

Diocese of Sale Catholic Education Limited

Modern Slavery Statement 2023

Disclosure Note

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

This is DOSCEL's fourth Modern Slavery Statement and sets out the progress that DOSCEL has made towards identifying, assessing and addressing modern slavery risks during the 2023 Calendar Year Reporting Period, from 1 January 2023 to 31 December 2023.

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
14 June 2024

A handwritten signature in black ink, appearing to read 'Garry McLean', with a stylized flourish at the end.

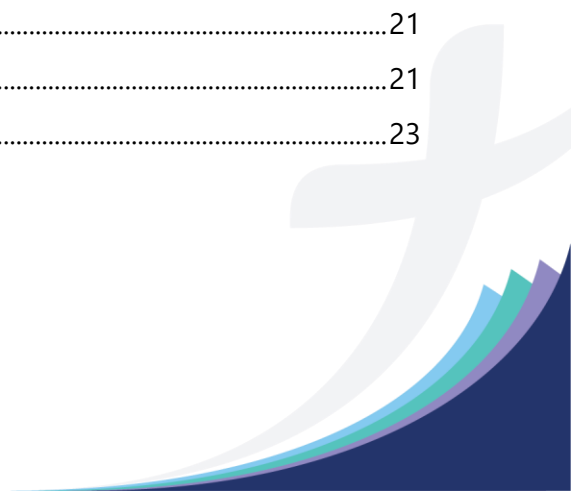
Garry McLean
Board Chair
Diocese of Sale Catholic Education Limited

Entity Details

The Diocese of Sale Catholic Education Limited
6 Witton Street, Warragul VIC 3820
ABN 91 621 266 993
www.doscel.catholic.edu.au
director@doscel.catholic.edu.au

Contents

Statement from Bishop Gregory Bennet	1
Criteria 1: About us	3
Opening statement.....	3
Nurturing Faith, Inspiring Learning: The Mission of Catholic Education	3
Criteria 2: Organisational structure, operations and supply chain.....	4
Our structure and operations	4
Our modern slavery governance framework	6
Our supply chain.....	7
Criteria 3: Modern slavery risks in our operations and supply chain.....	9
Building and construction	10
Information and communications technology.....	10
Labour hire.....	10
Cleaning and property maintenance.....	11
School uniforms	11
Criteria 4: Actions taken to assess and address risks.....	11
Resources dedicated to addressing modern slavery	12
St Josephine Bakhita Catholic Primary School.....	13
School uniforms	13
Awareness training.....	14
Supplier questionnaire.....	14
Modern Slavery Risk Profiling – Close the Gap Program	15
Contracts.....	15
Vetting potential suppliers.....	15
Service Agreements	15
Policy, standards, and programs.....	16
Case study – Strengthening supplier engagement and due diligence	17
Annual desktop review	18
Remediation	18
Criteria 5: Assessing the effectiveness of actions taken by us.....	19
Top 50 suppliers – Procurement data insights.....	20
Criteria 6: Consultation with entities owned or controlled.....	21
Criteria 7: Current and future initiatives.....	21
Appendix 1 - Entities owned and operated by DOSCEL.....	23





Statement from Bishop Gregory Bennet

Dear Sisters and Brothers in Christ,

As we embark on the 2023 modern slavery reporting period, I reflect on the challenges and opportunities ahead, building upon the groundwork laid in our 2022 statement.

In our pursuit to end modern slavery, we hold close the principles emphasised by Pope Francis in *Fratelli Tutti*, that everything is interconnected, and we are fellow travellers sharing the gift of our common home. This understanding shapes how we view our responsibility and approach to stewardship over the Earth. Instead of exploitation for personal gain, we must care for our planet, which in turn means caring for each other. Together, this forms a relationship of mutual responsibility, that is firmly grounded in the acknowledgement of God's affirmation in Genesis that all creation is inherently good. This also sits at the core of *Laudato Si'*, guiding us to prioritise values over profit margins.

The global prevalence of modern slavery, influenced by conflict, economic downturns, and climate change, remains a pressing issue. We are stewards of God's creation. We must hear the silent cries of the earth and share the burden of remedying the scars of exploitation. As we strive towards a more sustainable future, we take to heart the lessons of *Laudato Si'*, understanding the intricate links between environmental degradation and human suffering.

Transitioning to a low carbon future brings challenges, especially within the renewable energy sector, highlighting the need to address modern slavery risks in sustainable energy sources. Our society's growing sensitivity to sustainability and modern slavery concerns is evident with students advocating for a clean, healthy, and sustainable environment. We are encouraged by this shift and align our efforts with the global call for a sustainable future.

DOSCEL is approaching this task with a measured perspective. We are preparing for sustainability reporting, expanding our due diligence efforts, and participating in a digital reimagination project that includes improving technology capabilities for future procurement activities. Our advocacy extends to urging the government to provide pathways to permanency for those seeking safety in Australia, addressing forced labour implications with post-pandemic migration.


Anticipating significant changes resulting from the statutory review of the *Modern Slavery Act 2018* (Cth), DOSCEL welcomes the strengthening of the legislation and remains steadfast in its commitment to dismantling the structures perpetuating modern slavery. Our approach to modern slavery reporting is evolving and I am pleased to announce DOSCEL's new partnership with the Australian Catholic Anti-Slavery Network.

Amidst these challenges, let us remember the beacon of hope represented by the construction of St Josephine Bakhita Primary School in Clyde North, starting in 2023.

