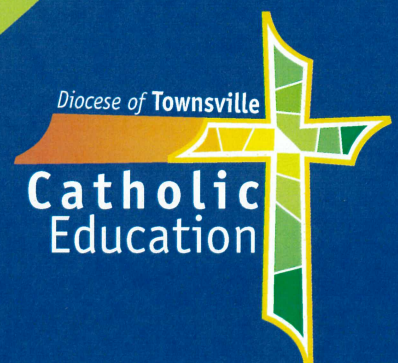


TOWNSVILLE CATHOLIC EDUCATION

# Modern Slavery Statement 2022





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# 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.

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. The information has been presented to comply with the recommendations of the mandatory criteria outlined in the *Guidance for Reporting Entities: Commonwealth Modern*

*Slavery Act 2018.* 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, 2022.



**Most Rev. Timothy J. Harris DD**

Bishop of Townsville, June 2023

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

*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**

## 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.

## OUR MISSION & VALUES

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.

## OUR GOVERNANCE FRAMEWORK

TCEO operates under the direction of Bishop Tim Harris, Bishop of the Diocese of Townsville, through the organisational leadership of the Executive Director. A

Strategic Leadership Team forms the executive of the organisation to guide strategic direction and ensure alignment with our mission and values.

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



**2,200**  
Staff



**12,700**  
Students



**18** Primary  
Schools



**5**  
Secondary  
Schools



**5** P-12 Schools  
**+1** P-9 School



**2**  
Boarding  
Colleges



## STRATEGIC DIRECTIONS

The TCE Strategic Directions 2022—2026 provide the scaffold for achieving the organisation’s overarching goal of ensuring each student receives an enriching Catholic school experience. The framework consists of our Strategic Intention and six pillars to guide our operations.

### 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.

**DIVERSITY AND WELLBEING** practices which prioritise care and dignity for all.

An experience of **FAITH AND MISSION** which enriches student’s lives and futures.

Strengthening **CAPABILITIES AND PARTNERSHIPS** to foster community.

**GOVERNANCE AND SUSTAINABILITY** to manage stewardship of resources.

**AUTHENTIC FAITH LEADERSHIP** which inspires all to the mission.

## REPORTING CRITERIA TWO

# Operations & Supply Chains

## OUR OPERATIONS

Townsville Catholic Education operates as an interconnected system of 29 schools/colleges, supported by TCEO specialist services including:

- Religious education
- Curriculum development
- Information technology
- Indigenous education
- Counselling
- Inclusive education
- Safeguarding
- People and safety
- Finance
- Planning/development
- Governance
- Marketing

## SUPPLIERS

- TCEO engages more than 1,100 suppliers.
- Approximately 700 additional suppliers service schools/colleges directly.
- Twelve suppliers spend more than \$500,000 per year.

## 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
- Travel and accommodation
- Investment of funds in term deposits
- Leasing of property as staff accommodation

- Leasing and purchase of vehicles
- Overseas travel for educational purposes or spiritual development (immersion)
- Market research and research for educational purposes
- Direct donations to charitable organisations
- Food and catering supplies

## SERVICES

- Consulting 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 (student and staff uniforms, promotional)
- Office supplies and teaching resources
- Construction equipment and material and fit-out of classroom/practical education spaces
- Print and promotional goods
- Fleet purchases

Our largest supply categories include energy, information technology hardware and software, insurance, building repairs and maintenance, travel and accommodation and fleet management, equalling 52% of the total spend on suppliers.



## REPORTING CRITERIA THREE

# Modern Slavery Risks IN OPERATIONS AND SUPPLY CHAINS

### OPERATIONAL RISKS – COVID-19

As an education provider, our operations continued to be affected by COVID-19. The commencement of 2022 saw impacts on service provision through the delayed start for students to the school year. Staff used the two weeks without students to focus on professional development and compliance training. The disruption did not affect the ability of TCEO to maintain contractual obligations with suppliers and contractors, minimising job losses that may have put workers at increased risk of being exploited. TCEO has continued to monitor the risks in supply chains for vulnerable groups including poor access to basic health care, worsening economic circumstances, lack of PPE and overcrowded working conditions.

