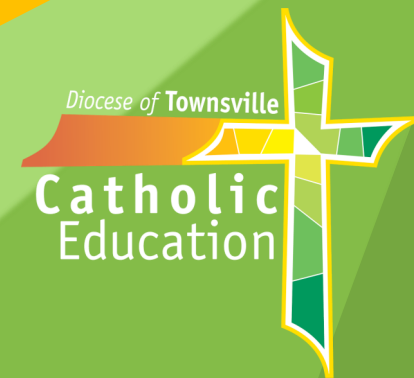


2023 MODERN SLAVERY STATEMENT



**2,200
Staff**



**12,700
Students**



**18 Primary
Schools**



**5 Secondary
Schools**



**5 P-21 Schools
+1 P-9 School**



**2 Boarding
Colleges**

TOWNSVILLE CATHOLIC EDUCATION OFFICE (ROMAN CATHOLIC TRUST CORPORATION FOR THE DIOCESE OF TOWNSVILLE)

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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, 2023. 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*.

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 2024

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

CRITERIA ONE—About TCEO

TCEO GOVERNANCE FRAMEWORK

The mission of the Townsville Catholic Education Office is to provide services to our 29 Catholic school communities which support them in achieving quality outcomes for students and in promoting the ongoing development of Catholic education. The Diocese of Townsville extends to Halifax in the north, west to Mount Isa and south to Proserpine. 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 2023, TCEO employed 2,730 staff. The annual budget expenditure for the period was \$344,032,233.

TCEO has responsibility for ensuring that each school is adequately and equitably resourced through the provision of centralised services. Reporting to the Executive Director are four directorates providing a system-wide approach to funding and service delivery. 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, collaborate to ensure Catholic education contributes to the Church's mission and to the local communities in which our schools operate.

Our network of schools is made up of:

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

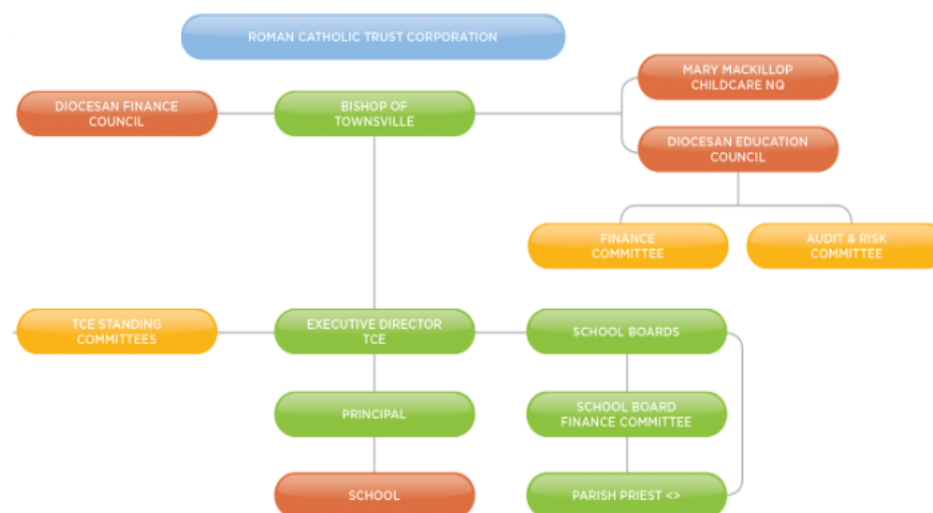


Figure 1—Structure of the Roman Catholic Trust Corporation for the Diocese of Townsville.

STRATEGIC DIRECTIONS

The TCE Strategic Directions 2022—2026 outline the structure for reaching the organisation's main objective of guaranteeing every student has a valuable Catholic school education. This structure includes our Strategic Intention and six key areas to direct our 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.

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.

AUTHENTIC FAITH LEADERSHIP which inspires all to witness the mission.

GOVERNANCE AND SUSTAINABILITY to manage stewardship of resources.