Named after the patron saint of victims of modern slavery, this school embodies our commitment to ethical procurement, illuminating the moral dimension of our economic decisions. May these efforts be a sign of our solidarity with our sisters and brothers throughout the world, and we accompany one another on the way to peace, justice and care for our common home.

A future that breaks ties with slavery awaits us.

Yours sincerely in Christ,

+ 

+ Greg Bennet
Bishop of Sale

Criteria 1: About us

Opening statement

Diocese of Sale Catholic Education Limited owns and operates all Catholic primary and secondary schools within the Diocese of Sale, excluding Catholic College Sale Ltd and Lavalla Catholic College, Traralgon.

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.

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 fourth Modern Slavery Statement and illustrates our progress towards identifying, assessing, and addressing modern slavery risks during the 2023 Calendar Year Reporting Period, from 1 January 2023 to 31 December 2023.

Nurturing Faith, Inspiring Learning: The Mission of Catholic Education

Our mission in Catholic education is to provide exceptional educational opportunities firmly rooted in our Catholic identity, with the goal of fostering holistic growth and making positive contributions to the world. The mission of DOSCEL is deeply aligned with the evangelising mission of the Church, primarily realised through our network of Catholic schools.

At the heart of our educational approach lies a commitment to holistic development, encompassing spiritual, academic, social, emotional, and physical growth. Our curriculum prioritises faith formation, immersing students in Catholic teachings and values. We actively promote Catholic Social Teaching, instilling in our students a dedication to social justice, global citizenship, and service to others.

Furthermore, we embrace the integration of technology into our classrooms, equipping students with the digital skills essential for success in the modern world. Our teaching methods are tailored to cater to diverse learning styles, abilities, and interests, ensuring that every student receives personalised support, academically and personally. Collaboration with

parish priests, teachers, staff, and families remains fundamental to our mission of holistic student development.

Under the leadership of Most Rev. Greg Bennet, Bishop of Sale, and with the support of the Secretariat, parish communities, and the wider faith community, DOSCEL is steadfastly committed to the DOSCEL Strategic Plan 2020-2024, "Inspiring Faith, Inspiring Learning." This strategic plan outlines our key priorities and direction, guiding our efforts to provide high-quality education that nurtures both faith and academic excellence.

In alignment with our mission, we are excited to announce the construction of St Josephine Bakhita Primary School, located in the new Five Farms estate at Wild Goose Way, Clyde North. This addition to our network of schools reflects our dedication to meeting the educational needs of the community while fostering faith-filled environments that empower families and young people. Scheduled for completion in 2025, St Josephine Bakhita Primary School will serve as a beacon of faith and learning, shaping the lives of generations to come. Additionally, by naming the school after the patron saint dedicated to modern slavery victims, we aim to raise awareness and inspire action against modern slavery within our community.

Gratitude is extended to the Victorian and Commonwealth Governments for their ongoing significant support, which enables us to invest in new learning facilities and school infrastructure through the Catholic Capital Grants Program and school community funding. Notably, DOSCEL schools celebrated significant milestones in 2023 with 13 official Blessing and Opening Ceremonies to celebrate school projects completed over the past three years. The ceremonies acknowledge and thank all contributors who support our mission of enhancing Catholic education within our community.

Criteria 2: Organisational structure, operations and supply chain

Our structure and operations

DOSCEL governs 38 Catholic primary schools, five of the seven 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 from 1 January to 31 December 2023, DOSCEL's annual consolidated revenue reached \$394.37 million, with employee-related expenses totalling \$251.0 million. During this period, DOSCEL schools educated 10,472 primary school students and 7,667 secondary students. Additionally, DOSCEL employed a workforce comprising 2,699 school staff and 106 Secretariat staff.

In 2018, the 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 Chair and Board of Directors to govern DOSCEL in partnership with the Chief Executive Officer/Director of Catholic Education.



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

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 Chief Executive Officer/Director of Catholic Education is supported by the DOSCEL Secretariat, working closely with schools to provide high-quality educational opportunities. Inspired by the teachings of Jesus, Catholic schools enable learning, faith, life and culture to converge within a safe and supportive environment. Catholic schools are inclusive, welcoming and focus on nurturing each student’s unique potential.

The structure of the DOSCEL Secretariat Senior Management Team altered in 2023 and consisted of:

- Chief Financial Officer – Finance (appointed 2023).
- Chief Compliance Officer, Executive Manager – Industrial Relations/Human Resources.
- Chief Operations Officer, Deputy Director – Catholic Identity, Leadership, Learning and Teaching.
- General Manager – Learning and Teaching.
- General Manager – Infrastructure and Support Services (appointed 2023).
- General Manager – Information and Technology.
- Senior Manager – Catholic Identity and Religious Education.

In 2023, the DOSCEL Board, including the Chair and Deputy Chair, was comprised of nine 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.

In 2023, the Conflict of Interest Policy was reviewed and updated, following approval by the DOSCEL Board.

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**') underwent a name change on 5 December 2023 and is now known as Victorian Catholic Education Authority Ltd ('**VCEA**'). VCEA represents Catholic education providers in Victoria, advocating for students' needs and managing government funding. The Bishop of Sale is a member of VCEA.

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

Figure 2 illustrates the DOSCEL organisational structure.

Our modern slavery governance framework

In September 2023, DOSCEL officially joined the Australian Catholic Anti-Slavery Network ('**ACAN**') and completed our orientation. We are now focussed on building a productive working relationship. For the first time, the DOSCEL Modern Slavery Statement is included in the ACAN Compendium of Modern Slavery Statements.

