

Diocese of Sale Catholic Education Limited

Modern Slavery Statement 2022



Diocese of Sale
Catholic Education Ltd

Inspiring *Faith* Inspiring *Learning*

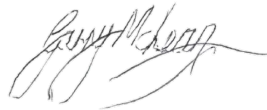
Disclosure Note

This statement has been made on behalf of Diocese of Sale Catholic Education Limited (DOSCEL) ABN 91 621 266 993. This statement is prepared pursuant to section 13 of the *Modern Slavery Act 2018* (Cth) and covers DOSCEL as a single entity.

This is DOSCEL's third Modern Slavery Statement and sets out the progress that DOSCEL has made towards identifying, assessing and addressing modern slavery risks during the 2022 Calendar Year Reporting Period, from 1 January 2022 to 31 December 2022.

Declaration

This Modern Slavery Statement was approved by the Board of Diocese of Sale Catholic Education Limited (DOSCEL) in accordance with section 13 of the *Modern Slavery Act 2018* (Cth) on 24 November 2023



Garry McLean
Chair

Diocese of Sale Catholic Education Limited Board

Entity Details

The Diocese of Sale Catholic Education Limited
6 Witton Street, Warragul VIC 3820
ABN 91 621 266 993
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Statement from Bishop Gregory Bennet

Dear Sisters and Brothers in Christ,

The prevalence of modern slavery has sadly increased in recent years, worsened by the ongoing pandemic, environmental challenges, and global conflicts. Despite this, we remain resolute in our commitment to a world free from exploitation.

Pope Francis has urged us to persist in our mission and to collaborate with likeminded institutions. As one of the largest purchasing entities in Australia, the Catholic Church has the means to leverage its influence for the greater good. We must leverage our collective strength and work in harmony to uphold the dignity of every human being. This commitment extends to our valued staff, students, their families, the communities we serve, and, importantly, workers in our supply chain.

We are dedicated to making informed decisions that prevent unintended consequences and uphold human sanctity. Collaboration and unity are guiding principles within DOSCEL's Modern Slavery Framework, as we collectively strive to comprehend and address modern slavery within our operations and supply chain. I extend my sincere appreciation to the dedicated teams at DOSCEL working to dismantle the structures perpetuating modern slavery in compliance with the *Modern Slavery Act 2018* (Cth).

Furthermore, it is with great joy that I announce the construction of St. Josephine Bakhita Catholic Primary School in Clyde North, commencing in 2023. The school, bearing the name of the patron saint of victims of modern slavery and human trafficking, embodies our commitment to ethical procurement practices. Collaboration with our partners on this project offers an opportunity for us to improve our practices and illuminate the moral dimension of our economic decisions, aligning with God's commitment to justice.

A future that breaks ties with slavery awaits us.

Yours sincerely in Christ,

+ 

+ Greg Bennet
Bishop of Sale

About us

Diocese of Sale Catholic Education Limited owns and operates all Catholic primary and secondary schools within the Diocese of Sale, excluding Catholic College Sale (governed by a College Board on behalf of members, the Marist Provincial and the Bishop of Sale) and Lavalla Catholic College, Traralgon (governed by Marist Schools Australia).

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.

Our primary focus is to provide the highest quality educational opportunities and outcomes for every student, anchored in Catholic identity and the aspiration to make the world a better place, with Christ at its core. The DOSCEL mission aligns with the Church's evangelising work, largely realised through Catholic schools. In 2022, the resilience and adaptability of our schools were put to the test by the ongoing challenges associated with the COVID-19 pandemic. Despite the difficulties, our classrooms remained vibrant centres of learning and we commend the dedication of our principals and staff as we navigate these unprecedented times. With the leadership of the Bishop of Sale, Most Rev Gregory Bennet, support from the Secretariat, parish communities, and the wider faith community, we remain committed to the DOSCEL Strategic Plan 2020-2024, *Inspiring Faith, Inspiring Learning*, which sets out the strategic priorities and direction for Catholic education in the Diocese with the determination to provide high-quality education that nurtures both faith and learning.

Reflecting on 2022, we celebrate the resilience and dedication of our school communities as they faced the challenges posed by the pandemic. Our commitment to enhancing learning and teaching practices remained unwavering, supported by investments in our staff and leaderships teams. Collaboration with parish priests, school teachers, staff, and families continues to be at the heart of our pursuit of holistic student development.

Our Catholic schools remain places of enrichment, fostering spiritual, academic, physical, and emotional growth. We are grateful for the ongoing support of the Victorian and Commonwealth governments, which enables us to invest in new learning facilities and school infrastructure through the Catholic Capital Grants Program designed to enhance the learning environment for our students.

