

Modern Slavery Statement 2020

About this statement

This inaugural Modern Slavery Statement has been prepared to comply with the requirements of the Australian Modern Slavery Act (Commonwealth) 2018. The document covers the activities of the Townsville Catholic Education Office to address modern slavery risks in business and supply chains for the financial year period ending 31 December 2020. This statement has been prepared in accordance with the mandatory criteria structure outlined in the *Guidance for Reporting Entities: Commonwealth Modern Slavery Act 2018*.

Addressing the devastating impact of modern slavery in communities throughout the world echoes the values of Catholic social teachings, further strengthening the commitment of Townsville Catholic Education in relation to abolishing human enslavement.

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

About TCEO

The reporting entity, Townsville Catholic Education Office (TCEO) is part 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, 2020, the organisation employed 2,594 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 in areas of speciality, including religious education, curriculum, ICT, 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.

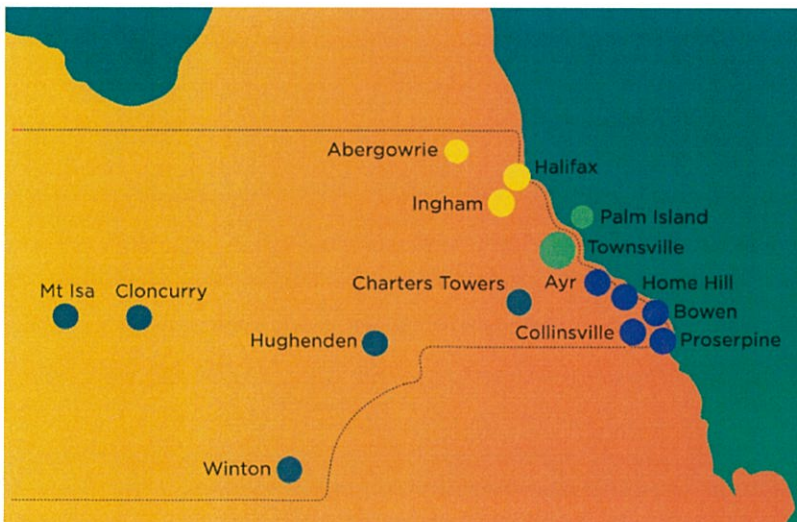
Operations

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)
- Direct donations to charitable organisations

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



17 Primary schools
5 Secondary colleges
2 Boarding colleges
4 Prep to Year 12 colleges
1 Prep to Year 9 school

Supply Chains

Information

- More than 800 suppliers are engaged by the Townsville Catholic Education Office
- Approximately 200 additional suppliers service schools/colleges directly
- Three suppliers have a spend of over \$500,000 per year

Products

- Information Communications & Technology equipment
- Textiles (uniforms)
- Office supplies & teaching resources
- Print and promotional goods
- Fleet purchases

Services

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

Risks

The modern slavery risks relevant to TCEO operations are summarised below. Major risks have been assessed as occurring in supply chains that source goods and services from outside Australia.

Category	Information
Workforce	<p>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). 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.</p> <p>Labour hire and consulting agencies TCEO have service level agreements in place with preferred suppliers who, on occasions, may provide recruitment and selection services. In the event a teaching employee is engaged via an agency, they will be subject to the same provisions as direct employment.</p> <p>Initial assessment concludes the risk of modern slavery practices in the direct employment of staff is low.</p>
Supply chains – products & services	<ul style="list-style-type: none"> • Information Communications & 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 • Vehicle and associated fuel/materials • Building materials – construction and maintenance • Fit out materials – schools and office • Cleaning products and services • Charitable donations to overseas entities <p>Initial 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</p>

	include overseas suppliers, particularly electronic goods, textiles, vehicle manufacture and consumables such as cleaning products.
Investments	<ul style="list-style-type: none"> Investment funds in term deposits <p>Initial assessment concludes the risk of modern slavery practices in the operations and supply chains of these service providers is assessed as low because of their jurisdiction of operations and regulatory oversight.</p>

Taking Action to Address the Risks

Governance & Audit

Identification and addressing modern slavery risks in TCEO operations is provided through TCEO’s governance structures and processes, whereby half yearly reports on the organisation’s actions addressing modern slavery risks are reviewed. The Diocesan Education Council receive a yearly statement tabled at a mid-year meeting. This structure aims to engage the TCE Strategic Leadership Team and Bishop’s Council to ensure they understand the modern slavery risks, mitigations and reporting requirements. The peak industry body, the Queensland Catholic Education Commission (QCEC) supports the efforts of all Queensland dioceses in managing business risks, through the QCEC Governance Network. The TCE Modern Slavery Working Group comprises leaders from key areas of the organisation including Human Resources, Governance, ICT and Finance/Procurement.

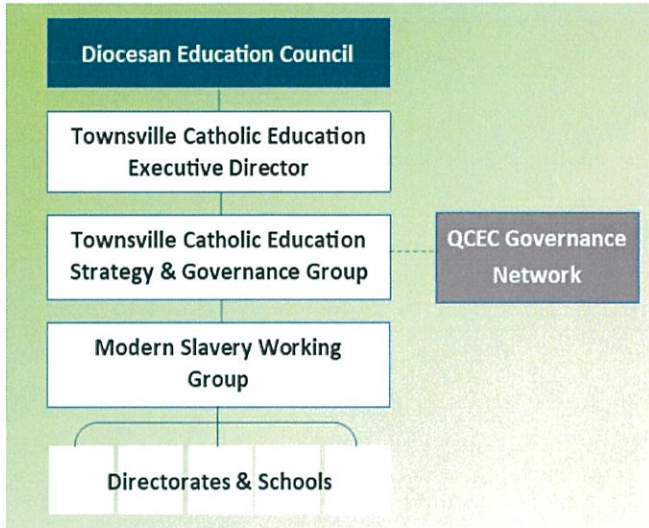


Figure 1: Governance structure - Modern Slavery

Supply chains

Suppliers play a key role in supporting TCEO, and the following actions have been established to address and eliminate modern slavery in TCEO’s supply chains.

- A process to identify risks in current supply chain sectors has been implemented.
- Contract clauses have been updated in strategic supplier agreements and all new templates to require suppliers to take steps to identify, manage, report and address incidents of modern slavery.
- Guidelines for procurement have been updated to mandate the inclusion of the above clauses in all contracts.

Future actions TCEO will request declarations from all suppliers, stating compliance to the Modern Slavery Act 2018. This correspondence will encourage suppliers to work with TCEO to eliminate risks from supply chains and commit to report breaches. The process aims to improve visibility of supply chains, especially those with links to overseas manufacture/supply. TCEO will continue to review supply chains and include the identification and mitigation of modern slavery risks in all vendor partnerships.

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 Staff Code of Conduct, policies, procedures and guidelines. The DEC Equal Opportunity Policy and Enrolment Policy and the Townsville Catholic Education 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.

Future actions Education about modern slavery definitions and risk will be incorporated into Staff Code of Conduct training. Yearly training will be conducted at a quarterly Principals' meeting and a fact sheet will be developed for leadership staff. This information will include what TCEO is doing and key risk management/reporting roles in the organisation.

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.

Future actions TCEO will further articulate commitment to 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.

Assessing Actions

TCEO recognises the provisions of the Act to drive continuous improvement over time. In the first reporting year, the organisation has focused on setting up the governance framework to ensure this continual improvement, and assessing the highest areas of risk in supply chains.

TCEO has demonstrated a commitment to working with suppliers through researching supply chains to affirm compliance or identify areas of concern to be addressed. This will occur 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.

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 2021

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