To facilitate our anti-modern slavery efforts, a new role has been established at DOSCEL, a dedicated Strategic Sourcing Adviser ('**SSA**') who serves as the Modern Slavery Liaison Officer ('**MSLO**') with ACAN. The MSLO works alongside the Chief Financial Officer to implement the ACAN Risk Management Program across DOSCEL operations and supply chain, with a focus on achieving the DOSCEL Modern Slavery Framework and risk mitigation activities.

The Chief Financial Officer presents the annual DOSCEL Modern Slavery Statement, endorsed by the Chief Executive Officer, to the DOSCEL Board via the Finance, Audit & Risk Committee.

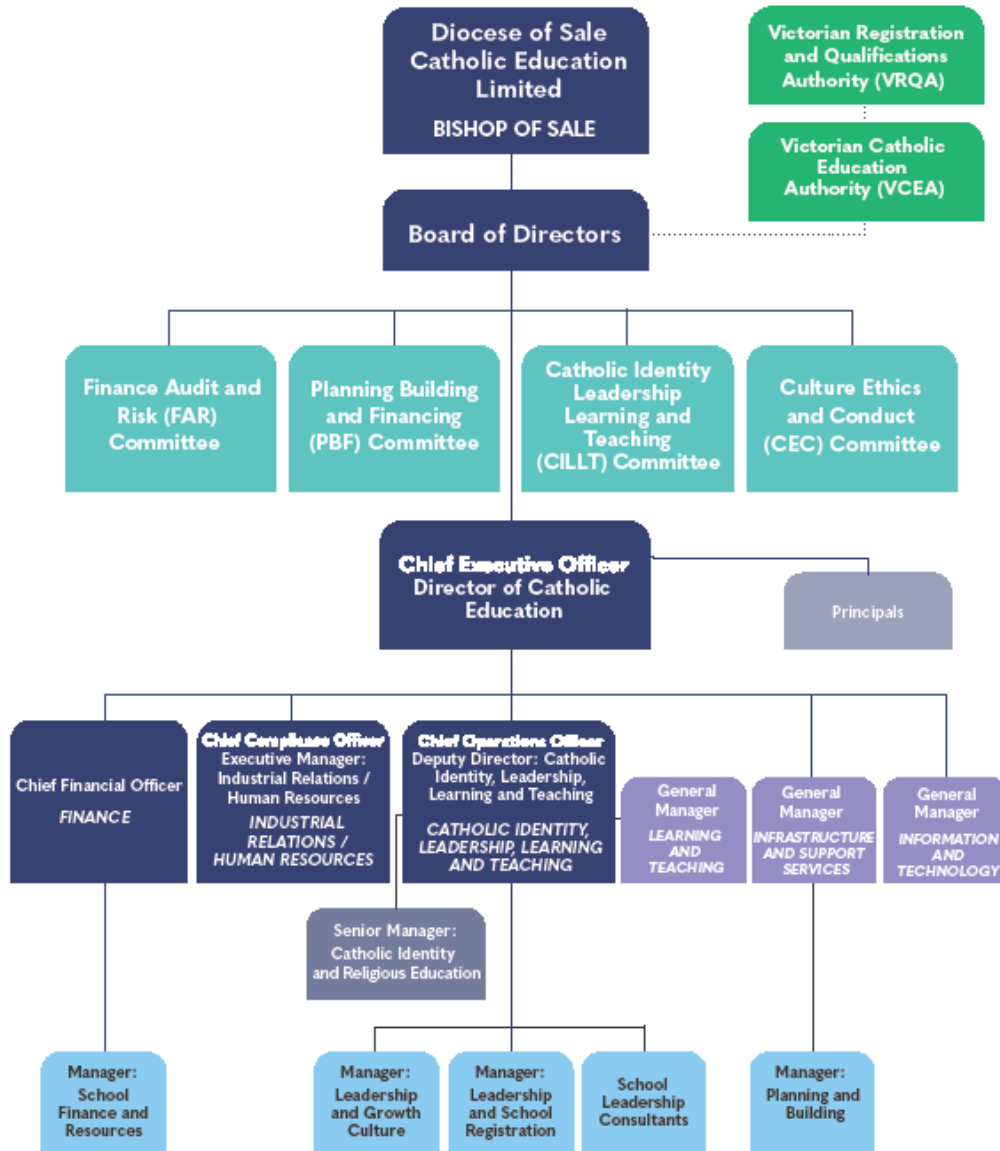


Figure 2: 2023 DOSCEL Organisational Structure

Our supply chain

In September 2023, DOSCEL commenced participation in the ACAN Modern Slavery Risk Management Program, marking a significant shift in our supply chain due diligence. The program, in collaboration with Sedex, enhances our capabilities in supplier mapping and engagement. This initiative aligns with our commitment to combating modern slavery and improving transparency within our supply chain.

DOSCEL's decentralised procurement system, while posing challenges in data collection, has been the subject of ongoing efforts for improvement. Currently, this is a manual process where approximately two weeks is employed to collect and consolidate spend data from primary schools, secondary schools, and the Secretariat. The list of top 50 suppliers by spend is then reconciled to understand the due diligence activities undertaken for each supplier, providing insights into the reach of our Modern Slavery Framework. This year, the data has been aligned with the ACAN Category Risk Taxonomy, based on the Global Slavery Index and International Labor Organization definitions of modern slavery.