In this Statement, we refer to *modern slavery*, as defined by the *Modern Slavery Act 2018* (Cth) ('**the Act**'), to include references to slavery, servitude, forced or compulsory labour, and human trafficking.

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.

We are dedicated to eliminating modern slavery from every facet of our operations and supply chain. Through ongoing due diligence, transparency, and collaboration with our stakeholders, we strive to create a world where exploitation is eradicated.

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. This is our third Modern Slavery Statement and illustrates our progress towards identifying, assessing, and addressing modern slavery risks during the 2022 Calendar Year Reporting Period, from 1 January 2022 to 31 December 2022.

Organisational structure, operations and supply chain

Our structure and operations

DOSCEL governs 38 Catholic primary schools, 5 of the 7 Catholic secondary schools and the Secretariat in the Diocese of Sale (Figure 1). Appendix 1 shows the complete list of entities owned and operated by DOSCEL. Catholic College Sale Ltd is governed by a College Board on behalf of the members, the Marist Provincial and the Bishop of Sale, and Lavalla Catholic College, Traralgon is governed by Marist Schools Australia, and are therefore not covered by this Statement.

In the calendar year 2022, our diocesan Catholic school communities educated 10,444 primary school students and 9,647 secondary students. Additionally, our educational institutions employed a workforce consisting of 3,243 school staff and 102 Secretariat staff.

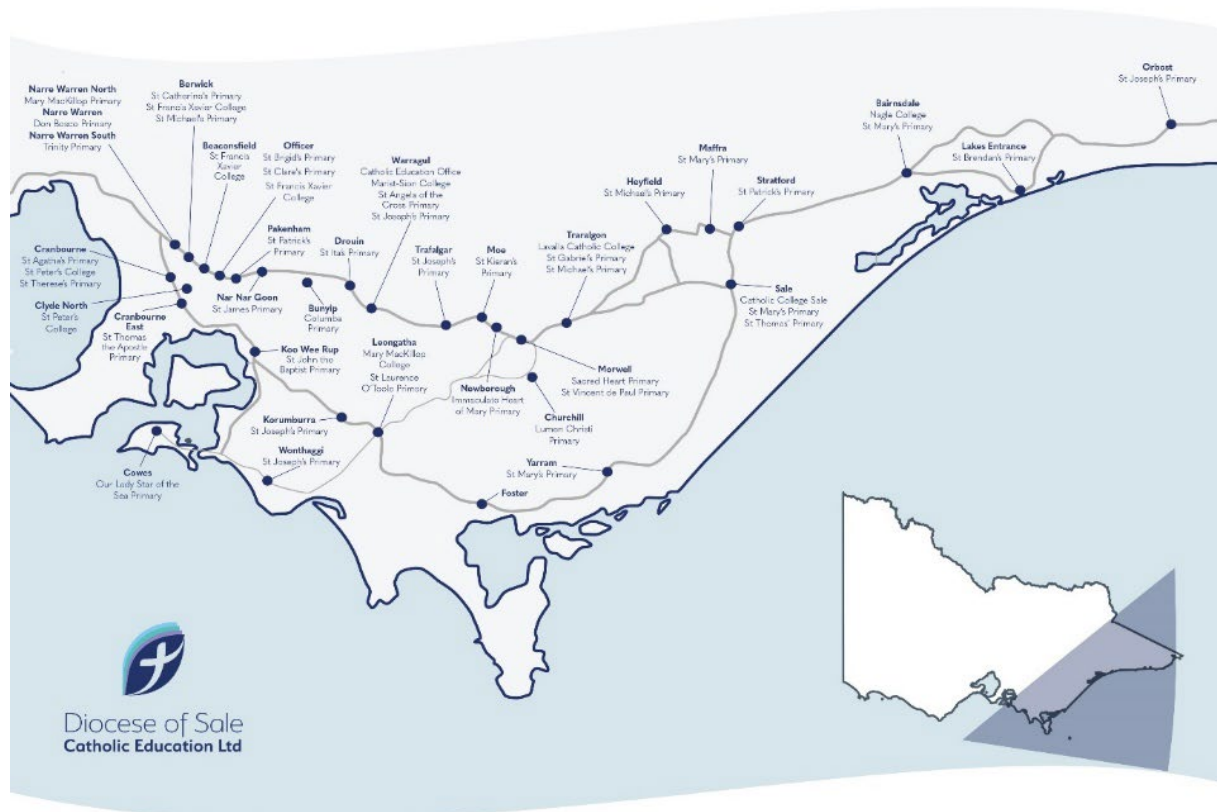


Figure 1: Location of DOSCEL schools in the Diocese of Sale

In 2018, governance of schools in the Diocese of Sale transitioned to Diocese of Sale Catholic Education Limited (DOSCEL), a Company limited by guarantee, with the Bishop of Sale as the sole member. The Bishop appointed a Board of Directors to collaborate with the Director of Catholic Education.