**2022 Risk assessment** —————→ **Low-Medium**

**Justified by:** Continued monitoring of the health and wellbeing of our school communities. Our pandemic management strategies aligned with information provided by the Government and the Queensland Catholic Education Commission (QCEC).

### WORKFORCE

#### Direct employment

On most occasions, the Townsville Catholic Education Office and school/college staff are employed directly by the governing entity. 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. Employees engaged via an agency, are subject to the same provisions as direct employment.

**2022 Risk assessment** —————→ **Low**

**Justified by:** Regulatory and legislative requirements and adherence to Enterprise Agreements/employment contracts.

### INVESTMENTS

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

**2022 Risk assessment** —————→ **Low**

**Justified by:** Jurisdiction of operations and regulatory oversight.

### 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 – 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

**2022 Risk assessment** —————→ **Medium-High**

**Justified by:** 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.

### RESEARCH

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

**2022 Risk assessment** —————→ **Low**

**Justified by:** Internal scrutiny of contractor operations and regulatory oversight.

### SUMMARY OF KEY ACTIVITIES IN 2022 TO ADDRESS MODERN SLAVERY RISKS

Review of TCE risk register for modern slavery	February
Working Group Terms of Reference ratified	February
2021 TCE Modern Slavery Statement submitted	June
Review of TCE Research Guidelines	November
Review of TCE Code of Conduct for Staff	November
Planning for 2023 review of at-risk suppliers and supplier declaration updates	October
Update to TCE website (tsv.catholic.edu.au)	November



## REPORTING CRITERIA FOUR

# Actions to Address Risks

### GOVERNANCE AND AUDIT

The TCE Modern Slavery Working Group is comprised of leaders from key areas including People and Safety, Governance, ICT and Finance/Procurement. The group aims to identify, review and address modern slavery risks. Terms of Reference for the Group were ratified by the TCE Strategy and Governance Forum.

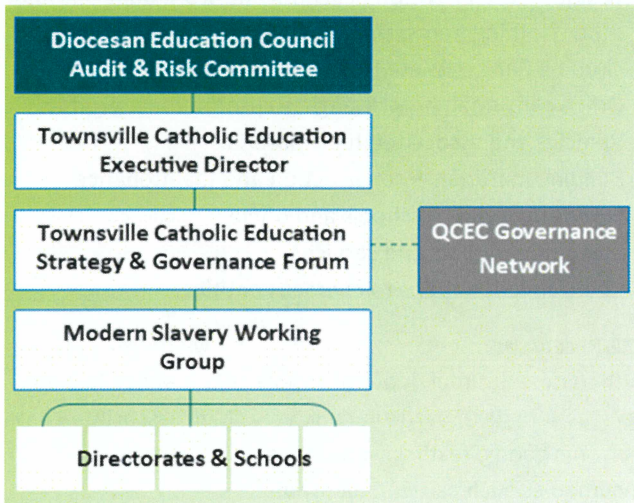


Figure 1: TCE Governance Structure—Modern Slavery

This risk management process pertaining to Modern Slavery is integrated into the TCE governance structures. The DEC, 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 Queensland Catholic Education Commission (QCEC) supported the efforts of all Queensland dioceses in managing business risks, through the QCEC Governance Network. In 2022, changes were proposed to the TCE Research Guidelines 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.

#### Future actions

The updated TCE Research Guidelines will be ratified in 2023, and the TCE Modern Slavery Position Statement will be reviewed in 2024, two years following the adoption of the document.

### SUPPLY CHAINS

Suppliers play a key role in supporting TCE, and a yearly review of the risks in current supply chain sectors was completed. This included reinforcement of continued adherence to contract clauses and TCE Procurement Guidelines, which require suppliers to take steps to identify, manage, report and address incidents of modern slavery.

#### Future actions

In 2023, TCE will audit declarations from suppliers, stating compliance to the *Modern Slavery Act 2018* (Commonwealth). The declarations improve visibility of supply chains, especially those with links to overseas manufacture/supply. TCE will continue to 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 reinforcing the TCE 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 2024 TCE Staff Code of Conduct training. Modern Slavery information will be updated 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. This structure 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 Modern Slavery 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 updated to articulate actions toward the reduction of modern slavery and provide national and international resources.

#### Future actions

Review of the TCE Modern Slavery Position Statement will be conducted in 2024.



