

Diocese of Sale Catholic Education Limited

Modern Slavery Statement 2024



Diocese of Sale
Catholic Education Ltd

Inspiring *Faith* Inspiring *Learning*

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 fifth Modern Slavery Statement and sets out the progress that DOSCEL has made towards identifying, assessing and addressing modern slavery risks during the 2024 Calendar Year Reporting Period, from 1 January 2024 to 31 December 2024.

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 13 June 2025



Cathy Jenkins
Board Deputy Chair
Diocese of Sale Catholic Education Limited

Entity Details

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Dear Sisters and Brothers in Christ,

In this 2024 modern slavery reporting period, I have contemplated the scourge of modern slavery, prayerfully considering the challenges Pope Francis offered to the world to ensure we can work together to eradicate slavery in all forms and orient ourselves to a just and peaceful society where all can flourish.

In a meeting with survivors of modern slavery in Rome in November 2023, Pope Francis called on all leaders to take action to end modern slavery. This call of Francis must drive our work here in the Diocese of Sale, where, in every sphere of Diocesan life, we remain vigilant to ensure our practices are not enabling slavery of any form to occur.

“The historical effects of slavery are still felt today, with millions of people suffering around the world. Faith and spiritual leaders, along with individuals, must keep fighting the structures creating modern slavery.” (Francis, 2023)

Today, human trafficking is estimated to be a \$150 billion industry that profits off an estimated 49.6 million victims worldwide. On the 10th International Day of Prayer and Awareness against human trafficking established by Francis to coincide with the February 8 Feast Day of St Josephine Bakhita, the patron saint of human trafficking victims, Francis exhorted each of us to ‘... *help one another to be more responsive, to open our lives and hearts to our sisters and brothers who even now are being bought and sold as slaves. It is never too late to take action.*’

In the construction and opening of our most recent school, St Josephine Bakhita Catholic Primary School, all our processes were designed to exemplify a rejection of modern slavery and trafficking. This was in direct response to the Pope’s call to ‘... *pray fervently and work proactively for this cause, the defence of human dignity, whether by prayer and action as individuals and families, or as parish and religious communities, as ecclesial associations and movements, and also in the various spheres of social and political life.*’ (Francis, 8/2/24)

In our ongoing commitment to reject modern slavery and human trafficking in all our endeavours, we continue to examine all our actions through the lens awareness – awareness of the factors that can give rise to human trafficking and slavery, including wars, conflicts, famine and climate change, and ways we can address these factors through our explicit actions. Here, Francis reminded us that is ‘... *only by lifting our eyes to Christ, our hope, that we can find the strength for a renewed commitment.*’ (Francis, 8/2/25)

Together, we can work to ensure that the conditions for trafficking and exploitation are eliminated and that the respect for fundamental human rights prevails, not just in the Diocese of Sale, but across the world.

Yours 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 is 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 fifth Modern Slavery Statement and illustrates our progress towards identifying, assessing, and addressing modern slavery risks during the 2024 Calendar Year Reporting Period, from 1 January 2024 to 31 December 2024.

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 fulfilled the Strategic Plan 2020-2024, "*Inspiring Faith, Inspiring Learning.*" This Strategic Plan outlined our key priorities and direction and guided our efforts to provide high-quality education that nurtured both faith and academic excellence over the past five years.

We are excited to announce the opening of St Josephine Bakhita Catholic 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. Officially opened in February 2025, St Josephine Bakhita Catholic Primary School now serves as a beacon of faith and learning, shaping the lives of current students and generations to come. Additionally, by naming the school after the patron Saint dedicated to modern slavery victims, we strive to raise awareness and inspire action against modern slavery within our community.

Gratitude is extended to the Victorian and Commonwealth Governments for their ongoing 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 2024 with nine official Blessing and Opening Ceremonies to celebrate completed school projects. 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 39 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 2024, DOSCEL's annual consolidated revenue reached \$426.24 million, with employee-related expenses totalling \$267.28 million. During this period, DOSCEL schools educated 10,706 primary school students and 7,553 secondary students. Additionally, DOSCEL employed a workforce comprising 2,901 school staff and 110 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.