DOSCEL's primary responsibility is to support and advance Catholic education while complying with legal requirements, with a focus on creating safe professional environments across all schools and workplaces, as well as a commitment to child safety.

The Director of Catholic Education is supported by the DOSCEL Secretariat, working closely with schools to provide high-quality education in alignment with Catholic traditions.

The DOSCEL Secretariat Senior Management Team in 2022 consisted of:

- Chief Finance, Information and Infrastructure Officer.
- Chief Compliance Officer, Executive Manager – Industrial Relations/Human Resources.
- Chief Operations Officer, Deputy Director – Catholic Identity, Leadership, Learning and Teaching.

In 2022, the DOSCEL Board, including the Chair and Deputy Chair, was comprised of eight Directors. The Board oversees corporate governance, regulatory compliance, Church Laws, risk management, and sets the strategic direction. A Directors' Code of Conduct is in place.

Four Committees enhance the Board's decision-making capacity:

- Catholic Identity, Leadership, Learning and Teaching.
- Finance, Audit and Risk.
- Planning, Building and Financing.
- Culture, Ethics and Conduct (established in 2022).

DOSCEL's Risk Management Framework is presented and reviewed at each Finance, Audit and Risk Committee and DOSCEL Board meeting. A Delegations Policy and Register are in place, updated with Committee and Board approval.

The Catholic Education Commission of Victoria Ltd ('**CECV**') represents Catholic education providers in Victoria, advocating for students' needs and managing government funding. The Bishop of Sale is a member of CECV.

The Victorian Registration and Qualifications Authority ('**VRQA**') is responsible for regulating education and training in Victoria, with DOSCEL's relationship maintained through CECV, the peak body for Catholic school education.

Figure 2 illustrates the DOSCEL organisational structure.

