

# MODERN SLAVERY STATEMENT

2024

1 January - 31 December



# ACKNOWLEDGEMENT OF COUNTRY, HEALING AND INCLUSION

We acknowledge and pay respect to the original and ongoing custodians of the land upon which we live, work, learn and teach.

We commit to actively working alongside First Nations people for healing, reconciliation and justice.

The Catholic education faith community is inclusive and acknowledges that we are all made in the image and likeness of God and we are created in love. People of all faiths, genders, sexualities, abilities and cultures are therefore respected equally in the Sandhurst Catholic community.

We acknowledge the pain and suffering of all who have been hurt in body, mind and spirit by those who have betrayed the trust placed in them.

May we all stand tall, stand firm, grounded in truth, together as one.

## CHILD SAFETY

Catholic Education Sandhurst Limited (CESL) and Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C Ltd) are committed to the safety, participation and empowerment of all children.

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## DISCLOSURE NOTE

This statement has been made on behalf of Catholic Education Sandhurst Limited (CESL) ABN 94 643 894 384 and Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C Ltd) ABN 98 643 978 205. This statement is prepared pursuant to Section 134 of the Modern Slavery Act 2018 (Cth) and covers CESL as a single reporting entity.

## ENTITY DETAILS

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## MODERN SLAVERY ACT 2018 (CTH) - STATEMENT ANNEXURE

### Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of Catholic Education Sandhurst Limited as defined by the *Modern Slavery Act 2018 (Cth)*<sup>1</sup> ("the Act") on Tuesday 20 May 2025.



**Ms Pam Betts**

*Chair - Catholic Education Sandhurst Limited Board (CESL Board)*

### Signature of Responsible Member

This Modern Slavery Statement was signed by a responsible member of Catholic Education Sandhurst Limited as defined by the Act on Tuesday 20 May 2025.








**Most Reverend Shane Mackinlay**

*Bishop of Sandhurst*

## VISION

The vision for education in Sandhurst is to provide, in partnership with our families, stimulating, enriching, liberating and nurturing learning environments in each of the Catholic school communities within Catholic Education Sandhurst Limited (CESL) and ELCs conducted by Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C Ltd). At the heart of this vision is our commitment to the ongoing duty of care that we have for the safety, wellbeing, and inclusion of all children and young people.

### We believe:

-  that the Gospel is central to who we are, what we do, and how we act.
-  that we have a vital role in the mission of the Catholic Church to imagine and seek new horizons while respecting our Tradition.
-  that a strong sense of community is dependent on the quality of our collegial relationships.
-  that each person's potential is fostered through the dedicated ministry of Catholic education.
-  in leadership encompassing vision, innovation and empowerment.

## MISSION

The ongoing mission of Catholic education remains the mission of the Church - "to spread the Kingdom of Christ over all the earth". Under the precepts of Canon Law (806 1), the Bishop watches over Catholic schools in the Diocese and provides general regulations for them. The Sandhurst Catholic school today responds to its mission by ensuring education is provided according to Catholic Teachings and Beliefs and by offering a particular cultural experience that is grounded in "... a Christian view of the world, of life, of culture and of history". This translates into a Christ-centred ethos and worldview that permeates all aspects of school life including relationships, structures, liturgies, celebrations and routines, as well as the formal curriculum.

Catechism of the Catholic Church, n.863 Congregation for Catholic Education. (1997),  
The Catholic School on the Threshold of the Third Millenium, n.14

## ABOUT US

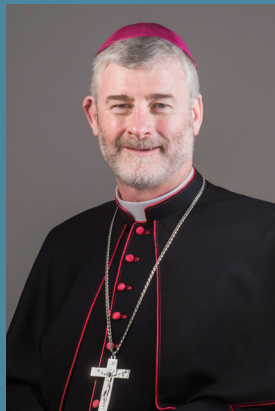
The identity of the Sandhurst Catholic Schools and Early Learning Centres reflects the principles of Catholic social teaching, grounded in the person of Jesus and interpreted and enacted for the "common good" in response to the "signs of the times". These principles require that the dignity and potential of each person be fully respected within a climate that is conducive to peace, security and development. This must find expression in the relationships, structures, curricula, planning, processes and care in the everyday life of the school and kindergartens.

# FROM THE BISHOP

Most Reverend  
Shane Mackinlay DD

and

CESL  
BOARD CHAIR  
Ms Pam Betts



The Christian tradition upholds the inherent dignity of every person: created in God's image, endowed with unique gifts and talents, interconnected with all of creation, enriched by relationships of friendship and love, capable of remarkable creativity, insight, and accomplishment, and called into communion with the Triune God as revealed by Jesus. This foundational Christian view of the human person is at the heart of the mission of Catholic Education Sandhurst Ltd.

While the most immediate expression of this principle is evident in placing students at the centre of Catholic education, it also shapes the relationship between Catholic schools, parents, staff, and the wider community. Pope Francis has encouraged us to embrace this community in the broadest sense, and we are increasingly recognising that our actions can have far-reaching impacts beyond our local community.

Modern slavery can affect the operations, business partnerships, and supply chains of our schools in many ways, often in ways that are not immediately visible. Practices such as human trafficking, child labour, and the exploitation of workers for little or no wages are egregious violations of human dignity and are contrary to the fundamental respect that Christians strive to uphold for each individual. Catholic Education Sandhurst Ltd and Sandhurst Catholic Early Childhood Education and Care Ltd are deeply committed to avoiding any involvement with these practices and to assisting with their elimination.

This is the fourth Modern Slavery Statement of Catholic Education Sandhurst Ltd since its new corporate structure was established in January 2021. We are pleased to report that, over the past year, the Company has made significant progress in raising awareness of modern slavery within its operations and identifying ways in which it might unintentionally support such practices.

The Company's plans for 2025 focus particularly on communication and training across its schools, kindergartens, and offices. These efforts will help raise awareness among staff and students, while also identifying potential risks and opportunities for addressing them. We are confident that these strategies will help all involved in Catholic education in the Sandhurst Diocese become more attuned to the risks of modern slavery and take actions that promote the dignity, freedom, and well-being of every person.

**Most Reverend Shane Mackinlay**  
*Bishop of Sandhurst*

**Ms Pam Betts**  
*CESL Board Chair*

# REPORTING CRITERION 2



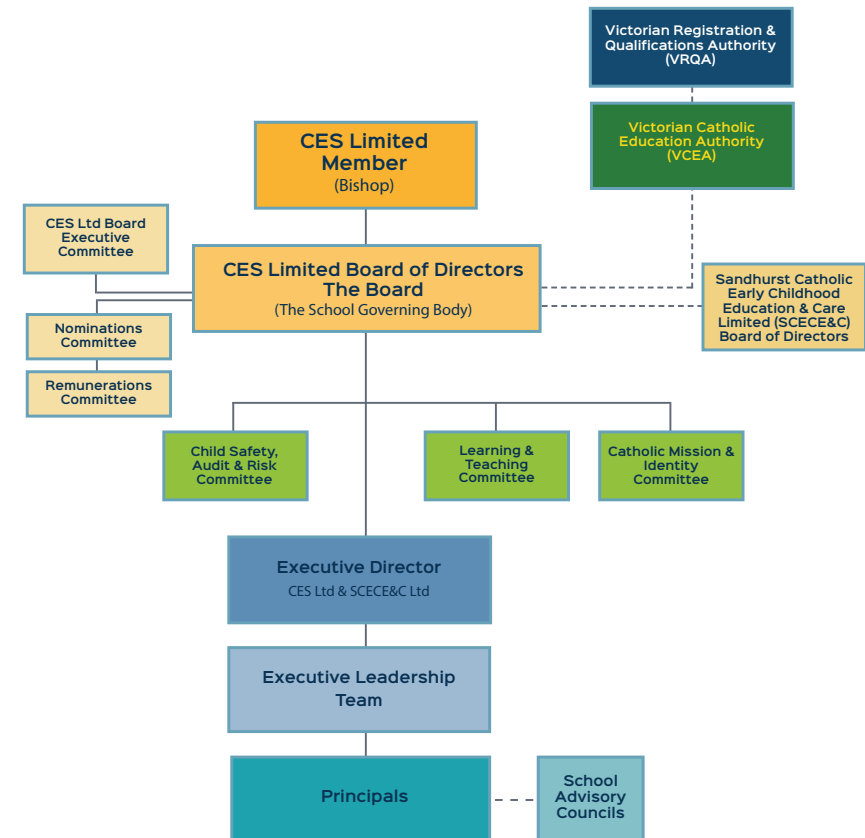
## Catholic Education Sandhurst Limited (CESL) - Governance Framework