Catholic Schools in the Diocese of Sale

● Primary Schools ● Secondary Schools ● Doscel Secretariat

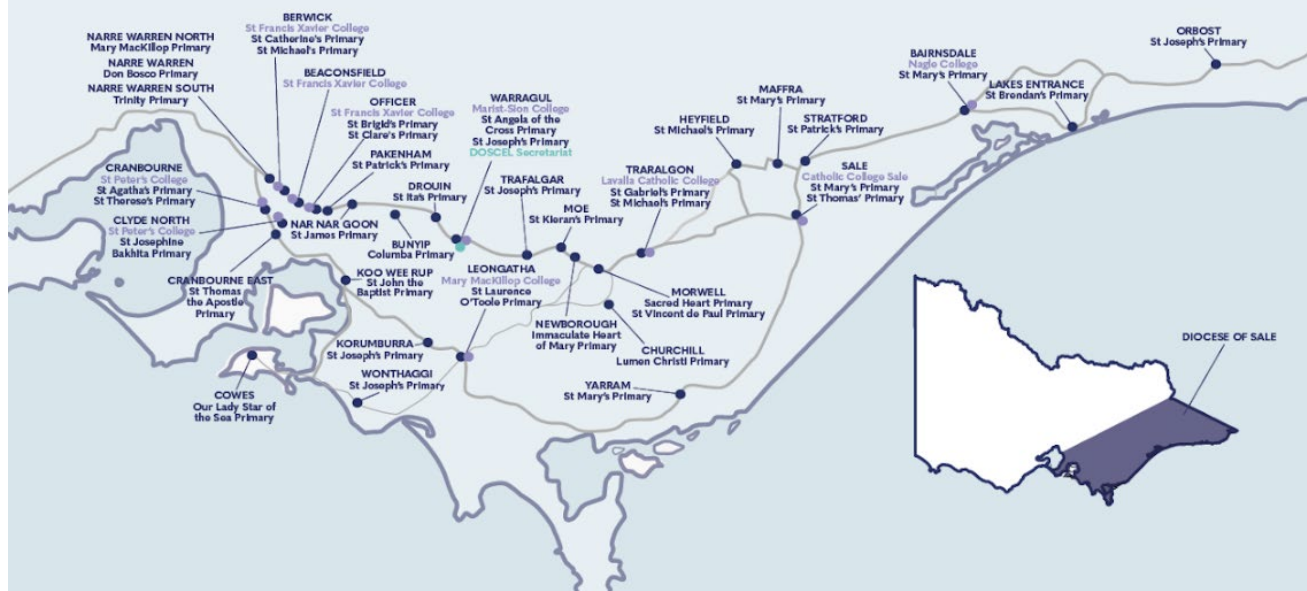


Figure 1: Location of DOSCEL schools in the Diocese of Sale

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.

In 2024, the DOSCEL Secretariat Senior Management Team consisted of:

- Chief Executive Officer / Director of Catholic Education
- Chief Operations Officer, Deputy Director – Catholic Identity, Leadership, Learning and Teaching
- Chief Financial Officer
- Chief Compliance Officer, Executive Manager – Industrial Relations/Human Resources (vacant from July 2024)
- General Manager – Learning and Teaching
- General Manager – Infrastructure and Support Services
- General Manager – Information and Technology
- Senior Manager – Catholic Identity and Religious Education.

In 2024, the DOSCEL Board, including the Chair and Deputy Chair, was comprised of eight Directors. The Board oversees corporate governance, regulatory compliance, Church law and risk management, and sets the strategic direction. A Directors' Code of Conduct is in place.

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.

DOSCEL's Risk Management Framework is presented and reviewed at each Finance, Audit and Risk Committee and DOSCEL Board meetings. A Delegations Policy and Register are in place, updated with Committee and Board approval.

Victorian Catholic Education Authority Ltd ('**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.

VCEA, as the VRQA appointed review body for Catholic schools in Victoria, is responsible for assuring the compliance of proprietors and their schools with the minimum standards for school registration. In line with this responsibility, VCEA undertook a governance and not-for-profit minimum standards for school registration review of DOSCEL in 2024.

Figure 2 illustrates the DOSCEL organisational structure in 2024.