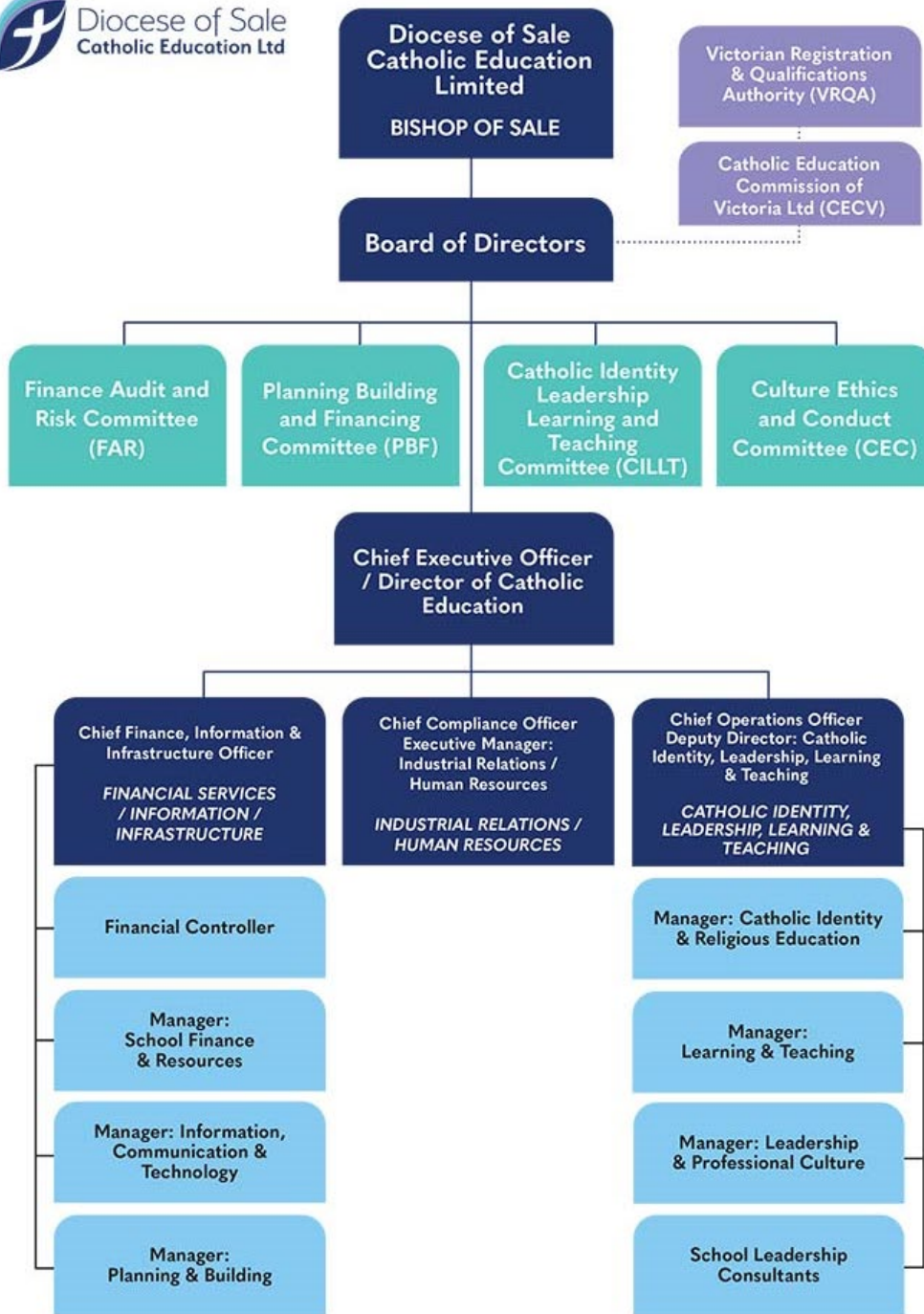


Figure 2: 2022 DOSCEL Organisational Structure

Our supply chain

An internal audit, using payment data for the 2022 calendar year across the DOSCEL Secretariat, primary and secondary schools indicates that DOSCEL has an estimated 5,000 suppliers and this includes everything from one-off purchases to longer-term supply contracts.

During the 2022 calendar year, we spent approximately \$126 million with external suppliers. Our top 50 spend equated to approximately \$82 million and comprised 65% of our total spend to external suppliers. Our largest procurement categories remain the same as the previous reporting year, Building and Construction, Information and Technology, and Recruitment.

For our top 50 spend suppliers that have undergone modern slavery risk assessment, the majority have operations predominately based in Australia, while others have stated operations in New Zealand, USA, and the United Kingdom.

DOSCEL is mindful that supply chains can run deep, and modern slavery can remain unchecked when there is limited visibility, especially in relation to the global sourcing of goods and services. Whilst the majority of our top 50 spend suppliers have stated their operations are based in Australia, many of them admit to not having visibility of their supply chains beyond Tier 1. Tier 1 in a supply chain refers to the first level of suppliers directly linked to an entity and typically consists of primary suppliers that provide goods and services directly to the organisation.

To improve our supply chain disclosure, we have produced supply chain descriptions of our largest procurement categories, which all carry a high potential for modern slavery. These descriptions assist with identifying potential vulnerabilities and opportunities to improve our ethical procurement practices.

Information and technology

The Information and Technology supply chain at DOSCEL encompasses the entire lifecycle of technology products and services. It involves sourcing, distribution, installation, maintenance, and disposal of hardware, software, and networking components.

Our Information and Technology supply chain ensures efficient digital classrooms, administrative systems, cybersecurity, and student experiences and requires coordination among vendors, internal departments, and stakeholders for optimal educational and operational outcomes.

Building and construction

Our building projects aim to provide quality learning environments, including general learning areas, grounds, and educational spaces. In collaboration with government-funded programs, we have secured substantial funding assistance. Our supply chain encompasses primary and secondary school building projects, including the addition of new general learning areas and associated facilities, and refurbishments.

We acknowledge that we are in the process of maturing our ethical procurement practices for building and construction, and we are committed to ongoing improvement in this area. Our goal is to continually enhance our practices to ensure they align with ethical standards and promote responsible sourcing.

Recruitment

DOSCEL is committed to meet the staffing needs of schools and the DOSCEL Secretariat by utilising both internal and external hiring processes, including recruitment agencies, to source appropriate candidates.

In addition, careful oversight of external labour hire practices is applied, ensuring adherence to labour laws and standards. DOSCEL has established clear expectations in relation to the provisions of the Act that our service providers acknowledge, understand, and comply with.

Furthermore, DOSCEL is dedicated to providing all employees with conditions and benefits in excess of the National Employment Standards ('NES') including scheduled salary increases and leave entitlements.

Modern slavery risks in our operations and supply chain

The UN Guiding Principles on Business and Human Rights are recognised as the global standard for preventing and addressing business-related human rights harm. The 'risks of modern slavery practices', means the potential for our entity to cause, contribute to, or be directly linked to modern slavery through its operations and supply chain – in other words, the risks that our entity may be involved in modern slavery. The concepts of cause, contribute to and directly linked to modern slavery, are set out in the UN Guiding Principles and are part of a continuum of conduct and are defined below. This means that an entity's risks may not always fit neatly into one of these categories.

