

Diocese of Sale Catholic Education Limited

Modern Slavery Statement 2021

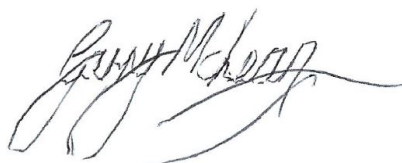
Disclosure Note

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

This is DOSCEL's second Modern Slavery Statement and sets out the progress that DOSCEL has made towards identifying, assessing, and addressing modern slavery risks during the 2021 Calendar Year Reporting Period, from 1 January 2021 to 31 December 2021.

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 8 September 2023

A handwritten signature in black ink, appearing to read 'Garry McLean', with a long horizontal flourish extending to the right.

Garry McLean
Chair

Diocese of Sale Catholic Education Limited Board

Entity Details

The Diocese of Sale Catholic Education Limited
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1 Introduction: Diocese of Sale Catholic Education Limited

Diocese of Sale Catholic Education Limited owns and operates all Catholic Primary and Secondary Schools within the Diocese of Sale, excluding Catholic College Sale (co-governed by Marist Schools Australia 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.

The primary activity of DOSCEL is the education of students. The long-term objectives of DOSCEL are to:

- support and advance Catholic education
- govern and manage the operation of the Catholic primary schools and secondary schools within the Diocese of Sale and
- provide support, service and leadership to those schools.

DOSCEL has developed a strategy document '*Inspiring Faith, Inspiring Learning*', which outlines the commitments to and the partnership with schools, families and parishes, to nurture the faith of children and youth, and develop their intellectual, physical, emotional and social knowledge, skills and attributes to meet their challenges with hope and faith.

The DOSCEL strategic direction (for period 2020-2024) places a strong emphasis on building and strengthening each school's capacity to achieve high quality learning outcomes for each student, effective ongoing professional learning for staff, and enhanced Catholic identity.

Catholic schools within the Diocese of Sale aim to equip students with the skills necessary to be critical thinkers, lifelong learners and active contributors and participants in society. A commitment to exploring contemporary issues such as social justice, equality and stewardship of creation aims to energise students, encouraging them to embrace their ability to effect positive change in their world; local and global.

In 2018, the Australian Government passed the *Modern Slavery Act No. 153, 2018* ('**the Act**'), that requires large corporations in Australia with turnover in excess of \$100 million, to annually report on the risks of modern slavery in their operations and supply chain, and actions taken to address those risks.

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.

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.

The Act defines modern slavery as including eight types of serious exploitation:

- 1) trafficking in persons,
- 2) slavery,
- 3) servitude,
- 4) forced marriage,
- 5) forced labour,
- 6) debt bondage,
- 7) deceptive recruiting for labour or services; and
- 8) the worst forms of child labour. The worst forms of child labour mean situations where children are subjected to slavery or similar practices, or engaged in hazardous work.

The impacts of COVID-19 have further accentuated modern slavery and exploitative behaviours across global supply chains. In response to the humanitarian challenge, DOSCEL continues to strive towards achieving the highest ethical standards. We are working towards greater visibility of our operations and supply chains and continuously review and strengthen our processes and systems to improve our human rights due diligence.

2 DOSCEL’s structure, operations and supply chain

DOSCEL governs 38 Catholic primary schools, 5 Catholic secondary schools and the Secretariat in the Diocese of Sale (Appendix 1). The Diocese spans metropolitan, regional and rural areas between Narre Warren and Cranbourne in the west of the Diocese, to Wonthaggi in the south and to Orbost in the east. In 2021, approximately 10,000 primary school students and 8,600 secondary students were educated in the Catholic school communities in our Diocese. In 2021, DOSCEL employed approximately 2,620 employees.



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

DOSCEL is responsible for the management of all aspects of Catholic education in the Diocese of Sale. It is a Company Limited by Guarantee with a Board of Directors. This Board reports to the Bishop of the Diocese who is the sole member of the Company.

The day to day management of the schools is delegated to the Chief Executive Officer ('CEO')/Director of Catholic Education, supported by the DOSCEL Secretariat. The Principals of our schools, who are part of our Senior Management Structure, are responsible to the CEO.

Our Senior Management further consists of the following officers who report to the CEO:

- 1) Chief Financial Officer: Finance Services.
- 2) Chief Information and Infrastructure Officer: Information and Infrastructure.
- 3) Chief Compliance Officer, Executive Manager - Industrial Relations/Human Resources: Industrial Relations/Human Resources.
- 4) Chief Operations Officer, Deputy Director - Catholic Identity, Leadership, Learning and Teaching: Catholic Identity, Leadership, Learning and Teaching.