During the 2023 calendar year, we spent approximately \$105.5 million with external suppliers. Our top 50 spend equated to approximately \$53.8 million and comprised 51% of our total spend to external suppliers. Our largest procurement categories remain the same as the previous reporting year, Building and Construction (including architects), ICT Hardware / ICT Software and Network Services, and Labour Hire (largely related to the sourcing of relief teachers).

Looking more closely at our top 50 suppliers by spend, 80% have operations solely based in Australia, 10% have a global presence and the remaining 10% have operations in one or more countries including New Zealand, United Kingdom, South Africa, China, and the Philippines. DOSCEL is currently linked with 6 suppliers on Sedex and we are actively encouraging membership for our suppliers interested in improving their social and environmental performance.

An internal audit of payment data for the 2022 calendar year revealed that DOSCEL had approximately 5,000 suppliers, ranging from one-off purchases to longer-term contracts. This estimate has increased to around 7,000 suppliers for the year 2023. The significant change in estimates between 2022 and 2023 reflects our limited understanding of our supplier base beyond those with expenditures under \$50,000, particularly when considering the top 50 suppliers list.

We acknowledge the trend towards sustainable procurement involving supply chain consolidation. DOSCEL is currently in the initial stages of mapping our supply chain and we are committed to gaining greater transparency of our existing suppliers. Furthermore, a new enterprise system will underpin procurement activities in the future. The VCEA Digital Re-imagination initiative is shaping the digital future of Catholic Education in Victoria. This encompasses the digital reimagining of the ICON enterprise system and has implications for procurement among other capability areas. DOSCEL is actively participating in the shaping of this future technology and business process ecosystem. The ICON system, originally designed in 2013, is due for renewal, prompting a review to capture current business requirements and improve functionality.

This year we have extended our supply chain descriptions beyond our top 3 high risk spend categories to include cleaning and property maintenance services, and school uniforms given these categories exist in our top 50 supplier list and the recognised modern slavery risks associated. Descriptions of these supply chains and risks are provided in the next section covering Criteria 3.

Criteria 3: 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. 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. 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 2023 desktop review is revealing persistent high-risk categories in the areas of Building and Construction, Information and Communications Technology, and Labour Hire. 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.

DOSCEL values suppliers that prioritise fair labour practices and environmental responsibility. We believe in supporting industries that care for workers and the environment. Sourcing responsible suppliers helps DOSCEL promote sustainable practices.

Below are supply chain descriptions (that cover Criteria 2), along with the common modern slavery risk factors relevant to our identified high-risk procurement categories.

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.

Risks: 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 communications technology

The Information and communications 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 communications 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.

Risks: 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. This connection is often influenced by the amount of money spent on equipment. Additionally, environmental risks stem from the electronics industry's resource-intensive production processes, such as e-Waste generation and the use of conflict minerals. Addressing these concerns requires sustainable sourcing practices.

Labour hire

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.

Risks: While the education sector in Australia is considered low risk, it is important to acknowledge that labour hire 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 property maintenance

The cleaning and property maintenance services supply chain for DOSCEL Secretariat and school buildings is characterised by Service Agreements with various providers for tasks such as general cleaning, floor care, gardening, building and property maintenance, security services and waste management.

Each school contracts independently, requiring diligent oversight to ensure ethical labour standards are maintained.

Risks: Cleaning and maintenance services are recognised as high-risk sectors, necessitating specific attention to safeguard worker welfare within this supply chain. The risks of modern slavery may exist in this type of work as suppliers have been known to subcontract workers, potentially increasing the risk of modern slavery. Other risk indicators include unusually low pricing.

School uniforms

The school uniform supply chain at DOSCEL primary and secondary schools encompasses suppliers responsible for manufacturing, distributing, and retailing uniforms to students. Uniforms are accessible through on-site school uniform shops or nearby local retailers.

DOSCEL is prioritising suppliers demonstrating transparent and ethical practices throughout their supply chain, particularly those using environmentally friendly materials.

Risks: Concerns regarding modern slavery stem from the garment manufacturing process, which may involve factories with substandard labour practices, and sourcing materials such as cotton, which pose risks of forced labour in harvesting.

Criteria 4: Actions taken to assess and address risks

In response to the evolving modern slavery policy landscape, driven by the recent statutory review of the Act, DOSCEL is committed to enhancing its performance in addressing modern slavery risks within its operations and supply chain. With renewed determination and the establishment of a new partnership with ACAN, along with the establishment of a new dedicated SSA role, DOSCEL is fostering collaboration, knowledge-sharing, and preparing for skill-building across all departments to ensure ethical procurement practices.

Seeking proactive insights into anticipated changes in reporting criteria, DOSCEL participated in key events such as 'The Future of Modern Slavery Reporting', hosted by Fair Supply in Melbourne. This engagement provided valuable insights and best practices, positioning us to confidently navigate the demands of modern slavery reporting.

Moreover, DOSCEL contributed to the global conversation on addressing modern slavery by participating in 'IMPACT! Procure with Purpose', a segment of the Big Ideas Summit series. This gathering facilitated exchanges of vital ideas, plans, experiences, and innovations aimed at addressing past, present, and future challenges.

As we mark five years since the introduction of the Act and witness the alarming rise in global slavery, DOSCEL is intensifying its commitment to preventing and eradicating modern slavery. This includes our significant flagship project, St Josephine Bakhita Primary School in Clyde North, named after the patron saint of modern slavery victims, reflecting our commitment to justice in the light of God's grace.