UN Guiding Principles on Business and Human Rights Concepts

- **Cause:** Refers to situations where an organisation's actions or decisions might directly create conditions that could lead to human rights violations, including modern slavery.
- **Contribute to:** Indicates scenario's where an organisation's activities indirectly contribute to human rights violations or modern slavery, even if they are not directly causing them. It might involve benefiting from practices that are linked to violations.
- **Directly linked:** Instances where modern slavery is directly connected to an organisation's operations or supply chain through the activities of another entity that they have a business relationship with.

DOSCEL's human rights due diligence and risk assessment practices are not yet sufficiently mature to extend beyond Tier 1 of our operations and supply chain. This limitation makes it challenging for us to identify or detect instances where a direct link to modern slavery might exist. We are looking to improve in this area as we develop our capability over time.

Our 2022 desktop review is revealing persistent high-risk categories in the areas of Building and Construction, Information and Technology, and Recruitment. With regards to managing modern slavery risks, DOSCEL takes a targeted approach by focussing its efforts on procurement areas that carry the highest potential to cause or contribute to modern slavery.

Below are common modern slavery risk factors relevant to our identified high-risk procurement categories.

- **Building and Construction:** The construction industry is characterised by a mobile workforce and frequent staff turnover. This creates significant modern slavery risk factors including:
 - Downward pressure on costs and time schedules.
 - Substantial migrant labour presence.
 - Heavy reliance on agency and subcontracted workers.
 - Challenges in tracking complex supply chains.
- **Information and Technology:** Technology companies often have suppliers in regions with elevated modern slavery risks, including areas with weak law enforcement, significant migrant worker populations, and documented instances of modern slavery.
- **Recruitment:** Recruitment in certain industries can carry substantial modern slavery risks. Vulnerable workers facing poverty, illiteracy, discrimination, and migration challenges, may be lured into exploitative jobs where they receive little to no pay and are unable to leave due to manipulation, debt bondage, or document confiscation. Cleaning and maintenance services are recognised as high-risk sectors, necessitating specific attention to safeguard worker welfare within this supply chain.

DOSCEL is careful not to prioritise cost savings when sourcing goods and services as this can lead to downward pressure on prices and result in suppliers cutting labour costs, potentially exploiting workers and increasing the risk of modern slavery.

Actions taken to assess and address risks

We have deepened our commitment to preventing and eradicating modern slavery with a significant flagship project – the construction of St. Josephine Bakhita Catholic Primary School in Clyde North, named after the patron saint of modern slavery victims. This project reflects our commitment to justice in the light of God’s grace.

Additionally, we’ve shifted our focus to ethically sourcing school uniforms, recognising the prevalence of modern slavery in fibre growth, harvesting, and garment manufacturing.

DOSCEL continues to utilise its Modern Slavery Framework to assess and address modern slavery risks.

Below are the actions we’ve taken during the 2022 reporting period.

St Josephine Bakhita Catholic Primary School

By constructing a school named after the patron saint dedicated to modern slavery victims, we aim to not only provide quality education but also to inspire our community to actively participate in efforts against modern slavery. A principal will be appointed who will engage the local community and foster a sense of social responsibility, empathy, and commitment to justice within the school.

Project Details

- **Location:** St. Josephine Bakhita Catholic Primary School will be located at 40 Wild Goose Way, Clyde North, within the Clyde Creek Victorian Planning Authority Precinct Structure Plan.
- **Scope:** Stage 1 of the project involves the construction of eight general learning areas, specialist and teacher resource areas, an administration area, and a staff room, accommodating up to 700 students at full enrolment.
- **Funding:** The \$11.7 million project is partially funded by a \$5 million grant from the 2021-2022 Victorian Government Capital Funding Program.
- **Timeline:** Construction commenced in October 2023, with the school planned to open its doors in 2025.
- **Strategic Partners:** DOSCEL will work closely with the architect and builder to avoid and minimise modern slavery from the building supply chain.

School uniforms

DOSCEL prefers to partner with school uniform providers that demonstrate ethical manufacturing and environmentally friendly yarns. Several school uniform suppliers onboarded recently have demonstrated their commitment to ensuring ethical manufacturing throughout their supply chain and have provided transparency by disclosing the location of their manufacturing facilities.

When schools consider supplier changes for school uniforms, we have introduced our short form modern slavery questionnaire to assist with ethical sourcing. We understand it will take time and continued effort to fully improve our school uniform supply chain.

Supplier questionnaire

A modern slavery questionnaire is included in the supplier tender process for the procurement of high spend Building and Construction, and Information and Technology. We have focussed on managing risks associated with higher spend suppliers. A more comprehensive version of the questionnaire is applied to suppliers where the spend value exceeds \$250K. The questionnaire evaluates supplier policies and practices in modern slavery prevention to facilitate our preventative measures to modern slavery risks.