## REPORTING CRITERIA FIVE

# Assessing Actions

### PROGRESS

Each year, TCEO conducts an analysis to understand our progress in addressing modern slavery risks. The analysis was first conducted in December 2020.



RISK CATEGORY	MITIGATION	2020	2021	2022	CHANGE
Customers and Stakeholders	Attitude	<span style="color: #e67e22;">■</span>	<span style="color: #f1c40f;">■</span>	<span style="color: #27ae60;">■</span>	↑
	Information Provision	<span style="color: #e67e22;">■</span>	<span style="color: #f1c40f;">■</span>	<span style="color: #27ae60;">■</span>	↑
	Feedback channels	<span style="color: #e67e22;">■</span>	<span style="color: #e67e22;">■</span>	<span style="color: #e67e22;">■</span>	=
	Staff engagement	<span style="color: #f1c40f;">■</span>	<span style="color: #27ae60;">■</span>	<span style="color: #27ae60;">■</span>	=
HR & Recruitment	Awareness	<span style="color: #f1c40f;">■</span>	<span style="color: #f1c40f;">■</span>	<span style="color: #f1c40f;">■</span>	=
	Policies & Systems	<span style="color: #f1c40f;">■</span>	<span style="color: #f1c40f;">■</span>	<span style="color: #f1c40f;">■</span>	=
	Training	<span style="color: #e67e22;">■</span>	<span style="color: #e67e22;">■</span>	<span style="color: #27ae60;">■</span>	↑
	Labour hire/outsourcing	<span style="color: #f1c40f;">■</span>	<span style="color: #f1c40f;">■</span>	<span style="color: #f1c40f;">■</span>	=
Procurement & Supply	Policies & procedures	<span style="color: #f1c40f;">■</span>	<span style="color: #27ae60;">■</span>	<span style="color: #27ae60;">■</span>	=
	Contract Management	<span style="color: #f1c40f;">■</span>	<span style="color: #27ae60;">■</span>	<span style="color: #27ae60;">■</span>	=
	Screening	<span style="color: #e67e22;">■</span>	<span style="color: #f1c40f;">■</span>	<span style="color: #27ae60;">■</span>	↑
	Supplier engagement	<span style="color: #f1c40f;">■</span>	<span style="color: #f1c40f;">■</span>	<span style="color: #f1c40f;">■</span>	=
	Monitoring and Corrective action	<span style="color: #e67e22;">■</span>	<span style="color: #f1c40f;">■</span>	<span style="color: #27ae60;">■</span>	↑
Management Systems	Governance	<span style="color: #f1c40f;">■</span>	<span style="color: #f1c40f;">■</span>	<span style="color: #27ae60;">■</span>	↑
	Commitment	<span style="color: #27ae60;">■</span>	<span style="color: #27ae60;">■</span>	<span style="color: #27ae60;">■</span>	=
	Business Systems	<span style="color: #e67e22;">■</span>	<span style="color: #e67e22;">■</span>	<span style="color: #27ae60;">■</span>	↑
	Reporting	<span style="color: #f1c40f;">■</span>	<span style="color: #27ae60;">■</span>	<span style="color: #27ae60;">■</span>	=
Risk Management	Risk identification	<span style="color: #f1c40f;">■</span>	<span style="color: #27ae60;">■</span>	<span style="color: #27ae60;">■</span>	=
	Operational risks	<span style="color: #f1c40f;">■</span>	<span style="color: #27ae60;">■</span>	<span style="color: #27ae60;">■</span>	=
	External risks	<span style="color: #e67e22;">■</span>	<span style="color: #e67e22;">■</span>	<span style="color: #27ae60;">■</span>	↑
	Reporting	<span style="color: #e67e22;">■</span>	<span style="color: #e67e22;">■</span>	<span style="color: #27ae60;">■</span>	↑

## REPORTING CRITERIA SIX AND SEVEN

### CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

We do not own or control any entities and therefore this criteria is not applicable. However, 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

TCE is committed to internationally-recognised human rights frameworks, which are expressed through the relevant legislation with which we comply. A review in 2022 identified 34 legislative instruments relevant to the business of TCEO. This information will guide our compliance actions in 2023, particularly our obligations relating to human rights, equality and reducing modern slavery risks.