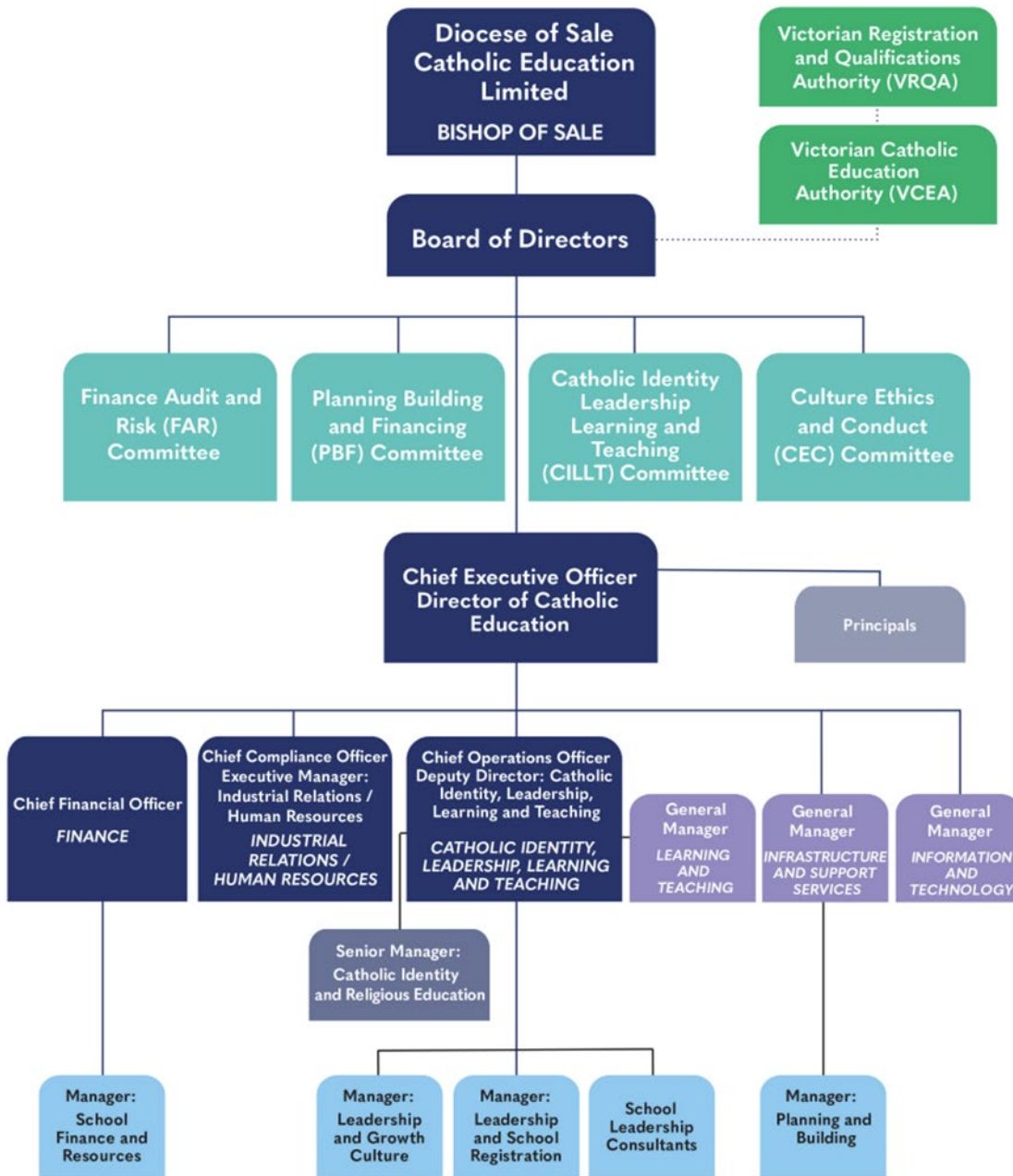


Figure 2: 2024 DOSCEL Organisational Structure

Our modern slavery governance framework

In September 2023, DOSCEL joined the Australian Catholic Anti-Slavery Network ('**ACAN**') and completed orientation. Over the course of 2024, DOSCEL engaged with ACAN collaboratively to develop a productive working relationship. For the second 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 was established at DOSCEL, a dedicated Strategic Sourcing Adviser ('**SSA**') who served as the Modern Slavery Liaison Officer ('**MSLO**') with ACAN. The MSLO worked 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. Unfortunately, the role of SSA became vacant in August 2024 and was not filled for the remainder of the year.

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.

Our supply chain

In 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 have been aligned with the ACAN Category Risk Taxonomy, based on the Global Slavery Index and International Labor Organization definitions of modern slavery.

During the 2024 calendar year, DOSCEL spent approximately \$132.0 million with external suppliers. Our top 50 spend equated to approximately \$77.7 million and comprised 58.9% of our total spend to external suppliers. Our largest procurement categories remain somewhat consistent with 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). With significant capital projects, including the construction of St Josephine Bakhita Catholic Primary School, Finance and Investment, Furniture and Office Supplies and Cleaning and Security also featured in the top procurement categories.