In our next reporting period for calendar year 2023, we are looking to introduce our modern slavery questionnaire when seeking quotes for financial services. We understand the significance of the financial services sector in relation to modern slavery rests in its connection to every industry and the resulting increased risk of harm to people.

EOI supplier tender process includes DOSCEL modern slavery questionnaire	2021	2022	2023
Building and Construction	√	√	√
Information and Technology	√	√	√
Financial Services	-	-	√

Contracts

We have introduced modern slavery clauses to tender documentation for procurement related to building and construction, and cleaning services to ensure our suppliers align with our dedication to uphold human rights and foster a responsible and sustainable supply chain. This approach is consistent with our previous statement and will remain an important feature of our modern slavery prevention strategy.

Contractual Controls – Modern Slavery Contract Clauses	2021	2022	2023
Building and Construction	√	√	√
Cleaning Services	√	√	√

Vetting potential suppliers

For high risk spend categories, DOSCEL supplements its due diligence activities with further checks such as reviewing websites, checking whether a voluntary or mandatory modern slavery statement has been made publicly available and considering any available media coverage and its credibility. All new suppliers undergo the vetting process for modern slavery risks prior to entering into service agreements.

We recognise that whilst reviewing publicly available information can provide some insights, it may not reveal the full extent of a supplier’s operations or potential issues.

Service Agreements

All DOSCEL Service Agreements have been updated to include modern slavery clauses, irrespective of the monetary value of the services provided. This minimum standard has been maintained from the previous year. DOSCEL intends to complete a review of these modern slavery clauses in the next reporting period to understand their effectiveness in complying with the Act.

Policy, standards, and programs

DOSCEL is committed to ensuring appropriate controls including policies, procedures and guidelines, and standards are in place to protect against modern slavery across the organisation’s internal operations. Below is a summary table describing these protective measures.

Policy, standards, and programs	Description	Role in mitigating modern slavery risk
Code of Conduct (DOSCEL Secretariat)	<p>Formal set of rules, principles, and ethical standards that sets out the professional standards of behaviour and actions of all employees of the DOSCEL Secretariat. The Code also focuses on the safety and well-being of children and young people.</p> <p>These standards exist alongside the standards of behaviour and performance required of employees under their contract of employment, DOSCEL policies, industrial agreements and relevant State and Federal legislation.</p>	Vital tool in mitigating modern slavery risk as it establishes our ethical foundation necessary to prevent, identify and address instances of modern slavery within DOSCEL’s operations and supply chain.
Child Safety Code of Conduct (DOSCEL Schools)	Establishes clear expectations and guidelines for ethical behaviour and responsible practices of all school staff, volunteers, contractors, clergy, School Advisory Committee members and any other adult involved in child-connected work within DOSCEL Schools. The primary focus is on the safety and well-being of children and young people.	Indirectly contributes to modern slavery risk mitigation by fostering ethical behaviour, vigilance, and accountability within DOSCEL.
Victorian Child Safe Standards	Framework that contributes to creating safe, transparent, and accountable environments that prioritise the protection and well-being of children and young people.	<p>The introduction of new Victorian Child Safe Standards (‘CSS’) during 2022 was rolled out to all DOSCEL schools and builds on the significant work that has been undertaken in all DOSCEL schools to keep children and young people safe.</p> <p>Key changes to the CSS include the requirement to provide greater clarity on the governance, systems, and processes to keep children and young people safe.</p>
DOSCEL's Commitment Statement to Child Safety	Sets out DOSCEL’s commitment to providing a safe and nurturing culture for all children and young people in the Diocese of Sale.	DOSCEL commits to providing a safe and nurturing culture for all children and young people in the Diocese of Sale through implementing rigorous risk-management and employment practices.

Policy, standards, and programs	Description	Role in mitigating modern slavery risk
Complaints and Grievances Management Policy and School Complaint Handling Procedures	Framework that provides parent(s), guardian(s), carer(s) and/or student(s) and other members of school communities to make complaints via an effective complaint-handling system that has a clear process for resolving complaints, treats people fairly, is timely and provides those people involved in a complaint with a fair opportunity to respond to issues and to present their views.	Empowers individuals to contribute to the prevention of modern slavery by reporting concerns and violations.
Whistleblower Policy	Sets out guidelines and procedures established by DOSCEL to provide a confidential and secure mechanism for individuals to report concerns about unethical, illegal, or improper conduct within DOSCEL without fear of retaliation.	Empowers individuals to contribute to the prevention of modern slavery by reporting concerns and violations.
Employee Assistance Program ('EAP')	Promotes a healthy and supportive workplace culture.	Provides confidential and professional assistance to employees who may be experiencing personal or work-related issues that could affect their well-being and job performance. The EAP offers guidance and resources to help employees achieve a healthy work-life balance, manage stress, and navigate life transitions.