In 2021 the Bishop (Bishop Shane Mackinlay) established the Company, Catholic Education Sandhurst Limited (CESL), to assume the ownership and operation of fifty-two Catholic schools previously operated in an unincorporated form, and to be responsible for the operation of any further schools that will be established by the Company referred to as (Sandhurst Catholic Schools). In addition, there is responsibility for three Early Learning Centres operating as a subsidiary entity Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C Ltd).

The CESL Board of Directors (the Board) has the responsibility to ensure the advancement of education through the operation of an effective system of Catholic education at all levels within the Diocese, always in accordance with the beliefs, traditions, practices and canonical decrees of the Church and Church Laws. The Catholic education provision of CESL spans primary schools, secondary schools, and specialist settings. It is the responsibility of the Board to ensure that each school operated by the Company is fully compliant with all legal obligations and standards required of registered schools in Victoria.

The Board is responsible for setting strategic direction and policies to achieve the above. It contributes legal, financial, and other professional expertise to the governance of the Company and is supported by an expert Board committee membership. The Board works to promote stability, confidence, mutual respect, and support in the relationships between all who exercise leadership and management. The Board must ensure CESL schools comply with the minimum standards for school registration under Schedule 4 of the Education and Training Reform Regulations 2017 (Vic) (ETR Regulations).

It is the role of the Board to make explicit the importance of system improvement, facilitate the achievement of high-quality personal learning outcomes for all students and the provision of educational environments in which all will continue to flourish.



# REPORTING CRITERION 2



In so doing the Board ensures that all legal obligations and compliance responsibilities arising from being a Company are met, particularly the:

- Key aspects of the Board's legal obligations under the Corporations Act (i.e. Board of Director responsibilities).
- Governance standards imposed by Division 45 of the Australian Charities and Not-for-profits Commission Act 2012 (Cth) (ACNC Act).
- Minimum standards for school registration under Schedule 4 of the ETR Regulations, including all matters relating to Governance; Enrolment; Curriculum and Student Learning; Student welfare; Staff employment and School infrastructure.
- Ministerial Order 1359 – Child Safe Standards - Managing the risk of child abuse in schools, the Board, as the school governing authority, is responsible for ensuring Sandhurst Catholic Schools embed a culture of child safety and operate in compliance of child safety requirements. These include, but are not limited to, ensuring the Company has suitable policies, which are enforced, and provide for child safety and strategies to reduce the risk of child abuse. All such policies are approved and mandated by the Board.

The Executive Director has delegated responsibility to report to the Board on the implementation of the policies:

- Reviewing and ensuring the reliability and effectiveness of CESL's compliance and risk management systems covering all areas of operation from occupational, health and safety to privacy.
- Finance and audit management.
- Capital development.

For the purposes of school regulation, the Board is structured in a way to enable:

- Effective development of strategic direction of Sandhurst Catholic schools.
- Effective management of the finances of Sandhurst Catholic schools; and
- Fulfil its legal obligations in respect of each Sandhurst Catholic school.



# REPORTING CRITERION 2



## **Child Safety, Audit and Risk Committee (CSA&R Committee)**

Supporting the responsibilities of CESL and SCECE&C Ltd Boards are their respective CSA&R Committees. The Committee's Terms of Reference state that they are to provide strategic advice and high-level thinking on matters pertaining to child safety, auditing, risk mitigation, financial and investment management, OH&S and modern slavery, ensuring quality reporting and compliance with statutory and regulatory requirements.

## **Sandhurst Catholic Early Childhood Education and Care Limited (SCECE&C Ltd)**

SCECE&C Ltd was instituted by Bishop Shane Mackinlay to assume the ownership and operation of two existing Catholic early childhood education and care centres in the Sandhurst Diocese, with a growth strategy to develop further Early Learning Centres. SCECE&C Ltd was an approved Provider with the Australian Children's Education and Care Quality Authority (ACECQA) for the early learning centres at St Mel's Kindergarten Shepparton, Assisi Kindergarten Strathfieldsaye and most recently in 2024 with the opening of the MacKillop Early Learning Centre Nagambie. SCECE&C Ltd is a company limited-by-guarantee and registered with the Australian Charities-and-not-for-profit Commission. As a wholly owned subsidiary of CESL, SCECE&C Ltd operates through an independent representative and expert Board of Directors and works in close collaboration and partnership with local Catholic and Government schools, parish communities and Diocesan agencies, to help ensure a continuity of growth and development for each child and their family.



# REPORTING CRITERION 2



## Educational and Office Services

### Key Objective of CESL

*“To foster the academic achievement and spiritual formation of each student, in an environment and culture that is committed to pastoral care and wellbeing, including appropriate safeguarding strategies and policies. Such an education builds up independent, confident and creative learners who have a love of learning, a sense of curiosity, and respect for themselves and for others, including the poor and marginalised.”*

Bishop Shane Mackinlay: CES Ltd Initial Directions 2020

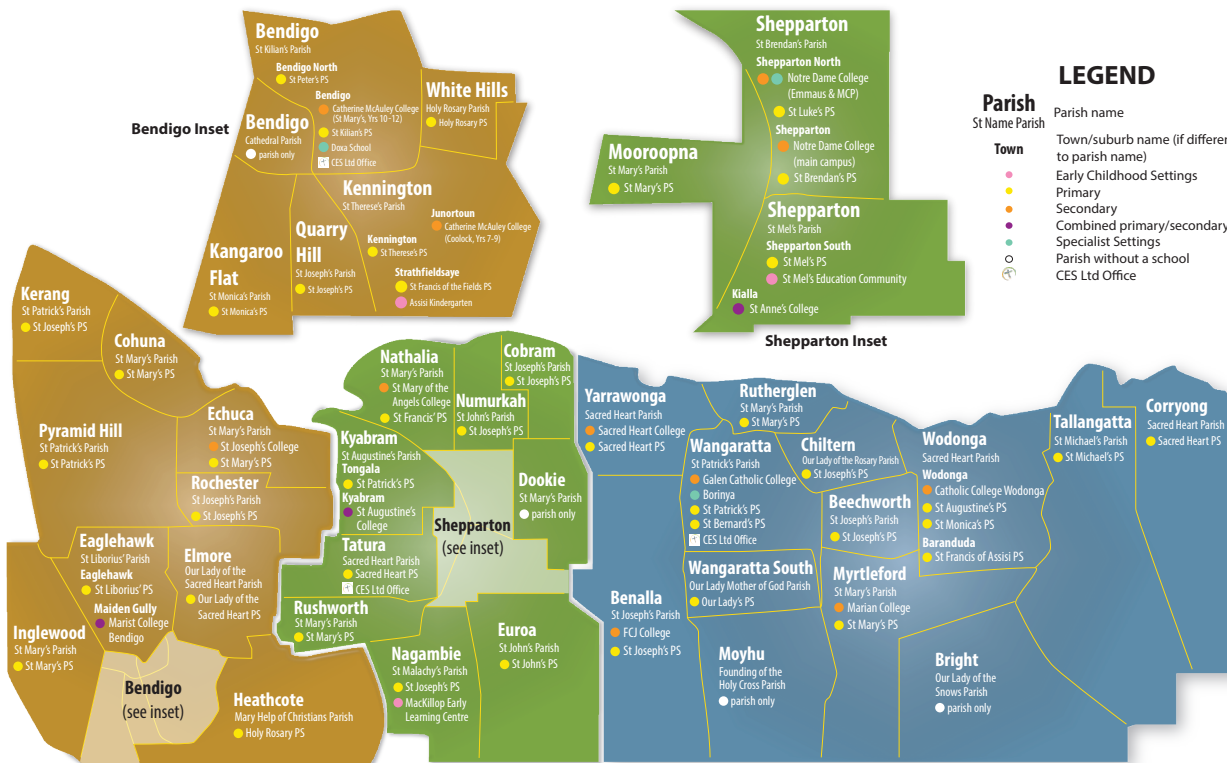
For 171 years, Catholic schools have been an integral part of the Diocese of Sandhurst, with the first school opening on the Bendigo Goldfields in 1853. Since then, the network of schools has made a unique contribution to the life, faith practice, spirit and culture of parishes throughout this region. Sandhurst Catholic schools are proud to be part of the long tradition of Catholic education in Australia, providing countless young people with enriching experiences and skills they acquired in Catholic learning environments.