Looking more closely at our top 50 suppliers by spend, approximately 80% have operations solely based in Australia, with the remaining 20% having operations in one or more countries including New Zealand, United Kingdom, South Africa, China, and the Philippines. All of our top 50 suppliers hold an Australian Business Number (ABN).

An internal audit of supplier data for the 2024 calendar year indicated that DOSCEL had 6,789 suppliers for the period, ranging from one-off purchases to longer-term contracts. This is consistent with our estimate of 7,000 suppliers in 2023.

We acknowledge the trend towards sustainable procurement involving supply chain consolidation. DOSCEL is currently in the early 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. Throughout 2024, DOSCEL participated in the VCEA Digital Re-imagination initiative aimed at shaping the digital future of Catholic Education in Victoria. DOSCEL is committed to the strategic priority of establishing enterprise systems which has transformative implications for procurement among other capability areas.

Criteria 3: Modern slavery risks in our operations and supply chain

As a primary and secondary education provider, DOSCEL has no risk of modern slavery occurring within its directly employed workforce. Employment is overseen by DOSCEL's Industrial Relations / Human Resources Department, ensuring all staff are engaged through fair, transparent, and ethical practices. The vast majority of employees are engaged under the *DOSCEL Schools and Secretariat Agreement 2022*.

DOSCEL takes a proactive stance on identifying and mitigating modern slavery risks, particularly among suppliers in labour-intensive sectors such as school cleaning, facilities management and construction. These industries often employ individuals who may be more vulnerable to exploitation, including migrants, temporary visa holders, international students, and undocumented workers. Subcontracting arrangements in these sectors can sometimes result in noncompliance with workplace rights and entitlements.

To strengthen protections against modern slavery, DOSCEL requires all labour suppliers to hold a valid labour hire license, ensuring they comply with industry regulations and ethical employment standards. This requirement forms part of DOSCEL's broader commitment to responsible supplier management and upholding fair workplace practices.

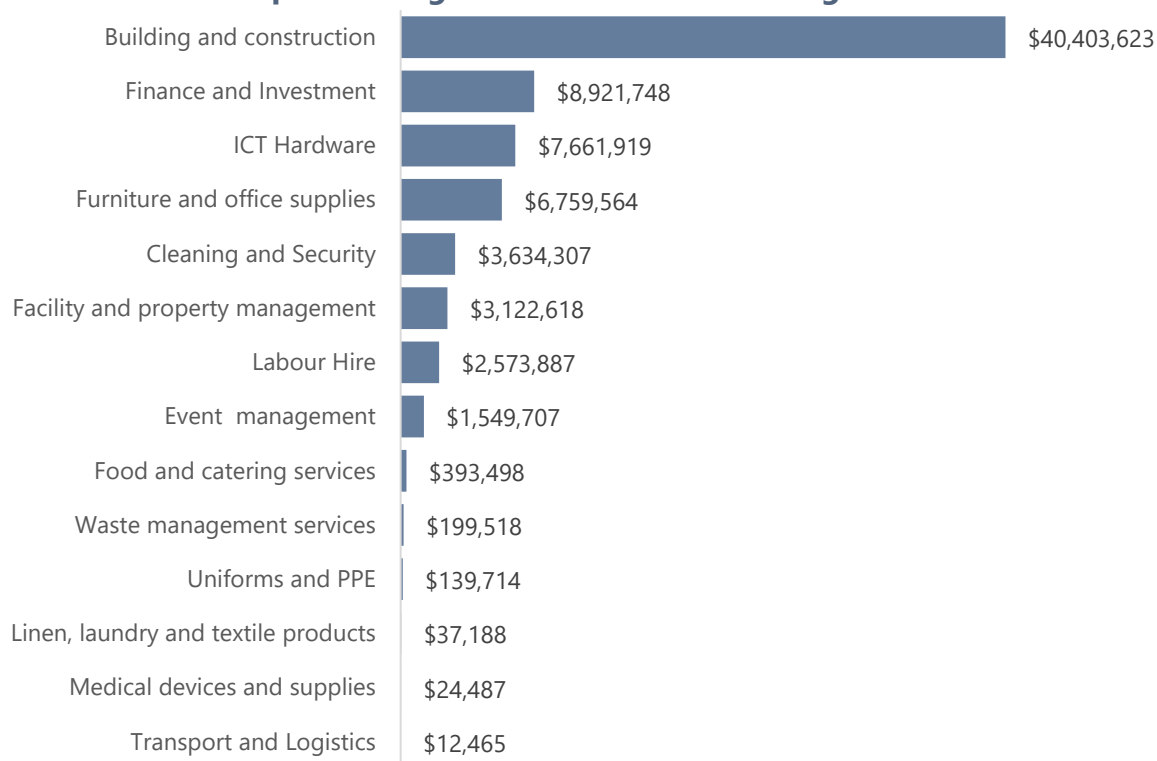
To effectively identify high-risk suppliers, DOSCEL has utilised the ACAN risk taxonomy, categorising each supplier accordingly. This approach enables comprehensive spend analysis by sector, providing insight into where funds are allocated, and which suppliers are involved.