Additionally, DOSCEL remains focussed on ethically sourcing school uniforms, acknowledging the prevalence of modern slavery in fibre growth and harvesting, and garment manufacturing. We are seeking assistance from ACAN how we can best address this concern in our supply chain.

In the following section, we outline the initiatives accomplished during the 2023 reporting period.

Resources dedicated to addressing modern slavery

Australian Catholic Anti-Slavery Network

In September 2023, DOSCEL became a member of ACAN, and in doing so joined a Catholic community recognised by its shared belief and commitment to ending modern slavery. As an ACAN participating entity, DOSCEL has access to shared resources highly developed for modern slavery risk prevention and mitigation. Moreover, in coming together with Catholic entities in Australia at ACAN, DOSCEL is better positioned to take action, as it contributes to and leverages collective purchasing spend and has a more coordinated response.

DOSCEL attendance at ACAN webinars:

- The MSLO attended the October and November ACAN Modern Slavery Working Group Webinars. Noting, the DOSCEL Building and Infrastructure Team also attended the November ACAN Modern Slavery Working Group Webinar.
- The MSLO attended ACAN Program Sessions: Sedex and Supplier Engagement, and a Supplier Webinar.

Strategic Sourcing Adviser

DOSCEL has significantly improved its internal resources and capabilities by appointing a SSA that acts as the MSLO to ACAN. This role was created to ensure modern slavery compliance, reporting, and our commitment to ethical sourcing practices. Furthermore, it encompasses a heightened focus on social and environmental performance, strengthening our dedication to ethical sourcing.

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.

We are thrilled to announce that extensive planning has paved the way for construction with a significant milestone being the turning of the sod on 22 September 2023. Construction is expected to conclude in 2025, and enrolments are set to begin in Term 4, 2024, with the first term scheduled for commencement in 2025. A principal will be appointed in 2024, who will engage the local community and foster a sense of social responsibility, empathy, and commitment to justice within the school.

In 2023, the SSA was invited to join the St Josephine Bakhita Primary School Working Group and delivered a presentation introducing the topic of modern slavery, emphasising opportunities and collaboration, particularly within the context of procurement of goods and services for the school, with careful consideration to modern slavery implications.

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.

Project Actions

- **Strategic partners:** We are working closely with the architect and builder to avoid and minimise modern slavery from the building supply chain including registration to Sedex and a commitment to address any modern slavery concerns.
- **Procurement of goods and services for the school:** In evaluating potential suppliers, preference will be given to those embracing a human rights approach to modern slavery risk identification and mitigation.
- **Identify opportunities:** We recognise the importance of creating a culture of health and human rights within the school community, and we intend to explore opportunities through strong leadership, education, community engagement and support programs.

School uniforms

DOSCEL is actively working towards prioritising partnerships with school uniform providers that uphold ethical manufacturing practices and utilise environmentally friendly materials. In

recent partnerships, school uniform suppliers have demonstrated their commitment to ethical manufacturing practices throughout their supply chain. Notably, one supplier has provided transparency by disclosing the locations of their manufacturing facilities and has implemented measures to promote fair labour practices and environmentally sustainability.

As part of our ongoing commitment to ethical sourcing, DOSCEL has introduced a short form modern slavery questionnaire to assist schools in evaluating potential uniform suppliers. This tool assists schools in evaluating potential uniform suppliers, enabling them to assess efforts to prevent modern slavery in supply chains ensuring alignment with DOSCEL’s values and ethical standards.

To further improve our efforts, DOSCEL is actively collaborating with ACAN to explore additional strategies and tools available to us. Together, we aim to strengthen our approach to mapping and monitoring our uniform supply chain. We acknowledge that achieving our goal of responsibly and ethically sourced student uniforms may take some time, but we remain dedicated to this endeavour.

Awareness training

As an ACAN participating entity, DOSCEL has access to comprehensive resources for modern slavery risk prevention, including flexible training modules. To meet our reporting goals, 50 DOSCEL Secretariat staff either involved in procurement processes or part of the St Josephine Bakhita Working Party completed this training, and there are plans to expand this initiative next year.

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 Communications 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 2023, the modern slavery questionnaire has been introduced 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 Communications Technology	√	√	√
Financial Services	-	-	√

Modern Slavery Risk Profiling – Close the Gap Program

To close potential gaps, a targeted program was launched towards the end of 2023 to triage suppliers that landed on our top 50 list of suppliers in 2022, who hadn't been screened for modern slavery risks in more than 12-months and encourage high-risk suppliers to join Sedex, thereby improving transparency and accountability. Suppliers who complete the DOSCEL modern slavery questionnaire are provided with general feedback including a risk rating and modern slavery support document that includes access to free awareness training and information on services available.

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 include modern slavery clauses, irrespective of the monetary value of the services provided. This minimum standard has been maintained from the previous year.

A review of modern slavery clauses in our standard DOSCEL Service Agreement has commenced with the aim to strengthen the sufficiency and effectiveness of the clauses.

In addition to this, a new Education Recruitment Service Agreement has been introduced, which establishes a centralised recruitment agency contract for sourcing relief teachers. This initiative includes the implementation of an interview panel and features updated modern slavery clauses.

These clauses have also been revised for the building contract associated with St Josephine Bakhita Primary School.

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.
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.

Case study – Strengthening supplier engagement and due diligence

In the 2023 procurement of Information and Communications Technology hardware and accessories, DOSCEL made a deliberate choice to partner with a supplier showing a commitment to enhancing their response to modern slavery prevention, rather than opting for a top performer in modern slavery due diligence disclosure. Despite initial shortcomings, the supplier demonstrated a willingness to learn and improve.