Today, CESL oversees and operates fifty-two Catholic schools, offering Primary, Secondary, and Specialist Settings to cater for the diverse needs of the community. We take pride in our responsibility to provide high-quality education that upholds our values and traditions. Additionally, CESL will continue to operate future schools established by the Company known as Sandhurst Catholic Schools, further expanding our contribution to the education landscape of the region.

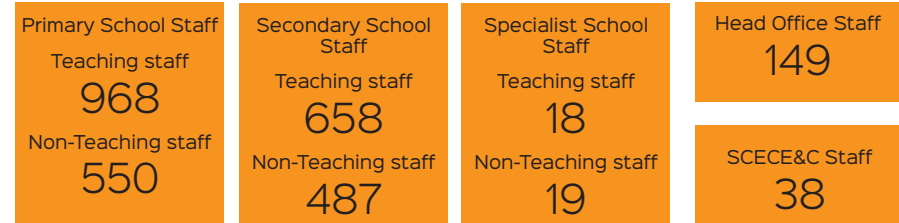
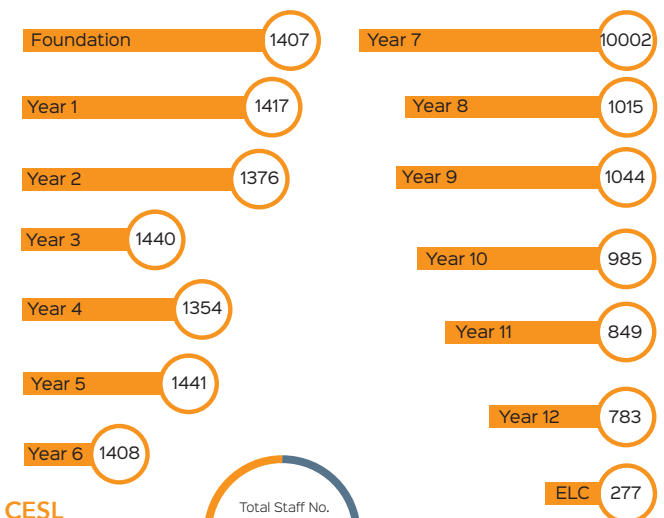
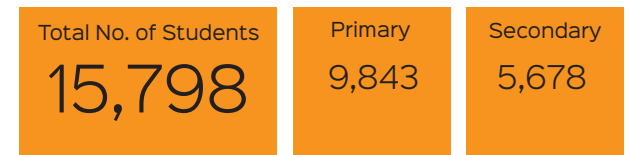
# REPORTING CRITERION 2



## Workforce Profile



### CESL Student Population



# REPORTING CRITERION 2

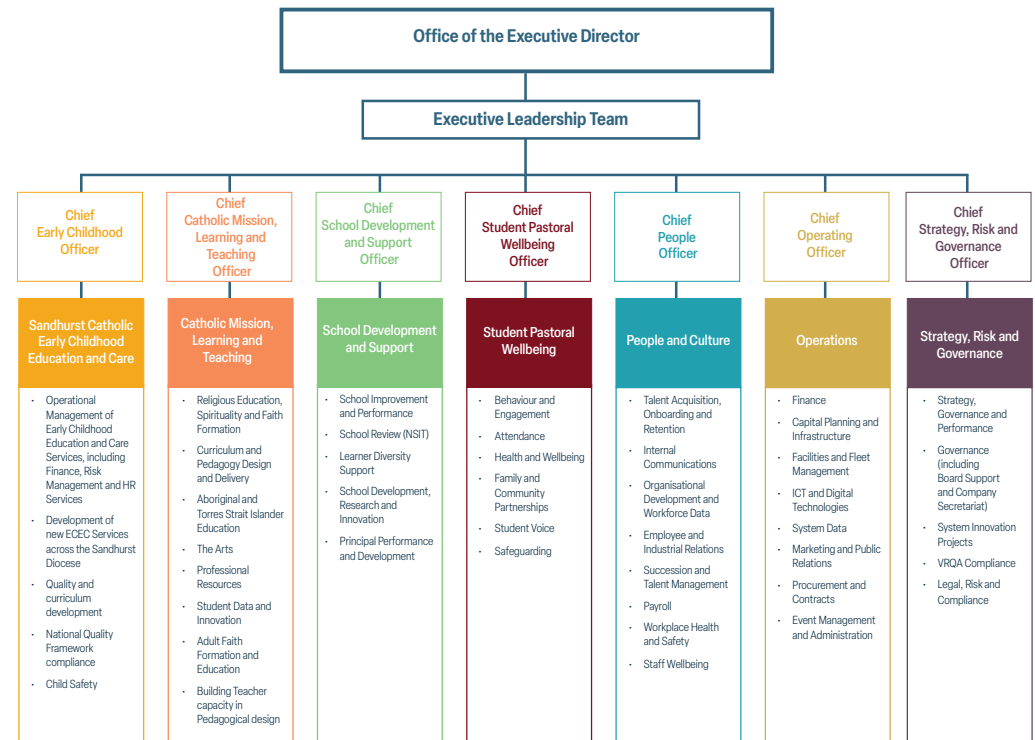


## The CESL Head Office Structure

The CESL Head Office provides support for the management of all CESL schools as well as SCECE&C Ltd. The CESL Executive Director, together with the CESL Executive Leadership Team, is responsible for providing leadership and direction across all areas of the company's operations. This includes ensuring compliance with regulations and standards, as well as driving the continuous improvement of both CESL schools and the CESL Head Office. Their goal is to foster a culture of excellence and innovation while upholding the values of the Catholic education community.

The Strategy, Risk and Governance team's purpose is to ensure that CESL are operating within Victorian Catholic Education Authority (VCEA)<sup>1</sup>, The Victorian Registration and Qualifications Authority (VRQA)<sup>2</sup> and legislative requirements.

The two entities collectively employ a team of 149 staff members located across three regional locations: Bendigo (Head Office), Tatura, and Wangaratta. The CESL Head Office is deeply committed to fostering a collaborative partnership with each school and parish community, as well as the broader Catholic education community of Victoria. They are dedicated to working in a spirit of co-responsibility to shape the culture, improve performance, and enhance the capacity of both the schools and the Catholic Education Office.