During the 2024 reporting period, DOSCEL engaged with 6,789 third-party suppliers for goods and services, with total expenditure reaching \$132.0 million. This figure does not include payroll-related payments and intra-company transactions.

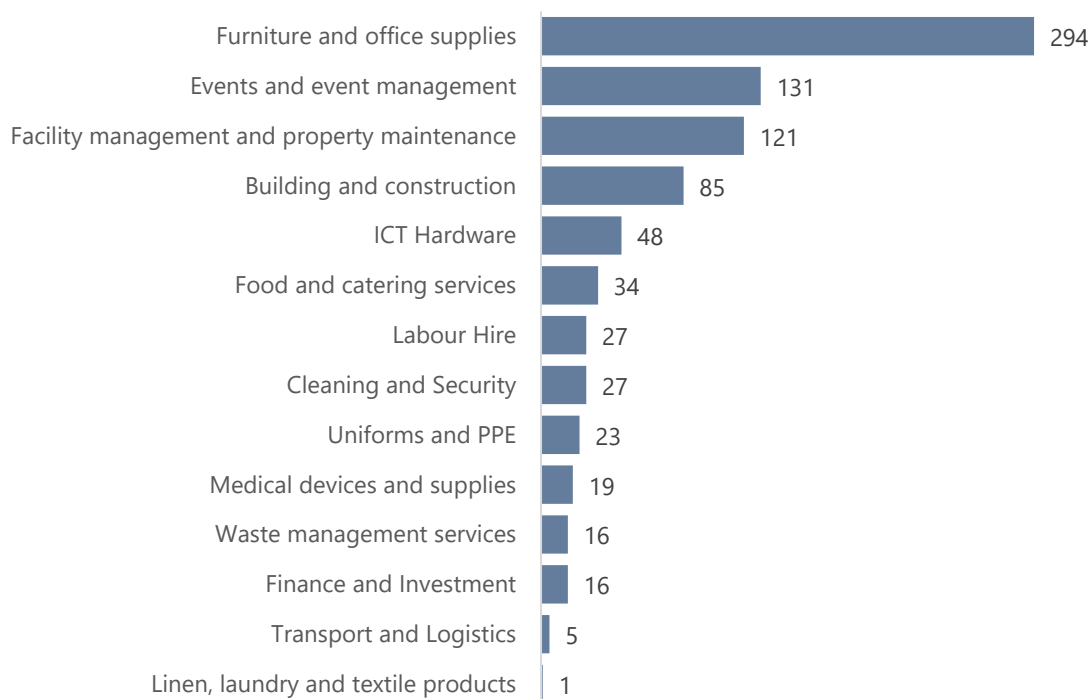
Consistent with previous years, the analysis highlights that a significant portion of DOSCEL's spending is directed toward industries traditionally associated with heightened modern slavery risks. These sectors include building and construction, ICT hardware, furniture and office supplies, cleaning and security. Many of the equipment and consumables used in these industries are manufactured overseas, often in high-risk regions such as China and Vietnam, where labour exploitation is more prevalent.

DOSCEL remains committed to monitoring and mitigating these risks through responsible procurement practices and supplier oversight.

Spend in High-Risk Procurement Categories



Number of Suppliers in High-Risk Procurement Categories



In the above graphs DOSCEL's spend and number of suppliers in high risk categories, as determined by the ACAN risk taxonomy, are shown.

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.

Seeking proactive insights into anticipated changes in reporting criteria, DOSCEL participated in key events such as 'The National Education Summit' program focussed on Sustainability in Schools. This engagement provided valuable insights and best practices, positioning us to confidently navigate the demands of modern slavery reporting, with a focus on sustainable products and services.