Annual desktop review

DOSCEL completes a periodic internal audit of its suppliers where annual payment data is compiled and the 50 top suppliers by spend are assessed to provide insights into our spending patterns, supplier relationships and procurement processes. The desktop review has been particularly important for DOSCEL as it has created an opportunity for engagement and collaboration, particularly with departments associated with procurement in high-risk categories of Building and Construction, and Information and Technology industries.

By focussing on suppliers with substantial financial transactions, DOSCEL can identify areas where there might be a higher potential of modern slavery. In addition to this, the method is one way that DOSCEL can prioritise its efforts on suppliers that have a greater impact on its operations and supply chain. This is a strategic approach and allows for a targeted and effective risk management strategy.

To determine the potential risks of modern slavery among our top spend suppliers, the data is surveyed to identify the high-risk categories we are utilising the most and to identify the level of due diligence that has been completed in these supplier relationships.

The annual desktop review has been completed over three reporting periods, allowing us to collect data for comparison. This year, the DOSCEL Secretariat payment data, along with primary and secondary schools, for the 12-month period, 1 January 2022 to 31 December 2022 was included in the internal audit. The results are summarised and discussed in the next section where we evaluate the effectiveness of our actions.

Staff awareness campaign

Similar to our initiative last year, another modern slavery awareness campaign for DOSCEL staff was held during Easter 2022 that included links to FAIRTRADE chocolate brands and ACRATH information about how we can enjoy a slavery-free Easter.

Remediation

DOSCEL is fully committed to collaborating with our suppliers to address issues, ensure effective remedies, and implement preventative measures.

In the event a supplier or external party discloses information about modern slavery to a staff member at DOSCEL, it is imperative that this information is immediately communicated to their line Manager for appropriate escalation. Another direct and confidential means for workers in our supply chain and the local community to communicate concerns and seek assistance is via the processes outlined in the DOSCEL Complaints and Grievances Management Policy, School Complaint Handling Procedure and/or the DOSCEL Whistleblower Policy.

Assessing the effectiveness of actions taken by us

The results of the annual desktop review are showing that over time, the implementation of due diligence activities has led to a progressive reduction in open exposure to modern slavery risks within DOSCEL's supply chain. As an increasing number of suppliers undergo thorough screening using our modern slavery questionnaire, potential vulnerabilities are being identified and addressed promptly. This step-by-step approach is helping to contribute to minimising DOSCEL's overall exposure to modern slavery risks.

Procurement data insights

- In 2022 the top three spending categories were Building and Construction, Information and Technology, and Recruitment. This scenario has remained consistent over previous reporting periods.
- A total of 44% of suppliers that made the top 50 list in 2021, also made the top 50 list in 2022, in other words, 22 suppliers out of 50. Of those 22 suppliers:
 - Five are reporting entities under the Act.

- 36% had been screened for modern slavery risks in 2021 and by 2022, 55% had been screened for modern slavery risks.

Reflecting on the first three years of reporting under the Act, DOSCEL has demonstrated the robustness of its Modern Slavery Framework to understand, manage and mitigate its risk and exposure to modern slavery in procurement. The outcome of the assessment of 2022 activities is showing that DOSCEL's reach is expanding, as more suppliers complete the modern slavery questionnaire and receive modern slavery risk profiles.

However, we recognise that further focus, endeavours, and resources are required to achieve the next level of maturity in compliance and reporting.

Consultation with entities owned or controlled

This statement has been prepared in consultation with staff from the DOSCEL Secretariat and staff from primary and secondary schools within the Diocese of Sale. This includes completing requests for information in relation to obtaining supplier payment data as well as sharing experiences and observations with our suppliers within the context of modern slavery.

DOSCEL is committed to a collaborative approach to addressing modern slavery risks across our supply chain. This is further demonstrated through active engagement with our staff responsible for procurement where knowledge is exchanged to gather insights around how we can achieve best practice.

Moreover, Senior Management, Executives and Directors have been consulted and informed of the actions taken throughout this reporting period.

For the preparation of this Statement, we have consulted with different departments of the DOSCEL Secretariat such as Finance, Information and Technology, Planning and Building, and Industrial Relations and Human Resources.

Current and future initiatives

DOSCEL strives to reach best practice human rights due diligence for ethical sourcing of products and services for the Secretariat and for the schools it owns and operates.

We are actively working towards achieving higher benchmarks to eliminate modern slavery from our operations and supply chain.

We recognise that to improve our performance requires capacity building and dedicated resources. An important feature of our next phase involves broadening our response to include fostering a culture of collective action within DOSCEL, where every effort contributes to the shared goal of upholding ethical sourcing practices.