Through open dialogue and collaboration, DOSCEL is engaging with the supplier to address potential modern slavery risks, leveraging Sedex and ACAN Program Management to identify and rectify any existing issues.

Additionally, in the process of assessing finance lease options, DOSCEL recognises the role of the financial services sector in modern slavery prevention. Understanding the sector's potential impact across industries, DOSCEL set high standards for lenders, requiring a proactive approach to managing modern slavery risks.

To ensure alignment with these standards, DOSCEL introduced a multi-step screening process. This included gathering non-financial information from publicly available sources and requesting financial institutions to complete a modern slavery checklist. These measures provided valuable insights into the strengths and vulnerabilities of potential suppliers.

Through these initiatives, DOSCEL continues to strengthen its supply chain and advance its efforts in combating modern slavery.

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 and more recently Financial Services.

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 four reporting periods, allowing us to collect data for comparison. DOSCEL Secretariat payment data, along with primary and secondary schools, for the 12-month period, 1 January 2023 to 31 December 2023 is included in the internal audit. The results are summarised and discussed in the next section where we evaluate the effectiveness of our actions.

Remediation

DOSCEL is fully committed to collaborating with our suppliers to address issues, ensure effective remedies, and implement preventative measures in line with UN Guiding Principle 31, which emphasises the importance of providing effective grievance mechanisms for affected stakeholders, including workers in supply chains.

Previously, DOSCEL referred to the Complaints and Grievances Management Policy, School Complaint Handling Procedure, and Whistleblower Policy. However, recognising the need for a more accessible and anonymous avenue for communication, we have transitioned to utilising DOMUS 8.7 as our primary grievance mechanism. Domus 8.7 provides ease of access and swift response that our internal policies cannot adequately provide.

DOMUS 8.7 is a reliable channel for workers, suppliers, and other stakeholders to report concerns related to modern slavery. This service ensures ease of access and anonymity for individuals seeking assistance. Upon reporting a concern, an assessment and case file are promptly created, and appropriate workflows are implemented based on the severity of the situation. While immediate danger situations are prioritised, all concerns are addressed on a needs basis.

In the event that indicators of modern slavery are observed, individuals are encouraged to utilise the DOMUS 8.7 service to report their concerns.

Through the implementation of DOMUS 8.7 and working towards establishing clear remediation procedures, DOSCEL is committed to ensuring that anyone who has concerns has access to a safe and effective pathway for addressing modern slavery concerns.

Below is a table indicating that no referrals to Domus 8.7 were made regarding workers in our operations and supply chain during the 2023 reporting period. Additionally, DOSCEL received no reports through internal grievance mechanisms concerning modern slavery indicators or incidents. It's important to note that the absence of reports does not necessarily indicate the absence of modern slavery.

2023	ACTIVITY	DOSCEL
DOMUS 8.7 EXTERNAL REFERRALS	Contacts made via worker voice / grievance mechanism	0
	Referrals for advice and assistance	0
	Individuals identified or referred for modern slavery assessment	0
	Individuals with modern slavery cases remediated	0

Criteria 5: Assessing the effectiveness of actions taken by us

At DOSCEL, we are committed to continuously evaluating the effectiveness of our actions in addressing modern slavery risks. Our efforts encompass a range of initiatives, including the development of policies and processes, provision of awareness training for staff, and the establishment of clear metrics to gauge progress.

Through a combination of data driven analysis, policy review, collaborative partnerships, and stakeholder feedback, we have ensured our strategies remain adaptive, responsive, and impactful.

The following section outlines an assessment of our ongoing efforts to combat modern slavery for the reporting period:

- The SSA delivered a presentation to the St Josephine Bakhita Working Party to introduce the topic of modern slavery and the opportunity for collaboration especially within the context of procurement of goods and services for the school.

- A total of 50 DOSCEL Secretariat staff completed two ACAN Training Modules, Introduction to Modern Slavery, and Modern Slavery Business Relevance.
- A total of 31 suppliers that landed on the 2022 top 50 list of suppliers were invited to complete the DOSCEL modern slavery questionnaire as part of the Modern Slavery Risk Profiling – Close the Gap Program. Of these, a total of 11 suppliers responded with completed questionnaires by 31 December 2023. A risk assessment was completed, and feedback provided to suppliers on ways they can strengthen their approach to modern slavery. This represents a 35% supplier engagement rate. We are continuing to receive responses and are continuing the program into 2024.
- As of 31 December 2023, DOSCEL had 6 suppliers registered on Sedex, providing transparency and accountability in our supply chain management practices.
- A new Education Recruitment Service Agreement, with updated modern slavery clauses has been introduced. The modern slavery contract clauses were updated for the building contract for St Josephine Bakhita Primary School. A major cleaning contract is also undergoing modern slavery clause review as well.
- We received commendation from a leading asset finance company, acknowledging DOSCEL as one of the first non-government entities they have observed to undertake a rigorous level of due diligence in financial services procurement.