Moreover, DOSCEL contributed to Royal Melbourne Institute of Technology (RMIT) University Business and Human Rights Institute and Behavioural Business Lab study on optimising remediation of slavery in supply chains. The purpose of this research was to test what solutions might help to improve remediation of modern slavery incidents, driven by the central concern that victim-survivors of modern slavery in supply chains are not adequately considered or involved when businesses and organisations respond to modern slavery reports and incidents.

DOSCEL also joined the Caritas Australia Earthcare Community which aims to assist Catholic organisations to plan and take action to live *Laudato Si'*, guiding us to prioritise values over profit margins.

DOSCEL's flagship modern slavery project in 2024 was the planning, construction and procurement for St Josephine Bakhita Primary School in Clyde North, named after the patron Saint of modern slavery victims. DOSCEL aspired to exemplary modern slavery practice in all aspects of this project.

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 on how we can best address this concern in our supply chain.

In the following section, we outline the initiatives accomplished during the 2024 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 was better positioned in 2024 to take action, as it contributes to and leverages collective purchasing spend and has a more coordinated response.

Strategic Sourcing Adviser (SSA)

DOSCEL significantly improved its internal resources and capabilities by appointing a SSA in 2023. In 2024, this role was dedicated to ensuring modern slavery compliance, reporting, and our commitment to ethical sourcing practices. Furthermore, it encompassed 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, DOSCEL aimed to not only provide quality education but also to inspire our community to actively participate in efforts against modern slavery.

Construction of the school commenced in 2023 and continued throughout 2024 in readiness for opening in February 2025. The Principal who commenced in July 2024, liaised with the SSA to develop a deep understanding of modern slavery. The Principal actively engages with the local school and parish community to foster a sense of social responsibility, empathy, and commitment to justice. The school's motto of "*Courage Humility Forgiveness*" is reflective of this commitment.

School uniforms

DOSCEL actively worked 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.

As part of our ongoing commitment to ethical sourcing, DOSCEL embedded a 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.

Awareness training

As an ACAN participating entity, DOSCEL has access to comprehensive resources for modern slavery risk prevention, including flexible training modules. During 2024, an invitation to participate in awareness training was extended to all school principals, leadership staff, business managers and administration officers.

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.

| EOI supplier tender process includes DOSCEL modern slavery questionnaire | 2021 | 2022 | 2023 | 2024 |
|---|-------------|-------------|-------------|-------------|
| Building and Construction | √ | √ | √ | √ |
| Information and Communications Technology | √ | √ | √ | √ |
| Financial Services | - | - | √ | √ |

Contracts

Modern slavery clauses are included in 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 statements and will remain an important feature of our modern slavery prevention strategy.

| Contractual Controls – Modern Slavery Contract Clauses | 2021 | 2022 | 2023 | 2024 |
|---|-------------|-------------|-------------|-------------|
| Building and Construction | √ | √ | √ | √ |
| Cleaning Services | √ | √ | √ | √ |

Vetting potential suppliers

For high risk spend categories, DOSCEL continues to supplement 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 previous years.

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, especially with departments associated with procurement in high-risk

categories of Building and Construction, and Information and Technology industries and more recently Financial Services.

The annual desktop review has been completed over five 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 2024 to 31 December 2024 are 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.

DOSCEL refers to 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.

Below is a table indicating that no referrals to Domus 8.7 were made regarding workers in our operations and supply chain during 2024, consistent with the previous 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.

| | ACTIVITY | 2023 | 2024 |
|---|--|------|------|
| DOMUS 8.7 EXTERNAL REFERRALS | Contacts made via worker voice / grievance mechanism | 0 | 0 |
| | Referrals for advice and assistance | 0 | 0 |
| | Individuals identified or referred for modern slavery assessment | 0 | 0 |
| | Individuals with modern slavery cases remediated | 0 | 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 was a member of the St Josephine Bakhita Catholic Primary School Working Party to ensure the topic of modern slavery was maintained at the forefront of procurement activities. This also served as an opportunity for collaboration and awareness raising for staff across the DOSCEL Secretariat, the Principal of St Josephine Bakhita Catholic Primary School and the Parish Priest of St Thomas the Apostle Parish, Clyde North.
- *DOSCEL Responsible Sourcing Guidelines* were developed as a practical resource for staff at St Josephine Bakhita Catholic Primary School.
- A communication was issued to all DOSCEL Principals outlining our ethical sourcing and anti-modern slavery commitments and requesting that they familiarise themselves with DOSCEL's Modern Slavery Statements.
- All School principals, leadership staff, business managers and administration officers were invited to complete ACAN modern slavery awareness e-learning modules: Introduction to Modern Slavery and Modern Slavery Business Relevance.
- Resources were provided to all DOSCEL schools in relation to the *UN World Day Against Trafficking in Persons* on 30 July 2024 for awareness raising.
- Increased modern slavery due diligence was completed with all major new and renewed contracts across a broad range of products and services including architecture and construction, ICT, labour hire, financial services, transport, cleaning and facilities management, energy, furniture and office supplies, school uniforms, legal representatives, insurance, third party education suppliers and playground equipment.
- A Modern Slavery Awareness Campaign was undertaken in the lead up to Easter with a focus on modern slavery free chocolate.
- As of 31 December 2024, DOSCEL had 75 suppliers registered on Sedex, providing transparency and accountability in our supply chain management practices.