1. The VCEA is the single body representing Catholic education providers in Victoria, working on behalf of diocesan education companies in Melbourne, Ballarat, Sale and Sandhurst, and Religious Institute and Ministerial Public Juridic Person education entities to promote Catholic education and advocate for students' needs. They are also responsible for receiving, distributing and reporting on government funding provided for Catholic schools in Victoria

2. The Victorian Registration and Qualifications Authority (VRQA) is Victoria's education and training regulator. They are an independent statutory authority that works to assure the quality of education and training in Victoria. They apply standards to education and training providers and accredit courses and qualifications.



# REPORTING CRITERION 2

## Operations and Supply Chains

As an educational institution our largest expenditure is the salaries of teachers, educators and support staff whose salaries and employment related costs represents the majority of the organisation's annual expenditure. In 2024 CESL had a total turnover of \$397 million which includes all consolidated entities.

The total workforce profile of CESL includes 2,849 direct employees, while the total number of goods and services, contractors and suppliers is almost 10,000.

Schools are supported through CESL in providing support services to schools which include:

- Office of the Executive Director
- Early Childhood Education and Care
- Mission and Educational Formation
- Learning and Teaching
- School Improvement and Safeguarding
- Operations
- People and Culture
- Strategy, Risk, and Governance

## Delegations Framework

At present schools have full autonomy to engage suppliers, however as part of the incorporation changeover a Financial Delegation oversight and approval process has been implemented dependent on the value of the engagement. The purpose of the Delegations Framework is to establish a framework for delegating powers, duties or functions of the CESL Board in a manner that facilitates efficiency and effectiveness and increases accountability in the operation of Sandhurst Catholic Schools.

Pope Francis's message is to make a choice for respecting the rights and dignities of every human being by mitigating modern slavery risk in our supply chain and is the strategic goal for Procurement at CESL.

***"Every person ought to have the awareness that purchasing is always a moral  
- and not simply an economic - act"***

Pope Francis (2014)

# REPORTING CRITERION 2



CESL has developed the following procurement values to guide decision making.



**Responsibility** – In our mission as a Catholic faith community, we are committed to seeking ethical, sustainable, and socially responsible procurement as we strive to make a positive impact on the global climate and environment, support First Nations communities and abolish Modern Slavery throughout our supply chain.

**Integrity** - CESL and Service Providers will observe the highest standards of ethics and integrity in undertaking procurement activities. All purchasing activities will comply with relevant legislation, regulations and CESL policies. Service Providers will be treated fairly, respectfully and free from bias.

**Clarity** – We will drive transparency and accountability to support open, success-driven and respectful partnerships with our Service Providers. We strive for success with our partnerships because when our Service Providers succeed, CESL and our school communities will thrive!

**Community** – CESL greatly values and promotes the viability of our local rural and regional communities and is committed to supporting and fostering the prosperity of businesses within the Sandhurst diocese. In alignment with Catholic Social Teaching, CESL also adopts social procurement practices that actively promote accessibility and inclusion across our supply chain, seeking to create positive influence and opportunity, with particular attention towards First Nations peoples, Victorians with disabilities, and other marginalised groups.

**Balance** - CESL determines “the Best Value” for goods and services to balance cost, service, quality, reliability, innovation, ethics, sustainability and value alignment.

# REPORTING CRITERION 3



## Operational Risks

CESL faces various operational risks that can have a significant impact on the organisation's reputation and operations. One of the most critical operational risks is modern slavery, which is a grave violation of human rights that affects millions of people globally. CESL has continued its partnership with the Australian Catholic Anti-Slavery Network (ACAN), allowing CESL to establish a robust relationship that will continue to assist us to identify and assess risks within the organisation, reducing the chance of modern slavery practices within our supply chains.

The modern slavery operational risks outline three key areas that CESL and SCECE&C Ltd need to consider identifying and addressing modern slavery risks within the organisation. These areas include supplier engagement, supply chain mapping, and due diligence.

Service Provider and Supplier engagement is a crucial component of modern slavery risk management within CESL. Service Providers and Suppliers can pose a significant risk if they engage in unethical practices such as forced labour or human trafficking or unknowingly procure goods from high-risk international regions.

By engaging with Service Providers and Suppliers and ensuring that they adhere to ethical standards, CESL can reduce the exposure to modern slavery risks. CESL will also continue to encourage and support our schools with their Supply Chain in taking steps to mitigate modern slavery risks within their own supply chains.

Supply chain 'Category Mapping' is another critical aspect of modern slavery risk management that CESL will continue to explore. The aim is to have a comprehensive understanding of our supply chains and identify any areas where modern slavery risks may exist. This includes identifying countries or industries that are at high risk for modern slavery and understanding the risks associated with specific products or services. Working towards categorising and mapping supply chains will enable CESL Procurement & Contracts team to develop effective strategies to mitigate modern slavery risks and ensure that our organisation is not contributing to this issue.

Due diligence is the final area that CESL will continue to focus on educating and supporting our staff, schools and ELCs to manage the operational risks associated with modern slavery. This includes reviewing Service Provider, Contractor and Goods & Services contracts and high expenditure goods and materials purchases, as the organisation become more resourced and mature in this area, assessing their labour practices, and monitoring their compliance with ethical standards.

With the support of the CESL Board and the Child Safety, Audit and Risk Committee, CESL has a Risk Management Framework that defines our risk operating model, appetite, responsibilities, and methodology.

# REPORTING CRITERION 3



This Framework supports the approach to managing modern slavery risks through good governance and accountability following the ISO 3100:2018 Risk Management – Guidelines. Our Risk Management Framework and accompanying policies are crucial in effectively managing operational risks, including those associated with modern slavery. These documents provide a structured approach to identifying, assessing, and mitigating risks, and ensuring that we continue to operate in a responsible and sustainable manner.

## Our People

CESL takes the responsibility towards our staff, students and community very seriously. CESL is committed to providing a safe and inclusive work environment where all employees and workers are treated fairly and with respect. CESL believe that treating our staff well is not only the right thing to do, but it also makes good business sense, as it helps us attract and retain top talent and maintain our reputation as a responsible and ethical organisation.

To mitigate the risk of modern slavery within our operations, CESL have implemented several measures. These include:

- **Robust recruitment practices:** CESL have established clear policies and procedures for recruitment and selection, including background checks and references, to ensure that all employees and workers are recruited in a fair and transparent manner.
- **Training and awareness:** CESL are introducing training and awareness programs for our employees and workers to help them recognise and report any signs of modern slavery or other unethical practices.
- **Ethical standards and code of conduct:** CESL have established clear ethical standards and a code of conduct that all employees and workers are required to follow. This includes a commitment to respect human rights and to report any suspected cases of modern slavery or other unethical practices.
- **Feedback mechanisms:** CESL has clear feedback mechanisms that employees and workers can use to raise concerns or complaints about any issues they may face at work.

In addition to these measures, the organisation is working towards having the appropriate resources to regularly review and monitor our operations to identify and address any potential risks of modern slavery. Our aim is to work closely with our suppliers and partners to ensure that they are adhering to ethical standards and that they are taking appropriate measures to manage any modern slavery risks within their own operations.

CESL, believe that our people are our greatest asset, and are committed to treating them with the respect and dignity they deserve. By taking proactive steps to mitigate the risk of modern slavery within our operations, CESL is not only fulfilling our responsibilities as a responsible organisation, but also contributing to a fairer and more just society.