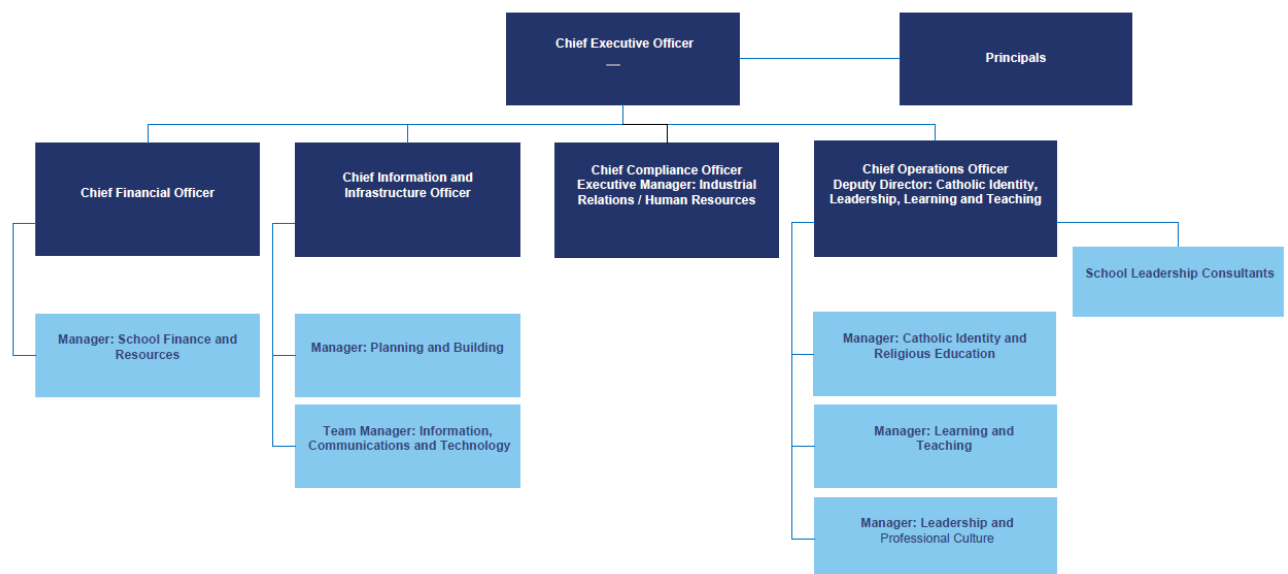


Figure 2: Overview of DOSCEL Management Structure

Our employees safety and wellbeing are of pivotal importance and we do whatever we can to keep our people healthy and happy. We aim to hire and retain the very best people, provide them with a balance of stimulation and security, and create a working environment that is inclusive and supportive. We also place great emphasis on education and training – keeping staff up-to-date with professional development requirements and safety regulations to ensure that staff maintain a high standard of integrity, honesty and diligence in performing their duties.

DOSCEL has extended our accountability to ensure our business and our people are aware of the risks of modern slavery in our operations and supply chain, and actions taken by DOSCEL to address these risks. We aim to be equally proud in ensuring our compliance with modern slavery requirements.

3 Risks of modern slavery practices in the operations and supply chain of DOSCEL

The results of our 2021 internal review of our major spending partners show that our largest risk for modern slavery in our operations and supply chain still comes from our use of suppliers in the Building and Construction, and Information and Technology industries. A new high-risk category has emerged due to COVID-19, which has led us to rely more on casual teaching staff. When we look closely at our suppliers, compared to last year, most of them continue to have a moderate to low risk of being involved in modern slavery. Also, most of our top 50 suppliers continue to be based locally.

These insights continue to drive our determination to take strong actions to reduce risks, work closely with industries, and ensure our active contribution to maintaining ethical standards within our supply chain.

4 Actions taken by DOSCEL to assess and address modern slavery risks, including due diligence and remediation processes

DOSCEL continued to utilise its established Modern Slavery Framework as a mechanism to assess and address modern slavery risks.

The following actions have been undertaken during the 2021 reporting period:

- DOSCEL introduced a modern slavery questionnaire which was embedded into the supplier tender process for previously identified high risk industries, Building and Construction and Information 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's policies and practices in modern slavery prevention to facilitate our preventative measures to modern slavery risks.
- Introduced modern slavery clauses to all Cleaning Services, and Building and Construction tender documentation to ensure our suppliers align with our dedication to uphold human rights and foster a responsible and sustainable supply chain.
- All new suppliers undergo a thorough vetting process for modern slavery risks prior to entering into service agreements. This not only ensures suppliers align with our legal and contractual obligations but also that DOSCEL maintains established ethical practices in relation to screening for modern slavery risks. This demonstrates our commitment to maintaining the same rigorous principles and practices that have been set to prevent and address modern slavery within our operations and supply chain. This involves not only initially implementing the standards but also ensuring their consistency and effectiveness over time.

- All DOSCEL Service Agreements have been updated to include modern slavery clauses, irrespective of the monetary value of the services provided. This represents a progression from the previous reporting period whereby this was only a requirement for major suppliers/contractors. The modern slavery clauses reflect our commitment to ethical practices and emphasise the importance of eradicating modern slavery from all aspects of our operations and supply chain. By incorporating these clauses, we aim to ensure transparency, responsibility, and the protection of human rights throughout our business relationships.
- We conducted an internal audit on our high spend suppliers using payment data from primary and secondary schools for the 12-month period, 1 January 2021 to 31 December 2021. The desktop review encompassed our top 50 spend suppliers, effectively capturing those with a minimum spend of \$500K and above. This approach was slightly different from the previous reporting period that included 60 top spend suppliers, however, maintains consistency where high-risk industries are captured based on spend value allowing us to measure the efficacy of our processes within our Modern Slavery Framework.
- The following DOSCEL policies, identified last year as requiring revision, have been updated to incorporate and reference the stipulations of the Act:
 - Code of Conduct
 - Whistleblower Policy
- A formal Modern Slavery session was held in September 2021 with our Principal's that outlined DOSCEL's reporting obligations under the Act.
- A modern slavery awareness campaign for DOSCEL staff during Easter 2021 highlighted occurrences within the chocolate industry and encouraged mindful purchase of certified slavery-free chocolate.