Top 50 suppliers – Procurement data insights

- In 2023 the top three spending categories were Building and Construction, Information and Communications Technology, and Labour Hire. This scenario has remained consistent across the previous three reporting periods.
- Among our top spend suppliers, 30% have consistently been on the top 50 list for three consecutive years, while 38% have appeared for two consecutive years (e.g., 2022 & 2023). Additionally, 6% have appeared twice but not consecutively (e.g., 2021 & 2023) and 26% are new to the list as of 2023. This suggests that DOSCEL's spending patterns show a degree of predictability, with a preference for established suppliers.
- Out of the top 50 suppliers, 13 are reporting entities under the Act and were not contacted to complete a DOSCEL modern slavery questionnaire. Instead, we review their modern slavery statements, which are accessible on the Australian Government Modern Slavery Statements Register.
- Out of the 37 suppliers not subject to reporting under the Act, we had screened 21 for modern slavery risks through our questionnaire by 31 December 2023. We're actively engaging with our top 50 suppliers through our Modern Slavery Risk Profiling – Close the Gap Program, aiming to expand the reach of our Modern Slavery Framework across all spending categories. The table below shows the growth of our modern slavery risk screening, with roughly a 20% increase each year.

Reporting Year	2021	2022	2023
A. Total number of top 50 suppliers that are reporting entities under the Act.	7	10	13
B. Total number of top 50 suppliers that are not reporting entities under the Act and completed the DOSCEL modern slavery questionnaire by 31 December 2023.	5	14	21
Percentage = $B / (50 - A) \times 100$	12%	35%	57%

Criteria 6: Consultation with entities owned or controlled

This statement was developed with input from staff at the DOSCEL Secretariat and from primary and secondary schools in the Diocese of Sale. This consultation involved gathering information on supplier payments and exchanging disclosure information regarding modern slavery issues.

DOSCEL is dedicated to a collaborative approach in addressing modern slavery risks throughout our supply chain. We actively engage with our procurement staff to exchange knowledge and seek insights for achieving best practices.

Additionally, senior management, executives, and directors have been kept informed about the actions taken during this reporting period.

In preparing this statement, we consulted various departments within the DOSCEL Secretariat, including Finance, Information Technology, Infrastructure and Support Services, and Industrial Relations and Human Resources. We are also working closely with the working party planning the new St Josephine Bakhita Primary School to enhance our procurement processes.

DOSCEL regularly consults with ACAN for guidance on implementing our Modern Slavery Framework.

Criteria 7: 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 controls.

Throughout the reporting period, DOSCEL invested significantly in resourcing and capacity building, focussing on awareness campaigns, internal working group development, and establishing our partnership with ACAN. These efforts have extended the reach of our due diligence activities and introduced new processes.

Looking ahead to 2024, DOSCEL is transitioning towards the development of a multi-year plan to address modern slavery, guided by ACAN. This strategic shift will allow us to optimise resource allocation for sustained impact, fostering a more integrated strategy that holistically addresses modern slavery risks.

While our due diligence efforts have primarily focussed on Tier 1 (direct) suppliers, multi-year planning aims to expand these efforts further down the supply chain. Furthermore, by expanding our planning horizon, DOSCEL aims to cultivate a clearer long-term vision for combating modern slavery, positioning us to make meaningful and lasting change.

Appendix 1 – Entities owned and operated by DOSCEL



Diocese of Sale
Catholic Education Ltd

**Catholic Education
Office**
WARRAGUL
ABN 12 716 912 401



Nagle College
BAIRNSDALE
ABN 12 659 477 973



**St Francis Xavier
College**
BEACONSFIELD
ABN 68 814 427 817



**St Peter's
College**
CRANBOURNE
ABN 13 100 996 768



**Mary MacKillop
Catholic Regional
College**
LEONGATHA
ABN 67 237 962 919



Marist-Sion College
WARRAGUL
ABN 96 914 121 604



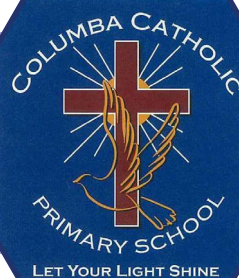
**St Mary's
Primary School**
BAIRNSDALE
ABN 99 751 861 942



**St Catherine's
School**
BERWICK
ABN 36 256 164 819



**St Michael's
Primary School**
BERWICK
ABN 20 750 217 023



**Columba Catholic
School**
BUNYIP
ABN 42 951 717 425



**Lumen Christi
Catholic
Primary School**
CHURCHILL
ABN 32 934 149 808

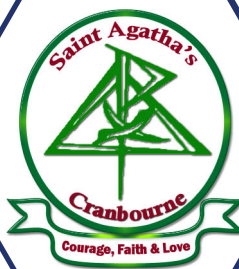


**OUR LADY
STAR OF THE SEA
PRIMARY SCHOOL COWES**

**Our Lady Star
of the Sea
Primary School**
COWES
ABN 85 122 734 010



**St Thomas
the Apostle
Primary School**
CRANBOURNE EAST
ABN 30 917 760 611



**St Agatha's
Primary School**
CRANBOURNE
ABN 35 217 156 106



**St Therese's
Primary School**
CRANBOURNE
ABN 61 587 505 023



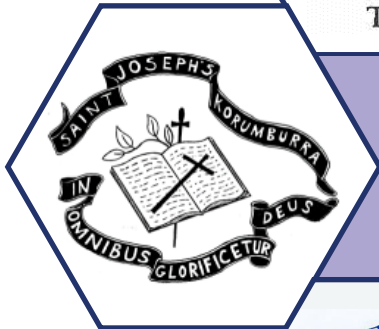
St Ita's Primary School
DROUIN
ABN 81 170 311 593