# REPORTING CRITERION 3



Through the ACAN Program, CESL and SCECE&C Ltd continue to focus activities with suppliers of labour and the operational risk associated with the following labour supply chains:

- **Cleaning and Security Services**
- **Facility Management and Property Maintenance**
- **Waste Management Services**
- **Labour Hire**

# REPORTING CRITERION 3



## Supply Chain Risks

CESL's finance systems are currently decentralised, with finance accounting systems (Technology One, SAS and Synergetic) being used across the organisation as a finance function, as opposed to a complete Supply Chain Purchase to Pay (P2P) management system. The decentralisation of data and inconsistent data entry across these platforms requires future resource investment to manage supply chain risk and improve analysis and reporting in the future.

As such the volume of goods and service providers, and the risk analysis is a high-level view based on school and head office data.

Using the data available from all CESL entities capturing invoice history valuing \$71m AUD to capture the top 50 suppliers of this data pool by spend as well as suppliers of key high-risk goods and services.

The highest risk areas identified for Educational institutions are:

1. Building and Construction
2. ICT Hardware
3. Furniture and Office Supplies
4. Cleaning and Security
5. Events and Event Management
6. Facility Management and Property Maintenance
7. Labour Hire

## Key Expenditure Categories



# REPORTING CRITERION 3



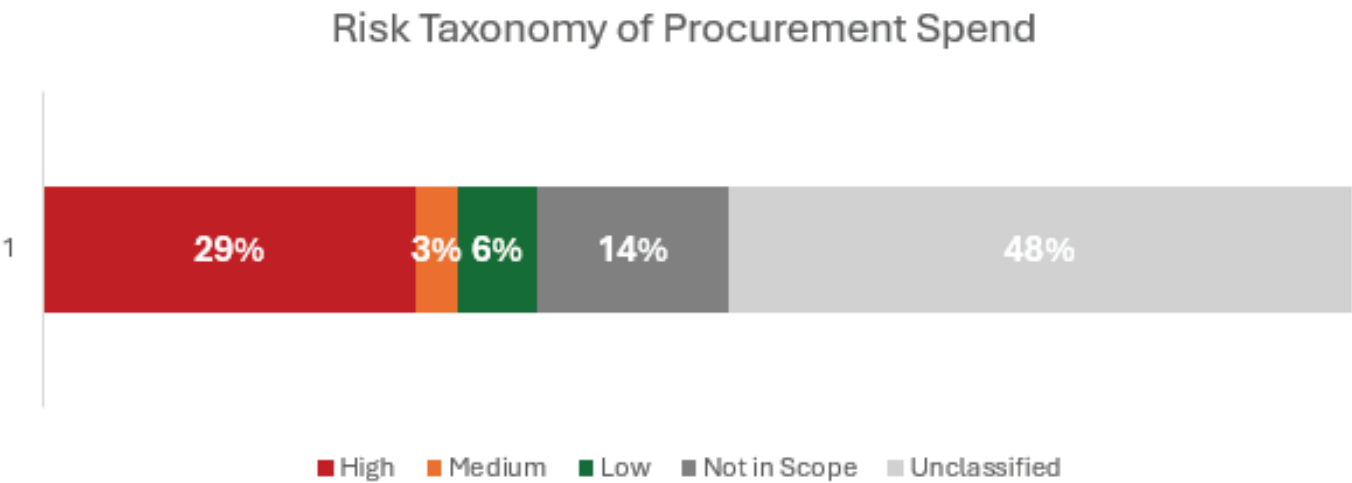
## Spend Data Analysis

### CESL High Risk Spend Categories

CESL High Risk Spend for the calendar year 2024 was \$75m from a total of 1,763 suppliers. The split between high and low risk for spend was 29% and 6% respectively and the number of suppliers was 18% high risk and 4% low risk.

Building & Construction related spending (\$41.8m) presents the greatest spend risk for CESL at 56% of total high risk spend, although the lower number of suppliers (152) helps mitigate this risk.

The Furniture and Office Supplies category accounts for the highest number of high-risk suppliers (657) and the third highest spend (\$9.3m). These two spending categories account for 72% of CESL high risk spend.



# REPORTING CRITERION 3



## Spend in high risk procurement categories



## Number of suppliers in high risk procurement categories



# REPORTING CRITERION 4

## CESL Modern Slavery achievements in 2024

CESL's Modern Slavery eradication efforts began with initiatives in 2021, when the organisation was founded. These initiatives were further developed and embedded throughout 2024. Achievements in 2024 included:

- Developed a Procurement Policy to ensure ethical sourcing and compliance with modern slavery requirements.
- Created a Procurement Procedure to guide consistent and responsible procurement practices.
- Developed a Modern Slavery Action Plan, promoting awareness among current and potential suppliers on the CESL website.
- A total score of 44% in the ACAN Maturity Assessment score in 2024, which was a significant increase of 8%.
- Incorporated Modern Slavery clauses into supplier contract templates to hold suppliers accountable.
- Utilised Vendor Panel for tender processes, aiding in supplier selection and ensuring compliance with Modern Slavery requirements.
- A significant reduction in the total number of suppliers (2,500).
- Attended ACAN and Sedex webinars.
- Delivered a presentation on Procurement and Modern Slavery at the CESL Administration and Finance Conference.
- Re-established the Modern Slavery Working Group to strengthen cross-departmental efforts.
- Reviewed and updated the CESL Modern Slavery Policy to ensure alignment with current best practices.
- Developed a Supplier Code of Conduct to further outline ethical expectations.
- Introduced a Contract Management system (Vendor Panel) to store and monitor contracts for both CESL schools and office, supporting ongoing compliance.
- Launched Modern Slavery introductory training with CESLO staff (including the Board), with 99 participants successfully completing the module.

# REPORTING CRITERION 4



## Actions taken to assess and address risks

In 2024 CESL Procurement Team commenced tendering to mitigate risk in the high-risk area of Cleaning Contractors and Building and Construction suppliers with the aim to provide schools and offices with a Preferred List of Providers that have been vetted to Modern Slavery Risk and inducted with Modern Slavery Training.

The Procurement Team is continuing to work with Schools and Offices internally to promote and educate staff on the Procurement goal and values. These tools are to support our social value decision making processes in alignment with the CESL Strategic Plan and Catholic Social Teachings and are designed to encourage a balanced, conscious, “moral decision” based on value alignment, that supports our strategic plan objectives for “Responsible Stewardship Communities”.

The current practices involving the schools and offices using three different accounting systems and autonomy over supplier selection, has caused a high-risk issue with data integrity and insight reporting. Due to inconsistent data across various accounting systems, the consolidation of the information is difficult to gain category analysis of the Supply Chain.

**CESL has completed a number of actions to address modern slavery and the risks it imposes.**

- **Modern Slavery Liaison Officers (MSLO)**, who lead the operational activities to identify and mitigate modern slavery risks within the organisation. The MSLOs work closely with the Executive Leadership Team to collaboratively work together for the organisation approach to modern slavery. The MSLOs participate in the ACAN monthly webinars and engage with ACAN expertise on a needs basis to assist in actions to address risk of modern slavery and keep informed of new initiatives and the risk management program activities.
- **CESL Modern Slavery Policy** - CESL implemented a Modern Slavery Policy in 2021 and a revision in 2024. This Policy provides a robust framework to ensure compliance with the reporting requirements of the Act, whilst also providing guidance for staff not to knowingly use or contribute to modern slavery practices.
- The development of **contractual clauses** for standard contracts. CESL will access ACAN guidance for comprehensive clauses for high-risk contracts.