ACAN Effectiveness Assessment

Measuring effectiveness is assessed by completing the annual ACAN Entity Profile Survey which generates the following reports:

- the Baseline Data metrics that can be compared against the previous period
- the Maturity Assessment for the period re progress in key modern slavery pillars.

The table below evidences the significant progress made against the prior period using the Base Line data captured by ACAN around actions taken by DOSCEL staff and suppliers.

DOSCEL's strong focus on encouraging suppliers to complete ACAN surveys and join Sedex have resulted in a significant number of suppliers engaging in these processes. Of highlight was the attendance at ACAN capacity building webinars of architects and construction company employees involved in the building of St Josephine Bakhita Catholic Primary School.

| DIOCESE OF SALE CATHOLIC EDUCATION LIMITED | ACTIVITY | 2023 | 2024 |
|---|---|-------------|-------------|
| INTERNAL / STAFF | Hours spent on modern slavery activities | 449 | 310 |
| | Individual staff completed e-learning | 0 | 2 |
| | E-learning modules completed | 0 | 4 |
| EXTERNAL / SUPPLIER ENGAGEMENT | Total number of suppliers | 500 | 6789 |
| | Number of suppliers with visible contact information and ABN (top 50) | 33 | 50 |
| | Number of suppliers across high-risk categories | 0 | 847 |
| | Number of ACAN Supplier Surveys completed | 0 | 294 |
| | Supplier staff attending capacity building webinars | 0 | 4 |
| | Invited to join Sedex | 0 | 12 |
| | Joined Sedex | 0 | 75 |
| | Sedex SAQ completed | 0 | 34 |
| | Social audits | 0 | 8 |
| | Corrective actions | 0 | 43 |
| DOMUS 8.7 EXTERNAL REFERRALS | Contacts made via worker voice / grievance mechanism | 0 | 0 |
| | Referrals for advice and assistance | 0 | 0 |
| | Individuals identified or referred for modern slavery assessment | 0 | 0 |
| | Individuals with modern slavery cases remediated | 0 | 0 |

In the above table, DOSCEL's ACAN Baseline Data Metrics are shown

Criteria 6: Consultation with entities owned or controlled

This Statement was developed with input from staff at the DOSCEL Secretariat and schools. 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, directors, executives and senior management 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.

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 governs.

Throughout the reporting period, DOSCEL invested significantly in resourcing and capacity building, focussing on awareness campaigns, internal working group development, and extending our partnership with ACAN.

Looking ahead to 2025, DOSCEL is focussed on commencing operation under the recently launched *DOSCEL Strategic Plan 2025 -2028*. The Strategic Plan outlines DOSCEL's Vision, Mission and Values of:

- *Vision:* Faith-inspired educational excellence for a hope filled future.
- *Mission:* To deliver sustainable and inclusive education that nurtures each student's potential, equips them to thrive in a dynamic world, and is enriched by our flourishing Catholic culture.
- *Values:* Integrity, Excellence and Inclusion.

A Key Program outlined in the Strategic Plan is the development of a new Procurement Framework with the outcome that *"DOSCEL engages in ethical, sustainable and strategic sourcing practices"*. The success measures of this Key Program are:

- DOSCEL operates within the established Procurement Framework supporting and promoting sustainable and ethical supply chains
- DOSCEL Modern Slavery Statements evidence substantial annual improvement in procurement activities.