CRITERIA TWO—Operations and Supply Chains

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 facilities at new and existing schools, and facilities maintenance
- 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

SUPPLY CHAINS

TCEO engages more than 1,100 suppliers, and there are an estimated 700 additional suppliers servicing schools directly. TCEO spent more than \$500,000 with 12 suppliers in 2023. This year, TCEO commenced a process of centralising all accounts payable, which will allow a more complete view of our contracts and procurement opportunities.

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. TCEO's most accessed supply chains, which are assessed for modern slavery risks are outlined in Figure 2 below.

SERVICES	PRODUCTS
<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • 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.

In 2024, TCEO will commence construction of a new secondary school in Townsville, Mary Help of Christians Catholic College, Shaw. In 2025, the college will welcome 120 year 7 students and is expected to eventually provide educational services to 1,000 students. This major capital works project may increase the likelihood of incurring the identified modern slavery risks, through the significant investment in construction materials, information technology equipment, furniture and items for fit-out of office and educational spaces, and uniforms for staff and students.

CRITERIA THREE—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 is some of the long supply chain categories identified.

- Information Communications 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

This risk has been assessed as medium to high, due to the length of supply chains, coupled with TCEO’s ongoing expenditure on building projects and school maintenance. In 2024, the risk will be re-assessed due to increasing activity relating to the engagement of suppliers to complete a major capital works project, the construction of Mary Help of Christians Catholic College, Shaw.

WORKFORCE → Low Risk

In most cases, staff at TCEO and schools/colleges are directly employed under contracts of employment and enterprise agreements that comply with the requirements of the Australian Fair Work Act 2009 (Cth). All employees are subject to eligibility to work checking mechanisms during recruitment. TCEO has labour hire and consulting agency agreements in place with suppliers who may provide recruitment and selection services. Employees engaged through an agency are subject to the same provisions as direct employment. This risk has been assessed as low due to the regulatory and legislative requirements to which our enterprise agreements adhere.

INVESTMENTS → Low Risk

The Roman Catholic Trust Corporation for the Diocese of Townsville holds investment funds in short and long timeframe term deposits. This risk has been assessed as low due to the regulatory and legislative requirements within the Australian banking industry.

RESEARCH → Low risk

TCEO controls risk relating to research undertaken in the organisation through scrutiny of applications, mandated by research guidelines. The TCEO Executive Director approves all applications for research, and the risk has been assessed as low.

OPERATIONAL RISK—COVID-19 → Low Risk

The easing of the pandemic restrictions in 2023 reduced risks identified in the 2022 Modern Slavery Statement. TCEO has continued to monitor the risks in supply chains for vulnerable groups who may experience poor access to basic health care, worsening economic circumstances, lack of PPE and overcrowded working conditions.

CRITERIA FOUR—Actions to address risks

ADDRESSING MODERN SLAVERY RISKS—2023 ACTIVITIES

ACTIVITY	DATE
Modern Slavery Working Group Meeting	February
Review of TCE risk register for modern slavery	February
Review of TCE Research Guidelines	May
2022 TCEO Modern Slavery Statement submitted	June
Planning for 2024 centralisation of accounts payable functions	June to December

GOVERNANCE AND AUDIT

The TCE Modern Slavery Working Group meets twice yearly. It is made up of senior staff representing key teams where modern slavery risks may occur, including People and Safety, Governance, ICT and Finance/Procurement. The Terms of Reference for the Group include 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 2022 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 diocese is the Queensland Catholic Education Commission (QCEC) Governance Network.

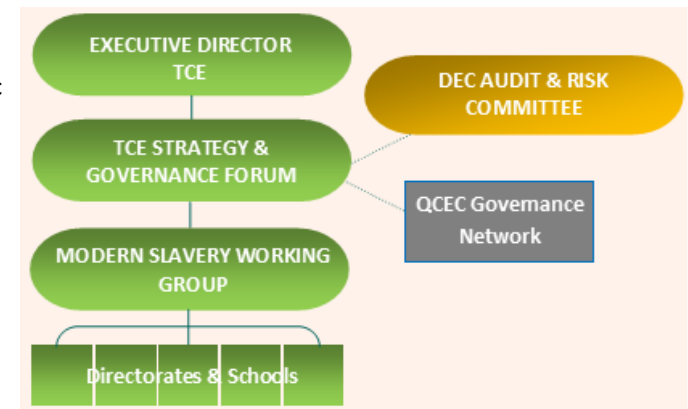


Figure 3: TCEO Governance Structure—Modern Slavery

In 2023, changes were made 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.