# REPORTING CRITERION 4



- **Completed Modern Slavery awareness training through ACAN** - The two MSLO have completed modern slavery training-learning modules and are developing training sessions for all of the organisation. E-learning modules cover;
  - » ACAN- Modern Slavery 101
  - » ACAN- Business Relevance
  - » ACAN- Implementing a Modern Slavery Risk Management Program
- Commemorating the Feast Day of St Josephine Bakhita on the 8th February to recognise victims of modern slavery.

## Supplier engagement in 2024

- CESL continued to include modern slavery clauses in the terms of Service Agreements and in tendering Request for Proposal (RFP) templates for offices and schools to include upfront information regarding Modern Slavery risk disclosure and information upon the request of CESL.
- 62 suppliers became members of Sedex, one of the world's leading ethical trade membership organisations, working with businesses to improve working conditions in global supply chains. The CESL Procurement team now has visibility over these suppliers, Self -Assessment Questionnaire responses and social audit results.
- Sedex provided schools with the resources to help make sustainable and ethical sourcing decisions.
- The Guiding Principles of Procurement continued to support Schools and Business units to view Procurement activities as a conscious moral decision.
- In 2024 CESL conducted tenders for cleaning providers and building and construction (architectural services) and developed a preferred supplier list that included modern slavery requirements.
- Overall reduction of 2,500 suppliers in 2024 from the previous year, this is the result of consolidating suppliers and the introduction of preferred suppliers.

# REPORTING CRITERION 5



## Our plans for 2025

To strengthen our mitigation practices going forward the following initiatives are in development for 2025:

- Continue implementing the Modern Slavery Communication Action Plan.
- Conduct quarterly awareness campaigns to enhance understanding of Modern Slavery risks within the organisation and Sandhurst schools.
- A modern slavery training program for both CESLO staff and all 51 schools.
- Engage an external organisation to conduct an audit of CESL's procurement practices.
- Implement a due diligence program for key suppliers.
- Invite and increase the number of suppliers to Sedex (20%) to complete the comprehensive self-assessment questionnaire (SAQ).
- Commence project on supply chain 'Category Mapping'.
- Commence a review into CESL suppliers and look to decrease and consolidate.
- Leverage the Sedex (ACAN program) platform to identify and assess risks associated with suppliers that may have red flags related to modern slavery practices.
- Maintain our relationship with ACAN, seeking guidance and support through their webinars and compliance programs.
- CESL's aspirational goal is to identify and eliminate all risks related to Modern Slavery within our operations, business partnerships and supply chain.
- Regular meetings and check-ins with CESL preferred suppliers.
- A contact system for escalation protocol and remedy pathways policy and framework review.



# REPORTING CRITERION 5



## **Provision of Remediation Solution through ACAN**

CESL is committed to ensuring it provides appropriate and timely remedy to people impacted by modern slavery in accordance with the Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities and relevant Australian laws.

Due to the complexity of remediation, the need for specialist resources and to ensure the most comprehensive and rights-compatible outcomes for people impacted by modern slavery, CESL is utilising the Domus 8.7 program from ACAN - an independent program to provide remedy to people impacted by modern slavery.

CESL has not had the opportunity to review the remediation program, but will enhance future directions through further policy development, detailed response procedures and engagement with Domus 8.7 and other civil society stakeholders. By partnering with ACAN, Domus 8.7, CESL can help people impacted by modern slavery achieve meaningful outcomes that can be reported on and continuously improve risk management and our response.

Where CESL is directly linked to modern slavery by a business relationship, CESL is committed to working with the entity to ensure remediation and mitigation of its recurrence. Remediation obligations and expectations are included in contracts with high-risk suppliers who must notify and consult with CESL to ensure victim centred remediation processes are implemented to the satisfaction of CESL.

When suspicions of modern slavery practises come to our attention through whistle-blower or other channels, staff will contact the Modern Slavery Liaison Officers (MSLO) in the first instance. Then the MSLO will contact the relevant law enforcement agencies and/or Domus 8.7 for an assessment, investigation, action planning and implementation of a remediation process.

A documented remedy pathway is an important requirement of the Modern Slavery Act.

Through the ACAN Program, CESL agencies have access to the expertise and independent advice available through Domus 8.7. CESL agencies or parishes can make referrals of people impacted by modern slavery to obtain support, advice and guidance on how to respond to concerns.

The right to remedy is a basic principle in international human rights law. The provision of remedy involves a business implementing actions and processes to investigate and redress negative impacts on people involved in business operations and supply chains, and ensure future incidents are prevented.

# REPORTING CRITERION 5



## **Measuring Effectiveness of actions taken**

### **Modern Slavery Baseline**

The Baseline data demonstrates continuous improvement and captures the direct impact of actions, and helps CESL understand the pace of change and set future direction. The data demonstrates increased engagement with suppliers of goods and services. The increased completion of the ACAN supplier survey (165%) improved identification of suppliers where the completion of the Sedex SAQ (2023 - 0, 2024 - 44) would support managing modern slavery risk in their own operations and supply chains.

CESL also achieved a 22% reduction in the number of suppliers across high-risk categories, and a further 21% decrease in the total number of CESL suppliers.

# REPORTING CRITERION 5



Catholic Education Sandhurst	Activity	2024	2023	2022
Internal / Staff	Hours spent on modern slavery activities	45	30	30
	Individual staff completed e-learning	99	0	0
	E-learning modules completed	3	5	0
External / Supplier Engagement	Number of suppliers	9874	12597	n/a
	Number of suppliers with visible contact information and ABN	0		
	Number of suppliers across high-risk categories	1764	2286	n/a
	Number of ACAN Supplier Surveys completed	841	317	0
	Supplier staff attending capacity building webinars	20	1	0
	Invited to join Sedex	44	148	0
	Joined Sedex	62	57	0
	Sedex SAQ completed	44	0	0
	Social audits	17	0	0
	Corrective actions	75	0	0
DOMUS 8.7 External Referrals	Contacts made via worker voice / grievance mechanism	0	0	0
	Referrals for advice and assistance	0	0	0
	Individuals identified or referred for modern slavery assessment	0	0	0
	Individuals with modern slavery cases remediated	0	0	0

CESL Board and People, Audit and Risk Committee will oversee the ongoing development of the planning and program to manage risks within our organisation of modern slavery. The ACAN Action Plan and Road Map provides a great base to build on our planning and our commitment from all staff and stakeholders.

# REPORTING CRITERION 6



## Maturity Assessment

The Maturity Assessment provided by ACAN replaced the previous Gap Analysis and assists entities in determining areas of focus. The Assessment helps focus on the maturity of our modern slavery risk management approach to aim for continuous improvement. The maturity scorecard is designed to provide a comprehensive view of our efforts across different key areas of operation, presented as pillars:

1. **Business Process and Governance:** Establishes the overarching structure and policies guiding our efforts, emphasising the importance of oversight and clear responsibilities.
2. **Operations:** Focuses on internal practices and how effectively we manage risks within our day-to-day activities.
3. **Supply Chain:** Examines our external partnerships and the mechanisms in place to assess and mitigate risks beyond our immediate operations.
4. **Worker Engagement:** Addresses how we manage worker engagement and the standards upheld to prevent exploitation.
5. **Entity's Program and Activities:** Looks at the broader initiatives and engagements we undertake to combat modern slavery.
6. **Grievance Mechanisms and Remediation:** Evaluates the channels available for reporting concerns and the processes for addressing them.

In line with best practice and reporting requirements, we measure the maturity across governance, risk assessment, risk management, and effectiveness measures.