5 Assessing the effectiveness of actions taken by us

DOSCEL is working to continually improve our strategies, and this is informed by internal performance reviews along with feedback received from our staff and suppliers.

Below is a list of positive indicators showing the effectiveness of our actions:

- The addition of modern slavery clauses as a control measure in our Service Agreements has raised awareness with our school staff and our suppliers about our legislative obligations to eliminate modern slavery from our supply chain. Moreover, this has instilled the concept that implementing ethical business practices is an important step towards cultivating a more ethical supply chain.

- By encouraging open communication and disclosures we are achieving more collaborative partnerships with our suppliers. This is helping to build trust within our supplier relationships regarding modern slavery as a shared responsibility. Furthermore, it supports early detection, prompt action, and collaborative problem-solving. This is evidenced through the following observations during interactions with suppliers:
 - Our suppliers are beginning to consider the implications of modern slavery on their businesses.
 - Our suppliers are beginning to delve into their supply chains by contemplating the origin of products and the individuals involved in manufacturing.
- Considerations affecting provider selection are now extending beyond cost and quality in procurement. Certain schools are currently assessing the origin of uniforms and fabrics, opting for local manufacturing over suppliers with unclear supply chain visibility. In addition to this, cleaning services are being monitored to ensure the absence of any modern slavery practices.

6 Consultation with entities owned or controlled

This statement has been prepared in consultation with staff from 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 Technology, Planning and Building, and Industrial Relations and Human Resources.

7 DOSCEL Current and Future Initiatives

DOSCEL is dedicated to refining our policies, procedures, and due diligence mechanisms to effectively identify, prevent, and mitigate modern slavery risks. Through transparent reporting and collaboration, we strive to evolve and set higher benchmarks in working towards eradicating modern slavery from our operations and supply chains.

As we look to continue our efforts against modern slavery, we have broadly set out the following goals to guide our path forward.

- Produce a more comprehensive supply chain map to better visualise the complexity of our supply chain. This will allow us to see more clearly our supply chain dynamics and allow us to better identify and address our potential risks and vulnerabilities related to modern slavery.
- Build on our annual risk assessment for high spend suppliers to include Secretariat supplier payment data in addition to primary schools and secondary schools supplier payment data.
- Extend our risk assessment and due diligence activities to include suppliers that provide less expensive items as we know that risks of modern slavery can exist at various levels of the supply chain and across different spending categories.
- Continue to engage with our major suppliers/contractors to ensure they are meeting our high ethical standards.

8 Appendix 1

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

- Mary MacKillop Catholic Regional College, Leongatha
- Mary MacKillop Primary School, Narre Warren North
- St Francis Xavier College, Beaconsfield
- St Peter's College, Cranbourne
- St Joseph's Primary School, Korumburra
- Catholic Education Office, Warragul
- St Ita's Primary School, Drouin
- St James Catholic School, Nar Nar Goon
- St John the Baptist School, Koo Wee Rup
- St Joseph's Primary School, Trafalgar
- St Joseph's Primary School, Warragul
- St Joseph's Primary School, Wonthaggi
- St Joseph's School, Orbost
- St Kieran's Primary School, Moe
- St Laurence O'Toole Primary, Leongatha
- St Mary's Primary School, Bairnsdale
- St Mary's Primary School, Maffra
- St Marys Primary School, Sale
- St Mary's School, Yarram
- St Michael's Primary School, Berwick
- St Michael's School, Heyfield
- St Michael's School, Traralgon
- St Patrick's Primary School, Pakenham
- St Patrick's Primary School, Stratford
- St Therese's Primary School, Cranbourne
- St Thomas' Primary School, Sale
- St Thomas the Apostle Primary School, Cranbourne East
- St Vincent de Paul Primary School, Morwell East
- Trinity Catholic Primary School, Narre Warren South
- Columba Catholic School, Bunyip
- Don Bosco Primary School, Narre Warren
- Immaculate Heart of Mary School, Newborough
- Lumen Christi Catholic Primary School, Churchill
- Marist Sion Regional College, Warragul
- Nagle College, Bairnsdale
- Our Lady Star of the Sea Primary School, Cowes
- Sacred Heart Primary School, Morwell
- St Agatha's Primary School, Cranbourne
- St Angela of the Cross Primary School, Warragul
- St Brendan's School, Lakes Entrance
- St Brigid's Catholic Primary School, Officer
- St Catherine's School, Berwick
- St Clare's Primary School, Officer
- St Gabriel's Catholic School, Traralgon West