SUPPLY CHAINS

Since 2022, the TCE Procurement Guidelines and standard contract clauses have been enacted to require suppliers to take steps to identify, manage, report and address incidents of modern slavery. In 2023, TCE commenced a major project to move all accounts payable functions to the centralised finance department. This will provide the opportunity for better understanding of the breadth of our supplier network. A further review of the risks in current supply chain sectors will be undertaken in 2024.

Following the centralisation of accounts payable, the organisation will review declarations from suppliers, stating compliance to the Modern Slavery Act 2018 (Cth). Major suppliers in high risk supply will be required to complete an updated declaration to improve visibility of supply chains, especially those with links to overseas manufacture/supply.

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.

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 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 TCE Modern Slavery Position Statement will be reviewed in 2024, two years following the adoption of the document.

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. The progress for key result areas is outlined in Figure 4. Ongoing information availability and improved understanding of the Modern Slavery Act 2018 (Cth) over time have been the main contributing factors to improved progress.

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 on 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 maintains a dedication to globally acknowledged human rights standards, which are reflected in the applicable laws we follow. A review conducted in 2022 pinpointed 34 legal documents pertinent to TCEO's operations. This data will 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

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
- Mary Help of Christians Catholic College, Shaw
- 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 Catholic College, Abergowrie

Risk category	Mitigation	2020	2021	2022	2023
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				

Figure 4: TCEO Progress in achieving key outcomes—
 Investigating/preparing action Making progress
 Starting out

Modern slavery action plan and roadmap

ACTION PLAN

We have a three-year roadmap with an eighteen-month action plan in place, which outlines initiatives across due diligence, monitoring and reporting, training and awareness-raising, risk management and compliance, and communication.

YEAR 1 2019 (AWARENESS AND MOBILISATION)	YEAR 2 2020 (APPROACH)	YEAR 3 2021 (EFFECTIVENESS REVIEW AND MONITORING)
Establish working group	Conducted risk assessment and gap analysis	Review approach/ framework
Review and understand obligations under the Act	Performed a change impact assessment	Extend risk assessment beyond Tier 1 Suppliers
Engaged with Catholic peer and industry groups	Reviewed St John of God Health Care Code of Conduct and existing policies relating to investment, donations, and whistleblower and developed new Modern Slavery Policy and processes as required.	Review goals, targets and KPIs
Undertook due diligence activities	Established regular reporting	Complete all top 50 suppliers' contract variations.
Engaged Board and Audit and Risk Committee	Engaged with high priority tier 1 suppliers (top 50)	Review and update our supply risk assessment and present progress
Established communication with ACAN	Updated governance framework	Implement Modern Slavery 101 training for caregivers as identified through gap analysis and change impact.
Identified top tier suppliers	Develop and deployed initial training for working group	Extend the inclusion of the modern slavery clauses into next 50 suppliers
Commenced engagement with suppliers to commit to ethical sourcing	Conducted system maturity review and established a baseline	Confirm changes to policy and procedures with all Facilities Managers and ensure 100 per cent compliance
Formed working group	Identified KPIs	Revisit Bridge the Gap assessment and show maturity improvement.
	Launched awareness and communication campaign	Identify and address more detailed operational risks.
	Changed the vendor onboarding process and documentation	Identify and document metrics for non-supply chain risks.
	Commenced contract reviews for the top 50 suppliers to include the modern slavery clauses.	
	Reviewed the supply chain risk associated with COVID-19 and undertook range of actions	
	Reviewed and updated the Supplier Code of Conduct and published on St John of God Health Care website.	
	Prepared first Modern Slavery Statement	

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Pope Francis