We have outlined the following initiatives for the year ahead, as we aim to maintain a consistent approach and to strengthen our response:

- Employment of a Strategic Sourcing Adviser dedicated to addressing modern slavery concerns across our operations and supply chain.
- Engage with Australian Catholic Anti-Slavery Network ('**ACAN**') who provides access to an extensive range of support tools and resources as well as e-learning modules. Becoming a member of ACAN will assist with identification of areas requiring further improvement and expansion and will allow for the development of 'next steps' that we can take to tackle modern slavery issues.
- Continue to complete an annual desktop review of the top 50 spend suppliers that includes payment data from the DOSCEL Secretariat, and all schools operated and owned by DOSCEL. This auditing exercise is valuable for assessing the effectiveness of our actions.
- Provide existing suppliers with an opportunity to update their responses when significant changes occur, where 12 months has lapsed since completing the modern slavery screening questionnaire.
- Provide our modern slavery questionnaire to suppliers who made the list of top 50 suppliers according to spend in 2022 but were not captured in our process, and who are considered an ongoing relationship of the DOSCEL supply base, in an effort to close the gap.
- Explore ways we can further analyse procurement data for business insights and effective decision making.
- Conduct a review of the modern slavery clauses in our DOSCEL Service Agreement to ensure they are sufficient and effective.

Appendix 1

Below is a list of entities owned and operated by DOSCEL:

- Mary MacKillop Catholic Regional College, Leongatha (ABN 67 237 962 919)
- Mary MacKillop Primary School, Narre Warren North (ABN 66 897 749 404)
- St Francis Xavier College, Beaconsfield (ABN 68 814 427 817)
- St Peter's College, Cranbourne (ABN 13 100 996 768)
- St Joseph's Primary School, Korumburra (ABN 30 588 371 259)
- Catholic Education Office, Warragul (ABN 12 716 912 401)
- St Ita's Primary School, Drouin (ABN 81 170 311 593)
- St James Catholic School, Nar Nar Goon (ABN 44 243 521 204)
- St Johns School, Koo Wee Rup (ABN 49 188 161 463)
- St Joseph's Primary School, Trafalgar (ABN 23 218 937 906)
- St Joseph's Primary School, Warragul (ABN 53 017 543 950)
- St Joseph's Primary School, Wonthaggi (ABN 19 090 361 804)
- St Joseph's School, Orbost (ABN 29 140 710 293)
- St Kieran's Primary School, Moe (ABN 24 939 316 336)
- St Laurence O'Toole Primary, Leongatha (ABN 89 522 669 939)
- St Mary's Primary School, Bairnsdale (ABN 99 751 861 942)
- St Mary's Primary School, Maffra (ABN 40 849 663 739)
- St Mary's Primary School, Sale (ABN 45 721 166 576)
- St Mary's School, Yarram (ABN 37 713 649 762)
- St Michael's Primary School, Berwick (ABN 20 750 217 023)
- St Michael's School, Heyfield (ABN 32 427 767 599)
- St Michael's School, Traralgon (ABN 62 095 609 409)
- St Patrick's Primary School, Pakenham (ABN 51 527 438 298)
- St Patrick's Primary School, Stratford (ABN 62 467 701 955)
- St Therese's Primary School, Cranbourne (ABN 61 587 505 023)
- St Thomas' Primary School, Sale (ABN 58 573 917 491)
- St Thomas the Apostle Primary School, Cranbourne East (ABN 30 917 760 611)
- St Vincent de Paul Primary School, Morwell East (ABN 94 949 730 469)
- Trinity Catholic Primary School, Narre Warren South (ABN 50 374 081 685)
- Columba Catholic School, Bunyip (ABN 42 951 717 425)
- Don Bosco Primary School, Narre Warren (ABN 71 386 192 144)
- Immaculate Heart of Mary School, Newborough (ABN 64 121 604 203)
- Lumen Christi Catholic Primary School, Churchill (ABN 32 934 149 808)
- Marist-Sion College, Warragul (ABN 96 914 121 604)
- Nagle College, Bairnsdale (ABN 12 659 477 973)
- Our Lady Star of the Sea Primary School, Cowes (ABN 85 122 734 010)
- Sacred Heart Primary School, Morwell (ABN 68 481 560 440)
- St Agatha's Primary School, Cranbourne (ABN 35 217 156 106)
- St Angela of the Cross Primary School, Warragul (ABN 86 597 965 923)
- St Brendan's School, Lakes Entrance (ABN 87 996 634 606)
- St Brigid's Catholic Primary School, Officer (ABN 67 249 383 806)
- St Catherine's School, Berwick (ABN 36 256 164 819)
- St Clare's Primary School, Officer (ABN 75 610 985 359)
- St Gabriel's Catholic School, Traralgon West (ABN 61 718 702 364)