



Diocese of Toowoomba  
Catholic Schools

# Modern Slavery statement 2024

*This is the fourth statement made by  
Toowoomba Catholic Schools  
to meet the requirements of the  
Modern Slavery Act (2018).*



Cover image – Reaching out – Steve Snodgrass

## Who we are

Toowoomba Catholic Schools (TCS) provides Catholic schooling to over 10,600 students and employment to over 1,600 staff in 32 schools and the Toowoomba Catholic Schools Office (TCSO). The 32 schools are located across the Catholic Diocese of Toowoomba, with the furthest west being in Quilpie.

As a system of schools, we are committed to offering a high-quality education that ensures academic success for all in a distinctively Catholic environment.

## Our structure

TCS is an agency of the Diocese of Toowoomba governed as a part of The Corporation of the Roman Catholic Diocese of Toowoomba under the Religious Education and Charitable Institutions Act 1861.

The Member of the Corporation's Governing Body is Bishop Kenneth Howell. As the Sole Member, the Bishop delegates to the Executive Director: Catholic Schools, leadership of TCS and the authority to determine system structures, employ personnel and set priorities.

The Executive Director: Catholic Schools is also authorised to determine implementation of the policies issued by the Bishop for Catholic schools and the development, implementation and review of all other governance instruments, including policies, frameworks, procedures and guidelines as required to meet civil, canonical and specific agency accountabilities.

The Executive Director: Catholic Schools must exercise these delegations and authority to ensure that TCSO and the 32 schools

- operate within the parameters of Canon law and civil law
- reflect Catholic culture, including subsidiarity and right relationships
- provide clarity for all employees
- empower leadership
- clearly define accountabilities and
- ascribe role requirements and the monitoring of performance.

As a not-for-profit entity, TCS fulfills the requirements of the Queensland Catholic Schools Not-for-Profit Guidelines to ensure that financial arrangements and relations with other entities are managed in a way that conforms to legislative and regulatory requirements.

## Our operations and supply chains

This statement covers the activities of TCS which includes its 32 schools and the TCSO. For the purpose of this statement, our key operations and associated supply chains are as follows.

Table 1: Main operations and supply chains

Area	Main operations	Supply chain
Toowoomba Catholic schools	delivering educational services to students  contributing to community through charitable works	<ul style="list-style-type: none"><li>• textiles ie school uniforms purchased from retail outlets in local area</li><li>• school supplies including stationery, paper, cleaning products</li><li>• subject specific teaching materials including animals, chemicals, foodstuffs, wood products</li><li>• foodstuffs including for boarding and tuckshops</li></ul>

		<ul style="list-style-type: none"> <li>• services including for cleaning and security</li> <li>• construction including building firms</li> <li>• technology including purchasing of hardware, software and cloud services</li> <li>• charitable works including Catholic and other registered charities, in Australia and overseas</li> </ul>
TCSO	<p>delivering educational support and corporate services to Toowoomba Catholic schools including</p> <ul style="list-style-type: none"> <li>• teaching and learning</li> <li>• staff formation and Catholic identity</li> <li>• finance, facilities and procurement</li> <li>• technology and data</li> <li>• human resources</li> <li>• governance</li> <li>• communications and marketing</li> </ul>	<ul style="list-style-type: none"> <li>• office consumables and promotional products</li> <li>• technology including purchasing of hardware, software and cloud services</li> <li>• utilities and professional services consultants</li> <li>• printing services</li> <li>• automotive requirements ie corporate car fleet</li> <li>• hospitality and catering services</li> </ul>

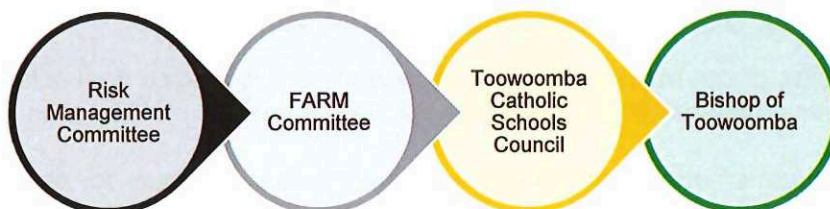
## Our risk management approach

The Executive Director: Catholic Schools has responsibility and is accountable to the Bishop of the Diocese of Toowoomba for ensuring that all risk is managed effectively.