Through this Key Program we will transition 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 direct suppliers to date, 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



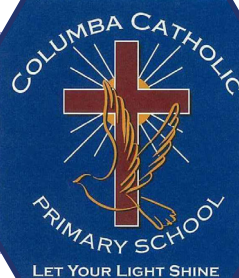
**St Mary's
Primary School**
BAIRNSDALE
ABN 99 751 861 942



**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



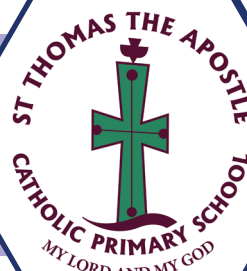
**Lumen Christi
Catholic
Primary School**
CHURCHILL
ABN 32 934 149 808



**St Josephine
Bakhita Catholic
Primary School**
CLYDE NORTH
ABN 12 638 504 514



**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



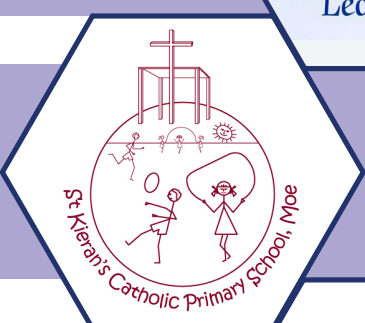
**St Brendan's
School**
LAKES ENTRANCE
ABN 87 996 634 606



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



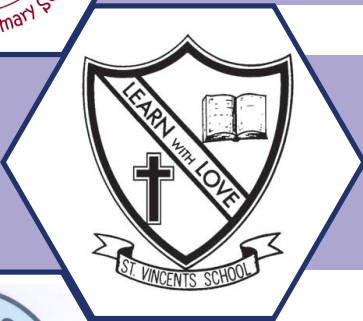
**St Mary's
Primary School**
MAFFRA
ABN 40 849 663 739



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



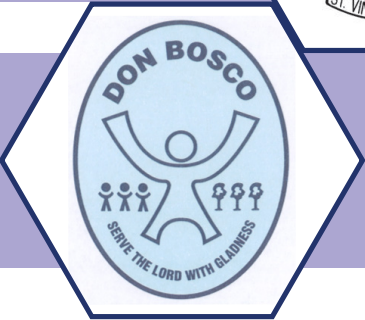
**Sacred Heart
Primary School**
MORWELL
ABN 68 481 560 440



**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



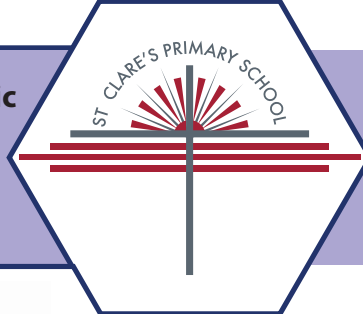
**Trinity Catholic
Primary School**
NARRE WARREN
SOUTH
ABN 50 374 081 685



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



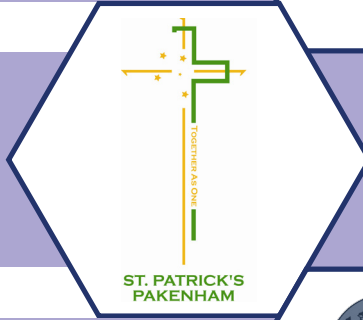
**St Brigid's Catholic
Primary School**
OFFICER
ABN 67 249 383 806



**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



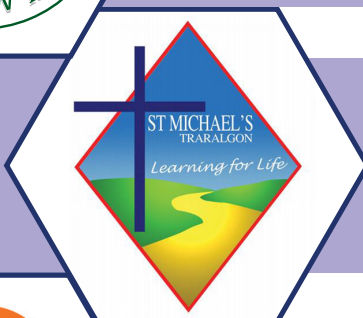
**St Patrick's
Primary School**
STRATFORD
ABN 62 467 701 955



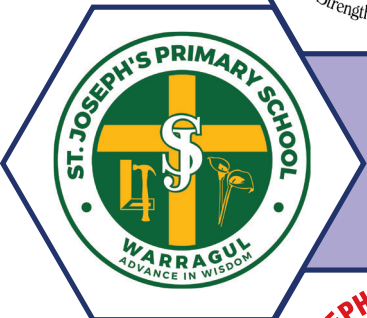
St Joseph's Primary School
TRAFALGAR
ABN 23 218 937 906



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



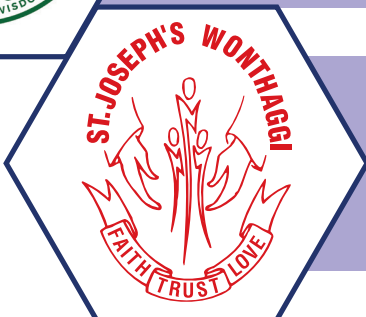
**St Michael's
School**
TRARALGON
ABN 62 095 609 409



**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