm Island
- St Patrick's Catholic School, Winton
- St Peter's Catholic School, Halifax
- St Teresa's College, Abergowrie

Criteria Six and Seven

Consultation with entities owned or controlled

The Townsville Catholic Education Office does not own or control any entities and therefore this criteria is not applicable. A full list of TCEO schools is supplied in this statement, and information pertaining to modern slavery risks is available to school/college leadership teams through the TCE staff intranet and website.

The modern slavery reporting process allows communication of our progress to our governing organisation, the Roman Catholic Trust Corporation for the Diocese of Townsville.

Other considerations

TCE is dedicated to globally acknowledged human rights standards, which are reflected in the applicable laws we follow. The organisation continues to review its obligations under various legislation pertinent to TCEO's operations. These insights direct our efforts to ensure ongoing compliance, especially in addressing our responsibilities concerning human rights, equality, and mitigating the risks of modern slavery.

“ 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