It is through the implementation of the TCS Enterprise risk management framework and associated risk management practices, that modern slavery risks are identified, assessed, managed, monitored, reviewed, recorded and reported.

The Framework includes a Risk Management Committee (RMC) made up of the Executive Leadership Team (ELT) of the TCSO. The RMC has responsibility for monitoring and reviewing the TCS strategic risk register.

A report based on the TCS strategic risk register is provided regularly to the Finance, Audit and Risk Management (FARM) Committee of the Toowoomba Catholic Schools Council, which has responsibility for providing strategic advice to the Bishop of the Diocese of Toowoomba.



## Our policies, frameworks and procedures

TCS has formal policies, frameworks and procedures in place to promote and give practical application to our values and ethical and legal conduct in all operations eg Code of Conduct, Sponsorship, fundraising and charitable works procedure framework and Resolution of complaints procedures. These policies, frameworks and procedures also describe for our own employees, and for others, TCS's commitment and expectations, linked to the Catholic social teachings.

### Catholic social teachings

- life and dignity of the human person
- call to family, community, and participation
- rights and responsibilities
- preferential option for the poor
- the dignity of work and the rights of workers
- solidarity

All TCS governance documents have a regular review cycle, and at each of these reviews, discussions will include consideration of the Modern Slavery Act (2018) and the inclusion of specific requirements of employees to identify and mitigate any identified modern slavery risks.

## Potential risks in our operations and supply chains

In 2023-2024, TCS continued to review potential risk for modern slavery across our operations and supply chains, applying the TCS Enterprise risk management framework.

In its fourth report, the TCS focus continues to be on identifying risks that may cause, contribute to and/or be directly linked to modern slavery practices, as described in the Australian Government's Department of Home Affairs guidance for reporting entities.

In doing so, TCS continues to confirm and further identify areas of no or low risk, for example, in recruitment and employment practices that are governed by internal procedures. TCS has also continued to identify and mitigate potential risks in areas where products may be sourced from a local supplier whose supply chains are overseas eg school uniforms and marketing/promotional materials.

TCS has used potential risk areas to identify and prioritise supplier engagement activities. This is highlighted to new and existing suppliers through the Modern Slavery identification, mitigation and reporting clauses in generic service and supplier agreements and contracts, and discussions with TCS employees who are engaging new suppliers and contractors or renewing agreements and/or contracts.

## Addressing the risk of modern slavery practices

Through further mapping of our main operations and supply chains based on Table 1 (above) TCS continues to improve its understanding of and ability to assess modern slavery risks.

As a result, relevant governance documents and statements continue to demonstrate TCS's commitment to and actions being taken to mitigate the risks of modern slavery. These include

- modern slavery being highlighted for discussion at each review of and as new risks are identified in the TCS strategic risk register
- ensuring the TCS Code of conduct for employees continues to include specific reference to responsibilities related to minimising modern slavery risks

- developing a fact sheet and declaration for suppliers in the major areas of risk ie textiles, ICT, building and fit out materials reiterating TCS's commitment and expectations of these suppliers should issues of modern slavery be known or become known.

## Assessing the effectiveness of our actions

The TCS Enterprise risk management framework includes the review and evaluation of risk mitigation strategies to ensure continuous improvement. Any identified risks and associated mitigation strategies related to modern slavery will continue to be subject to this approach to assess the effectiveness of TCS's actions.

## Consultation, education and training

During 2023-2024 the Executive Leadership Team of TCS and the FARM Committee continued to reflect on and refine the Strategic risk register, inclusive of considering the requirements of the Modern Slavery Act (2018). This business-as-usual approach to identification, consultation, education and training, changes to governance documentation if required and determining future commitments to addressing identified risks is now embedded into the work of these groups.

## Approvals

This statement has been endorsed by the Executive Director: Catholic Schools.



**Dr Patrick Coughlan**  
Executive Director: Catholic Schools

This statement has been approved and signed by the Bishop Kenneth Howell, Sole Member of The Corporation of the Roman Catholic Diocese of Toowoomba.



**Most Reverend Kenneth Howell**  
Sole Director of The Corporation of the Roman Catholic Diocese of Toowoomba  
Bishop of Toowoomba

June 2025