**St Michael's
School**
HEYFIELD
ABN 32 427 767 599



St John School
KOO WEE RUP
ABN 49 188 161 463



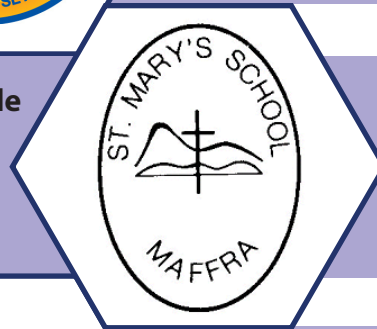
**St Joseph's
Primary School**
KORUMBURRA
ABN 30 588 371 259



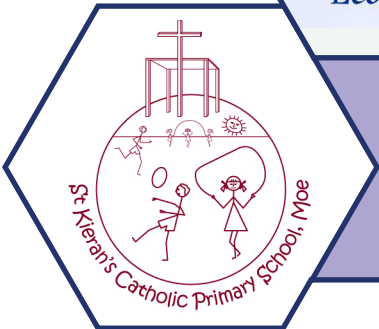
St Brendan's School
LAKES ENTRANCE
ABN 87 996 634 606



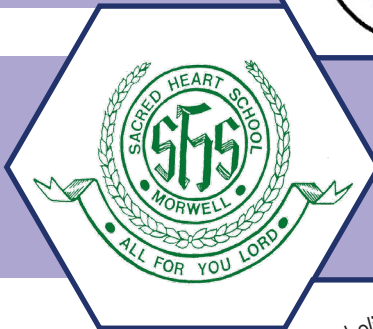
**St Laurence O'Toole
Primary School**
LEONGATHA
ABN 89 522 669 939



**St Mary's
Primary School**
MAFFRA
ABN 40 849 663 739



**St Kieran's
Primary School**
MOE
ABN 24 939 316 336



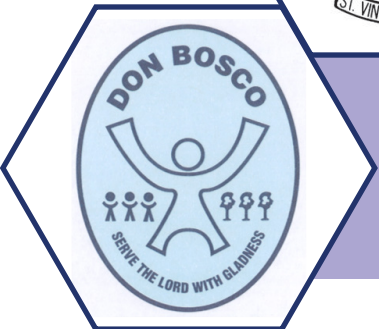
**Sacred Heart
Primary School**
MORWELL
ABN 68 481 560 440



**St Vincent de Paul
Primary School**
MORWELL EAST
ABN 94 949 730 469



**St James
Catholic School**
NAR NAR GOON
ABN 44 243 521 204



**Don Bosco
Primary School**
NARRE WARREN
ABN 71 386 192 144



**Mary MacKillop
Primary School**
NARRE WARREN NORTH
ABN 66 897 749 404



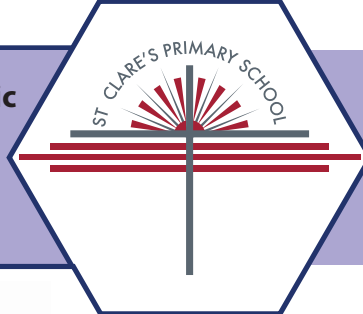
**Trinity Catholic
Primary School**
NARRE WARREN
SOUTH
ABN 50 374 081 685



**Immaculate Heart of
Mary School**
NEWBOROUGH
ABN 64 121 604 203



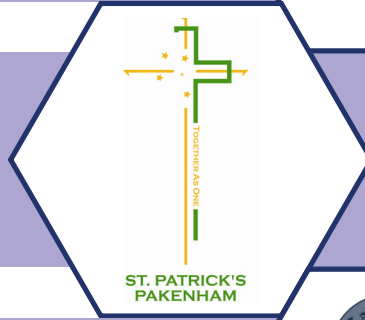
**St Brigid's Catholic
Primary School**
OFFICER
ABN 67 249 383 806



**St Clare's
Primary School**
OFFICER
ABN 75 610 985 359



**St Joseph's
School**
ORBOST
ABN 29 140 710 293



St Patrick's Primary School
PAKENHAM
ABN 51 527 438 298



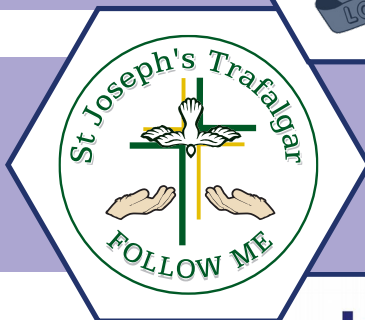
**St Mary's
Primary School**
SALE
ABN 45 721 166 576



**St Thomas'
Primary School**
SALE
ABN 58 573 917 491



**St Patrick's
Primary School**
STRATFORD
ABN 62 467 701 955



St Joseph's Primary School
TRAFALGAR
ABN 23 218 937 906



**St Gabriel's
Catholic School**
TRARALGON WEST
ABN 61 718 702 364



**St Michael's
School**
TRARALGON
ABN 62 095 609 409



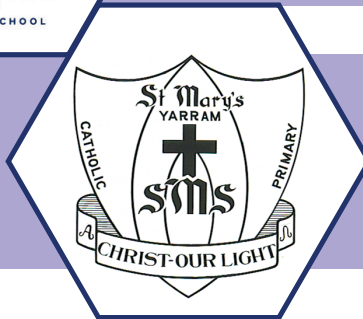
**St Joseph's
Primary School**
WARRAGUL
ABN 53 017 543 950



**St Angela of the Cross
Primary School**
WARRAGUL
ABN 86 597 965 923



**St Joseph's
Primary School**
WONTHAGGI
ABN 19 090 361 804



St Mary's School
YARRAM
ABN 37 713 649 762