This evaluation helps identify strengths and weaknesses in our approach, across the four areas, presented as sub-pillars:

- **Governance:** sets the framework for our work, with mature governance characterised by strong policies and processes, guided by oversight and accountability.-
- **Risk assessment:** identifies potential at-risk-areas in our operations and supply chain, upon which we can act. A mature risk assessment involves continuous monitoring and collaboration and allowing for the prioritisation of resources and mitigating actions.
- **Risk management:** evaluate how well we apply the mitigating actions, with mature efforts being proactive and adaptable to changing circumstances, and driving real and measurable impact.
- **Effectiveness:** measures the impact of our anti-slavery efforts and it is what holds us accountable. While many such metrics are proxy measures, a mature approach is one that provides a basis for ongoing improvement, ensuring efforts are impactful and contribute meaningfully to eradicating slavery.

# REPORTING CRITERION 6

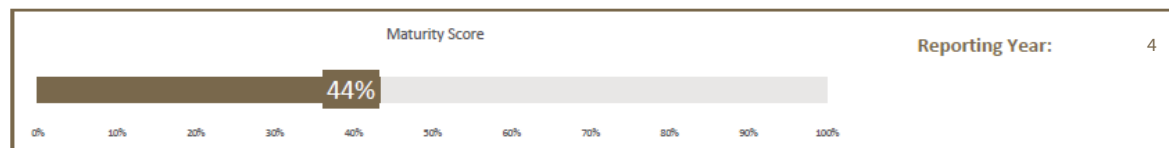


For 2024, CESL achieved a maturity assessment improvement score of 8%, this falls in the 31% - 50% range indicating an Emerging Practice level. The Analysis by Pillar table below demonstrates improvements in all areas of CESL. Strategies introduced at CESL since working towards eradicating modern slavery practices have seen a significant improvement. Emerging practices represent methodologies that are recognised as efficient and effective in managing modern slavery risks, based on current knowledge and evidence. These practices are benchmarked and serve as models for emulation. This means our processes related to modern slavery risk management are well-defined, standardised, and integrated into the organisational culture and operations. The focus extends beyond individual projects to include organisation-wide standardisation and continuous process improvement accompanied by adequate staffing and resources



## Maturity Assessment 2024

### Catholic Education Office Sandhurst - Overview

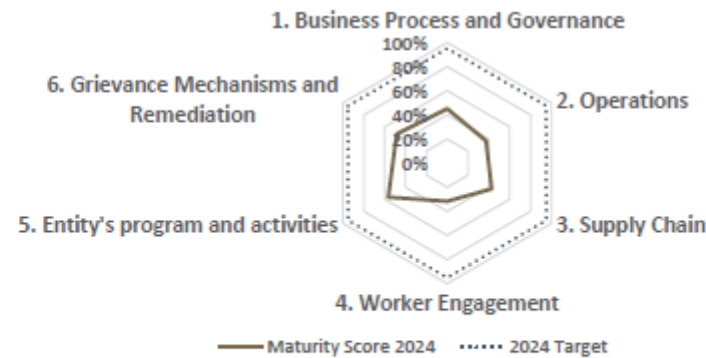


### Catholic Education Office Sandhurst - 2024 Analysis by Pillar

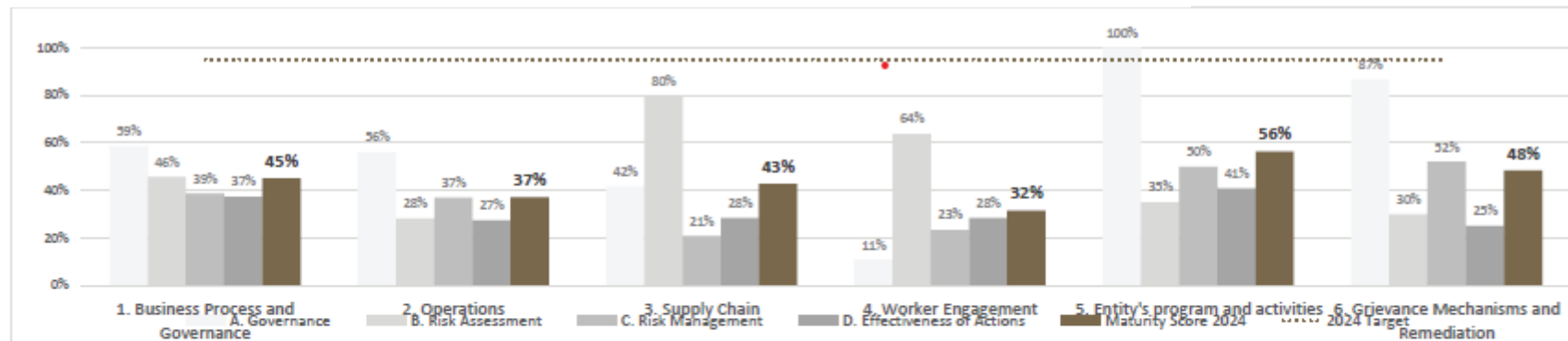
Pillar	A. Governance	B. Risk Assessment	C. Risk Management	D. Effectiveness of Actions	Maturity Score 2024	
1. Business Process and Governance	59%	46%	39%	37%	45%	↑ 7%
2. Operations	56%	28%	37%	27%	37%	↑ 5%
3. Supply Chain	42%	80%	21%	28%	43%	↑ 20%
4. Worker Engagement	11%	64%	23%	28%	32%	↑ 1%
5. Entity's program and activities	100%	35%	50%	41%	56%	↑ 11%
6. Grievance Mechanisms and Remediation	87%	30%	52%	25%	48%	0%
Average	59%	47%	37%	31%	44%	
	↑ 17%	↑ 0%	↑ 4%	↑ 8%	↑ 8%	

Maturity Score 2024 individual scoring by pillar and sub pillar, including averages and total 2024 score

# REPORTING CRITERION 6



**Maturity Score 2024: comparative to target and maximum scoring, by Pillar**

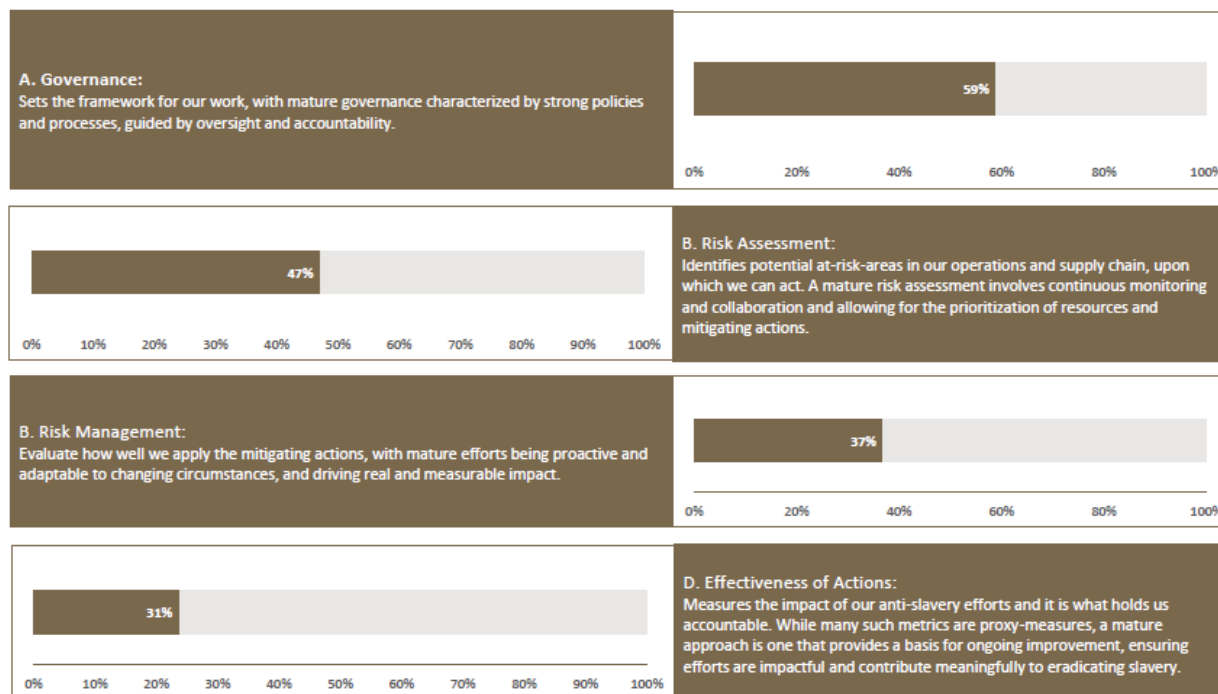


**Maturity Score 2024: comparative individual scoring, by Pillar and Sub Pillar**

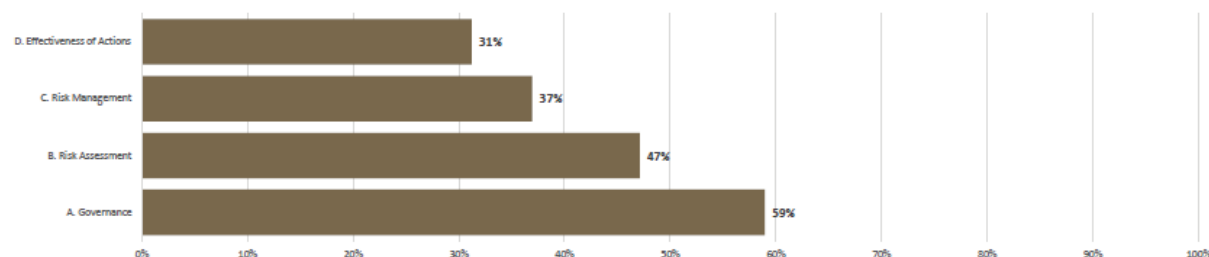
**Notes:**

- Participation in Domus 8.7 Remediation Services was incorporated into scoring of pillar 6. Grievance Mechanisms and Remediation, increasing governance and effectiveness scores. This will be removed in the 2025 (extended from 2024) Maturity Assessment for entities not actively participating in the Domus 8.7 Remediation Services activities.
- Participation in the ACAN Program was incorporated to Supply Chain, increasing the overall score across Risk Assessment (ACAN Taxonomy and supplier engagement activities) and Effectiveness of Actions (Baseline Data). This will be removed in the 2025 (extended from 2024) Maturity Assessment for entities not actively participating in the ACAN Program activities.

# REPORTING CRITERION 6



Maturity Score 2024: Comparative analysis of 2023 performance by sub-pillar with sub-pillar description



Maturity Score 2024: Comparative analysis of 2023 performance by sub-pillar.

## Notes:

- Participation in Domus 8.7 Remediation Services was incorporated into scoring of pillar 6. Grievance Mechanisms and Remediation, increasing governance and effectiveness scores. This will be removed in the 2024 Maturity Assessment for entities not actively participating in the Domus 8.7 Remediation Services activities.

- Participation in the ACAN Program was incorporated to Supply Chain, increasing the overall score across Risk Assessment (ACAN Taxonomy and supplier engagement activities) and Effectiveness of Actions (Baseline Data). This will be removed in the 2024 Maturity Assessment for entities not actively participating in the ACAN Program activities.



## Action Planning 2025

### Catholic Education Office Sandhurst - Action Planning 2025

#### Recommended focus Areas for 2024

Pillars:	
4. Worker Engagement	32%
3. Supply Chain	43%

Sub-Pillars	
D. Effectiveness of Actions	31%
C. Risk Management	37%

### 2025 Commitment of Actions - Entity Profile

The Entity has committed to the following actions on their 2024 Entity Profile:

Action 1	A modern slavery training program for both CESL office staff and all 51 schools
Action 2	Regular meetings and check-ins with CESL preferred suppliers
Action 3	A contact system for escalation protocol and remedy pathways policy and framework review
Action 4	Commence a review into CESL suppliers and look to decrease and consolidate
Action 5	Invite and increase the number of suppliers to SEDEX (20%) to complete the comprehensive self-assessment questionnaire (SAQ)
Action 6	Commence a project on Supply Chain 'Category Mapping'



# REPORTING CRITERION 6



## **Consultation with Entities Owned or Controlled**

This statement is provided as a single reporting entity, pursuant to section 13 of the Modern Slavery Act 2018 (Cth) and incorporates the activities and operations of the 52 Sandhurst diocesan schools and also includes subsidiary entity SCECE&C Ltd's three early learning centres.

For the preparation of this statement the CESL Chief Operating Officer consulted with different functional departments across CESL and SECEC&C Ltd as well as ACAN and other participating members of the ACAN network.

This consultation with ACAN and other departments has informed the approach to ensure it is appropriate and effectively tailored to reflect our organisational context and will be an ongoing consultation process for future initiatives, activities and statements.

# REPORTING CRITERION 7



**CESL Modern Slavery Liaison Officers participated in the following ACAN webinars:**

<b>2024</b>	<b>ACAN Webinar topics</b>
<b>27 June</b>	Working Group Updates
<b>25 July</b>	Working Group Updates
<b>29 August</b>	Working Group Updates
<b>26 September</b>	Working Group Updates
<b>31 October</b>	Working Group Updates
<b>28 November</b>	Working Group Updates

<b>2024</b>	<b>ACAN Supplier and Capacity Building</b>
<b>13 June</b>	Introduction and Modern Slavery
<b>14 August</b>	Contracting Labour
<b>9 October</b>	Cleaning and Security Services
<b>11 December</b>	Grievance Mechanisms and Remediation

<b>2024</b>	<b>CESL Modern Slavery Working Group</b>
<b>3 September</b>	Working Group Meeting
<b>26 November</b>	Working Group Meeting



## Response to modern slavery - Australian Catholic Anti-Slavery Network

The Catholic Church has a history of anti-slavery action from working to end Transatlantic slavery to supporting people impacted by modern slavery and by tackling its root causes.

Catholic anti-slavery initiatives focused on prevention, support and systemic drivers are delivered across the world every day by clergy, lay Catholics, parishes and large organisations such as Caritas, the International Catholic Migration Commission and the Order of Malta. ACAN participating entities are united in the belief that action against modern slavery is fundamental Catholic Social Teaching. Pope Francis has called modern slavery “a crime against humanity.” He has pledged with other global religious leaders to rid the world of this affront to human dignity and human freedom.

Catholic schools, hospitals, aged care facilities, universities, community services, investment and finance are just some of the Catholic institutions that touch the lives of millions of Australians. 1 in 5 Australian children are educated in Catholic schools (approximately 800,000) and 1 in 10 hospital patients and aged care residents receive care in Catholic facilities.

The extent of the supply chains is therefore highly significant and constitutes the major exposure to modern slavery for Catholic entities in Australia. ACAN brings together Catholic entities to leverage their collective purchasing spend, share resources and coordinate action to manage modern slavery risk across their industry sectors.

Catholic entities participating in ACAN are strongly positioned to respond effectively to the statutory requirements in the Modern Slavery Act with a comprehensive risk management program. The Modern Slavery Statements of Catholic entities will also form a compendium of Catholic principles and action for the advancement of human dignity and the common good. CESL and SCEC&C Ltd are proud to be working in partnership with ACAN and network participants to deliver on the commitment to end Modern Slavery.



# APPENDIX B



Through the ACAN Program, CESL has access to the expertise and independent advice available through Domus 8.7.

CESL Schools, Offices & Early Learning can make referrals of people impacted by modern slavery to obtain support, advice and guidance on how to respond to concerns.

